



Nuneaton and Bedworth Borough Plan Sustainability Assessment

Non-Technical Assessment

On behalf of Nuneaton and Bedworth Borough Council

August 2018

54 Hagley Road, Edgbaston, Birmingham B67 5JB

Tel: 0121 456 7444

Email: mark.walton2@wyg.com



Document Control

Project: Sustainability Assessment – Non Technical Assessment


Client: Nuneaton and Bedworth Borough Council

Job Number: A081175-114

File Origin:

Document Checking:

Prepared by:	Mark Walton	Signed:	
--------------	-------------	---------	---

Checked by:	Mark Walton	Signed:	
-------------	-------------	---------	---

Verified by:	Gerald Sweeney	Signed:	
--------------	----------------	---------	---

Issue	Date	Status
1	18 th July 18	Draft for Client
2	31 st August 18	Revised Draft for Client



Contents Page

1.0	Introduction.....	1
2.0	Sustainability Assessment – SA Framework and Objectives	10
3.0	Assessment of 'reasonable' alternatives.....	18
4.0	Appraisal of Borough Plan - Publication Plan - Main Modifications.....	32
5.0	Mitigation and Enhancement	45
6.0	Monitoring and Next Steps.....	46



1.0 Introduction

1.1 Background

- 1.1.1 WYG is commissioned to undertake a Sustainability Appraisal (SA) in support of the Nuneaton and Bedworth Borough Plan.
- 1.1.2 The SA is a mechanism for considering and communication the likely effects of a draft plan, and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse effects and enhancing the positives. The SA of the Local Plan is a legal requirement.
- 1.1.1 Under S19(5) of the Act and the SEA Regulations which came into force in England and Wales in July 2004 SA and Strategic Environmental Assessment (SEA) are mandatory for all Local Plans and SPDs. S39 of the Planning and Compulsory Purchase Act requires Local Plans/SPDs to be prepared with a view to contributing to the achievement of sustainable development. SA is one way of helping fulfil this duty through a structured appraisal of the economic, social and environmental sustainability of the plan. The production of a SA is one of the “*tests of soundness*” on a Local Plan/SPD.
- 1.1.2 The requirement to undertake SEA is established in the EU by the European Directive 2001/42/EC, ‘*the Assessment of the Effects of Certain Plans and Programmes on the Environment*’ (commonly known as the SEA Directive). The SEA Directive is transposed into English law by the SEA Regulations.
- 1.1.3 SEA and SA are closely linked. SA aims to integrate sustainability issues into decision making by appraising the plan or strategy using environmental, social and economic objectives, whilst SEA also aims to facilitate sustainable development but its emphasis is on integrating environmental considerations into decision making through analysis of environmental issues.
- 1.1.3 SA/SEA is a five stage process. Figure 1 below sets out each of the stages and the stage currently reached.

<p>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</p> <ol style="list-style-type: none"> 1: Identify other relevant policies, plans and programmes, and sustainability objectives 2: Collecting baseline information 3: Identify sustainability issues and problems 4: Develop the SA framework 5: Consult the consultation bodies on the scope of the SA report
<p>Stage B: Developing and refining options and assessing effects</p> <ol style="list-style-type: none"> 1: Testing the Local Plan objectives against the SA framework 2: Developing the Local Plan options including reasonable alternatives 3: Evaluate the likely effects of the Local Plan and alternatives 4: Considering way of mitigating adverse effects and maximising beneficial effects 5: Propose measures to monitor the significant effects of implementing the Local Plan
<p>Stage C: Preparing the Sustainability Appraisal Report</p>
<p>Stage D: Seek representations on the SA report from consultation bodies and the public</p>
<p>Stage E: Post adoption reporting and monitoring</p> <ol style="list-style-type: none"> 1: Prepare and publish post-adoption statement 2: Monitor significant effects of implementing the Local Plan 3: Respond to adverse effects

Figure 1: SA Process Stages

1.1.4 This document comprises the Sustainability Appraisal Report Non-Technical Summary (NTS) for the Nuneaton and Bedworth Borough Plan - Publication Plan incorporating the Main Modifications proposed by the Council during the Hearing Sessions. The report meets the requirements of a 'Non-Technical Summary' set out at Paragraph 12 and Schedule 2 of the SEA Regulations 2004.



1.2 Stage A – Scoping

1.2.1 The scoping stage of a SA involves the collation of evidence relating to the baseline position and policy context - culminating in a series of key issues that should be a focus for the SA and which helped to establish a sustainability framework.

1.2.2 The Sustainability Topics were established at the scoping stage to reflect the headline principles of sustainable development. These topics also reflect those issues referred to in Schedule 2 of the SEA Regulations, which are suggested as issues that should be addressed in a Strategic Environmental Assessment. The SA objectives used in this process are set out in Table 2 below.

Ref no.	Sustainability Objective	Link to topics in SEA Regulations
1	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)	Population Material assets
2	To enhance the vitality of town centres	Material Assets
3	Provide decent and affordable housing for all, of the right quantity, type, tenure and affordability to meet local needs, in clean, safe and pleasant environments	Material Assets
4	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	Population Human Health
5	Reduce crime, fear of crime and antisocial behaviour	Population
6	Address poverty and disadvantage taking into account the particular difficulties of those facing multiple disadvantage	Population Human Health
7	Improve opportunities to participate in the diverse cultural, sport and recreational opportunities the Borough can offer	Population Human Health Material Assets
8	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	Material Assets



9	To protect and enhance the natural environment, habitats, species, landscapes and inland waters	Fauna and Flora Biodiversity
10	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	Population Human Health
11	To protect and improve soil quality	Soil
12	Use natural resources, such as water efficiently, including by incorporating efficiency measures into new land use and developments, redevelopment and refurbishment	Water
13	Ensure that new developments minimise water pollution levels and avoid areas which are at risk from flooding and natural flood storage areas	Water
14	Increase use of public transport, cycling and walking as a proportion of total travel in order to reduce road traffic congestion, pollution and accidents	Material Assets Air Human Health
15	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	Air Material Assets
16	Reduce overall energy use through increased energy efficiency	Material Assets
17	Minimise the Borough's contribution to the causes of climate change by reducing emissions of greenhouse gases from transport, domestic, commercial and industrial sources	Material Assets
18	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	Material Assets
19	To ensure the prudent use of resources including the optimum use of previously developed land, buildings and the efficient use of land	Material Assets
20	To protect and enhance the historic environment	Cultural Heritage inc. architectural and archaeological heritage
21	To maintain and enhance the quality of landscapes	Landscape



1.3 The Borough Plan - what is it seeking to achieve ?

1.3.1 Nuneaton and Bedworth Borough Council is seeking to pursue a plan that meets the future social, economic and environmental needs of the Borough. The Borough Plan's purpose is to shape the future of the Borough up to 2031 as set out in the vision statement which states:

1.3.2 *By 2031, Nuneaton and Bedworth Borough will be a place where there are opportunities for sustainable economic growth with diverse job prospects, healthy and safe communities and an integrated infrastructure network. Businesses will want to invest in the Borough as a result of the outcomes of policies in the Plan, which will include creating an attractive environment.*

1.3.3 The Borough Plan is supported by 8 strategic objectives for delivering sustainable economic growth, healthy and safe communities and an integrated infrastructure network within an attractive environment. These are:

Objective 1 – promote economically driven growth to regenerate the Borough.

Objective 2 - seek employment opportunities that will support the diversification of the Borough's economy and improve job opportunities for residents.

Objective 3 - develop and diversify Nuneaton and Bedworth Town Centres so they each have a distinctive and individual role in serving the Borough which is supported by lower order centres in a retail hierarchy.

Objective 4 - to provide the size, type and mix of housing that meets the specific needs of the Borough.

Objective 5 - to ensure that all new development and investment contributes to a significant improvement in infrastructure and facilities that serve the Borough.

Objective 6 - to create healthy, safe and strong communities.



Objective 7 - to ensure that new development enhances and improves the quality and appearance of the existing urban area.

Objective 8 - to address climate change and encourage sustainability in all new development.

1.3.4 To meet the above objectives and overall vision, as amended, the Borough Plan seeks to bring forward a proportionate level of new development for the period up to 2031. This comprises 14,060 new dwellings accompanied by the provision of 107.8 hectares of employment land and a key consideration for the Council is to accommodate this growth and associated infrastructure, whilst protecting the Borough’s built and natural environment and delivering a high quality of life for the Borough’s residents, visitors and workers.

1.4 Baseline Context – Key Sustainability Issues

1.4.1 The Sustainability baseline for Nuneaton and Bedworth Borough used for the purposes of this Assessment is set out in the Scoping Report. This sets out the updated empirical data on all relevant economic, social and environmental factors. The baseline information provides the basis for identifying trends, predicting the likely effects of the Plan and monitoring its outcomes.

1.4.2 The key sustainability issues are set out in the table below:

SEA/ SA Topic	Sustainability Issues
Economic Factors	<ul style="list-style-type: none"> • The unemployment rate for Nuneaton and Bedworth (5.5%) is higher than national (5.1%) but lower than the regional (5.7%) averages. • The economic active rate in Nuneaton and Bedworth (69.7%) is lower regional (74.8%) and national (77.8%) averages. • Average gross weekly pay in Nuneaton and Bedworth (£488.70) is below the national (£492.50) and regional average (£529.60). • Nuneaton and Bedworth is situated in the heart of the motorway network and both towns are easily accessible from the M6, M69, M42, M40, M1 and the A5 running north of Nuneaton. • Residential uses within Nuneaton town centre are currently limited. • Development and investment is required for the town centres to strengthen their position in light of the potential threats from competing centres.



	<ul style="list-style-type: none"> The evening economy is more geared towards younger people in pubs and bars and offers little variety. Enhancements to the A3 offer (restaurants and cafes) are seen as an opportunity.
Social Factors	<ul style="list-style-type: none"> It is very difficult for people to purchase houses, especially first time buyers. There is an annual need for 85 affordable homes across the Borough. There are no green spaces in Nuneaton and Bedworth managed to a Green Flag Award Standard. The Borough has a higher crime rate per 1,000 population than the county average. The number of people attaining NVQ levels 1 – 5 has increased over the past ten years. There has been a significant increase in the number of buildings that are open to the public which are also accessible to disabled people. The number of visits to the museum has decreased and there is potential to improve the tourist and cultural facilities in the Borough. Poorer perceptions of public safety than the county average. Nuneaton and Bedworth has the highest levels of deprivation in Warwickshire.
Biodiversity	<ul style="list-style-type: none"> The Borough has 1 European Site, 2 SSSIs, 3 LNRs, 25 SINC. The two SSSI sites in the Borough are in favorable condition. Threat to biodiversity from development, land management and climate change. The Borough has the lowest number of local nature reserves in the County. Nuneaton and Bedworth has a lower accessibility to woodlands than county and regional levels. Threat to biodiversity from non-native species Threat to Ensor's Pool from bio-security risks
Population	<ul style="list-style-type: none"> The Borough currently has a relatively large working population (16-60) and has a slightly older population than the Warwickshire average. The population is an ageing one, which in future years is likely to create additional social care needs. Population is predicted to increase by 7.6% from 125,409 to 134,889 between 2011 – 2031, which is much lower than the national average at 14.6%. Just over 60% of the population are Christian, which is higher than both the regional and national average. 91.4% of the population in Nuneaton and Bedworth are white, which is higher than West Midlands and England's average.
Human Health	<ul style="list-style-type: none"> Male and female life expectancy remain below the England average and is one of the lowest in Warwickshire, although life expectancy in the Borough has increased for both male and females. The level of deprivation in Nuneaton and Bedworth varies widely, with some areas among the most deprived fifth of England areas and some among the least. There is a corresponding difference in life expectancy between least and most deprived areas with a gap of between 7.1 and 10.7 years for men, and between 3.2 and 6.6 years for women.
Soil	<ul style="list-style-type: none"> The percentage of new homes being built on previously developed land increased from 06/07 to 12/13



Water	<ul style="list-style-type: none"> • There has been a gradual improvement in chemical water quality nationally but this has not mirrored in Nuneaton and Bedworth. • Nuneaton and Bedworth has the lowest percentage of good chemical water quality through 2001 and 2006 compared to other local authorities in Warwickshire. The Borough average is significantly lower than both Warwickshire and England. • Nuneaton and Bedworth has the lowest percentage of good biological water quality through 2001 to 2006 compared to other local authorities in Warwickshire. The average is significantly lower than both Warwickshire and England. • A number of weirs, engineered channels and culverted sections of watercourse in Nuneaton and Bedworth are preventing natural processes from improving the river habitat. These create impoundments; promote sediment and siltation deposits which degrade the habitat affecting WFD status, while also creating barriers to fish movement. • Nuneaton and Bedworth has a number of Main River and ordinary watercourses.
Air	<ul style="list-style-type: none"> • Air pollutant levels in the Borough have steadily decreased and it is anticipated that this trend will continue. • Car ownership levels are generally in line with both regional and national averages • The majority of people travel to work by car , with 44.0% of the Borough's population travelling to work by car, which is above the national average of 34.9% • The number of residents commuting over 30km in the Borough has increased by a third. • A high dependency on private car for commuting results in congestion and negative impacts on air quality. • A low volume of public transport use is a major contributor to reduced air quality. • The National Air Quality Objective for the level of nitrogen dioxide is likely to be exceeded in the declared AQMA around the Leicester Road traffic gyratory system. • Around 4,000 residents are commuting over 30km to work • 49% of the Borough's population travels to work by car for journeys under 2km. Journeys of this distance are the most likely to be transferred to more sustainable forms of transport.
Climatic Factors	<ul style="list-style-type: none"> • Carbon emissions per capita is lower than regional and national averages
Material Assets	<ul style="list-style-type: none"> • The percentage of household waste being recycled and composted is increasing steadily.
Cultural Heritage	<ul style="list-style-type: none"> • There are two buildings at risk in the Borough which are: Park Farmhouse in Arbury Park and The Tea House in Arbury Park.
Landscape	<ul style="list-style-type: none"> • Additional dwellings could place further pressures on the green belt and surrounding landscape.



	<ul style="list-style-type: none">• The countryside surrounding the Borough is protected by green belt, area of restraint or countryside designations, which direct development pressures away from sensitive landscapes and help to protect biodiversity.
--	--

1.5 Consultation on the Scope of the SA

1.5.1 A draft Borough Plan Scoping Report was originally published in September 2005. Based on the time period that elapsed, the original Scoping Report was reviewed and updated in September 2012, April 2014 and September 2016.

1.5.2 Each of the Scoping Reports were the subject of formal consultation with the public and statutory consultees/stakeholders and the comments received taken into account. This included, as a minimum, the three statutory environmental consultation bodies set out in the SEA Regulations (namely Natural England, Environment Agency and English Heritage).



2.0 Sustainability Assessment – SA Framework and Objectives

2.1 The Framework

2.1.1 The SA framework is used to predict and evaluate the social, economic and environmental effects of proposed options and policies (and any reasonable alternatives) being considered. It is important that the assessment process is practical and manageable.

2.1.2 Based on the review of the policy context and baseline information (established through scoping) a range of key sustainability issues were established that identify what the SA should focus upon. These key issues were used as a basis for establishing a series of sustainability objectives and supporting questions (to aid the assessment process) that together make-up the Sustainability Appraisal Framework.

2.1.3 The agreed SA Objectives and appraisal questions are set out in the table below:

SA Objective	Appraisal Questions
Economic Factors 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?
	Will it help diversify the economy?
	Will it enhance the vitality of urban centres?
	Will it support small businesses?
	Will it ensure an appropriate supply of employment sites within the Borough to support sustainable economic development?
	Will it provide employment land near to the potential workforce?

SA Objective	Appraisal Questions
	<p>Will it encourage investment to develop deprived areas and focusing resources in areas of greatest need?</p> <p>Will it promote sustainable tourism?</p>
To enhance the vitality of town centres	Will it improve the economic viability of town centres?
	Will it maintain a balanced mix of development?
Social Factors Provide decent and affordable housing for all, of the right quantity, type, tenure and affordability to meet local needs, in clean, safe and pleasant environments	Will it increase the supply of affordable housing?
	Will it promote a range of housing types and tenure?
	Will it reduce the number of unfit/non-decent/empty homes?
	Will it reduce homelessness?
Ensure easy and equitable access to services, facilities and opportunities, including jobs and learning, and that people are not	Will it maintain and enhance existing facilities?
	Will it put unacceptable pressure on existing services and community facilities?
	Will it improve access to local services and facilities?

SA Objective	Appraisal Questions
disadvantaged with regard to ethnicity, gender, age, disability, faith, sexuality, background or location	<p>Will it ensure that education and skills infrastructure meets projected future demand and need?</p> <p>Will it reduce inequalities in education and skills across the Borough?</p> <p>Will it support provision of communication infrastructure, including broadband?</p>
Reduce crime, fear of crime and antisocial behaviour	Will it promote the reduction of crime rates?
	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?
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 and provided?
	Will it protect and create high quality or valued recreational spaces and avoid erosion of recreational function?
Encourage land use and development	Will it require good urban design to create attractive, high quality environments where people will choose to live, work and invest?

SA Objective	Appraisal Questions
that creates and sustains well-designed, high quality built environments, that help to create and promote local distinctiveness and sense of place	<p>Will it promote design that enhances townscapes and streetscapes?</p> <p>Will it improve the quality of the built environment through high standards of sustainable design and construction of new and existing buildings?</p>
<p>Biodiversity</p> <p>To protect and enhance the natural environment, habitats, species, landscapes and inland waters</p>	<p>Will it improve the landscape and ecological quality of the countryside?</p> <p>Will it protect and enhance species, habitats and sites at risk?</p> <p>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?</p> <p>Will it support development that incorporates improvements to wildlife habitats?</p> <p>Will it increase access to woodlands, wildlife and geological sites and green spaces particularly near/ in urban areas?</p>
<p>Population and Human Health</p> <p>Improve health and reduce health inequalities by encouraging and enabling healthy</p>	<p>Will it diminish inequalities in mortality, health and wellbeing across the Borough?</p> <p>Will provide and improve access to health and social care services?</p> <p>Will it promote healthy lifestyles and opportunities for exercise?</p> <p>Will it promote opportunities to participate in sport?</p>

SA Objective	Appraisal Questions
active lifestyles and protecting health, as well as providing equitable access to health services	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?
	Will it retain the best quality agricultural land (1, 2 and 3a)?
Water 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?
Ensure that new developments minimise water pollution levels and	Will it avoid developments in areas being at risk from fluvial, sewer or groundwater flooding?

SA Objective	Appraisal Questions
avoid areas which are at risk from flooding and natural flood storage areas	
Air 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?
	Will it reduce the movement of goods by road/lorry?
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?

SA Objective	Appraisal Questions
Climatic Factors 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?
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?
Material Assets 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 arisings (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	Appraisal Questions
<p>To ensure the prudent use of resources including the optimum use of previously developed land, buildings and the efficient use of land</p>	<p>Will it encourage land use and development that optimises the use of previously developed land and buildings?</p>
	<p>Will it focus retail and office development in town centres?</p>
	<p>Will it encourage housing development which makes more efficient use of land; and seek greater intensity of development at places with good public transport accessibility?</p>
	<p>Will it encourage maximum efficiency and appropriate use of materials, particularly from local and regional sources?</p>
	<p>Will it require new developments to incorporate renewable, secondary, or sustainability sourced local materials in buildings and infrastructure?</p> <p>Will it safeguard reserves of exploitable minerals from sterilisation by other developments?</p> <p>Will it encourage local sourcing of food, goods and materials?</p>
<p>Cultural heritage</p> <p>To protect and enhance the historic environment</p>	<p>Will it protect and enhance sites, features and areas of historical, archaeological and cultural value?</p>
	<p>Will it improve access to buildings of historical/cultural value?</p>
<p>Landscape</p> <p>To maintain and enhance the quality of landscapes</p>	<p>Will it enhance and manage the character and appearance of the Borough's landscapes, maintaining and strengthening local distinctiveness and sense of place?</p>
	<p>Will it protect and enhance the character and settings of the towns and village?</p>



3.0 Assessment of Reasonable Alternatives

3.1 Introduction

3.1.1 Regulation 12 (2) of the 2004 Regulations states that where an environmental assessment is required an environmental report shall be prepared to "*identify, describe and evaluate the likely significant effects on the environment of –*

(a) Implementing the plan or programme; and

(b) Reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme”.

3.1.2 An assessment of 'reasonable' alternatives to the selected plan is required to meet the requirements of Regulation 12 of the 2004 Regulations and in doing so, identify and evaluate their sustainability impacts. The Regulation implies that alternatives that are not reasonable do not need to be subject to the SA process. For the purposes of the SA it is assumed that unreasonable alternatives include policy options that do not meet the objectives of the plan or national policy (e.g. the National Planning Policy Framework) or site options that are unavailable or undeliverable.

3.1.3 This Section provides a summary of the findings of the various SA reports and sets out why the preferred approach has been selected. The Section has been divided to take account of the following issues:

- Amount and distribution of growth;
- Strategic site options for housing;
- Strategic site options for employment; and
- Alternative Policy options.



3.2 Amount and distribution of growth

- 3.2.1 The starting point, for the Borough Council, in defining the Borough Plan options and reasonable alternatives was to meet or exceed the amount and distribution of housing and employment land growth to ensure that Objectively Assessed Housing Need (OAHN) and employment land requirements are met. This was the Council's preferred option at each stage of the Borough Plan's evolution.
- 3.2.2 For the Council to not plan for this level of growth would not accord with the requirements of NPPF. On this basis a 'do nothing' or meeting a 'lower level' than the identified need was considered an unreasonable alternative by the Borough Council and this potential option was not considered further.
- 3.2.3 An option planning for a higher growth, i.e. above the objectively assessed need, was also considered by the Borough Council in the form of various growth levels associated with the Borough Council's ambition to bring forward an "economically driven plan" at the Preferred Option stage. The growth rates considered were baseline (no growth), 0.5%, 1%, 1.5% and 2%.
- 3.2.4 The growth figures and subsequent housing and employment needs for the Borough have evolved during the various stages of the Borough Plan but the Borough Council has been committed to meeting the objectively assessed need. This option is currently the preferred option for the Borough Plan and the Borough Council identify strategic sites and policies accordingly. This is described in detail below. A summary of the changes to the Borough Council's preferred option during the various stages of the Borough Plan are set out below.



3.2.5 The Borough Council’s consistent ambition has been to meet or exceed the relevant level of objectively assessed need in the Borough during the plan period. The growth figures have evolved during the evolution of the Borough Plan which are summarised in the table below. The SA has reassessed the growth figures at each stage.

Stage of Plan	Amount of development
Issues and Options (based on RSS targets)	<ul style="list-style-type: none"> • 10,800 dwellings between 2006 and 2026; and • 96 hectares of employment land.
Preferred Option (based on NBBC 1.5% growth target)	<ul style="list-style-type: none"> • 7,900 new homes with approximately 4,550 homes located on green-field sites; and • 75 hectares of land for employment;
Submission Draft (based on updated SHMA rate and 0.7% employment growth target)	<ul style="list-style-type: none"> • 10,040 dwellings up to 2031; and • 52 hectares of land for employment;
Publication Plan (based on updated SHMA rate, 10% buffer and revised Employment Land Review (ELR))	<ul style="list-style-type: none"> • 13,374 dwellings up to 2031; and • 98.6 hectares of land for employment;
Main Modifications to Publication Plan	<ul style="list-style-type: none"> • 14,060 dwellings up to 2031; and • 107.8 hectares of land for employment;

3.2.6 The Borough Council considered that it would be unreasonable to plan for a significantly increased amount of housing (above the OAHN) and employment (above the ELR) for the following reasons:

- Based on the results in the updated Housing and Employment land review undertaken during the Examination Hearings the Borough Council is able to identify sufficient sites to meet the combined requirements of Nuneaton and Bedworth Borough and the meet needs of Coventry City Council in full but only with a 776 dwellings buffer;



- The earlier versions of the SA Report showed that an increase in the growth scenario (in terms of housing and employment land) will have negative effects on the wider environment (see Table on Page 20);
- The scale of growth is not justified by the evidence base and will be difficult to deliver – the Council has identified significant difficulty in committing to the delivery of 26ha of additional employment land to contribute to Coventry’s unmet needs. The Publication, Plan incorporating Main Modifications, has committed to the deliver 17.8ha of employment land towards Coventry’s unmet need but also a new Policy DS9 to review the Borough Plan Development Strategy including any unmet needs by 31st March 2023.

3.2.7 On this basis, the Borough Council’s site selection evidence base confirms that the above alternative option is unreasonable and this potential option is not considered further.

3.3 Strategic Site Options for housing

3.3.1 As identified above the Council has identified a minimum of housing requirement of 14,060 dwellings over the plan period. This figure has evolved as the plan has developed but is supported by a robust evidence base and an appraisal of growth scenarios which have, in turn, been fully reviewed and assessed against the agreed Sustainability Objectives developed in this SA. The Borough Council agreed that the option that meets the objectively assessed needs of the Borough and Coventry’s shortfall is the preferred approach for housing growth.

3.3.2 The Council’s SHLAA process has identified a number of small scale sites on previously developed within the urban areas to contribute to the housing needs of the Borough but, as acknowledged in the Issues and Options Borough Plan, these are unable to accommodate all the future housing growth requirements. The strategic release of open countryside or Green Belt land is therefore the only reasonable option available to the Council.



3.3.3 A number of spatial options were identified and tested through the various stages of the SA to help determine how the future housing requirements could be distributed across the Borough.

3.3.4 The Issues and Options - Borough Plan considered eight spatial development options for accommodating the growth requirements for Nuneaton and Bedworth Borough but did not include any allocated sites. These consisted of 'general' development areas for future housing and employment sites and policy direction but all the options include development of brownfield land within the Borough's existing urban areas first, before being directed to the countryside, Area of Restraint and then Green Belt.

3.3.5 The spatial development options developed in the Core Strategy Issues and Options are set out below:

Option 1: Sequential Approach

Option 2: North/South Corridor

Option 3: Nuneaton Focus A, B and C

Option 4: Bedworth Focus

Option 5: Small Urban Extensions

3.3.6 The Sustainability Appraisal (2009) considered the environmental effects of each of the options and concluded that options focussing new development in or adjacent to the existing urban areas scored higher in sustainability terms with Options 3 (a, b and c) and 4 score best overall as they reduce the geographic spread of development, contribute to the intensity, viability and vitality of the Borough's existing urban areas, contribute to economic growth in deprived areas as well as potentially rationalising and enhancing public transport corridors.



- 3.3.7 The subsequent stages of the Borough Plan have sought to deliver a proportion of new growth (housing and employment) within or adjacent to the existing urban areas of Nuneaton and Bedworth which were identified as broadly sustainable locations for growth in line with Option 3 and 4 of the Issues and Options report.
- 3.3.8 The Site selection process considered all the suitable/available sites within the Borough and identified ten Potential Development Areas (PDA 1-10) that were considered most suitable, in planning terms, to contribute to the delivery of the housing needs in the Borough Plan. Following the Borough-wide search the proposed strategic locations were considered the most viable sites for new housing development. Each of these 10 Potential Development Areas were assessed under the SA Objectives and findings presented in the SA Report 2012.
- 3.3.9 The potential development areas were large scale areas that focussed on strategic land areas adjacent to the Nuneaton and Bedworth urban areas.
- 3.3.10 The 2012 SA report for the Preferred Option concluded that each of the Potential Development Area had sustainability merits and drawbacks but did not seek to 'rank' the sites to provide the Council with overall flexibility in the final site selection process.
- 3.3.11 The Borough Plan – Preferred Options (2013) identified four Potential Development Areas, namely PDA 1/10, PDA3, PDA5 and PDA7, which were taken forward by the Council as housing land allocations to meet the growth target. The selection of these sites was based on the findings of the SA and other planning considerations. The Sites were renamed as SHS 1-4.
- 3.3.12 Four of the Potential Development Areas, namely PDA 1/10, PDA3, PDA5 and PDA7, were taken forward by the Council in the Borough Plan Preferred Option (2013) as housing land allocations to meet this growth target. The selection of these sites by the Borough Council was based on the findings of the SA whilst meeting wider planning policy requirements and this is documented in the background papers entitled "Strategic Housing – Site Selection-



Background Paper Stages 1 & 2 and the Stage 3 – Assessment of Options – Infrastructure Update. The Sites were renamed as SHS 1-4 and are shown on **Plan 4.2**

Woodlands (PDA 6)

- 3.3.13 It is noted that the SA Report considered PDA 6 (Woodlands) as a sustainable location for development. The Site was specifically excluded at the Preferred Option stage as this land was separately being proposed as a possible extension to the Green Belt by the Council.
- 3.3.14 Following receipt of legal advice after the Preferred Options stage, the Borough Council agreed not to pursue the allocation of the land as Green Belt and the site was reconsidered as a sustainable location for new development at the future stages.
- 3.3.15 Based on the findings of the SA, the Council officers made recommendations to Cabinet as to where future growth could be sustainably located whilst meeting wider planning policy requirements.
- 3.3.16 Following the 'call for sites' exercise in 2014, a further fifteen potential housing sites were identified by landowners and potential developers. These additional sites were assessed against the SA Objectives and the findings are presented in an 'interim' SA Report 2014. The 2014 SA report was used by the Council to assess and identify the six Strategic Housing Sites in the Borough Plan – Submission Document 2015.
- 3.3.17 Nuneaton and Bedworth Borough Council are part of the Coventry and Warwickshire Housing Market Area (HMA) which, as part of the '*Duty to co-operate*' set out in the NPPF and NPPG, is required to deliver objectively assessed housing needs (OAHN) for market and affordable housing. Since the publication of the Borough Plan Submission Document the Councils that make up the HMA have identified OAHN for each Council area. Nuneaton and Bedworth Borough Council has been tasked with seeking to accommodate a further 4,020 dwellings in their plan period, to meet part of the unmet housing from the Coventry City Council administrative area which cannot be accommodate within its boundary.



- 3.3.18 To assist this process the Council held a further 'call for sites' exercise in December 2015 and January 2016 together with a further review of all previously submitted sites. In tandem with this exercise all the Council's preferred strategic sites were the subject of a strategic viability and deliverability review to confirm that the identified sites are capable of coming forward within the plan period. This assessment work reviewed 13 strategic housing sites of which 12 were considered to be viable and are the subject of this SA Report. The Sites are referenced HSG 1-11 and EMP2. The site not taken forward is Land at Hawkesbury which was excluded on viability grounds.
- 3.3.19 A summary of the results of the SA process are set out in the SA Report
- 3.3.20 Each of the site options has a dedicated 'delivery policy'. The assessment has considered the allocation and the associated policy as a package but it is not the intention of the SA process to rank or prioritise the sites but simply to present the positive or negative sustainability considerations associated with each site.
- 3.3.21 The general locations of all the current strategic housing sites accord with the preferred spatial options (Option 3 (a, b and c) and Option 4) agreed at the Issues and Option stage.
- 3.3.22 The previous SA's and subsequent viability works undertaken by the Borough Council have identified areas of future mitigation that have been incorporated into the current iterations of the Sites/policies, i.e. the protection of important views and heritage landscapes, requirements for enhanced public transport facilities/infrastructure and provision on new local centres and facilities. These are set out in the individual sites matrices.
- 3.3.23 During the Examination Hearings the 12 allocated strategic housing sites and the alternative sites were reviewed and tested against the comments raised by residents, statutory bodies and other stakeholders. In addition, the Non- Strategic Residential Sites contained in Policy DS7 were the subject of a stand-alone SA report that was published on the Council web-site on the 18th January 2018. The findings of the stand-alone SA should be read in accordance with this SA report for the Borough Plan Publication Plan as a whole.



- 3.3.1 During the Examination Hearings a statement of common ground was agreed between the developers of the Former Hawkesbury Golf Course Site (HSG12), the Borough Council and the County Council resolving the Highway Authority's previous access concerns which allows the Site to be reconsidered as a viable site for housing. Based on the statement of common ground, an updated Sustainability Assessment matrix was prepared which confirms that the Land at Hawkesbury offers a number of sustainability benefits.
- 3.3.2 Given the findings of the updated Sustainability Assessment the Former Hawkesbury Golf Course Site (HSG12), the Borough Council has allocated the land for a mix of residential, canal marina and community facilities as a Main Modification to the Publication Plan. The inclusion of an addition 380 dwellings provides further flexibility to the Local Plan housing supply figure.
- 3.3.3 An update to Housing Trajectory prepared by the Council during the Examination Hearings confirmed that 14,456 dwellings will be developed in the Borough by 2031. The updated trajectory considered the number of residential completions as at 1st April 2018 and included an assessment of the level of residential completions viable on each of the allocated strategic and non-strategic sites. The subsequent figure exceeds the OAHN of 14,060 (including the total unmet needs of Coventry) by 396 dwellings.
- 3.3.4 The inclusion of a further 380 dwellings at the Former Hawkesbury Golf Course Site means that the Borough Plan will deliver **14,836** dwellings during the Plan Period. The Borough Plan will, therefore, exceed delivery of the full OAHN figure (14,060 dwellings) by 776 dwellings and ensure the Plan has flexibility to address unforeseen events.
- 3.3.5 Based on the updated trajectory and the amendments to the quantum of homes deliverable on each of the allocated sites the Council concludes that additional sites are not required to be brought forward during the Plan Period.



3.4 Strategic Site Options - Employment

- 3.4.1 The Issues and Options - Borough Plan considered eight spatial development options for accommodating the employment growth requirements for Nuneaton and Bedworth Borough but did not include any allocated sites. The Sustainability Appraisal considered the environmental effects of each of the options and concluded that options focussing new employment development in or adjacent to the existing urban areas scored higher in sustainability terms.
- 3.4.2 The evidence base prepared for the Preferred Option Borough Plan includes a background paper entitled "Location and Nature of Employment Growth". The background paper summarises the findings of the Employment Land Review (2010) which considered an assessment of all available land to meet the employment needs of the Borough.
- 3.4.3 The Site selection process considered the 16 Potential Economic Development Areas that were considered most suitable, in planning terms, to contribute to the delivery of the employment needs in the Borough Plan. Based on the Borough-wide search these areas all represented the most viable sites for all new development and could potentially accommodate employment land, subject to suitable revisions. These areas were assessed for employment uses under the SA Objectives and findings presented in the SA Report 2013.
- 3.4.4 Based on the scale of the potential development areas the opportunities to accommodate new employment growth in the urban areas were limited but the Borough Plan sought to bring forward areas adjacent to Nuneaton and Bedworth urban areas. The 2013 SA report for the Preferred Option concluded that each of the Potential Economic Development Area had sustainability merits and drawbacks but, overall, the Borough Plan's approach would reduce the geographic spread of development which will encourage the viability and vitality of the existing urban areas and contribute to the economic growth in deprived areas.



- 3.4.5 The Borough Plan – Preferred Options sought to provide for approximately 75 hectares of new employment land to support economic growth between 2010 and 2028. Seven of the assessed areas, namely AR13h, P4 & AR13I, AR13J, AR13K & WB03, and EX19 were taken forward by the Council in the Borough Plan Preferred Option (2013) as employment land allocations. The Sites were amalgamated and renamed as ECO1-3.
- 3.4.6 Changes in the scale of level of economic growth to be accommodated by the Borough and the end date for the Borough Plan were identified following the publication of the Borough Plan – Preferred Options. This resulted in the Borough Plan seeking to accommodate a reduced level of new employment land (circa 52ha) during the Plan Period which was extended until 2031.
- 3.4.7 Following the 'call for sites' exercise in 2014 a further forty-five potential employment sites were identified by landowners and potential developers. The 2014 'Interim' SA report was used by the Council to assess the sites received in the 'call for sites' exercise and re-assess the previously identified employment sites to confirm those sites that meet the Local Plan and Sustainability Objectives.
- 3.4.8 On this basis, the findings of the 2014 'interim' SA the Council took forward three employment land allocations in the Borough Plan – Submission Draft.
- 3.4.9 Since the publication of the Borough Plan Submission Document the Council has commissioned an updated Employment Land Review that seeks to identify the employment land needs in the Borough including unmet employment from the Coventry City Council administrative area which cannot be accommodate within its boundary. This review has identified a target of circa 113 Ha of employment land requirement during the plan period.
- 3.4.10 To assist this process the Council held a further 'call for sites' exercise in December 2015 and January 2016 together with a further review of all previously submitted employment sites. The Employment Land Review (2016) assessed the identified sites to confirm the availability for future employment uses. In tandem with this exercise all the Council's



preferred strategic sites were the subject of a strategic viability and deliverability review to confirm that the identified site are capable of coming forward within the plan period.

- 3.4.11 This assessment work reviewed 9 strategic employment sites of which 7 were considered to be viable and are the subject of this SA Report. The Sites are referenced EMP 1, 2, 4-7.
- 3.4.12 The two sites that were identified as part of the Employment Land Review but discounted on viability grounds were Land at Griff Lane (previously ECO1 – Bermuda 1) and Land at Prologis (previously EMP 3 and ECON 3).
- 3.4.13 During the Examination Hearings the allocated strategic employment sites were reviewed and tested against the comments raised by residents, statutory bodies and other stakeholders.
- 3.4.14 An updated review undertaken by Council of all existing and proposed land for employment uses in the Borough during the Examination Hearings identified a shortfall of 10.5 hectares of employment land compared to the target requirement of 113 Ha of employment land during the plan period. In addition, evidence was provided during the Examination Hearings by the developer of the Land at Prologis to address the previous ecological and amenity concerns. Based on the above the Council has included 5.3 Ha of employment uses on Land at Prologis Park (EMP3) as Main Modification to the Publication Plan.
- 3.4.15 Since the submission of the Borough Plan - Publication Plan (2017), planning Permission has been granted on appeal for residential uses on the Land at Caldwell Lane (EMP5). Consequently, the Council proposes to delete this potential site for employment uses.
- 3.4.16 Based on the findings of the Review, the removal of the Land at Caldwell Lane and the inclusion of Land at Prologis Park as an allocated Employment Site the Council has identified a total of 107.8ha of employment land as a Main Modification to the Publication Plan.



3.4.17 Each of the site options has a dedicated 'delivery policy'. The assessment has considered the allocation and the associated policy as a package. A summary of the conclusions for each employment site/policy presented in the Borough Plan – Publication Draft is set out in the SA Report.

3.5 Alternative Policy Options

3.5.1 The Issues and Options - Borough Plan considered a number of spatial issues relevant to Nuneaton and Bedworth Borough. The Borough Plan Preferred Options translated these recommendations into eight strategic objectives and twenty-three strategic policies. These draft policies were assessed under the SA Objectives and findings presented in the SA Report 2012.

3.5.2 The Borough Plan - Preferred Options set out all the relevant 'reasonable alternatives' to each of the draft policies that had been considered and including the 'do nothing' option. These alternative options were also taken into account in the SA assessment for each Policy.

3.5.3 Based on the findings of the Sustainability Appraisal for each policy and other material planning consideration, the draft policies were amended and refined. The Borough Plan – Preferred Options identified three policies were either not taken forward or merged with other policies, namely Policy ENV 3 – Urban Character and Design Quality, Policy DEV 5 – Green Belt and Policy DEV3 – Urban Focus and Strategic Sites.

3.5.4 The Policy Direction at the Preferred Option stage envisaged an 'economically driven' plan based on 1.5% growth rate. Following the publication of the Borough Plan – Preferred Options, the Borough Council sought to change the direction of the Borough Plan to one that meets a 0.7% growth rate.



- 3.5.5 This change of direction was considered as part of the assessment of the revised policies and the findings are presented in the interim SA Report 2014. The further SA related to twenty two policies and included new policies, namely, Presumption in Favour of Sustainable Development, Telecommunications, Open Space, Retaining Community Assets and Contamination & Land Stability. These were partly as a result of the conclusions in the SA.
- 3.5.6 Based on the findings of the Sustainability Appraisal for each policy and other material consideration, the draft policies were further amended and refined. The Borough Plan – Submission Document identified twenty-five policies (NB1-NB25) including the separation of the previous policy on Health into 'Health' and 'Sport & Exercise'. The previous policy assessments have been reviewed and updated for each policy, including the new health and sports policies. The Assessment was presented in the 2015 SA Report.
- 3.5.7 The submission draft of the Borough Plan has revised the 'Development Strategy' policies by dividing the previous 'Scale and Location of Growth' Policy into 'DS3 – Development Principles', 'DS4 Overall Development Needs', 'DS5 – Residential Allocations' and 'DS6 – Employment Allocations'. These policies are supported by a suite of new strategic allocation policies that provide policy requirement information on the delivery of each of the allocated sites. A new Policy on protecting the Green Belt has also been introduced. The above policy changes are not a consequence of the SA process.
- 3.5.8 During the Hearing Examinations three new policies were recommended by the Inspector for inclusion in the Borough Plan. The new policies are '**DS8 – Monitoring of Housing Delivery (MM29)**', '**DS9 – Review (MM30)**' and '**Policy HS7 – Creating a Healthier food Environment (MM155)**'. All the policies in the Borough Plan – Publication Plan incorporating Main Modifications are considered in more detail in Section 5.
- 3.5.9 Each of the policies in the Borough Plan – Publication Draft are considered in more detail in Section 4.



4.0 Appraisal of the Borough Plan – Publication Draft

4.1 Introduction

4.1.1 This section of the report summarises the findings of the Sustainability Assessment of the Borough Plan – Publication Document in respect of any significant effects associated with the SA objectives and also considers the cumulative effects arising from Borough Plan as a whole. The findings are presented in accordance with the groups of policies in the Borough Plan – Publication Plan incorporating Main Modifications.

4.2 Assumptions, uncertainties and difficulties

4.2.1 An appraisal of environmental effects inevitably relies on assumptions and an element of subjective judgement. Where assumptions have been made in the assessment process these have been noted on the individual policy matrix. All the appraisals for policies assumed that the effect of the Policy would commence on the day the Borough Plan is adopted. Therefore there are no short, medium or long term effects associated with the Borough Plan policies unless a specific timeframe is set out in the policy wording.

4.2.2 It is a requirement of the SEA Regulations that consideration is given to difficulties that are encountered during the SA process. This could include any data limitations or other the availability of relevant assessments. As the Borough Plan has evolved the evidence base for the document has expanded and been refined resulting in a more robust understanding of the effects on the policy options on the Sustainability Objectives.



- 4.2.3 During the earlier stages of the Borough Plan's formation it was difficult to assess in detail the likely effects of the options on each SA objective. In these cases an uncertain effect was recorded. Once the draft policies and/or site allocations had been further assessed and more evidence gathered on the environmental considerations it was possible to draw more certain conclusions about their likely effects. This SA has reduced the number of certain effect to a minimum.
- 4.2.4 The majority of the proposed housing and employment allocations in the Borough Plan – Publication Plan incorporating Main Modifications are located in the Green Belt and are proposed to be removed from this designation by the adoption of the Borough Plan. The Borough Council will justify the removal of these sites as part of the evidence base of the Borough Plan. This assessment has been undertaken on the assumption that the land has been removed from the Green Belt and is therefore equal to other land outside the Green Belt.
- 4.2.5 One sustainability objective has remained difficult to assess, namely, crime and fear of crime. This is not due to the availability of the baseline data but because the effect of new development or policy requirements on this objective is notoriously difficult to predict as it is also reliant on factors outside the planning process. Whilst every effort has been made to assess the Borough Plan against this SA Objective on a positive, negative or neutral basis, the assessors preferred to record an 'uncertain' effect than to make assumptions that may be inconsistent.
- 4.2.6 If any other uncertain effects or difficulties have been encountered as part of the assessment process then these are noted under the relevant sections along-side the assessor's comments.



4.3 Vision and Objectives

- 4.3.1 The overall vision for Nuneaton and Bedworth sets out the aspiration for development in the Borough to be delivered in a sustainable way, to ensure that the Borough is a place where people are proud to live, work and visit. The strategic objectives then provide more detail about how the Vision will be achieved. Therefore, where effects on the SA objectives have been identified these are broadly very positive. Where the Local Plan objectives directly address a particular SA objective, significant positive effects have been identified although in most cases the positive effects are minor due to the general nature of the objectives and the fact that they will be delivered through more detailed policies in the Borough Plan.
- 4.3.2 No conflicts between the SA objectives and the Borough Plan objectives were identified.

4.4 Development Strategy

- 4.4.1 The SA scores for nine Development Strategy policies are presented in Table 5.1 in the SA Report. Policies DS5 and DS6 include residential allocations and employment allocations. A summary of the SA scores for these allocations are set out in Table 5.1 and Table 5.2 in the SA Report.
- 4.4.2 The Borough Plan – Publication Publication Plan incorporating Main Modifications offers positive effects in terms of economic criteria in the SA. All the employment policies and potential employment sites score well against the economic objectives.



- 4.4.3 The amount of housing and employment development to be provided through the Development Strategy policies (in particular DS3 and DS4) will have generally significant positive effects on **SA objective 3: decent and affordable housing** as it will meet the objectively assessed housing need for Nuneaton and Bedworth Borough and on **SA objective 1: Strong and stable economy** as it will meet the identified needs for employment land in the Borough by delivering a portfolio of potential sites. Balancing the amount of housing and employment land will ensure that local needs are appropriately met and a number of the sites allocated through these policies will include both housing and employment development alongside one another.
- 4.4.4 Generally positive effects are also identified in relation to **SA objective 6: poverty** and **SA Objective 10: Health** as the policies will combine to provide employment opportunities which will help to improve economic inclusion.
- 4.4.5 Policies DS8 and DS9 seek to ensure that the delivery of new housing during the Plan Period in line with delivery rates envisaged in the Borough Plan Publication Plan incorporating Main Modifications. These policies will have generally significant positive effects on **SA Objective 3: Decent and Affordable Housing** and on **SA Objective 1: Strong and Stable Economy** as it will ensure that the objectively assessed needs for Nuneaton and Bedworth Borough and the unmet needs of Coventry are met.
- 4.4.6 Nuneaton and Bedworth's regeneration is closely linked to the revitalisation of the Borough's image and economic growth, in particular the regeneration of the existing main urban areas, improved self-sufficiency and the attraction of a skilled labour force. The allocation of a significant level of employment land is intended to encourage significant economic growth and, in turn, revitalise Nuneaton and Bedworth Town Centres. However, this could have a negative effect on **SA objective 11: soil resources**.



- 4.4.7 However, the growth that will result from these policies could have a range of negative effects on the environmental SA objectives in the absence of mitigation provide via the implementation of other Borough Plan policies. Based on the implementation of these policies generally neutral effects are recorded on the remaining SA objectives where there is a link between the Policy and SA objective.
- 4.4.8 The Borough Plan – Publication Plan incorporating Main Modifications includes a number of changes to the Green Belt boundary to allow new strategic allocations to come forward. These changes have been appraised, as if adopted, both as individual development site allocations and under the overarching housing allocations policy DS7.
- 4.4.9 All the allocated sites are above 0.5ha and so defined as ‘strategic’ for the purposes of this SA and thus, are considered to be too large to accommodate the associated scale of employment or residential development, namely 20+ dwellings, on a single site within existing Town Centres. In this case the scoring is reduced to slight adverse.
- 4.4.10 Policy DS7 also includes non-strategic residential sites and these are the subject of a stand-alone SA report that was published on the Council web-site on the 18th January 2018. The findings of the stand-alone SA should be read in accordance with this SA report for the Borough Plan Publication Plan as a whole.
- 4.4.11 In terms of the allocated sites, only three of the sites (HSG 11 – Tuttle Hill, HSG 12 – Former Hawkesbury Golf Course Site and EMP 4 – Coventry Road) are located on previously developed land. The remaining sites are located in ‘edge of centre’ or ‘out of centre’ locations, so scored poorly in terms of contributing to the vitality and viability of Town Centre area but the provision of strategic sites will provide for a range of land and premises for housing and employment uses in attractive and accessible locations (by public transport, foot and cycle). This will lead to an overall enhancement of the Borough in economic terms and, in terms of housing, directly address social factors associated with unemployment and academic attainment.



4.4.12 The location of new employment areas on land outside the main urban areas and on the edge of existing settlements will help promoting economic growth along transport corridors (A444) and the future key public transport node at Bermuda. The proposed employment and housing sites at Faultlands/Gypsy Lane (**EMP1 and HSG3, EMP 2 and EMP6 and HSG6**) offer the opportunity for increased mixed use and integration between residential and employment development and the existing employment and residential areas. This will result in a positive cumulative effect.

4.5 Housing

4.5.1 The SA scores for three Housing policies are presented in Table 5.2 in the SA report.

4.5.2 Providing everyone with an opportunity to live in decent and affordable home is a key social target. Housing is a key driver to revitalisation and it is an essential community need and a variety of housing types. A steady supply of housing is necessary to generate vitality, facilitate continued economic prosperity, help support local shops and services required by local residents and help achieve the aim of creating mixed and balanced communities. There is a shortage of affordable housing in the Borough. The proposed growth will further increase the pressure for affordable housing which **Policy H2** seeks to address via a 25% target for development proposals of 15 dwellings or more. The provision of allocated housing areas will contribute positively to these objectives.

4.5.3 All the housing policies (**HSG 1-3**) and allocations (**HSG 1-11**) score well against the social objectives. It is the Council's intention to bring forward a range and mix of housing tenures during the plan period to support the planning of high levels of economic growth. This is likely to contribute to reducing poverty (**SA Objective 6**), improving health (**SA Objective 10**), deprivation and social exclusion by virtue of improving access to housing (**SA Objective 3**) and employment opportunities, thereby delivering an equitable sharing of the benefits of prosperity.



- 4.5.4 The Housing policies are expected to have no effects on a relatively high proportion of the SA objectives as there is no direct linkage between the Policy and the SA Objectives. No likely significant negative effects are identified in relation to any of the SA objectives.
- 4.5.5 The allocated housing sites (**HSG 1-11**) are generally situated in 'dispersed locations' which, for the purposes of this assessment, is defined as land on the edge or outside the Town Centres of Nuneaton and Bedworth. Such dispersed sites scored low in respect of current access to services and facilities.
- 4.5.6 The allocated housing sites will result in a neutral to slight positive effect on economic factors due to jobs and training opportunities created during the construction phase and the long term link between the provision of new homes and retention of employment/trained personnel in the Borough.
- 4.5.7 A number of the allocated assessed sites (**HSG2/HSG3/EMP1&4**) offer the potential to improve access to employment opportunities and a variety of housing types to deprived communities in Camp Hill, Bar Pool, Kingswood and Wem Brook wards. This will result in a positive cumulative effect.

4.6 Employment

- 4.6.1 The SA scores for three Employment policies are presented in Table 5.3 in the SA report.
- 4.6.2 Overall, there are likely to be mainly positive effects from the Employment policies. Two significant positive effects are expected for **SA objective 1: Strong & Stable economy** as the aims of the policies are in line with those of that SA objective, i.e. to support sustainable economic growth and improve employment opportunities in the Borough together with **SA objective 2 Vitality of Town Centres**. Policy E2 is strengthened by the inclusion of new criteria seeking to restrict the loss of employment sited for non-employment uses.



- 4.6.3 One major negative effect is identified for **Policy E1**, on **SA objectives 11**: soils. This is due to the fact that the policy could result in development in out of centre areas. These areas are generally served less well by public transport compared to urban areas, and so development there is likely to result in high levels of private car use. However, improvements in public transport provision as part of new development proposal will lead to a positive overall effect **SA objectives 15**: Efficient use of infrastructure.
- 4.6.1 Employment activity can also have an indirect positive effects on human health in the longer term. The Health Impact Assessment concludes that *“getting people into employment is critically important in reducing inequalities in health”*. The development of the allocation employment sites will result in an in-direct positive effect on promoting health lifestyles.
- 4.6.2 The policies are likely to have generally positive effects on **SA objectives 6**: Poverty, **SA Objective 10**: Health and **SA Objective 19**: Prudent use of resources. The Employment policies are expected to have a neutral effect on a relatively high proportion of the SA objectives as there is protection built into these policies which will prevent adverse impacts on the environment.
- 5.6.3 The provision of new development has the potential to result in an effect on crime and fear of crime. Crime rates are currently high in the Borough but are steadily falling. Crime may, if not mitigated, increase in line with proposed growth levels. However, in the absence of further information on the type and nature of the specific developments to confirm any correlation between sites and **SA Objective 5**: crime or fear of crime between are currently unknown.



4.7 Town Centres

- 4.7.1 The SA scores for three Town Centre policies are presented in Table 5.4 in the SA report.
- 4.7.2 The Town Centre Policies are likely to have a neutral or positive effect on the majority of SA objectives. Due to the nature of the policies, seven likely significant positive effects are identified on **SA objectives 1**: economy, **SA objectives 2**: vitality of town centres and **SA Objectives 15**: Efficient use of infrastructures, **SA objectives 19**: Prudent use of resources because the aims of these policies are in line with those of the SA objectives.
- 4.7.3 **Policies TC1, TC2 and TC3** seeks to prioritise development in town centres including tourism and heritage activities which are better served by public transport resulting in new development that are accessible to all members of the community thereby reducing poverty and social exclusion (**SA objective 6**) and benefitting access to services and facilities (**SA objective 4**). Similarly, these policies will have minor positive effects on **SA objective 14**: air quality and **SA objective 17**: climate change because they provide for lower levels of car use by focusing development in central locations.
- 4.7.4 No likely negative effects (either minor or significant) are identified in relation to any of the SA objectives.

4.8 Health, safe and inclusive communities

- 4.8.1 The SA scores for six Health, Safe and inclusive communities' policies are presented in Table 5.5 of the SA report.



- 4.8.2 The nature of the Healthy, Safe and Inclusive Communities policies means that positive effects (either minor or significant) are identified for all relevant policies in relation to **SA Objective 4**: access to services; **SA Objective 7**: cultural, Sport and recreational opportunities; and **SA objective 10**: health. The policies will benefit the health of local communities by ensuring that there are open space and access sport facilities available, that essential infrastructure such as healthcare and educational facilities and green infrastructure is available to meet the needs of the growing population and thus that there are fewer inequalities resulting from poor access to health services and facilities.
- 4.8.3 **Policies HS2-6** are likely to have generally positive effects on specific SA objectives due to the specific nature of the policy but with a neutral or no link to the majority of SA objectives.
- 4.8.4 **Policy HS2** is also likely to have a significant positive effect on **SA objectives 14**: air quality, **SA Objective 16**: energy, **SA objective 17**: climate change as it supports improvements to the walking and cycling network and encourages developments that will contribute to improved and enhanced green infrastructure and improved connectivity.
- 4.8.5 The **Health Impact Assessment** prepared by Ben Cave Associates concludes that housing and employment are both important determinants of health and supports the provision of good quality dwellings in the Borough. It is considered that the development of new housing sites for a range and mix of affordable housing tenures will improve social inclusion for residents consequently having positive impacts on human health and well-being.
- 4.8.6 **Policy HS5** requires all major development to demonstrate that they have an acceptable impact on health and well-being via the preparation of a Health Impact Assessment. This Policy will have a significant positive effect on **SA Objectives 10**: Health and positive effect on **SA Objective 2**: Town centres.
- 4.8.7 **Policy HS7** seeks to limit the development of environments that encourage obesity including restricting A5 uses (hot food take-aways) outside town centres identified in Policy TC3. This Policy will have a significant positive effect on **SA Objectives 10**: Health.



4.8.8 No significant negative effects have been identified for any of the policies for Healthy, Safe and Inclusive Communities in relation to any of the SA objectives.

4.9 Natural Environment

4.9.1 The SA scores for five Natural Environment policies are presented in Table 5.6 of the SA report.

4.9.2 A large number of positive effects have been identified for the Natural Environment policies as they cover specific topics such as biodiversity, green infrastructure, flood risk and landscape. As the policies seek to protect the natural environment and thus all the effects identified are broadly positive.

4.9.3 All the policies are likely to have positive effects on **SA objective 9**: natural environment and **SA objective 11**: soils as their primary purpose is to protect and enhance biodiversity in the Borough together with **SA objective 21**: Landscape.

4.9.4 In the case of **Policy NE1**, a significant positive effect is identified for this objective as the policy seeks to protect and enhance green infrastructure as part of development proposals which will have benefits for biodiversity as a result of habitat creation and improved habitat connectivity. In addition, the wider benefits of green infrastructure means that positive effects are also likely to result from Policy NE1 for **SA Objectives 7**: Cultural, Sports and Recreational Opportunities, **SA Objective 8**: Design, **SA Objective 10**: Health, **SA Objective 11**: Soils, **SA Objective 14**: Air Quality, **SA Objective 17**: Climate Change, **SA Objective 20**: Heritage and **SA Objective 21**: Landscape.

4.9.5 **Policy NE3** protects designated features of biodiversity and geodiversity and will have a significant positive effect on **SA Objective 9**: natural environment.



- 4.9.6 **Policy NE4** to manage flood risk and water quality is included in the Borough Plan in order to ensure all new development is accompanied by suitable mitigation measures. The policy should allow for site specific measures to be agreed at the planning application stage. **Policy NE2** as modified confirmed that new open space can multi-function as flood storage.
- 4.9.7 **Policy NE5** is likely to have a significant positive effect on **SA objective 21**: landscape as the primary aim of the policy is to ensure that new developments positively contribute to landscape character by ensuring that landscape is a key component of design.
- 4.9.8 It is considered that all the allocated sites will result in some changes to landscape character of varying degrees. The development of the sites for employment or housing uses will generally result in the loss of existing open agricultural land fields and features that provide separation between existing built up areas. In each case, the development of the site will increase the level of built development in the local area but also offers the opportunity to recreate and connect existing landscape features resulting in long term landscape improvements.
- 4.9.9 Based on the above, it is considered that the development of sites falling within Landscape Character Areas requiring action to enhance, restore or recreate landscape features will, generally, result in a slight adverse effect on this sustainability objective in the short term. However, an overall neutral to positive effect in the medium to long term will derive once the landscaping proposals have started to mature and the linkages become established.
- 4.9.10 Conversely, the development of sites falling within Landscape Character Areas requiring action to conserve existing landscape character/features will have a significant adverse effect on this sustainability objective in the short term but an overall slight adverse effect in the medium to long term once the landscaping proposals have started to mature and the linkages become established. The implementation of **Policy NE1 - Green Infrastructure and Policy NE5– Landscape Character** will therefore result in no significant or cumulative effect on landscape character.



4.9.11 No significant negative effects have been identified for any of the Natural Environment policies in relation to the SA objectives.

4.10 Built Environment

4.10.1 The SA scores for four Built Environment policies are presented in Table 5.7 of the SA report.

4.10.2 A number of likely significant positive effects are identified, mainly where a policy directly addresses an SA objective, for example BE4 seeks to conserve and enhance the historic environment so is likely to have a significant positive effect on **SA objective 20**: heritage and BE3 addresses the potential impacts of development on sustainable design & construction so is likely to have a significant positive effect on **SA objective 8**: design.

4.10.3 Because of the nature of the **Policy BE2 and Policy BE3** have significant positive effects on **SA objective 17**: climate change.

4.10.4 **Policy BE4** (Valuing and Conserving our Historic Environment) requires that new development proposals take full account of the characteristics and setting of the heritage asset to ensure that features of historic interest are protected and conserved. The implementation of the policy will therefore result in no significant or cumulative effect on cultural heritage coming forward as a result of the proposals in the Plan.

4.10.5 No significant negative effects have been identified for any of the Natural Environment policies in relation to the SA objectives.

4.11 Cumulative Effects

Based on the findings of the individual matrices for each allocated site and proposed policy it is considered that the Borough Plan – Publication Draft will not result in any significant cumulative effects that cannot be fully addressed by the provisions of the policy framework or suitable site-specific mitigation.



5.0 Mitigation and enhancement

5.1 INTRODUCTION

- 5.1.1 As the Borough Plan has developed, the draft policies and site allocations were subjected to an SA which suggested a small number of mitigation and enhancement measures.
- 5.1.2 The emerging Borough Plan was prepared positively and therefore there was little scope for suggesting mitigation measures as no significant negative effects were identified. However, there was some scope for enhancement. These have all been accepted by the Borough Council and incorporated into changes in the wording the policies.
- 5.1.3 Based on the above, no further mitigation measures are identified for the Borough Plan – Publication Plan incorporating Main Modifications.



6.0 Monitoring and Next steps

6.1 INTRODUCTION

6.1.1 The Nuneaton and Bedworth Borough Plan represents a significant opportunity to ensure that the delivery of the planned housing and employment growth is genuinely sustainable. The SA will contribute to determining the right balance of sustainable development in the Borough.

6.2 Monitoring

6.2.1 SA is an ongoing process and does not cease once the plan is adopted. Monitoring proposals have been designed to ensure that relevant information continues to be collected to highlight specific issues and significant effects, and which could help decision-making.

6.2.2 Monitoring will be focused on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken.

6.2.3 Where possible, the indicators proposed in Appendix H draw from those in the monitoring framework prepared by Nuneaton and Bedworth Borough Council and presented in the Borough Plan - Publication Plan incorporating Main Modifications. The data used for monitoring in many cases will be provided by outside bodies. Information collected by other organisations (e.g. the Environment Agency) can also be used as a source of indicators. It is therefore recommended that the Council continues the dialogue with statutory environmental consultees and other stakeholders that has already been commenced, and works with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable.



- 6.2.4 Data on the link between crime and fear of crime levels in respect on the effects of new development is difficult to obtain. No monitoring has been identified to address this effect.
- 6.2.5 The collected monitoring data will be presented as part of the Borough Council's Annual Monitoring Report. The data will be reviewed annually to identify any unexpected trends or unforeseen adverse effects at an early stage.

6.3 Next Steps

- 6.3.1 This SA NTS has been prepared to support the Borough Plan Publication Plan incorporating Main Modifications. Consultation on this version of the Plan is taking place in Summer 2018.
- 6.3.2 Following consultation on the Plan, the Council will take into account any consultation responses and forward them to the Inspector undertaking the Examination into the Borough Plan and taken into account in the completion of his Report on the 'soundness' of the Borough Plan.

