



Nuneaton and Bedworth Borough Plan Sustainability Assessment

**On behalf of Nuneaton and Bedworth
Borough Council**

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Contents Page

1.0	Introduction.....	1
2.0	Sustainability Assessment - Context and Objectives	14
3.0	Methodology of the Sustainability Assessment	52
4.0	Assessment of 'reasonable' alternatives.....	60
5.0	Appraisal of significant environmental effects.....	119
6.0	Mitigation and Enhancement.....	142
7.0	Monitoring and Next Steps.....	143
8.0	Conclusions.....	145

Appendix Contents

Appendix A Borough Plan - Publication Plan – Main Modification dated July 2018

Appendix B - B1 – Plans, Policies and Programme review

B2 - Sustainability Issues and Interactions

Appendix C - Summary of previous SA reports

Appendix D - Summary of Consultation bodies, consultee comments and responses

Appendix E - Summary and Matrices of Policies and Allocations – Borough Plan - Publication Plan
incorporating Main Modifications

Appendix F - Summary and Matrices of alternative sites options

Appendix G - Summary of Vision and Objectives against SA Objectives

Appendix H - Summary of mitigation and enhancement measures suggested by the SA



Appendix H - Monitoring measures and indicators for each SA Objective



1.0 Introduction

1.1 Background

1.1.1 Nuneaton and Bedworth Borough Council (NBBC/The Council) is currently preparing its Borough Plan (the Plan), which will set out the following:

- spatial vision;
- strategic objectives for the Borough;
- key policies; and
- monitoring and implementation framework for the next 15 years.

The Borough Plan will replace the existing Nuneaton and Bedworth Local Plan, which was adopted on 28 June 2006 and covers the period to 2011.

1.1.2 The preparation of the Nuneaton and Bedworth Borough Plan has been the subject of an integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) (hereafter referred to as SA) in line with the requirements of:

- Planning and Compulsory Purchase Act 2004;
- Statutory Instrument 2004 No. 1633: The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations);
- Statutory Instrument 2012 No. 767: Town and Country Planning (Local Planning) (England) Regulations 2012;
- National Planning Policy Framework (NPPF) formerly PPS 12; and
- Planning Policy Guidance (PPG).

1.1.3 The Sustainability Appraisal has been undertaken by WYG (formerly Alliance Planning) who are highly experienced in completing SAs and SEAs of spatial planning documents. WYG/Alliance Planning has been retained to undertake a sustainability assessment of the Borough Plan at each stage in its evolution. This included the completion of a Sustainability Appraisal (incorporating the provisions of the EU SEA Directive) (hereafter referred to as SA) and Habitats Regulations Assessment (HRA) of the Borough Plan – Submission Draft (January 2017).



1.1.4 The Nuneaton and Bedworth Borough Plan 2011-2031 Publication Plan (Publication Plan) was formally submitted to the Secretary of State for examination in March 2017. The Inspector examining the Nuneaton and Bedworth Borough Plan Publication Plan held Hearings sessions in August/September 2017 and February/March 2018.

1.1.5 During these sessions the Council proposed a number of Main Modifications (MMs) to the Publication Plan. The Main Modifications focus on changes to the following sections:

- Vision and Objectives (Section 4);
- Development Strategy (Section 5);
- Strategic Allocations (Section 6);
- Housing Policies (Section 7);
- Employment Policies (Section 8);
- Town Centres (Section 9);
- Health, safe and inclusive communities (Section 10);
- Natural Environment (Section 11);
- Built Environment (Section 12); and
- Appendices

1.1.6 A list of the proposed Main Modifications is presented at Appendix A. Any Main Modifications referenced in this SA Report are identified by underlining and/or referenced in bold i.e. **(MM01)**.

1.1.7 This document comprises the Sustainability Appraisal Report (SA Report) for the Nuneaton and Bedworth Borough Plan - Publication Plan incorporating the Main Modifications proposed by the Council during the Hearing Sessions. The HRA is presented as a separate 'standalone' document. The SA Report should be read alongside the SA Report for Non-Strategic Residential Sites (January 2018).

1.1.8 The SA report meets the requirements of an 'Environmental Report' set out at Paragraph 12 and Schedule 2 of the SEA Regulations 2004 and a 'Sustainability Appraisal Report' required by Section 19 (5) (b) of the Planning and Compulsory Purchase Act 2004. The SA report has also been prepared in line with the Government Guidance entitled 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents: Guidance on Regional Planning Bodies and Local Planning Authorities' dated November 2005.

1.2 Nuneaton and Bedworth –Borough Plan – Purpose and Objectives

1.2.1 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:



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.

1.2.2 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

To use economically driven growth in a way that will help regenerate the Borough and raise its profile as a more attractive place to live, but particularly to work and invest in.

Objective 2

To seek employment opportunities that will support the diversification of the Borough's economy and improve job opportunities for residents. In particular:

a) *Maintain and improve existing employment sites. Key sites include:*

- *Attleborough*
- *Bayton Road*
- *Bermuda*
- *Prologis Park*

b) *Provide additional employment land that is attractive to investors in the following locations:*

- *Faultlands*
- *Pickards Way/ Wilsons Lane*
- *Coventry Road*
- *Caldwell Road*
- *Longford Road*
- *Bowling Green Lane*



- c) *Enable growth in a diverse range of sectors, particularly focusing on the following;*
- *Business services*
 - *Construction*
 - *Distribution & retail*
 - *Health*
 - *Transport and communications*
 - *Engineering.*
- d) *Encourage offices and other high value employment generators in Nuneaton and Bedworth Town Centres*
- e) *Use growth to promote training and educational facilities and opportunities which will improve the skills of the current and future labour market.*
- f) *Improve accessibility, via public transport, to job opportunities in the Borough and in nearby towns such as Coventry, Hinckley, Leicester and Atherstone.*

Objective 3

To continue to 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. In particular:

- a) *Maintain Nuneaton Town Centre as the primary centre for shopping, leisure and business activity in the Borough and to enable it to remain competitive at a sub-regional level.*
- b) *Encourage new housing and leisure uses in Bedworth Town Centre to complement and support its focus for day-to-day shopping and commercial activity.*
- c) *Ensure local needs are met through Local and District Centres.*



Objective 4

To provide the size, type and mix of housing that meets the specific needs of the Borough. In particular:

- a) Aspirational housing that will attract residents who can make a significant investment in the development of businesses in the area.*
- b) Affordable housing of different tenures to meet identified housing need.*
- c) Housing options to meet the needs of the increasing number of older people in the Borough.*
- d) Providing smaller properties in Nuneaton, family housing in Bedworth and supporting the private rented sector across the Borough.*
- e) Continued regeneration and investment in areas where there is poor housing stock to improve energy efficiency, reduce fuel poverty and to bring empty properties back into use.*
- f) Adequate provision to meet the identified needs of gypsies and travellers.*

Objective 5

To ensure that all new development and investment contributes to a significant improvement in infrastructure and facilities that serve the Borough. In particular:

- a) A step change in public transport provision along a North-South corridor to link Nuneaton and Bedworth to Atherstone and Hinckley in the north and Coventry, Warwick and Leamington in the south.*
- b) Improved access to existing facilities, particularly the Borough's two town centres and major leisure and community facilities (e.g. Bermuda, George Eliot Hospital, the Colleges and the Pingles and Bedworth Leisure Centres).*
- c) Retention and improvement of local shopping, health and other community facilities.*
- d) New development that integrates the required infrastructure and service provision to support it and where appropriate includes improvements to existing infrastructure and services. This includes:*
 - A northern distributor road*
 - Connectivity improvements*



- *Education provision*
 - *Emergency services provision*
 - *Leisure improvements*
 - *Sustainability measures*
- e) *A Green Infrastructure network of high quality, well connected, multi-functional open spaces, corridors and links that deliver benefits to the landscape, wildlife and the public in line with the priority projects identified from the Borough's five green infrastructure zones.*

Objective 6

To create healthy, safe and strong communities by:

- a) *Creating and improving networks that increase opportunities to walk and cycle to a range of facilities.*
- b) *Enabling access to a range of high quality open spaces.*
- c) *Enabling participation in active sport by building on the strengths of the Pingles Leisure Centre and other facilities.*
- d) *Reducing crime and antisocial behaviour through a multi-faceted approach, using actions such as good design, raising aspirations and providing opportunities for the young alongside the necessary infrastructure provision.*
- e) *Creating well planned and integrated communities that foster cohesion and accessibility for all.*

Objective 7

To ensure that new development enhances and improves the natural environment, which includes biodiversity, geodiversity and landscape. This will have secondary benefits of improving the quality and appearance of the existing urban area. In particular:

- a) *Important open spaces such as Riversley Park, Miners Welfare Park, Whittleford Park and Community and Local parks are protected and enhanced. Landscape character, historic, geological and natural features such as Arbury Historic Park and Garden, Stockingford Railway Cutting and Ensor's Pool are protected and enhanced.*
- b) *Derelict, contaminated and untidy sites are brought back into beneficial use.*
- c) *Minimise the negative impact of development and make improvements where possible to air quality in Air Quality Management Areas and at locations where concentrations are close to Air Quality Objectives.*



- d) *Maximise opportunities to use the River Anker, Wem Brook, the Coventry Canal and Ashby Canal as attractive focal points for open space and new development where there is no negative impact on the green network or the water quality.*
- e) *Infill development positively responds to local character and does not result in town cramming.*
- f) *High quality and sustainable design and construction in line with design standards.*

Objective 8

To address climate change and encourage sustainability in all new development. In particular:

- a) *Avoid where possible sites that are at risk of flooding now or in the future.*
- b) *Utilising appropriate sustainable urban drainage systems for flood or surface water attenuation and using water sustainably.*
- c) *Protect and enhance the Borough's ecological and geological networks, in particular priority habitats and species and minimising impacts on biodiversity and geodiversity.*
- d) *Maximise energy efficiency and the use of renewable energy, particularly those with greatest potential in the Borough. For example, combined heat and power district energy, biomass energy, ground source heat pumps, solar photovoltaics and solar thermal, along with any future renewable or low carbon technology that may become more suitable for the Borough during the plan period.*
- e) *Ensure development makes links to cycling and walking networks to encourage green travel.*

1.2.3 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.

1.3 Baseline Context

1.3.1 Nuneaton and Bedworth Borough is located in the north of Warwickshire, in the West Midlands. It contains the second largest population (approximately 120,000) in the County but is the smallest in geographical area at 79.3km². The towns of Nuneaton and Bedworth are thriving communities,



although the Borough traditionally has had a lower rate of population growth compared with the rest of the Country. The Borough is predominately urban in character and consists of the two market towns of Nuneaton and Bedworth and the large village of Bulkington which is situated in the Green Belt to the east of Bedworth.

- 1.3.2 The Borough has excellent transport links and is situated at the heart of the motorway network. Both Nuneaton and Bedworth are easily accessible from the M1, M5, M6, M42 and the M69. Nuneaton is served by the West Coast Mainline with services to Crewe and London Euston and is also within easy reach of Birmingham International Airport (20 minute drive) and East Midlands Airport (40 minute drive).
- 1.3.3 The Borough has a diverse economy and the most prominent business sector is manufacturing. Other significant sectors are Wholesale & Retail Trade, Health & Social Work and Transport Storage and Communication. The business foundation of the Borough's local economy is a mixture of small and medium-sized firms.
- 1.3.4 There are however, significant pockets of deprivation in Nuneaton and Bedworth with the Borough suffering from the highest levels of deprivation in Warwickshire. The level of deprivation in the Borough varies widely, with some areas among the fifth most deprived areas of England and some among the least. A key indication of the scale of the socio-economic challenge facing the Borough can be understood from the 2015 Indices of Deprivation. The most deprived Super-Output Area (SOA) in Warwickshire is the Bar Pool North and Crescents SOA in Nuneaton. This area is ranked 492 out of 32,483 SOAs in England, placing it within the top 2% most deprived SOAs in England. (English Indices of Deprivation, DCLG 2015).
- 1.3.5 In the health profile for the Borough in 2015, male and female life expectancy remains below the average in England at 78.4 for males and 82.7 for females compared to 79.6 for males and 83.2 for females as a national average. (ONS, reviewed September 2016).
- 1.3.6 There are no green spaces in Nuneaton and Bedworth Borough which have a Green Flag Award. (Green Flag Award, reviewed September 2016).
- 1.3.7 The Borough contains 1 European Site (Ensor's Pool Special Protection Area), 2 SSSI's and 3 Local Nature Reserves and 25 SINCs. (Natural England, reviewed September 2016).



- 1.3.8 The Borough contains 94 Listed Buildings and has 5 Conservation Areas that are designated for their 'special architectural or historic interest, the character or appearance of which is desirable to preserve or enhance'. (English Heritage, reviewed September 2016).

1.4 Nuneaton and Bedworth's Commitment to Sustainability and Climate Change

- 1.4.1 The Council have signed up to both the Nottingham Declaration on Climate Change and the Warwickshire Climate Change Strategy, with the aim of addressing the sustainability agenda and tackling climate change. The Council is committed to meeting the aims and targets of the Warwickshire Climate Change Strategy. The overarching aim of the Strategy is:-

"To reduce greenhouse gas emissions in Warwickshire to at least the level set out by Government policy, 15%-18% reduction by 2010 and a 60% reduction by 2050 (against 1990 levels). We will achieve this whilst maintaining and improving the quality of life of Warwickshire residents through the implementation of a policy of sustainable development."

- 1.4.2 The Nuneaton and Bedworth Borough Plan and the accompanying SA and HRA will have a key role in delivering the aims and targets of the Nottingham Declaration on Climate Change and the Warwickshire Climate Change Strategy. The SA will help ensure that the Borough Plan is prepared with a view to contributing to the achievement of sustainable patterns of growth.

1.5 Integrated Sustainability Assessment

- 1.5.1 The Nuneaton and Bedworth Borough Plan and accompanying SA represent an important opportunity to drive forward the sustainability agenda and assist with urban and rural renaissance across the Borough. SA is a powerful tool that can not only evaluate the sustainability of the Borough Plan but also help promote patterns of development and ensure that sustainability considerations are reflected in the evolution of the plan and policy preparation. An independent Sustainability Assessment has been undertaken at each stage in the preparation of the Borough Plan.



Borough Plan - Issues and Options

- 1.5.2 NBBC commenced work on the production of the Borough Plan in 2009 with the Borough Plan Issues and Options document, the purpose of which was to consult the public on the range of spatial options capable of delivering the vision and objectives of the Plan. The Issues and Options Core Strategy was the subject of a standalone Sustainability Appraisal (SA) prepared for the Council by Alliance Planning (now part of WYG). Both documents were the subject of formal public consultation during Summer 2009. A summary of the Issues and Options SA is presented at Appendix B (A full copy of the Issues and Options SA Report (2009) is available on the Borough Council's web-site).
- 1.5.3 During the Issues and Options consultation period the document was known as the Nuneaton and Bedworth Core Strategy, but at the Council's Cabinet meeting on the 22nd September 2010, it was agreed to change the name of the emerging local development document to the '*Nuneaton and Bedworth Borough Plan.*' The representations received at the Issues and Options stage were taken into account in the preparation of the Borough Plan Preferred Option document and the subsequent SA.

Borough Plan - Preferred Option

- 1.5.4 The Borough Plan Preferred Options Document and the associated SA was the subject of statutory consultation between 5th July 2013 and the 30th August 2013. The SA was prepared by Alliance Planning (now part of WYG) and took account of the of consultation responses and findings in the SA for the Issues and Options stage together with the subsequent changes brought forward by the Council within the draft Borough Plan Preferred Options document. A summary of the Preferred Option SA is presented at Appendix B (A full copy of the Preferred Option SA Report (2013) is available on the Borough Council's web-site).

Borough Plan – Call for Sites

- 1.5.5 Following a subsequent review of the Borough's housing and employment needs, the Council identified the need for more growth than previously estimated in the Preferred Option Document and a call for new development sites was undertaken in Spring 2014.



- 1.5.6 An independent assessment of the new development sites suggested by landowners/agents as part of the further 'Call for Sites' in Spring 2014, together with a review of the sites put forward in the consultation process for the Borough Plan Preferred Option document against agreed sustainability objectives was undertaken by Alliance Planning (now WYG). An 'interim' SA report of the findings of the independent assessment of these sites was prepared in February 2015. The findings of the interim SA Report has assisted in the preparation of the Borough Plan Submission Document.

Borough Plan – Submission Document

- 1.5.7 A further SA was prepared by WYG to assist in the preparation of the Borough Plan – Submission Document. The SA took account of consultation responses and the findings in the SA for the Preferred Options stage Borough Plan and the interim SA associated with the 'Call for Sites' process. A summary of the 'Interim' SA (2014) and Submission Document SA (2015) are also presented at Appendix B. (A full copy of the 'Interim' SA (2014) and Submission Document SA (2015) are available on the Borough Council's web-site).
- 1.5.8 The Borough Plan Submission Document and the associated SA were the subject of an initial statutory consultation between October and December 2015.

Borough Plan – Publication Plan

- 1.5.9 WYG prepared a further SA Report for the Borough Plan - Publication Plan. The Report took account the findings of all the previous SA reports to ensure that the principles of sustainable development are at the core of the decision-making process in a transparency and open manner. The findings of the SA Report have assisted in the preparation of the Borough Plan Publication Plan.
- 1.5.10 The Borough Plan Publication Document and the associated SA were the subject of statutory consultation between January and March 2017.

Borough Plan – Publication Plan – Non-Strategic Residential Sites

- 1.5.11 WYG prepared an additional SA Report for the Borough Plan - Publication Plan in January 2018. The Report assessed each of the proposed non-strategic residential sites against the sustainability objectives agreed in the previous SAs.
- 1.5.12 The SA Report was published on the Council's website on the 17th January 2018.



Borough Plan – Publication Plan incorporating Main Modifications

- 1.5.13 This SA Report has been prepared to update the SA Report that accompanied the Borough Plan - Publication Plan to take account of the Main Modifications proposed by the Council during the Examination Hearings. This report has also taken account of updates to the Borough Plan evidence base together with the Action Points set out by the Inspector following the conclusion of the Hearing Sessions which was posted on the Council's web-site on the 8th May 2018.
- 1.5.14 The Report has been reviewed and updated to ensure that principles of sustainable development are at the core of the decision-making process in a transparency and open manner. The SA Report will be made available for public consultation alongside the Borough Plan – Publication Plan incorporating Main Modifications.

1.6 Structure of this Sustainability Appraisal Report

- 1.6.1 This chapter of the SA report provides an introduction to the Borough Plan, the baseline context of Nuneaton and Bedworth Borough and the integrated SA process. The remainder of the report is structured as follows:
- Chapter 2 – outlines the methodology of the SA;
 - Chapter 3 –provides sustainability context and objectives of the Plan;
 - Chapter 4 – appraisal of 'reasonable' alternatives considered;
 - Chapter 5 – appraisal of the significant effects associated with the plan policies and sites;
 - Chapter 6 – outlines the residual effects;
 - Chapter 7 – Monitoring; and
 - Chapter 8 - Conclusions/Next Steps.



1.7 How to comment on this Sustainability Appraisal Report

1.7.1 This SA is being published for comment as part of the statutory consultation process alongside the Nuneaton and Bedworth Borough Council – Publication Plan incorporating Main Modifications. The consultation methods and bodies (included the three statutory environmental consultation bodies set out in the SEA Regulations (namely Natural England, Environment Agency and English Heritage). If you have any comments on this report please respond to:

planning.policy@nuneatonandbedworth.gov.uk



2.0 Methodology of the Sustainability Assessment

2.1 Introduction

- 2.1.1 Under Section S19(5) of the Planning and Compulsory Purchase Act 2004 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 Supplementary Planning Documents (SPDs). S39 of the 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*” of a Local Plan/SPD.
- 2.1.2 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.
- 2.1.3 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.
- 2.1.4 Although the requirement to undertake both SA and SEA is mandatory, it is possible to satisfy the requirements of both parties of the legislation, through a single appraisal process. This approach is confirmed at Paragraph 165 of the NPPF (See paragraph 1.7.11 above).
- 2.1.5 Further guidance on the preparation of the SA in relation to the stages of Local Plan production together with the information to be covered within the SA Report is set out in the Planning Policy Guidance (PPG) dated March 2014. The PPG states at paragraph 11-009 “*The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the Local Plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan*”. The level of detail set out in this SA Report is considered to be commensurate with the stage of Local Plan production.



2.1.6 The guidance goes on to state at paragraph 11-018 “*the sustainability appraisal should identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them. The sustainability appraisal must consider all reasonable alternatives and assess them in the same level of detail as the option the plan-maker proposes to take forward in the Local Plan (the preferred approach)*”. This is the current stage of the SA process being undertaken. The findings of this SA will be used by the Council to assess “*the overall sustainability of the different alternatives, including those selected as the preferred approach in the Local Plan*” and ultimately “*inform the selection, refinement and publication of proposals*”. An assessment of the alternatives considered as part of the SA process is set out at Chapter 5.

2.2 SA Key Steps and Tasks

2.2.1 SA/SEA is a five stage process. Figure 1 below sets out each of the stages and the stage currently reached.

2.2.2 The preparation of this SA Report comprises the third major step in the SA of the Nuneaton and Bedworth Borough Plan and relates to Stage C of the five stage SA process set out at Paragraph 11-013 of the Planning Practice Guidance (March 2014). The comments received on the previous SA Reports associated with the Issues and Options, Preferred Option and Submission Borough Plan together with a subsequent review of sites put forward at the ‘Call for Sites’ stage, has facilitated a further evaluation of the Borough Plan options and reasonable alternatives considered available in this SA Report. These are considered in more detail in Section 3.



2.2.3 The SA Report will be the subject of a formal consultation process in line with the Borough Plan – Publication Plan Incorporating Main Modifications (Stage D) in Summer 2018.

Table 1: SA Process Stages

<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 objectives2: Collecting baseline information3: Identify sustainability issues and problems4: Develop the SA framework5: Consult the consultation bodies on the scope of the SA report	} STAGES A & B COMPLETE
<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 framework2: Developing the Local Plan options including reasonable alternatives3: Evaluate the likely effects of the Local Plan and alternatives4: Considering way of mitigating adverse effects and maximising beneficial effects5: Propose measures to monitor the significant effects of implementing the Local Plan	
<p>Stage C: Preparing the Sustainability Appraisal Report</p>	} WE ARE HERE
<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 statement2: Monitor significant effects of implementing the Local Plan3: Respond to adverse effects	



2.2.4 The SA Report will be reviewed and updated in light of all relevant consultation representations received. The consultation responses and the SA Report will be submitted 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.

2.3 Stage A – Establishing the baseline, scope and sustainability objectives

Tasks A1-A3 – Sustainability Context and baseline

2.3.1 The Sustainability Objectives upon which this SA is based were developed as part of the SA Stage A and represent a key aspect of the Appraisal process. The scoping stage of a SA involves the collation of evidence relating to the baseline position and policy context for the Borough Plan, culminating in a series of key sustainability issues and problems that should be a focus for the SA and to establish a sustainability framework. A summary of the findings of the baseline review of relevant policies, plans and programmes is set out in Appendix B1.

2.3.2 The sustainability problems and issues relevant to the emerging Borough Plan are set out in Chapter 3 (Table 2) of the Scoping Report but are summarised in Table 2 below.

Table 2 – Sustainability Issues

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. • 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 SINCs. • 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



	<p>Warwickshire. The Borough average is significantly lower than both Warwickshire and England.</p> <ul style="list-style-type: none"> • 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 Water Framework Directive (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 Air Quality Management Area (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. • 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.



Inter-relationships

- 2.3.3 Each of the SA topics and issues listed in Table 2, whilst presented individually, have clear inter-relationships. For example, an increase in population can result in increased pressure on community facilities and infrastructure or traffic generation and thus air quality.
- 2.3.4 The main inter-relationships between each of the SA topics considered in this SA is discussed in the Scoping Report (2016) and summarised in the table of Sustainability Issues and Options at Appendix B2 of this SA Report. This enables any potential synergies to be exploited and any potential inconsistencies and incompatibilities to be identified and addressed. Where relevant these are discussed in the site or policy matrices.
- 2.3.5 No other potential inconsistencies were identified during the SA process.

Task A4 – Develop the SA Framework/Objectives

- 2.3.6 The SA Framework and associated objectives were developed on an iterative basis to reflect the sustainability problems and issues relevant to the emerging Borough Plan. The objectives were defined taking into account the national, EU and international obligations set out at Appendix A of the Scoping Report. Each time the Scoping Report was updated the SA objectives were reviewed to confirm whether they still addressed the specific sustainability issues/problems associated with the Borough.
- 2.3.7 Following a reassessment by the Council of the Borough Plan Objectives and sustainability issues at the Preferred Options stage, it was necessary to review the SA objectives developed for the purposes of the Sustainability Appraisal. Based on the outcome of this review a number of SA objectives were amended. The Borough Plan – Preferred Options Document and associated SA addressed these amendments and were the subject of formal consultation during July and August 2013. No further changes to the SA objectives were suggested following the outcome of the formal consultation at either the Borough Plan Preferred Option or Borough Plan – Submission stages.
- 2.3.8 Prior to undertaking this SA, the Sustainability Issues and associated Objectives were reviewed again, taking into account the formal comments received during the Publication Plan consultation period and the Examination Hearings. No conflicts were identified between the Main Modifications to the



Objectives of the Borough Plan and the Sustainability Objectives used in this SA. It was concluded that the objectives remain *'fit for purpose'* and thus no further changes are proposed.

2.3.9 Effects relating to air quality are specifically identified in the SA Directive and SEA Regulations for assessment as part of the SA process. The review of baseline information (Stage A) has confirmed that air quality effects in the Borough are specifically related to traffic congestion and pollution. Air Quality is, therefore, not considered in isolation in this SA but considered in respect of issues to reduce the need to travel (**SA Objective 14**) and seeking to focus development in urban areas (**SA Objective 15**).

2.3.10 The Sustainability Objectives used in this SA are set out in Table 3. Table 3 also shows how all of the topics set out in the SEA Regulations, except inter-relationships, are linked to the SA objectives. Inter-relationships are discussed at paragraphs 2.3.3. to 2.3.5 above.

Table 3 – Sustainability Objectives (SO)

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 Flora
10	Improve health and reduce health inequalities by encouraging and enabling healthy active lifestyles and protecting	Population Human Health

	health, as well as providing equitable access to health services	
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

2.3.11 In order to assess the sites and proposals against each of the SA objectives in a consistent manner, a number of appraisal questions and associated indicators have been developed. These are set out at in Table 4 below.



Table 4 – SA Questions and Indicators

SA Objective	Appraisal Questions	Indicators
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?	GDP per head
	Will it help diversify the economy?	GDP per worker % of working age people in employment
	Will it enhance the vitality of urban centres?	Proportion of unemployed people claiming benefits who have been unemployed for more than one year
	Will it support small businesses?	Number and survival of business start-ups
	Will it ensure an appropriate supply of employment sites within the Borough to support sustainable economic development?	Vacant land, properties and derelict land
	Will it provide employment land near to the potential workforce?	

SA Objective	Appraisal Questions	Indicators
	<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,	Will it increase the supply of affordable housing?	Affordable dwellings completed as a % of all new housing completions
	Will it promote a range of housing types and tenure?	House price to income ratio
	Will it reduce the number of unfit/non-decent/empty homes?	



SA Objective	Appraisal Questions	Indicators
safe and pleasant environments	Will it reduce homelessness?	<p>House prices relative to national and regional averages</p> <p>Housing starts and completions (market and affordable)</p> <p>Households living in fuel poverty</p> <p>Number of rough sleepers</p> <p>Households in temporary accommodation</p> <p>Household accommodation without central heating</p> <p>% of unfit/non-decent homes</p> <p>% of empty homes</p>
Ensure easy and equitable access to services, facilities and opportunities,	Will it maintain and enhance existing facilities?	Changes in the level of accessibility to housing and key services

SA Objective	Appraisal Questions	Indicators
<p>including jobs and learning, and that people are not disadvantaged with regard to ethnicity, gender, age, disability, faith, sexuality, background or location</p>	<p>Will it put unacceptable pressure on existing services and community facilities?</p>	<p>Households finding it very or fairly difficult to get to a corner shop or supermarket, post office, doctor or hospital</p>
	<p>Will it improve access to local services and facilities?</p>	<p>% of households and businesses with access to broadband</p>
	<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>	
	<p>Will it promote the reduction of crime rates?</p>	<p>Recorded robberies; burglaries; vehicle</p>



SA Objective	Appraisal Questions	Indicators
Reduce crime, fear of crime and antisocial behaviour	Will it encourage the adoption of principles to 'design out' crime in housing and employment sites?	<p>crimes per 100,000 population</p> <p>% of residents that think people being attacked because of their skin colour, ethnic origin or religion is a very or fairly big problem in their area</p> <p>% of residents who say they feel very or fairly safe outside a) during the day; b) after dark</p>
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?	<p>Wage/income levels-gross weekly pay</p> <p>% of wards in bottom 10% of UK wards</p> <p>Working age people/children living in workless households</p> <p>Children/pensioners in relative low-income households before/after housing costs</p>

SA Objective	Appraisal Questions	Indicators
<p>Improve opportunities to participate in the diverse cultural, sport and recreational opportunities the Borough can offer</p>	<p>Will it ensure that facilities and locations for cultural activities are protected and provided?</p>	<p>% of residents that think over the past three years community activities for their area have got better or stayed the same</p>
	<p>Will it protect and create high quality or valued recreational spaces and avoid erosion of recreational function?</p>	<p>% of residents that think over the past three years for their area a) activities for teenagers; b) cultural facilities; c) facilities for young children; d) sport and leisure facilities and e) parks and open spaces have got better or stayed the same</p> <p>Number of leisure and recreation facilities</p> <p>Number of school pupil visits to museums and galleries</p> <p>Number of visits to libraries per capita</p>
<p>Encourage land use and development that creates and sustains well-designed, high</p>	<p>Will it require good urban design to create attractive, high quality environments where people will choose to live, work and invest?</p>	<p>% of residents satisfied with living in their local community</p>



SA Objective	Appraisal Questions	Indicators
<p>quality built environments, that help to create and promote local distinctiveness and sense of place</p>	<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>Retention and enhancement of townscape assets</p>
Biodiversity		
<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>Area of land designated as a local nature reserve per 1,000 population</p>



SA Objective	Appraisal Questions	Indicators
	<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>% area of land designated as sites of special scientific interest (SSSI) within the Borough in favourable condition</p> <p>Proportion of developed land that is derelict</p> <p>Farmland bird populations</p>
	<p>Will it support development that incorporates improvements to wildlife habitats?</p>	<p>Woodland bird populations</p>

SA Objective	Appraisal Questions	Indicators
	Will it increase access to woodlands, wildlife and geological sites and green spaces particularly near/ in urban areas?	Extent of ancient woodland Area of priority habitats protected and restored in the Borough Change (additions and subtractions) to: <ul style="list-style-type: none"> • priority biodiversity habitats (by type) • areas designated for their intrinsic environmental value, including sites of international, regional or subregional significance
Population and Human Health		
Improve health and reduce health inequalities by encouraging and enabling healthy active lifestyles and protecting health, as well as providing	Will it diminish inequalities in mortality, health and wellbeing across the Borough?	Infant mortality Death rates from circulatory disease; cancer; suicides
	Will provide and improve access to health and social care services?	
	Will it promote healthy lifestyles and opportunities for exercise?	

SA Objective	Appraisal Questions	Indicators
equitable access to health services	Will it promote opportunities to participate in sport?	Prevalence of cigarette smoking
	Will it protect, provide and enhance the provision of quality open space?	Life expectancy at birth Access to local green space
	Will it prevent noise and light pollution?	% of population within 500m access to woodland of no less than 2ha in size % of population within 4km access to woodland of no less than 20ha in size Parks/open spaces attaining 'Green Flag' status
Soil		
To protect and improve soil quality	Will it minimise development on Greenfield land?	Amount of derelict and contaminated land in different parts of the region
	Will it reduce the amount of derelict, degraded and underused land?	Level of high quality agricultural land

SA Objective	Appraisal Questions	Indicators
	Will it reduce the quantity of contaminated land in the Borough?	degraded/ lost to development
	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?	Household water use and peak demand
	Will it encourage water efficiency and conservation?	Average per capita water consumption in new build and existing development
	Will it minimise adverse effects in ground and surface water quality?	
	Will it protect and enhance the quality of watercourses?	% of watercourses in 'good' or 'fair' biological and chemical quality
Ensure that new developments minimise water pollution levels and avoid areas which are at risk from	Will it avoid developments in areas being at risk from fluvial, sewer or groundwater flooding?	Number of properties located in Flood Risk Zone 2 or 3

SA Objective	Appraisal Questions	Indicators
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?	SO ₂ , NO ₂ , PM ₁₀ levels Number of AQMAs Distance travelled to work and mode of travel
	Will it reduce traffic congestion and improve road safety?	% of average trunk road speed achieved at a.m. peak
	Will it reduce the movement of goods by road/lorry?	Tonnes of freight transported by rail and road per annum No. of days when air pollution reported as moderate or higher
Ensure development is primarily focused in urban areas, and makes efficient use	Will it focus development in the major urban areas?	Walking and cycling as a % of all trips

SA Objective	Appraisal Questions	Indicators
<p>of existing physical infrastructure and reduces need to travel, especially by private car</p>	<p>Will it promote compact, mixed-use developments with good accessibility to local facilities and service that reduce the need to travel?</p>	<p>Public transport as a % of all trips</p> <p>Children who walk or cycle to school</p>
	<p>Will it reduce the number and length of journeys made by car?</p>	<p>% of resident population that travels to work a) by private motor vehicle; b) by public transport; c) on foot or by cycle</p>
	<p>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?</p>	<p>Number/length of car journeys</p> <p>Public transport usage</p> <p>Walking and cycling trips per person</p>
Climatic Factors		
<p>Reduce overall energy use through increased energy efficiency</p>	<p>Will it reduce or minimise greenhouse gas emissions?</p>	<p>% of energy generated from renewables</p>
	<p>Will it increase the proportion of energy generated from renewable and low carbon sources, including by micro-generation, CHP, district heating and transportation?</p>	<p>Energy use per household</p>

SA Objective	Appraisal Questions	Indicators
Minimise the Borough's contribution to the causes of climate change by reducing emissions of greenhouse gases from transport, domestic, commercial and industrial sources	<p>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?</p> <p>Will it promote the adoption of climate change adaptation and climate proofing principles in planning and design?</p>	Carbon dioxide emissions by sector and per capita
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)?	Total waste arisings Amount of waste being generated, recycled, recovered, going to landfill Household waste recycling rates
	Will it increase recycling and composting rates and encourage easily accessible recycling systems?	
	Will it promote re-use of resources?	
To ensure the prudent use of resources including the optimum use of	Will it encourage land use and development that optimises the use of previously developed land and buildings?	% of new housing developed on previously developed land

SA Objective	Appraisal Questions	Indicators
<p>previously developed land, buildings and the efficient use of land</p>	<p>Will it focus retail and office development in town centres?</p>	<p>% of resident population travelling over 20km to work</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>Loss of greenfield and/or greenbelt land</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>Levels of minerals and aggregate use replaced by recycled or substitute materials</p> <p>Construction and demolition waste going to landfill</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>Number of listed buildings (Grade I and II*) at risk</p>

SA Objective	Appraisal Questions	Indicators
	Will it improve access to buildings of historical/cultural value?	Number of registered Parks and Gardens at risk
Landscape		
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?	% of Character Areas showing no change or showing change consistent with existing character area descriptions
	Will it protect and enhance the character and settings of the towns and village?	Number of Village or Local Area Design Statements that have been adopted as planning guidance

Tasks A5 – Consultation of the Scope of the SA - Scoping Report

2.3.12 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. The Scoping Report presents data on each of the following matters:

- Policy context (review of relevant national, EU and international plans, policies, programmes and objectives);
- Baseline data review including sources of data, data gaps and trends; and
- Identification of sustainability issues and problems.

2.3.13 The above matters are discussed in details in Section 3 of this report.



2.3.14 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).

2.4 Stage B – Developing and Refining options and assessing effects

2.4.1 A Sustainability Appraisal (SA) should meet all of the requirements of the Strategic Environmental Assessment (SEA) Directive and the [Environmental Assessment of Plans and Programmes Regulations 2004](#). 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”.

2.4.2 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 Regulations imply that alternatives that are not reasonable do not need to be subject of 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.

2.4.3 An independent SA has been undertaken at each stage in the preparation of the Borough Plan. This has included a detailed assessment of a variety of alternative site and policy options identified by the Borough Council to meet the objectively assessed needs of the Borough against the SA objectives of the Borough Plan.

2.4.4 The SA findings are not the only factors taken into account when determining preferred options or site allocations to be taken forward in a plan. Indeed, there will often be an equal number of positive and negative effects identified for each option such that it is not possible to 'rank' them based on sustainability performance in order to select a preferred option. Factors such as consultation responses, deliverability and conformity with national policy will also be taken into account by plan-



makers when selecting preferred options for their plan. The preferred options considered in the SA are discussed in Section 4.

2.5 Defining 'Significant effects'

2.5.1 An important factor to be identified as part of the scoping exercise of the environmental report prepared under the 2004 Regulations is the definition of 'likely significant effects'. The 2004 Regulations (Schedule 1) specify the criteria that should be taken into account when determining likely significant effects. These criteria, which principally relate to the characteristics of the effects arising from the plan and the value and vulnerability of the area likely to be affected, are summarised as follows:

- How valuable and vulnerable is the area that is being impacted?
- What is the duration and how probable, frequent, long lasting and reversible are the effects?
- What is the magnitude and spatial scale of the effect?
- What is the cumulative nature of the effects?

2.5.2 Further detail on the nature of the significant environmental issues and the duration of effects to be assessed in the Environmental Report is provided at Schedule 2 of the 2004 Regulations which states that the likely significant effects on the environment include:

"issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscapes and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects".

2.5.3 Whether an effect is significant or not is the product of two factors:

- The value of the environmental resource affected; and
- The magnitude of the impact.



- 2.5.4 A significant effect arises as a result of a minor impact on a resource of national value or a major impact on a resource of local value. In addition, the accumulation of many non-significant effects on similar local resources geographically spread throughout the scheme may give rise to an overall significant effect.
- 2.5.5 This approach to assessing and assigning significance to an environmental effect relies upon such factors as legislative requirements, guidelines, standards and codes of practice, consideration of the SA/SEA Regulations, the advice and views of statutory consultees and other interested parties and expert judgement. Based on the above, the following questions are relevant in evaluating the significance of potential environmental effects:
- Is the effect positive or negative?
 - Which risk groups are affected and in what way?
 - Is the effect reversible or irreversible?
 - Does the effect occur over the short, medium or long term?
 - Is the effect continuous or temporary?
 - Does it increase or decrease with time?
 - Is it of local, regional, national or international importance?
 - Are national standards or environmental objectives threatened?
 - Are mitigating measures available and is it reasonable to require these?
- 2.5.6 Each policy/proposal was assessed (guided by the above questions) to identify the potential impact on the SA objectives. A combination of expert judgment, analysis of baseline data (contained in the Scoping Report 2016) and the definitions set out below were used to judge the potential significance of the specified effect on the plan's objectives.

2.6 Definitions

2.6.1 The following definitions are used in this Environmental Report:

Duration of Effects

2.6.2 The duration of environmental effects in this SA are defined as follows:

- Short-term Less than two years
- Medium-term Two to five years



- Long-term Five to twenty years

Nature of Effects

2.6.3 In assessing significance account will be taken as to whether effects are:

Effect	Description
Positive effects	Effects that have a beneficial influence on the environment;
Negative effects	Effects that have an adverse influence on the environment;
Direct effects	Effects that are caused by activities which are an integral part of the plan proposal/policy;
Indirect/secondary effects	Effects that are due to activities that are not part of the specific plan proposal/policy,
Permanent effects	Effects will have a unchanging impact on the plan proposal/policy;
Temporary effects	Effects that are a consequence of a limited effect of the plan proposal/policy;
Combined/interactive/synergistic effects	Combined effects or interactive effects are the result of impact interactions between the plan proposals/policies. Assessment of the individual proposal/policy effects may be insignificant but



	Combined the effects can have an overall significant impact,
Cumulative effects	Cumulative effects are the result of the interaction between effects associated with the plans proposals/policies.

2.6.4 The list of effects considered in this SA include the consideration of a 'direct' effect. This is not specifically listed in the SA Directive or SEA Regulations but is considered to provide an important 'counter balance' to any secondary/indirect effects. The definition of effects were set out in the Scoping Report and consulted upon at each subsequent change of the Borough Plan. No consultation responses were received in respect of the definitions for each effect.

2.7 Assessing effects

2.7.1 SA is an extremely powerful tool in the development and refinement of development plan document options. The assessment provides a means by which the relative merits of the individual options can be assessed. The appraisal process seeks to ascertain the environmental, social and economic effects of each option as well as the identification of mitigation or enhancement to be included in the Borough Plan. This assessment process is done in the context of the level of information that is currently available for each policy or site and so represents a desk based assessment. However, recommendations put forward at each stage have helped to refine and enhance the sustainability performance of the options.



- 2.7.2 This stage offers the opportunity to review the Main Modifications to the Borough Plan Publication Plan in the context of the findings of the previous Sustainability Appraisals. This iterative approach is invaluable in allowing the SA to inform the Inspector’s final report on the Publication Plan.
- 2.7.3 Each of the proposed Main Modifications to the Policies and subject Sites set out in the Borough Plan were tested against the sustainability objectives developed for the purposes of the Sustainability Appraisal. As set out at paragraph 2.3.5 above, the SA objectives were reviewed prior to undertaking this assessment and found to be ‘fit for purpose’. The SA Objectives, appraisal questions and indicators are presented at Table 4.
- 2.7.4 The assessment considers the effects of the preferred policy or site on the environment. The performance of each site allocation or policy was scored using the following seven-point scale:

Score	Description
++	Option likely to result in a significant positive effect
+	Option likely to result in a positive effect
0	Neutral (neither positive or negative significant effect)
?	The impact between the option and SA objective is uncertain
/	No relationship
-	Option likely to result in a negative effect
--	Option likely to result in a significant negative effect

- 2.7.5 The appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option or policy on the SA objective in question is considered to be of such magnitude that it will have a



noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. However, scores are relative to the scale of proposals under consideration.

- 2.7.6 The full appraisal results are set out in the matrix presented at Appendix F for each policy and allocation. Each matrix contains a summary of the overall environmental effects. A summary of the appraisal results is presented at Section 5.

Assumptions

- 2.7.7 The scoring was based on available information in respect of each site allocation or policy and has been based on the SA team's judgement. In order to ensure consistency in the appraisal of the preferred and alternative options a set of appraisal questions (see Table 3) were developed to enable the SA team to consider each effect within clear parameters. Where mitigation measures have been proposed within the appraisal table, the long term effects have been scored on the basis that the mitigation measures have been applied.
- 2.7.8 Further details on the assumptions used in this SA are set out at Section 5.2 of this report.

Difficulties Encountered

- 2.7.9 It is a requirement of the SEA Regulations that consideration is given to any data limitations or other difficulties that are encountered during the SA process. During the appraisal of the policy options the fact that options had not yet been worked up in detail (comprising only suggested policy approaches) meant that at times it was difficult to assess in detail the likely effects of the options on each SA objective. Once the draft policies had been worked up in more detail it was possible to draw more certain conclusions about their likely effects.
- 2.7.10 There was a need to ensure that a large number of site options could be appraised consistently. This was achieved by the use of assumptions described above and at Section 5.2 of this report.



2.7.11 Each of the individual site matrices include, to a greater or lesser degree, specific mitigation. For the purpose of the SA it is assumed that the proposed mitigation is delivered and the SA objective is 'scored' accordingly. To ensure consistency we have assumed that an SA score may only be increased by one place on the scoring matrix i.e. a negative effect is changed to a neutral effect as a result of mitigation.

2.8 Stage C – Prepare SA Report

2.8.1 This document is the SA report referenced at Stage C. The report outlines the significant effects on the environment, social and economic factors of the Borough Plan Publication Plan incorporating the Main Modification.

2.8.2 The SEA Directive sets out at Article 5 and Annex I the information required to form part of the environmental report. This information is repeated as Schedule 2 of the 2004 Regulations. Table 5 below identifies how the requirements set out in Schedule 2 of the SEA Regulations have been met in this SA report.

Table 5 – Correlation between the requirements of SEA Regulations and the SA report

SEA Regulation Requirements	Section of SA report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I):	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2, 3 & Appendix A1
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Section 2, 3 & Appendix A2



c) The environmental characteristics of areas likely to be significantly affected;	Section 2 & Appendix A2
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Section 2 & Appendix A2
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation	Section 2 & Appendix A1
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long term permanent and temporary, positive and negative effects)	Section 4 & 5 Appendices D & E
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 6 & Appendix G
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Section 4 & Appendix E
i) a description of measures envisaged concerning monitoring in accordance with Art. 10;	Section 7 & Appendix H
j) a non-technical summary of the information provided under the above headings	A separate non-technical summary document has been prepared.



<p>The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2)</p>	
<p>Consultation: authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Art. 5.4)</p>	<p>Section 2.3 and Appendix C</p>
<p>authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)</p>	<p>Section 2.3 and Appendix C</p>
<p>other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7).</p>	<p>N/A</p>
<p>Taking the environmental report and the results of the consultations into account in decision-making (Art. 8)</p>	
<p>Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted under Art.7 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> • the plan or programme as adopted • a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and • the measures decided concerning monitoring (Art. 9) 	<p>To be addressed after the Borough Plan is adopted.</p>
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10)</p>	<p>To be addressed after the Borough Plan is adopted.</p> <p>Appendix H</p>
<p>Quality assurance: Environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12).</p>	<p>This report has been produced in line with current guidance and good practice for SEA/SA.</p>



2.9 Stage D – Consultation on SA Report

2.9.1 The SA report will be published for comment alongside the Borough Plan Publication Plan incorporating Main Modifications. The consultation period will comprise a period of 8 weeks and will be undertaken in accordance with the Council’s Statement of Community Involvement.

2.10 Stage E – Post adoption Reporting and Monitoring

2.10.1 The SEA Regulations require the significant environmental effects to plans and programmes to be monitored in order to identify at an early stage unforeseen adverse effects.

2.10.2 The Borough Plan sets out a monitoring programme to identify if the policies and site allocations meet the overall Plan Objectives and Vision. This programme will allow the Council to monitor the success of individual policies and also monitor the baseline environmental, social and economic conditions of the Plan area. The results of the monitoring programme will be presented in the Annual Monitoring Report.

2.10.3 The final SA monitoring programme will be included in the SA adoption Statement (once the Borough Plan is adopted) and this will reflect any changes proposed by the Inspector during the Examination Stage.



3.0 Sustainability Assessment – SA Framework and Objectives (Stage A)

3.1 Nuneaton and Bedworth Borough Plan

3.1.1 The Borough Plan is the new form of spatial development plan introduced by the Government under the Planning and Compulsory Purchase Act 2004 (hereafter referred to as the 2004 Act) as amended by the Town and Country Planning (Local Planning) (England) Regulations 2012 (hereafter referred to as the 2012 Regulations). The Act requires each Local Planning Authority (LPA) to prepare a Local Plan for its administrative area. Local Plans set out the spatial framework which largely determine where, how and what development takes place. The Borough Plan consists of a suite of Development Plan Documents (DPDs) which will guide all development.

3.1.2 The Nuneaton and Bedworth Borough Plan will consist of the following DPDs:

- **Statement of Community Involvement (SCI)** - This document was adopted in September 2015, sets out how and when the Council intends to engage with stakeholders, statutory consultees and the public during the Local Plan preparation process.
- **Borough Plan (BP)** - The Borough Plan will be the first document to be prepared. All other documents and Supplementary Planning Documents (SPD) need to be in general conformity with the Borough Plan. The Borough Plan will set out the spatial vision, strategic objectives and policies, delivery strategy and preferred development options for the Borough.
- **Supplementary Planning Documents (SPD)** – A number of supplementary planning documents are proposed to support the delivery of the Borough Plan policies.
- **Borough Plan Proposals Map** - The Proposals Map will illustrate the adopted land use policies and proposals set out in the DPDs, all land allocations and areas of protection. For example strategic housing and employment allocations, the Green Belt and environmental designations such as Sites of Special Scientific Interest (SSSIs) and Local Nature Reserves (LNRs).



- **Authority Monitoring Report (AMR)** - Every LPA is required under the Act to publish an AMR at least annually. The AMR will assess the Council's progress in preparing its LDDs and in implementing its policies.
- **Infrastructure Delivery Plan (IDP)** - The IDP defines what infrastructure is required to support development and outlines who provides it. It identifies the current baseline of provision, any existing issues, standards and shortfalls along with what changes and schemes are currently planned. It will draw upon current investment plans and influence future investment plans of the local authority and other infrastructure providers. It will help to co-ordinate public and private investment and provide clarity on the amount of total investment in the Borough that is required for infrastructure within the timeframe of the Borough Plan.

3.2 Previous SA Work

3.2.1 A substantial amount of work has already been undertaken on the Nuneaton and Bedworth Borough Plan and consequently, the Council has prepared the following SA documents which are available on the Borough Council's web-site:

- Draft SA Scoping Report¹ and submitted for consultation in September 2005;
- Bedworth Town Centre AAP Issues and Options SA Report²;
- Nuneaton Town Centre AAP Issues and Options SA Report³; and
- Affordable Housing SPD SA Report, 2007.
- Core Strategy Issues and Options SA Report, 2009;
- Borough Plan SA Scoping Report - Updated September 2012, April 2014 & September 2016;
- Borough Plan - Preferred Options SA Report 2013;
- Borough Plan – Interim SA Report – 2014;
- Borough Plan – SA Report – 2015;

¹ Sustainability Appraisal Scoping Report, September 2005, N&BBC

² Bedworth Town Centre AAP Issues and Options SA Report, June 2007, N&BBC

³ Nuneaton Town Centre AAP Issues and Options SA Report, June 2007, N&BBC



- Borough Plan Publication Plan – SA Report – January 2017; and
- Borough Plan Publication Plan – Non-Strategic Residential Sites – SA Report – January 2018.

3.2.2 This SA report has drawn upon the findings of these early SA reports where appropriate.

Sustainability Context – Plans, Policies and Programmes (Task A1)

3.2.3 The Borough Plan is not prepared in isolation but is greatly influenced by other plans, policies and programmes and by broader sustainability objectives. The adopted plan needs to be consistent with international and national guidance together with relevant environmental protection legislation.

3.2.4 Appendix A of the Borough Plan SA Scoping Report (2016) sets out a comprehensive list of the policy documents that are relevant to the preparation of the Borough Plan together with a summary of the relevance of each document to the Borough Plan and, more specifically, this SA. This list has been revised and update since it was originally presented in the SA Scoping Report (2009) to ensure that the review remains up to date and reflects the scope of the full Borough Plan. All these documents have been taken into account in the development of the SA objectives and the overall appraisal process. The comprehensive list of the plans, policies and programmes is presented at Appendix B1 together with confirmation as to the relevant sustainability objectives.

Key International plans, policies and programmes

3.2.5 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the “SEA Directive”) and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the “Habitats Directive”) are particularly significant as they require Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) to be undertaken in relation to the Borough Plan.

3.2.6 These processes have been undertaken in an iterative and integrated manner in tandem with the production of the plan in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and can be mitigated. This matter is discussed further at Section 3.5 of this report.



3.2.7 There are a wide range of other EU Directives relating to issues such as water quality, waste and air quality, most of which have been transposed into UK law through national-level policy; however a complete list of the relevant international directives have been included in Appendix B1.

Key National plans, policies and programmes

3.2.8 Sustainable development is a cornerstone of Government policy in relation to planning and the use of land. The Government's approach to sustainable development is set out in the national strategy "Securing the Future". The Strategy, published in March 2005 focuses on five principles; Living within Environmental Limits, Ensuring a Strong, Healthy and Just Society, Achieving a Sustainable Economy, Promoting Good Governance and Using Sound Science Responsibly. The Strategy identifies four key priority areas: Sustainable Consumption and Production, Climate Change and Energy, Natural Resource Protection and Environmental Enhancement, and Sustainable Communities.

3.2.9 The Government's general statements of planning policy are set out in the National Planning Policy Framework (NPPF) which establishes the policies and principles which should be taken into account in the preparation of development plans and consideration of individual proposals.

3.2.10 The NPPF highlights the economic, social and environmental roles of the planning system and planning's contribution towards a strong, responsive and competitive economy; strong, vibrant and healthy communities; and the protection of the natural, built and historic environment. These objectives are seen as mutually dependent and should be pursued in an integrated way.

3.2.11 The NPPF introduces a presumption in favour of 'sustainable development' which is defined as "*a golden thread running through both plan making and decision taking*".

3.2.12 Paragraph 17 identifies 12 core land use planning principles that should underpin both plan-making and decision taking. They include the requirement for planning to:

- Be a creative exercise in finding ways to enhance and improve the places in which people live their lives;
- Always seek to secure high quality design and a good standard of amenity;
- Promote the vitality of our main urban areas;
- Contribute to conserving and enhancing the natural environment and reducing pollution;



- Encourage the effective use of land by reusing land that has been previously developed, provided that it is not of high environmental value;
- Promote mixed use developments, and encourage multiple benefits from the use of land;
- Conserve heritage assets in a manner appropriate to their significance; and
- Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.

3.2.13 Section 10 of the NPPF emphasises that sustainable development involves securing a radical reduction in greenhouse gas emissions; minimising vulnerability and providing resilience to the impacts of climate change' and supporting the delivery of renewable and low carbon economy and associated infrastructure. The NPPF contains a sequential approach designed to direct new development towards areas with the lowest probability of flooding.

Conserving and Enhancing the Natural Environment

3.2.14 Section 10 of the NPPF states that the planning system should contribute to and enhance the natural and local environment by, amongst other things:

- minimising impacts on biodiversity and providing net gains in biodiversity where possible; and
- preventing both new and existing development from contributing to or being put at risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.

Conserving and Enhancing the Historic Environment

3.2.15 Section 12 of the NPPF aims to conserve and enhance the historic environment and both designated and undesignated heritage assets and the general principle is that heritage assets should be conserved in a manner appropriate to their significance.

3.2.16 The NPPF states at paragraph 151 that "*Local plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in the Framework, including the presumption of sustainable development*". In this regard, Local planning Authorities are advised to "*seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net*



gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate”.

3.2.17 Paragraph 165 of the NPPF specifically references the approach to the Sustainability Appraisal. Paragraph 165 states *“A Sustainability Appraisal which meets the requirement of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors”.*

3.2.18 The NPPF goes on to confirm at paragraph 166 that *“where possible, assessments should share the same evidence base and be conducted over similar timescales but local authorities should take care to ensure that the purposes and statutory requirements of difference assessment processes are respected”.* Paragraph 167 confirms that *“assessments should be proportionate and should not repeat policy assessment that has already been undertaken. The process should be started early in the plan making process and key stakeholders should be consulted in identifying the issues that the assessment must cover”.*

Local Plans, policies and programmes

3.2.19 At the sub-regional and local levels there are a wide range of plans and programmes that are specific to Warwickshire and Nuneaton and Bedworth Borough, and which provide further context for the emerging Borough Plan. These plans and programmes relate to issues such as air quality, housing, employment land, transport, renewable energy and green infrastructure and have also been reviewed at Appendix B1.

Summary

3.2.20 Based on the review of the relevant policies, plans and programmes the key sustainability issues and problems for the Borough were identified. These are set out in full in Appendix B2 but are summarised below:

- Reduce greenhouse gas emissions and improve air quality;



- Encourage use of renewable and sustainable sources of energy;
- Increase accessibility to key services such as health, education and sustainable transport;
- Enhance, maintain, and protect natural habitats and sensitive landscapes;
- Enhance, maintain, and protect biodiversity;
- Enhance, maintain, and protect important historical and geological sites
- Increase the health and wellbeing of resident;
- Ensure stakeholder engagement throughout the plan process;
- Be able to meet the housing needs of the whole community by providing a mix of homes and the services to support them;
- Encourage sustainable economic growth with proactive and positive strategies;
- Ensure a high and stable level of economic growth and diversity;
- Ensure new homes are of high quality and are built to a good environmental standard;
- Ensure effective management of water resources;
- Increase accessibility to green spaces and open spaces;
- Encourage the remediation of contaminated land, and seek to protect controlled water and related abstractions; and
- Ensure development is sustainable and resilient to flood risk from different sources

3.2.21 The SEA Regulations require the SA report to consider the inter-relationships between the sustainability issues and problems identified and likely evolution of the relevant aspects of the current state of the environment without the Borough Plan being implemented. Appendix B2 of this report describes the interrelationships between the key issues and the likely evolution of each of the key sustainability issues if the Borough Plan was not adopted.



3.3 Baseline information (Task A2)

3.3.1 The Sustainability baseline for Nuneaton and Bedworth Borough used for the purposes of this Assessment is set out at Appendix B of the Scoping Report (September 2016) and is not repeated in this report. This sets out 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.

3.4 Relationship between the SA and HRA

3.4.1 In accordance with Article 6(3) of the EU Habitats Directive an assessment is required where a plan or project not directly connected to or necessary to the management of a European protected site for nature conservation (i.e. designated and proposed/candidate SPA's and SAC's sites) may give rise to significant effects upon a the designated site. The Habitats Directive is primarily transposed in England under the Conservation of Habitats and Species Regulations 2010.

3.4.2 Nuneaton and Bedworth Borough has one designated European site within its boundary, namely Ensor Pool SAC, designated due to the presence of white-clawed crayfish. The Site is situated approximately 2.5km to the south west of Nuneaton. WYG has been commissioned by Nuneaton and Bedworth Borough Council to prepare a Habitats Regulations Assessment of the Borough Plan to consider whether the plan is likely to have significant effects on European habitats or species. A HRA of the Borough Plan Publication Draft is presented as a separate 'standalone' document.

3.4.3 PPG states at paragraph 11-011 that "*the sustainability appraisal should take account of the findings of a Habitats Regulations Assessment, if one is undertaken*". The conclusion of the standalone HRA have been reviewed in the production of this SA Report.

3.4.4 In recent years, the population of white-clawed crayfish has been diminishing from the Ensor Pool SAC and has now completely disappeared. Natural England has undertaken a programme to reintroduce the species but this has proved unsuccessful. In consultation with the Environment Agency, Natural England have confirmed that the ecological importance for this Site no longer exists and the Site can be put forward for de-classification. On this basis, Natural England will not object to development in close proximity of the SAC.



4.0 Developing and assessing options and reasonable alternatives (Stage B)

4.1 Introduction

4.1.1 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”.

4.1.2 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 Regulations imply that alternatives that are not reasonable do not need to be subject of 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.

4.1.3 An independent SA by WYG (Alliance Planning) has been undertaken at each stage in the preparation of the Borough Plan. The SA has reviewed all the reasonable options considered during the evolution of the Borough Plan and assessed the significant effects on the environment. This included a detailed assessment of a variety of alternative sites and policy options against the SA objectives of the Borough Plan. These options, taken together, are considered to meet the requirement for ‘reasonable’ alternatives in the 2004 Regulations.

4.1.4 A summary of the findings of the various SA reports and why the preferred approach has been selected is set out below. This accords with Task B2 of the SEA five stage process. 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.

Amount and distribution of growth

- 4.1.5 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 the 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.
- 4.1.6 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 option by the Borough Council and this potential option was not considered further.
- 4.1.7 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 and was considered in the SA (2012) report. The SA (2012) report considered baseline (no growth), 0.5%, 1%, 1.5% and 2% growth rates.
- 4.1.8 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 throughout the process to meeting or exceeding the objectively assessed need. This option is currently the preferred option for the Borough Plan and the Borough Council identified strategic sites and policies accordingly. This is described in detail below. A summary of the changes to Borough Council's preferred option during the various stages of the Borough Plan are set out below.

Issues and Option Stage

- 4.1.9 At the time that work commenced, the Development Plan included the West Midlands Regional Spatial Strategy (RSS) which set housing and employment land targets for Nuneaton and Bedworth Borough Council. This included for an element of growth 'overspill' from the Coventry urban area. The RSS was the subject of an independent Sustainability Appraisal.



4.1.10 The Issues and Options - Borough Plan (2009) set out how the Council proposed to meet the RSS growth targets for the Plan period as defined by the RSS, namely:

- At least 10,800 dwellings between 2006 and 2026;
- 65,000 sq.m of retail and office space in Nuneaton;
- 96 hectares of employment land; and
- 27-29 new gypsy and travel pitches up to 2017.

4.1.11 The growth levels set out above represented the baseline position for the emerging Borough Plan. For the Council to not seek to meet this level of growth would represent 'non-compliance' with the Development Plan and Government Guidance. This is considered an unreasonable option.

4.1.12 The SA Report (2009) considered the effects of meeting this level of growth in the Borough against each of the SA objectives. The report concluded "*The Nuneaton and Bedworth Core Strategy represents a significant opportunity to ensure that the delivery of the planned housing and employment growth is genuinely sustainable*".

Preferred Option Stage

4.1.13 In 2010, the incoming Coalition Government commenced the process of revoking all RSS's and provided Local Authorities with the opportunity to determine their own growth rates. The Council commissioned a number of evidence base studies, including the Strategic Housing Land Availability Assessment (SHLAA) and the Employment Land Study to identify the potential of the Borough's urban areas to accommodate development. These studies considered the amount of land that will need to be released from the countryside and, potentially, Green Belt, to meet the Council's development targets.

4.1.14 In tandem with these studies the Council chose to consider a range of growth targets for the Local Plan as a whole in order to identify a 'sustainable' level of growth for the Borough during the Plan Period. The SA report (February 2012) considered the key effects associated with each of the alternative growth scenarios, namely, baseline (no growth), 0.5%, 1%, 1.5% and 2% rates. The baseline scenario represents the 'do nothing' option and the 2% growth rate represented a high growth option. Both of these options were discounted by the Council as unreasonable alternatives.



4.1.15 Each of the growth scenarios were the subject of a separate assessment matrix presented at Appendix D of the SA Report (2012) and summarised in Table 6 below:

Growth Target	Conclusions
Baseline	<p>The baseline option will result in the creation of 2,200 additional jobs, 6,500 homes and will encourage investment in the Borough but will result in continued levels of out migration levels from in the Borough by 2028.</p> <p>The Sustainability Assessment concludes that the baseline option is generally considered to have a neutral effect on the local economy and a positive effect on social factors. The overall impact on the environment is either negative or uncertain as the precise location of the proposed development is not being assessed.</p> <p>The baseline option does not identified suitable sites for major development per se and thus should be accompanied by strategic policies supporting the protection and enhancement of water resources, landscape quality, urban design, cultural heritage, waste/recycling and energy. If such policies are incorporated there will be a neutral effect on these sustainability objectives.</p> <p>In addition, by incorporating policies/proposals that locate major development at sustainable locations and facilitating the use of sustainable modes of transport the baseline level will have positive impacts on air quality.</p>
0.5%	<p>This growth option will result in the creation of 3,800 additional jobs, 6,600 homes and will encourage investment in the Borough but will result in out migration levels increasing by 1,000 in the Borough by 2028.</p> <p>The Sustainability Assessment concludes that the 0.5% growth option is generally considered to have a neutral effect on the local economy and a positive effect on social factors. The overall impact on the environment is either negative or uncertain as the precise location of the proposed development is not being assessed.</p> <p>The growth target does not identify suitable sites for major development per se and thus should be accompanied by strategic policies supporting the protection and enhancement of water resources, landscape quality, urban design, cultural heritage, waste/recycling and energy. If such policies are incorporated there will be a neutral effect on these sustainability objectives.</p> <p>In addition, by incorporating policies/proposals that locate major development at sustainable locations and facilitating the use of sustainable modes of transport the growth option will have positive impacts on air quality.</p>
1%	<p>This growth option will result in the creation of 7,700 additional jobs and 7200 new homes which will encourage investment in the Borough and will reduce out migration levels by 800 in the Borough by 2028.</p>



	<p>The Sustainability Assessment concludes that the 1% growth option is generally considered to have a positive effect on the local economy and a resulting neutral/positive effect on social factors including reducing poverty and the provision of essential services and well-being. In terms of sports facilities, if the growth option is accompanied by policies to protect and enhance existing sports provision then a positive effect will be recorded.</p> <p>The overall impact on the environment is either negative or uncertain as the precise location of the proposed development is not being assessed. The growth target does not identify suitable sites for major development per se and thus should be accompanied by strategic policies supporting the protection and enhancement of water resources, landscape quality, urban design, cultural heritage, waste/recycling and energy. If such policies are incorporated there will be a neutral effect on these sustainability objectives.</p> <p>In addition, by incorporating policies/proposals which direct major development at sustainable locations this growth option is considered to facilitate sustainable travel and will promote a modal split in modes of transport. This will also result in a positive impact on air quality.</p> <p>The Sustainability Assessment concludes that the 1% growth option is generally considered to have a positive effect on the local economy and social factors and neutral effect on the Environment.</p>
1.5%	<p>This growth option will result in the creation of 12,000 additional jobs and 7900 new homes which will encourage investment in the Borough and will reduce out migration levels by 2500 in the Borough by 2028.</p> <p>The Sustainability Assessment concludes that the 1.5% growth option is generally considered to have a significant positive effect on the local economy and a resulting neutral/positive effect on social factors including reducing poverty and the provision of essential services and well-being. In terms of sports facilities, if the growth option is accompanied by policies to protect and enhance existing sports provision then a positive effect will be recorded.</p> <p>The overall impact on the environment is either negative or uncertain as the precise location of the proposed development is not being assessed. The growth target does not identify suitable sites for major development per se and thus should be accompanied by strategic policies supporting the protection and enhancement of water resources, landscape quality, urban design, cultural heritage, waste/recycling and energy. If such policies are incorporated there will be a neutral effect on these sustainability objectives.</p> <p>In addition, by incorporating policies/proposals which direct major development at sustainable locations this growth option is considered to facilitate sustainable travel and will promote a modal split in modes of transport. This will also result in a positive impact on air quality.</p>



	<p>The Sustainability Assessment concludes that the 1.5% growth option is generally considered to have a significant positive effect on the local economy and social factors and neutral effect on the Environment.</p>
2.0%	<p>This growth option will result in the creation of 16,500 additional jobs and 8600 new homes which will encourage investment in the Borough and will reduce out migration levels by 4100 in the Borough by 2028. This growth option will increase working age employment in the Borough by 5,800 and create 11,300 new jobs for residents of the Borough.</p> <p>The Sustainability Assessment concludes that the 2% growth option is generally considered to have a significant positive effect on the local economy and a resulting neutral/positive effect on social factors including reducing poverty and the provision of essential services and well-being. In terms of sports facilities, if the growth option is accompanied by policies to protect and enhance existing sports provision then a positive effect will be recorded.</p> <p>The overall impact on the environment is either negative or uncertain as the precise location of the proposed development is not being assessed. The growth target does not identify suitable sites for major development per se and thus should be accompanied by strategic policies supporting the protection and enhancement of water resources, landscape quality, urban design, cultural heritage, waste/recycling and energy. If such policies are incorporated there will be a neutral effect on these sustainability objectives. A significant effect on soil resources, biodiversity and the prudent use of resources has been noted but this can be reduced to an adverse effect by the implementation of strategic policies to protect areas of biodiversity interest and encourage the sustainable use of land.</p> <p>In addition, by incorporating policies/proposals which direct major development at sustainable locations this growth option is considered to facilitate sustainable travel and will promote a modal split in modes of transport. This will also result in a positive impact on air quality.</p> <p>The Sustainability Assessment concludes that the 2% growth option is generally considered to have a significant positive effect on the local economy and social factors and a neutral to adverse effect on the Environment.</p>

Table 6 - Growth Rates - Summary Table

- 4.1.16 The SA showed a clear relationship between the increase in growth and adverse effects on the sustainability objectives relating to the environment.
- 4.1.17 At the Cabinet meeting on the 22nd May 2013 a growth option of 1.5% was agreed by the Council as the appropriate growth rate for the Preferred Option Borough Plan. The Preferred Option Borough Plan stated at paragraph 5.15:



"that a growth rate of 1.5% is the best able to achieve the Council's objectives. It would lead to a notable growth in jobs, reduction in unemployment and addresses the current high levels of out commuting. While growth of 1% would mean out commuting stabilises, growth at 1.5% has the potential to lead to a 6% reduction in current levels. A growth rate of 1.5% would enable housing needs to be met at the same average rate that has been achieved over the last 10 years and is therefore considered deliverable. The growth is also expected to help facilitate the delivery of a narrowing of the gaps with the rest of Warwickshire. Growth of 1.5% would lead to a requirement to build on Green field sites and could have other environmental implications but it is expected that the impact can be mitigated. The 1.5% rate of growth is considered to strike an appropriate balance between housing and employment growth. It will facilitate the delivery of an ambitious Plan capable of making positive progress in delivering the Council's corporate objectives".

4.1.18 The development consequences of the agreed 1.5% growth rate, as set out in the Preferred Options Borough Plan, are:

- 75 hectares of land for employment;
- 7,900 new homes with approximately 4,550 homes located on green-field sites;
- 32 residential and 5 transit pitches for gypsies and travellers and 2 plots for travelling show people;
- 43,750 square metres of space for non-food retail mostly located in Nuneaton town centre;
- 4,050 square metres for food retail; and
- 30,000 square metres of office space in Nuneaton town.

4.1.19 The Borough Council committed to delivering this Option by directing development to existing urban areas and the allocation of new strategic sites and associated policies. Strategic Policy Directions on these matters were set out in the Preferred Options Borough Plan.



Submission Stage

- 4.1.20 In November 2013 (following the publication of the Preferred Options Borough Plan) a Strategic Housing Market Assessment (SHMA) for the Coventry and Warwickshire Housing Market Area was completed. This identified an objectively assessed need of 9,900 houses for Nuneaton and Bedworth for the period 2011-2031 and translated into an employment growth scenario of 0.7% or 52ha or 5,400 jobs.
- 4.1.21 The assessment was reviewed in September 2014 following the release of the ONS sub-national population projections which identified a housing market need for Nuneaton and Bedworth of 8,440 dwellings. The sub-region agreed that the OAN for the whole of the HMA should be that set out in the new (September 2014) JSHMA document at 4,004 homes per annum. However, as not all local authorities could meet the identified OAN it was agreed that the starting point for meeting the HMA OAN should be in line with the OAN figures set out in the November 2013 study. This approach meant that there was an additional housing requirement of around 234 dwellings per annum (or 4680 dwellings over a 20 year period) that still needed to be met within the HMA and was to be agreed through an Memorandum of Understanding.
- 4.1.22 In September 2015 a further update to the SHMA was undertaken which identified a need of 8,580 dwellings for Nuneaton and Bedworth. However factoring in economic uplift and supporting affordability the objectively assessed need for the Borough amounts to 10,040 dwellings. This was the housing growth figure taken forward by the Council in the Borough Plan Submission Version (2015). Based on a review of consultation responses to the Borough Plan - Preferred Option and changes at the macro-economy, the previous 1.5% growth rate was considered unrealistic and the employment growth rate was amended to 0.7%. These were the options considered in the SA Report 2015.

Publication Plan Stage

- 4.1.23 The Council commissioned an updated Employment Land Review in 2016 to determine the employment growth rate in line with the updated SHMA. This concluded that the total objectively assessed employment land need for the Borough during the plan period is 87.4ha.



4.1.24 The housing need figure of 10,040 set out in the Borough Plan - Publication Plan has been carried forward and reviewed by the Borough Council. The Council is planning for a 10% oversupply above the OAHN figure. This builds in flexibility to respond to potential changing circumstances over the life of the Borough Plan. It is widely accepted within the development industry that a site may not be delivered as quickly as expected or sometimes may not be delivered at all. This can be for a variety of reasons including site specific issues such as contamination, viability or because of a change in the landowner's circumstances. For this reason a buffer of 10% has been included to take into account the non-delivery of sites.

Coventry City Council – unmet housing and employment growth

4.1.25 The SHMA includes a calculation of the housing needs of Coventry City Council. The City Council has undertaken a detailed SHLAA exercise which concluded that they are unable to meet the objectively assessed need for the City within their boundary. This shortfall needs to be redistributed across all the neighbouring Warwickshire Authorities to ensure that the OAHN is met. A Memorandum of Understanding relating to the planned distribution of housing across the Coventry and Warwickshire HMA was prepared in 2015 allocating 4,020 of these additional dwellings to NBBC. This resulted in an OAHN of 14,060 during the Plan Period. The Borough Council committed to deliver as much of consumer need as possible across the plan period.

4.1.26 The Borough Council undertook an updated SHLAA process in 2016 to identify the 'deliverable' level of housing growth that can be accommodated in the Borough during the plan period. This updated assessment included a review of the sites with planning permission, potential sites within the urban area and larger strategic sites. This process confirmed that a total of 2,331 dwellings above the level required to meet the Borough Council's OAHN (with a 10% buffer) can be accommodated during the Plan Period to the Coventry 'shortfall'. This represents an 'under-supply' of 2,092 compared to the target figure for Nuneaton and Bedworth Borough set out in the Memorandum of Understanding. The Borough Plan – Publication Plan therefore planned for a total of 13,374 dwellings during the plan period; combining their own OAHN and a contribution of 2,331 dwellings towards Coventry's unmet need.

4.1.27 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 a 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. The Borough Council has signed the Memorandum of Understanding and committed to deliver the additional 4,020 dwellings across the plan period. The delivery, in full, of the OAHN figure (14,060 dwellings) is a Main Modification to the Publication Plan **(MM9)**.

4.1.28 A further Memorandum of Understanding, dated July 2016, relating to planned distribution of employment land across the Coventry and Warwickshire area required the Council to accommodate a further 26ha of additional employment land during the plan period. This will result in a total need figure of 113ha of new employment land.

4.1.29 An updated review of all existing and proposed land for employment uses in the Borough during the Examination Hearings resulted in the inclusion of 5.3 Ha of land at Prologis Park as Main Modification to the Publication Plan **(MM22)**. The Review identified a number of potential sites and provided details on the availability and deliverability of each site. Based on the findings of the Review and inclusion of 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 **(MM9)**.

Reasonable alternatives considered

4.1.30 The Borough Council has identified three alternative options for the purpose of this SA.

- to allocate sites to meet the objectively assessed need for the Borough in full and as much of Coventry's overspill as possible;
- to allocate sites to meet a lower level of objectively assessed need for the Borough; and
- to allocate sites to meet the level of objectively assessed need for the Borough and 4,020 dwellings towards Coventry's unmet need.

Based on the requirements of the NPPF for Local Planning Authorities to plan positively to meet the objectively assessed needs of their area a 'do nothing' option was discount as a legally unrealistic option.



Borough Plan Option

4.1.31 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. For the reasons set out above the OAHN growth figures have evolved during the evolution of the Borough Plan which are summarised in table 7 below for ease of reference:

Table 7: Summary of Growth targets per plan stage.

Stage of Plan	Growth Target
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;

4.1.32 The option considered in this SA Report comprises the housing and employment growth level in bold in Table 7.



Alternative options

- 4.1.33 The starting point for determining reasonable alternatives for the amount and distribution of housing and employment land growth is to ensure that Objectively Assessed Housing Need (OAHN) and employment land requirements for the Borough are met. For the Council to not plan for this level of growth would not accord with the requirements of NPPF. On this basis a lower growth option without a robust evidence base is considered unreasonable and this alternative option is not considered further.
- 4.1.34 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 396 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 6 above);
 - 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 (**MM15**) but also a new policy DS9 (**MM30**) to review the Borough Plan Development Strategy including any unmet needs by 31st March 2023.
- 4.1.35 On this basis, the Borough Councils site selection evidence base confirms that the above alternative option is unreasonable and this option is not considered further.



Strategic Site Options for Housing

- 4.1.36 As identified above the Borough Council has identified a housing requirement of 14,060 dwellings over the plan period **(MM09)**. 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 for housing in full is the preferred approach for the Publication Plan incorporating Main Modifications.
- 4.1.37 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.

Issues and Options Stage

- 4.1.38 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. The spatial development options consisted of 'general' development areas for future housing and employment sites and policy direction but all the options included development of brownfield land within the Borough's existing urban areas first (defined as Nuneaton, Bedworth and Bulkington), before being directed to the countryside, Area of Restraint and then Green Belt.
- 4.1.39 Details of the Nuneaton and Bedworth spatial development options depicted in the Core Strategy Issues and Options Paper are set out below:

Option 1: Sequential Approach

- This option adopts a sequential approach to the development of land.
- Development would be focused on the existing urban areas before being directed to the countryside, Area of Restraint and then Green Belt.
- The existing urban areas of Nuneaton, Bedworth and Bulkington would be the initial focus for new development. Development would then in the first instance be directed to the north of the Borough to the locality of St Nicolas and Weddington and to the north west of Bedworth (to the locality of Bedworth North).



- It is likely that there would be sufficient land within the urban area, countryside and Area of Restraint to meet development needs. Under this option it is unlikely that Green Belt land would be required.

Option 2: North/South Corridor

- Development would be directed along a north/south corridor through the Borough following the main arterial road of the A444 and the Nuneaton-Coventry railway line.
- Nuneaton and Bedworth would absorb some of the development within the existing urban areas. Development would then be focused on areas within easy reach of the A444.
- Development on sites outside the existing urban area would be primarily located on the southern edges of Nuneaton in Abbey and Wem Brook and Arbury and Stockingford and on the north, east and western edges of Bedworth in and adjacent to the localities of Bedworth North and Bedworth South.

Option 3: Nuneaton Focus A, B and C

A: North of Nuneaton

- This option seeks to direct development to the north of Nuneaton.
- Development that cannot be absorbed within the existing urban areas of Nuneaton, Bedworth and Bulkington would be directed to the area north of Nuneaton, primarily within the localities of Weddington and St Nicolas and on the eastern edge of Camp Hill and Galley Common.

B: East of Nuneaton

- This option would direct development to the east of Nuneaton.
- Development that cannot be absorbed within the existing urban areas of Nuneaton, Bedworth and Bulkington would be directed to the east of Nuneaton within the south east area of the localities of Weddington and St Nicolas and to Whitestone and Bulkington.

C: West of Nuneaton

- This option would direct development to the west of Nuneaton.
- Development that cannot be absorbed within the existing urban areas of Nuneaton, Bedworth and Bulkington would be directed to the west of Nuneaton within the localities of Arbury and Stockingford.



Option 4: Bedworth Focus

- This option would direct development to the east and west of Bedworth.
- Development that cannot be absorbed within the existing urban areas of Nuneaton, Bedworth and Bulkington would be directed to the edges of the built up area in Bedworth North, Bedworth South and the western edge of Whitestone and Bulkington where it joins with Bedworth South.

Option 5: Small Urban Extensions

- This option would spread development across the whole Borough.
- Development that cannot be absorbed within the existing urban areas of Nuneaton, Bedworth and Bulkington would be directed to the edges of those areas. Development would therefore be directed to all localities.

4.1.40 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.

“The appraisal of the spatial options for Nuneaton and Bedworth reveals that there is much commonality between the options in relation to their impacts on the SA objectives and each option has sustainable merits and drawbacks. Although it appears that 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. Furthermore the delivery of new development under these options is likely to deliver a critical mass of development to enable significant development contributions towards community and transport infrastructure”.

4.1.41 The future stages of the Borough Plan sought to deliver a proportion of new growth (housing and employment) within or adjacent to the existing urban areas of Nuneaton, Bedworth and Bulkington which were identified as broadly sustainable locations for growth in line with the conclusions of the 2009 SA report.

4.1.42 The Council identified a number of small scale sites within the urban areas to contribute to the housing needs of the Borough but, as acknowledged in the Issues and Options Borough Plan, were unable to accommodate all its housing growth requirement on previously developed land and thus open countryside or Green Belt land would need to be released.



Preferred Options stage

- 4.1.43 The Borough Council's preferred spatial option, identified at the issues and options stage, was carried forward into a more detailed site selection process at the Preferred Option stage. The Spatial Option was set out in Policies DEV 1-3 of the Preferred Options Borough Plan.
- 4.1.44 The evidence base prepared for the Preferred Options Borough Plan includes a background paper entitled "Strategic Housing – Site Selection". The background paper set out the approach and conclusions of a two stage sequential site search of suitable land to meet the housing needs of the Borough undertaken by the Council in 2013.
- 4.1.45 The Site selection process considered all the suitable/available sites within the Borough and identified ten Potential Development Areas (PDA 1-10 **See Plan 4.1**) 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 2013.
- 4.1.46 The potential development areas were large scale areas that focussed on strategic land areas adjacent to the Nuneaton and Bedworth urban areas.
- 4.1.47 The 2013 SA report for the Preferred Option concluded that each of the Potential Development Area's 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, which included a review of the findings of the SA.
- 4.1.48 The Borough Plan – Preferred Options sought to provide for approximately 7,900 dwellings to support economic growth between 2010 and 2028. The Preferred Options Borough Plan states "*Large scale or 'strategic' urban extensions offer the best opportunity to deliver the range of infrastructure needed to support new development. New development outside the urban areas will take place on a limited number of large sustainable urban extensions to Nuneaton and Bedworth*".
- 4.1.49 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 Options (2013) as housing land allocations to meet identified growth targets. The selection of these sites by the Borough Council was based on the



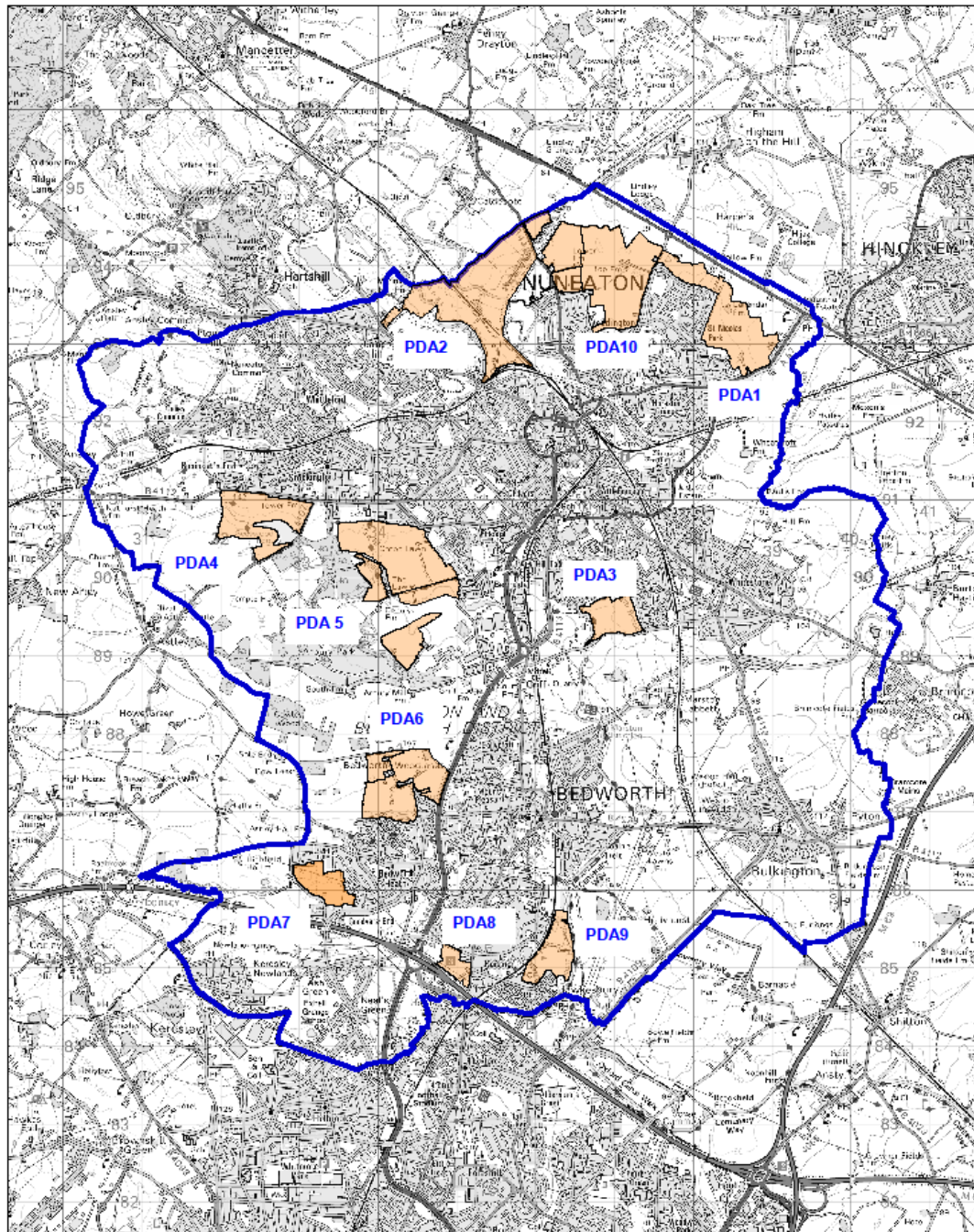
findings of the SA whilst meeting wider planning policy requirements. This is documented in the background papers entitled "Strategic Housing – Site Selection- Background Paper Stages 1 & 2 and the Stage 3 – Assessment of Options – Infrastructure Update. The Sites were renamed as SHS 1-4 and are shown on **Plan 4.2**

Woodlands (PDA 6)

- 4.1.50 It is noted that the SA Report and Site Selection Background Paper identified PDA 6 (Woodlands) as a sustainable location for development. The Site was specifically excluded at the Preferred Options stage as this land was separately being proposed as a possible extension to the Green Belt by the Council.
- 4.1.51 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.



Plan 4.1 – Potential Development Areas - 2012



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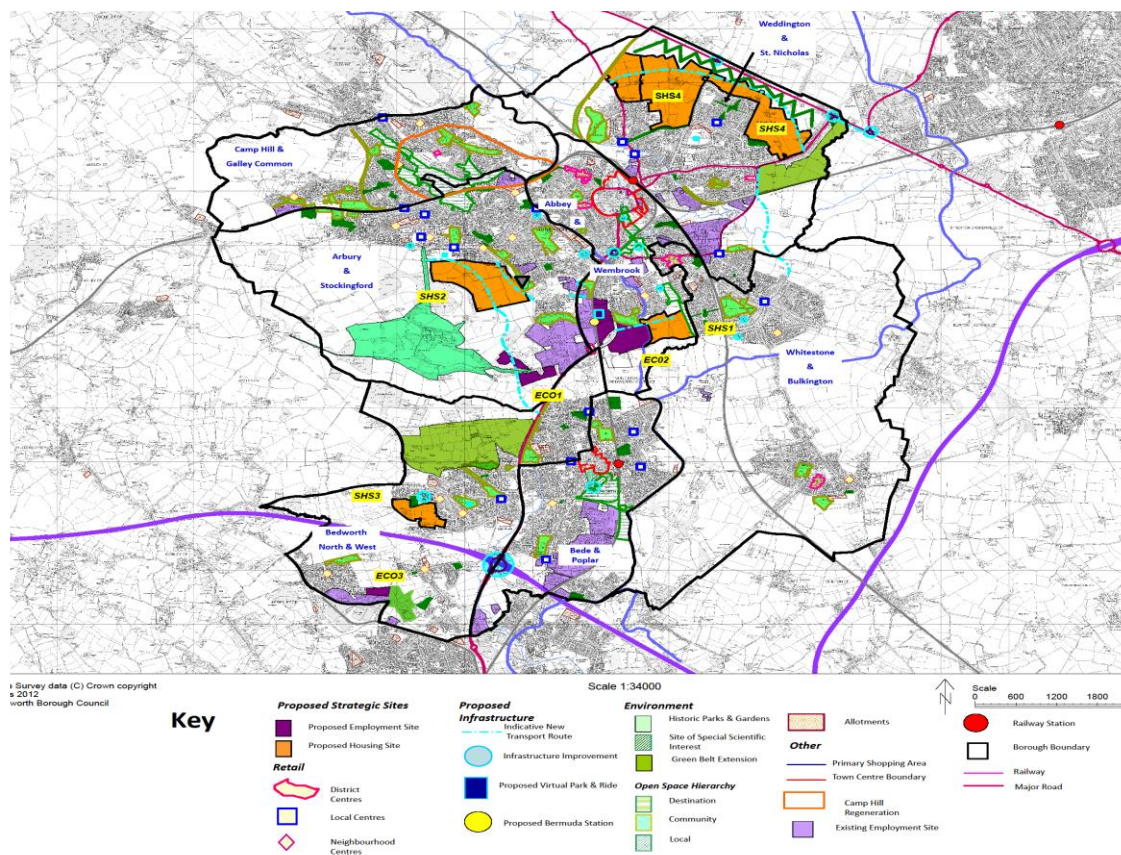
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Submission Stage

4.1.52 As set out above, changes in the scale of housing growth to be accommodated by the Borough and the end date for the Borough Plan were identified following the publication of the Borough Preferred Plan Options. This resulted in the Borough Plan seeking to accommodate 10,400 dwellings during the Plan Period which was extended until 2031. On this basis, the Council concluded that additional housing sites would be required to be identified to meet the housing growth for the Borough. A 'call for sites' consultation was undertaken in 2014.

Plan 4.2 – Preferred Options – Proposals Map - 2013



4.1.53 Following the 'Call for Sites' exercise in 2014, a further fifteen potential housing sites, including PDA 6 (Woodlands) 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.



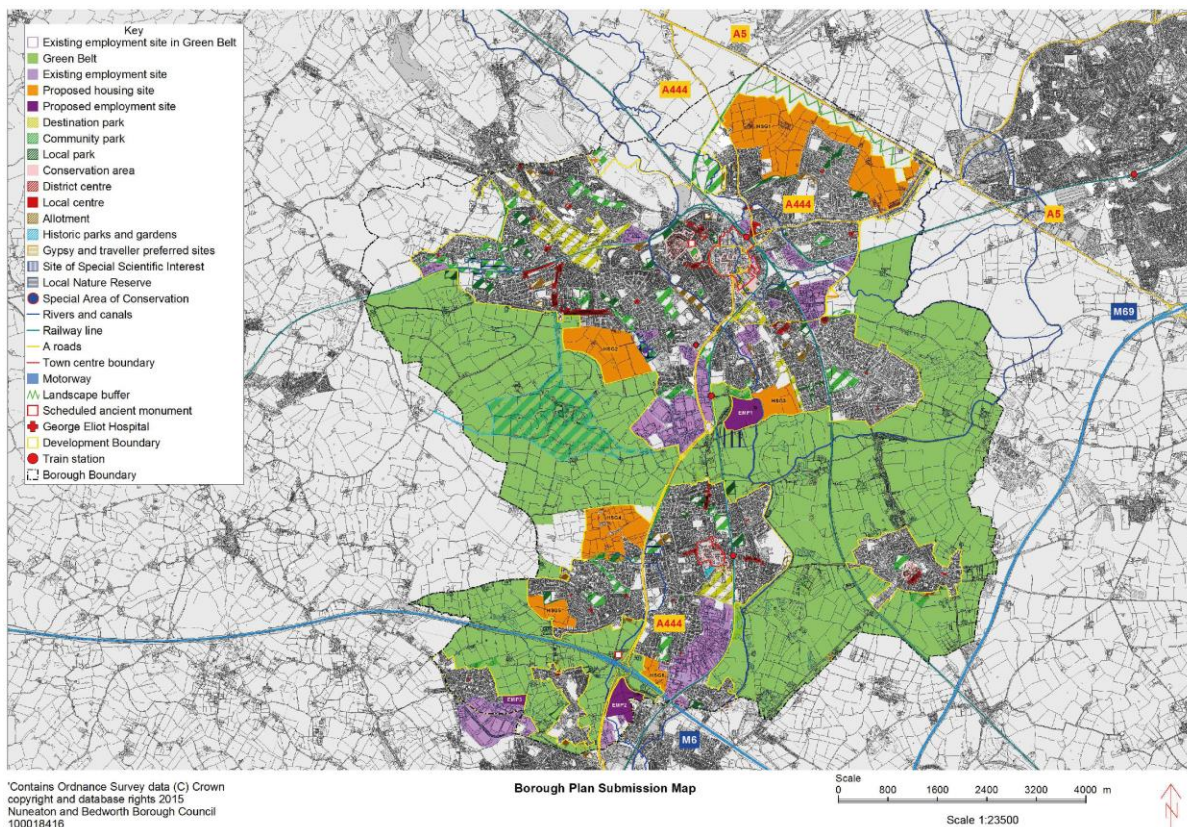
4.1.54 The findings of the 'interim' 2014 SA report was used by the Council to review the previously promoted sites (SHS 1-4) in a consistent manner with all the sites identified in the 'call for sites' exercise undertaken in 2015.

4.1.55 The selection of these sites by the Borough Council was based on the findings of the SA whilst meeting wider planning policy requirements. The review confirmed that the previously selected sites (SHS 1-4) remained suitable and deliverable but also identified two further sites, namely, HSG 4 – Woodlands (previously PDA 6) and HSG 6 – School Lane (Previously PDA 8). The six Strategic Housing Sites in the Borough Plan – Submission Document 2015 are shown on **Plan 4.3**.

Reasonable Alternatives considered at the Publication Plan stage

4.1.56 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 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 accommodated within its administrative boundary.

Plan 4.3 – Submission Document – Proposals Map – 2015



4.1.57 To assist this process the Council held a further 'call for sites' exercise in December 2015 and January 2016 and undertook a further review of all the previously submitted sites. The Borough Council assessed each of the identified sites as part of an updated SHLAA process. 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.

4.1.58 The outcome of the updated SHLAA work reviewed 13 strategic housing sites of which 12 were considered to be viable and were included in the Borough Plan - Publication Plan (2017) and were the subject of an SA. The Sites are referenced HSG 1-11 and EMP 2.



- 4.1.59 The Site that was identified as part of the SHLAA process but discounted on viability grounds in the Submission Document was the Former Hawkesbury Golf Course Site - HSG 12 (previously PDA 9). The future development of this Site for a strategic housing allocation raised objections from Warwickshire County Council due to the adverse effect on the capacity and safety of the local road. To overcome this objection the Highways Authority were seeking the creation of a new access to the west of the Site. The requirement for the new access to transverse the existing railway line, and the associated engineering works, meant it was uncertain whether the development of the Site was unviable and deliverable during the plan period (See Paragraph 4.1.65 below).
- 4.1.60 The Potential Development Areas, strategic housing sites and sites identified by landowners/developers as part of the various 'call for sites' exercises are considered to represent the extent of available and viable sites in the Borough. This consists of a total of 30 sites which are considered as the 'reasonable' alternative housing sites for the purposes of the SEA Regulations. A summary table of the SA findings for each of the 'reasonable' alternative sites considered as part of the SA is presented at Appendix E. A Sustainability Assessment of each Site has been undertaken 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.
- 4.1.61 The selection of sites in the Borough Plan has been informed by the findings of the SA Reports. A number of sites have been assessed, and reassessed, as part of the SA during the evolution of the Borough Plan. This has taken into account updated information prepared as part of the formal evidence base for the Plan and comments received by statutory bodies and other stakeholders in the planning process.
- 4.1.62 During the Examination Hearings the 12 allocated strategic housing sites and all the alternative sites were reviewed and tested against the comments raised by residents, statutory bodies and other stakeholders.
- 4.1.63 A statement of common ground between the developers of the Former Hawkesbury Golf Course Site (HSG12), the Borough Council and the County Council resolved 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 (**Appendix E**) which confirms that the Land at Hawkesbury offers a number of sustainability benefits.



- 4.1.64 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 (**MM175**). The inclusion of an additional 380 dwellings provides further flexibility to the Local Plan housing supply figure.
- 4.1.65 As set out at Paragraph 4.1.27 above, 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.
- 4.1.66 The inclusion of a further 380 dwellings at the Former Hawkesbury Golf Course Site and the amendments to the quantum of homes deliverable on each of the allocated sites (**MM32-MM97 and MM116**) means that the Borough Plan will deliver **14,836** dwellings during the Plan Period (**MM10**). 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.
- 4.1.67 The Borough Plan Publication Plan incorporating Main Modifications allocates sufficient sites to meet the objectively assessed need for the Borough and Coventry's overspill in full together with a reasonable level of flexibility. As the need targets are led by the Borough Council's ability to identify deliverable and viable sites it is concluded that the 'reasonable' alternative sites are the following thirteen housing allocation sites, namely:
- North of Nuneaton - **HSG 1** (previously PDA 1/10 and SHS 4);
 - Arbury - **HSG 2** (previously PDA 5 and SHS 2);
 - Gipsy Lane – **HSG 3** (previously PDA 3 and SHA 1);
 - Hospital Lane – **HSG 4** (previously PDA 7 and SHS 3);
 - Woodlands - **HSG 5** (previously PDA 6);
 - School Lane – **HSG 6** (previously PDA 8);

- East of Bulkington - **HSG 7**;
- West of Bulkington – **HSG 8**;
- Golf Drive - **HSG 9**;
- Attleborough Fields – **HSG 10**;
- Tuttle Hill – **HSG 11** (previously PDA 1/10);
- Former Hawkesbury Golf Course, Blackhorse Road – **HSG 12 (MM175)**; and
- Pickards Way/Wilson Lane - **EMP 2**.

4.1.68 The Assessment matrices for all the above housing site options, incorporating the relevant Main Modifications are presented at Appendix E.

4.1.69 Each of the site options has a dedicated 'delivery policy'. The assessment has considered the allocation and the associated policy, including any Main Modifications, as a package. A summary of the conclusions for each housing site/policy presented in the Borough Plan – Publication Plan incorporating Main Modifications is set out in Table 8 below.

Table 8 – Allocated Housing sites

Site/Policy Reference no.	SA Conclusions
North of Nuneaton HSG 1 (previously PDA 1/10 and SHS 4)	The proposed development will bring forward <u>at least 4,419 (MM32)</u> new housing units and thus represents a significant positive effect on the provision of homes. There will also be indirect positive effects in terms of economic factors and social factors associated with deprivation and poverty together with waste minimisation.



	<p>The northern boundary of the allocation has been re-defined and extends to the A5 (MM34). The impact of the proposed residential development on landscape character along this stretch of the A5 will be mitigated by new tree and hedgerow planting and small copses of trees in field corners to filter views of the new edge of the urban area.</p> <p>The development of the Site will result in the loss of open agricultural land located outside, but adjacent to the existing urban areas and will have a negative effect on the prudent use of resources, soils, landscape (in the short term), provision of sports and recreational facilities, access to services, and the vitality of the Town Centres.</p> <p>The Site is accessible by car for services, jobs and learning activities and is situated between two existing bus routes. A new junction will be formed to the A5 via the development at Calendar Farm (MM41). The dispersed location of the land will discourage a modal shift away from the car which in turn will increase traffic movements and travel times with an associated increase in air pollution levels. Enhanced public transport measures brought forward in tandem with the development will mitigate effects in the longer term.</p> <p>The Site will have a neutral effect on climatic factors, design/sense of place, cultural heritage, water resources (with mitigation), and health facilities (with mitigation) provided that the development accords with other policies in the Borough Plan.</p>
<p>Arbury – HSG 2 (Previously PDA 5 and SHS 2)</p>	<p>This Site is within the Green Belt.</p> <p>The proposed development will bring forward <u>at least 1525</u> (MM43) new housing units and thus represents a significant positive effect on the provision of homes. There will also be indirect positive effects in terms of economic factors and social factors associated with deprivation and poverty together with waste minimisation.</p>



	<p>The development of the Site will result in the loss of open agricultural land located adjacent to the existing urban areas and will have a negative effect on the prudent use of resources, soils, historic landscape (in the short term), provision of sports and recreational facilities, access to services, and the vitality of the Town Centres without mitigation.</p> <p>Any development will be of a height and density which can be screened by the existing planting within and around the Registered Park and Garden. The existing trees and hedgerows will be retained to screen views to and from the strategic site and where necessary enhanced. The use of green corridors and low rise residential development may help to minimise the visual impact of any change within the strategic site.</p> <p>The Site is accessible by car for services, jobs and learning activities but more limited for residents' dependent on public transport. The dispersed location of the land will discourage a modal shift away from the car which in turn will increase traffic movements and travel times with an associated increase in air pollution levels.</p> <p>Although the B102 and B4112, situated close to the Site, are bus routes there is no existing linkage to these routes from the Site therefore enhanced public transport measures will be brought forward in tandem with the development.</p> <p>A new distributor link road through the allocation (MM45-MM46) will be provided to include primary access points on Heath End Road, Hazell Way and Walsingham Drive. New bus infrastructure will also be provided. The measures will mitigate any potential impacts in the longer term.</p> <p>The Site is situated adjacent to Arbury Estate Historic Park and Gardens which includes Arbury Hall and a number of other listed</p>
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	<p>buildings. Any proposals to develop the Site will need to ensure that the setting of the Historic Park and listed buildings is preserved and where possible enhanced. Accordingly, the development of this Site will result in an adverse effect on cultural heritage factors without mitigation but with suitable mitigation it is considered to will result in a neutral or slight positive effect in the longer term. In this regard, any development of the Site will also be accompanied an Asset Management Plan for the wider Arbury Estate which will include measures to repair and maintain Park Farmhouse and the Tea House (MM49).</p> <p>The Site is situated adjacent to the Ensor Pool SAC which is an internationally protected site associated with principally White Clawed Crayfish. However, recent empirical evidence provided by Natural England has confirmed that the protected species, the subject of the designation, is no longer present and there is no impediment to the Site being developed. A separate HRA of the Borough Plan has 'scoped out' the designated site from the need for an Appropriate Assessment.</p> <p>Any proposals to develop the Site will need to include measures proposed to enhance the integrity of the site for ecological purposes in the longer term including protecting Spring Kidden and North Woods Ancient Woodlands (MM50).</p> <p>The development of the Site for residential uses will result in the loss of existing hedgerows features and will increase the level of built development in a historic parkland setting. However the Site also offers the opportunity to enhance and create integrated hedgerows/copse and woodland area in the east of the character area to screen existing views of the existing built development as part of the wider landscape scheme for the Site and adjacent historic parkland. The development will also provide the opportunity to provide new green infrastructure linkages with existing woodland/</p>
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	<p>hedgerow features, namely the Griff Brook tributaries and Spring Kidder Wood, resulting in landscape enhancements in the longer term.</p> <p>The Site will have a neutral effect on climatic factors, design/sense of place, water resources (with mitigation), and health facilities (with mitigation) provided that the development accords with other policies in the Borough Plan.</p>
<p>Gipsy Lane – HSG 3; (Previously PDA 3 and SHS 1)</p>	<p>This Site is within the Green Belt.</p> <p>The proposed development will bring forward <u>at least</u> 575 (MM53) new housing units and thus represents a significant positive effect on the provision of homes. There will also be indirect positive effects in terms of economic factors and social factors associated with deprivation and poverty, important considerations given the proximity of the Site to the Hill Top area of Nuneaton, together with waste minimisation.</p> <p>The development of the Site will result in the loss of open agricultural land located outside the existing urban areas and will have a negative effect on the prudent use of resources, soils, landscape (in the short term), provision of sports and recreational facilities, access to services, and the vitality of the Town Centres.</p> <p>The Site is accessible by car for services, jobs and learning activities although more limited for residents' dependent on public transport albeit the B4113, Coventry Road is a bus route and the Site is situated approximately 750m from the extant Bermuda Park and Ride facility. The dispersed location of the land will discourage a modal shift away from the car which in turn will increase traffic movements and travel times with an associated increase in air pollution levels. Enhanced public transport measures and the provision of footway/cycleway linkages along the north bank of the Griff Brook, existing canal</p>



	<p>towpath (including cross the canal (MM56)) and, via EMP1, on to Bermuda Park (MM55) will be brought forward in tandem with the development to ensure that potential impacts are mitigated in the longer term increasing the accessibility of the Site to the park and ride facility.</p> <p>The Site will have a neutral effect on climatic factors, design/sense of place, cultural heritage, water resources (with mitigation), and health facilities (with mitigation) provided that the development accords with other policies in the Borough Plan.</p>
Woodlands – HSG 4 (Previously PDA 6)	<p>The Site will bring forward <u>at least 689</u> (MM60) homes and thus represents a significant positive effect on social factors associated with access to decent and affordable housing for all. There will also be indirect positive effects in terms of economic factors in the medium to longer term.</p> <p>The Site is adjacent to existing area of Nature Conservation Importance (Nook and Flash Meadow LWSs) and important heritage assets in the form of High Quality 'ridge and furrow'. These protected areas will be retained, as far as possible (MM62), as part of an integrated layout thus enhancing these features in the longer term. SuDS will be provided with the identified residential areas.</p> <p>The dispersed location of the Site would tend to discourage modal shift away from the car which in turn will increase traffic movements. Primary access for vehicles will be via Newtown Road and associated improvements to the existing highway network (MM66). Other vehicular access points are available from Woodlands Road, Judd Close, Buttercup Way and Woodlands Lane/ Bedworth Lane.</p>



	<p>The Site will result in the loss of high quality agricultural land which has poor accessibility to existing employment, health facilities, education facilities and the town Centre. Bedworth Town Centre is 1km to east of HSG4 and provides a number of local retail facilities. A new local centre will be developed in the western half of the Site to serve existing and future residents and reduce the need to travel. This will result in a positive effect on these considerations in the longer term.</p> <p>The Site will have a neutral effect on issues of biodiversity, landscape character, water resources, access to sports/cultural facilities and positive long term effects on tackling multiple deprivation, climate change, energy use and recycling provided that the proposed mitigation is provided and development accords with other policies in the Borough Plan.</p>
<p>Hospital Lane - HSG 5 (Previously PDA 7 and SHS 3) and</p>	<p>This Site is within the Green Belt.</p> <p>The proposed development will bring forward <u>at least</u> 398 (MM68) new housing units and thus represents a significant positive effect on the provision of new homes in the Borough. There will also bring forward indirect positive effects in terms of economic factors and social factors associated with deprivation and poverty together with waste minimisation.</p> <p>The development of the Site will result in the loss of open agricultural land located adjacent to existing urban areas and will have a negative effect on the prudent use of resources, soils, landscape (in the short term), provision of sports and recreational facilities (without mitigation), access to services, and the vitality of the Town Centres.</p> <p>The Site is accessible by car for services, jobs and learning activities and is situated between three existing bus routes. The dispersed location of the land will discourage a modal shift away from the car</p>



	<p>which in turn will increase traffic movements and travel times with an associated increase in air pollution levels. Enhanced public transport measures will be brought forward in tandem with the development that will mitigate any potential impacts in the longer term.</p> <p>A new District Centre will be developed in the north eastern corner of the Site to serve existing and future residents of Goodyers End and reduce the need to travel. Land adjacent to the existing Newdigate Primary School boundary will be retained to accommodate expansion of the primary school premises. These measures will result in a positive effect on access to services.</p> <p>The development of the Site will increase the level of built development in the area but also offers the opportunity to 'recreate' and connect existing landscape features as part of the wider scheme for the Site and provide green infrastructure linkages to existing biodiversity features, resulting in landscape enhancements in the longer term. In particular, Cattell's Wood provides an important landscape and visual screen and will be enhanced as part of any development on the Site.</p> <p>The Site will have a neutral effect on climatic factors, design/sense of place, cultural heritage, water resources (with mitigation) and, health facilities (with mitigation) provided that the development accords with other policies in the Borough Plan.</p>
HSG 6 – School Lane	<p>This Site is within the Green Belt.</p> <p>The proposed development will bring forward <u>at least 220 (MM70)</u> homes and thus represents a positive effect on the provision of homes. There will also be indirect positive effects in terms of</p>



	<p>economic factors and social factors associated with deprivation and poverty together with waste minimisation.</p> <p>The development of the Site will result in the loss of open agricultural land located adjacent to the existing urban areas and will have a negative effect on the prudent use of resources, soils, landscape (in the short term), provision of access to services, and the vitality of the Town Centres.</p> <p>The Residential Development will be brought forward as a mixed use scheme with enhanced areas of public open spaces, and biodiversity importance. Access to the residential areas will be via two new access points on School Lane. The existing pedestrian access to public footpath B26 will be retained and enhanced by a new pedestrian access to Heckley Fields.</p> <p>The Site will result in the loss of high quality agricultural land. The Site is accessible by car for services, jobs and learning activities and is situated adjacent to an existing bus route. The dispersed location of the land will discourage a modal shift away from the car which in turn will increase traffic movements and travel times with an associated increase in air pollution levels. Enhanced public transport measures, including improvements to School Lane and Longford Road will be brought forward in tandem with the development that will mitigate any potential impacts in the longer term.</p> <p>The Site will have a neutral effect on climatic factors, design/sense of place, cultural heritage, water resources (with mitigation), health facilities (with mitigation) provided that the development accords with other policies in the Borough Plan.</p> <p>Despite short and medium term adverse effects, in the longer term, the Site will have a neutral effect on issues of water resources, landscape character, sports/cultural facilities and a positive effect on</p>
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	<p>climatic factors, tackling multiple deprivation, biodiversity material assets and recycling provided that the development accords with other development control policies in the Borough Plan.</p>
<p>East of Bulkington</p> <p>HSG 7</p>	<p>This Site is within the Green Belt.</p> <p>The proposed development will bring forward <u>at least</u> 196 (MM73) homes and thus represents a significant positive effect on the provision of homes. There will also be indirect positive effects in terms of economic factors and social factors associated with deprivation and poverty together with waste minimisation.</p> <p>The development of the Site will result in the loss of open agricultural land located adjacent to the existing urban area of Bulkington and will have a negative effect on the prudent use of resources, soils, landscape (in the short term), provision of sports and recreational facilities (without mitigation), access to services and the vitality of the Town Centres. Contributions will also be sought for community and health facilities in Bulkington (MM75 and MM76).</p> <p>The allocation of part of the Site for informal open space will provide a positive effect on recreational facilities in the local area. Footpath access is proposed through the informal open space will create a green route linking the northern and southern parcels of the Site. Contributions will also be sought for highway improvements in Bulkington (MM74 and MM77).</p> <p>The Site will result in the loss of high quality agricultural land but has good accessibility to existing employment, Health and education facilities within Bulkington District Centre. The Site is accessible by car for services, jobs and learning activities and is situated adjacent to an existing bus route. The dispersed location of the land will discourage a modal shift away from the car which in turn will increase traffic movements and travel times with an associated increase in air</p>



	<p>pollution levels. Enhanced public transport measures will be brought forward in tandem with the development that will mitigate any potential impacts in the longer term.</p> <p>The Site will have a neutral effect on climatic factors, design/sense of place, cultural heritage, water resources (with mitigation), and health facilities (with mitigation), provided that the development accords with other policies in the Borough Plan.</p> <p>Despite short and medium term adverse effects, in the longer term, the Site will have a neutral effect on issues of water resources, and a positive effect on landscape character, sports/cultural facilities, climatic factors, tackling multiple deprivation, biodiversity material assets and recycling provided that the development accords with other development control policies in the Borough Plan.</p>
<p>West of Bulkington</p> <p>HSG 8</p>	<p>This Site is within the Green Belt.</p> <p>The proposed development will bring forward <u>at least</u> 495 (MM78) homes and thus represents a significant positive effect on the provision of homes. There will also be indirect positive effects in terms of economic factors and social factors associated with deprivation and poverty together with waste minimisation.</p> <p>The development of the Site will result in the loss of open agricultural land located adjacent to the existing urban area of Bulkington and will have a negative effect on the prudent use of resources, soils, landscape (in the short term), provision of sports and recreational facilities, access to services, and the vitality of the Town Centres. Contributions will also be sought for community and health facilities in Bulkington (MM80 and MM81).</p> <p>The allocation of part of the Site for formal and informal open space, U12's play area and allotments will provide a positive effect on recreational facilities in the local area. Footpath/cycleway access is</p>



	<p>proposed through the development and areas of open space to create a green route linking the Site.</p> <p>The Site will result in the loss of high quality agricultural land but has good accessibility to existing employment, and education facilities within Bulkington District Centre. The Site is accessible by car for services, jobs and learning activities and is situated adjacent to an existing bus route. The dispersed location of the land will discourage a modal shift away from the car which in turn will increase traffic movements and travel times with an associated increase in air pollution levels. Enhanced public transport measures will be brought forward in tandem with the development that will mitigate any potential impacts in the longer term. Contributions will also be sought for highway improvements in Bulkington (MM79).</p> <p>The Site will have a neutral effect on climatic factors, design/sense of place, cultural heritage, water resources (with mitigation), health facilities (with mitigation) provided that the development accords with other policies in the Borough Plan.</p> <p>Despite short and medium term adverse effects, in the longer term, the Site will have a neutral effect on issues of water resources, and a positive effect on landscape character, sports/cultural facilities, climatic factors, tackling multiple deprivation, biodiversity material assets and recycling provided that the development accords with other development control policies in the Borough Plan.</p>
Golf Drive – HSG 9	<p>This Site is within the Green Belt.</p> <p>The proposed development will bring forward <u>at least</u> 621 (MM84) homes and thus represents a significant positive effect on the provision of homes. There will also be indirect positive effects in terms of economic factors and social factors associated with</p>



	<p>deprivation and poverty together with waste minimisation. The Site will be developed in a comprehensive manner (MM89).</p> <p>The development of the Site will result in the loss of open agricultural land located outside the existing urban areas and will have a negative effect on the prudent use of resources, soils, landscape (in the short term), provision of sports and recreational facilities (without mitigation), access to services, and the vitality of the Town Centres.</p> <p>The allocation of part of the Site for informal open space at the junction with existing Public Rights of Way and the creation of a new footpath/cycle route connecting the Site to the existing Community Park to the north west will mitigate the adverse effect on recreational facilities.</p> <p>The Site will result in the loss of high quality agricultural land and may affect the setting of the Grade II Listed Hill Farmhouse heritage asset. Any future planning application will need to undertake a full detailed Heritage Assessment to identify a suitable buffer zone to protect the setting and impact on the significance of the asset (MM88). This will inform detailed design for the north eastern corner of the Site.</p> <p>The Site is accessible by car for services, jobs and learning activities and is situated adjacent to an existing bus route. The dispersed location of the land will discourage a modal shift away from the car which in turn will increase traffic movements and travel times with an associated increase in air pollution levels. Enhanced public transport measures, including evening and weekend services (MM85) and infrastructure works (MM86), will be brought forward in tandem with the development that will mitigate any potential impacts in the longer term.</p> <p>A new local centre will be developed in the southern part of the Site to serve existing and future residents and reduce the need to travel.</p>
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	<p>This will result in a positive effect on these considerations in the longer term.</p> <p>The Site will have a neutral effect on climatic factors, design/sense of place, cultural heritage, water resources (with mitigation), health facilities (with mitigation) provided that the development accords with other policies in the Borough Plan.</p> <p>Despite short and medium term adverse effects, in the longer term, the Site will have a neutral effect on issues of water resources and a positive effect on landscape character, sports/cultural facilities, access to services, climatic factors, tackling multiple deprivation, biodiversity material assets and recycling provided that the development accords with other development control policies in the Borough Plan.</p>
<p>Attleborough Fields</p> <p>HSG 10</p>	<p>The proposed development will bring forward <u>at least</u> 360 (MM90) homes and thus represents a significant positive effect on the provision of homes. There will also be indirect positive effects in terms of economic factors and social factors associated with deprivation and poverty together with waste minimisation.</p> <p>The development of the Site will result in the loss of open agricultural land located adjacent to the existing urban areas and will have a negative effect on the prudent use of resources, soils, landscape (in the short term), provision of sports and recreational facilities (without mitigation), access to services, and the vitality of the Town Centres.</p> <p>Informal Public Open Space will be focussed in the eastern part of the Site to create a defined 'green edge' to the urban areas and the creation of a new footpath/cycle route connecting the Site to the existing Community Park to the south will mitigate the adverse effect on recreational facilities.</p>



	<p>The Site will result in the loss of high quality agricultural land.</p> <p>The Site is accessible by car for services, jobs and learning activities and is situated adjacent to an existing bus route. The dispersed location of the land will discourage a modal shift away from the car which in turn will increase traffic movements and travel times with an associated increase in air pollution levels. Enhanced public transport measures will be brought forward in tandem with the development that will mitigate any potential impacts in the longer term.</p> <p>The Site will have a neutral effect on climatic factors, design/sense of place, cultural heritage, water resources (with mitigation), and health facilities (with mitigation) provided that the development accords with other policies in the Borough Plan.</p> <p>Despite short and medium term adverse effects, in the longer term, the Site will have a neutral effect on issues of water resources and a positive effect on landscape character, sports/cultural facilities, access to services, climatic factors, tackling multiple deprivation, biodiversity material assets and recycling provided that the development accords with other development control policies in the Borough Plan.</p>
Tuttle Hill HSG 11	<p>The proposed development will bring forward <u>at least</u> 200 (MM91) homes and thus represents a significant positive effect on the provision of homes. There will also be indirect positive effects in terms of economic factors and social factors associated with deprivation and poverty together with waste minimisation.</p> <p>The development of the Site will result in the use of previously developed land adjacent to the existing urban areas and will have a positive effect on the prudent use of resources, soils, landscape,</p>



	<p>provision of sports and recreational facilities, access to services, and the vitality of the Town Centres.</p> <p>The development of the eastern part of the Site for residential uses will be undertaken in a comprehensive and co-ordinated basis that will also contribute to the retention and enhance of the establishing biodiversity area in the western part of the Site. The historic and geological importance of the local Camp Hill area for quarrying and biodiversity benefits offers the opportunity to develop the western part of the Site as a focus point for a visitor centre to promote the Cambrian Ridge a local amenity destination. The development of the Site will take the opportunity of improving the setting of the canal (MM96) and the towpath (MM97), including design, better public access and interpretation. This will result in a positive effect on biodiversity and heritage considerations.</p> <p>The Site is accessible by car for services, jobs and learning activities and is situated adjacent to an existing bus route. Enhanced public transport measures will be brought forward in tandem with the development that will mitigate any potential impacts in the longer term. Enhanced cycle infrastructure along Stoney lane will also be facilitated by the development of the Site (MM93).</p> <p>The Site will have a neutral effect on climatic factors, design/sense of place, cultural heritage, water resources (with mitigation) and, health facilities (with mitigation) provided that the development accords with other policies in the Borough Plan.</p> <p>Despite short and medium term adverse effects, in the longer term, the Site will have a neutral effect on issues of water resources and a positive effect on landscape character, sports/cultural facilities, access to services, climatic factors, tackling multiple deprivation, biodiversity, heritage/material assets and recycling provided that the</p>
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	<p>development accords with other development control policies in the Borough Plan.</p>
<p>Former Hawkesbury Golf Course, Blackhorse Road HSG 12 (MM175)</p>	<p>The proposed development will bring forward circa 380 homes and thus represents a significant positive effect on social factors associated with access to decent and affordable housing for all. There will also be indirect positive effects in terms of economic factors in the medium to long term.</p> <p>As the agricultural land classification is poor the Site will result in a neutral effect on soils and a significant positive effect on the efficient use of land. The Site's location on the edge of the existing urban area of Bedworth is accessible by car and public transport to existing health care facilities, local services and jobs and the provision of improved pedestrian and cycle routes will provide enhanced access to these facilities resulting in a significant positive effect on access to services and air pollution in the and a reduction in air pollution in the medium to long term.</p> <p>In addition, contributions will be required to improve the off-site links to the Borough's walking and cycling network as well as linking with areas of deprivation and the Green Infrastructure network. The provision of a safe, integrated and attractive walking and cycling environment as part of the overall development with financial contributions to off-site works will contribute to an indirect significant effect on healthy living and well-being. Based on the proposed mitigation, the Site will result in a significant positive effect on this sustainability objective in the longer term.</p> <p>The Site will bring forward a new Country Park in tandem with the residential development which will create biodiversity features that will result in a significant positive effect on biodiversity and</p>



	<p>sports/cultural facilities and a positive effect on landscape on the medium to longer term.</p> <p>The Site will have a neutral effect on issues of water resources and material assets.</p>
<p>Pickards Way/ Wilson Lane</p> <p>EMP 2</p>	<p>This Site is within the Green Belt.</p> <p>The proposed development will bring forward circa 73 homes and thus represents a positive effect on the provision of homes. There will also be indirect positive effects in terms of economic factors and social factors associated with deprivation and poverty together with waste minimisation.</p> <p>The development of the Site will result in the loss of open agricultural land located adjacent to the existing urban areas and will have a negative effect on the prudent use of resources, soils, landscape (in the short term), provision of access to services, and the vitality of the Town Centres. Contributions will also be sought for health facilities in the local area (MM116).</p> <p>The Residential Development will be brought forward as a mixed - use scheme with the adjacent employment allocation which seeks to enhance existing areas of public open spaces and biodiversity importance.</p> <p>The Site will result in the loss of high quality agricultural land.</p> <p>The Site is accessible by car for services, jobs and learning activities and is situated adjacent to an existing bus route. The dispersed location of the land will discourage a modal shift away from the car which in turn will increase traffic movements and travel times with an associated increase in air pollution levels. Enhanced public transport measures will be brought forward in tandem with the</p>



	<p>development that will mitigate any potential impacts in the longer term.</p> <p>The Site will have a neutral effect on climatic factors, design/sense of place, cultural heritage, water resources (with mitigation) and, health facilities (with mitigation) provided that the development accords with other policies in the Borough Plan.</p> <p>Despite short and medium term adverse effects, in the longer term, the Site will have a neutral effect on issues of water resources, landscape character, sports/cultural facilities and a positive effect on climatic factors, tackling multiple deprivation, biodiversity material assets and recycling provided that the development accords with other development control policies in the Borough Plan.</p>
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Summary

- 4.1.70 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 Options stage.
- 4.1.71 The previous SAs 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 of new local centres and facilities. These are set out in the matrices for individual sites.

Strategic Site options – Employment

- 4.1.72 As identified at Paragraph 4.1.28 above NBBC has identified an employment land requirement of 107.8ha over the plan period **(MM9)**. This figure has evolved as the plan has developed but is supported by a robust evidence base and has been 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 as much as possible of Coventry’s shortfall is the preferred approach for employment growth.



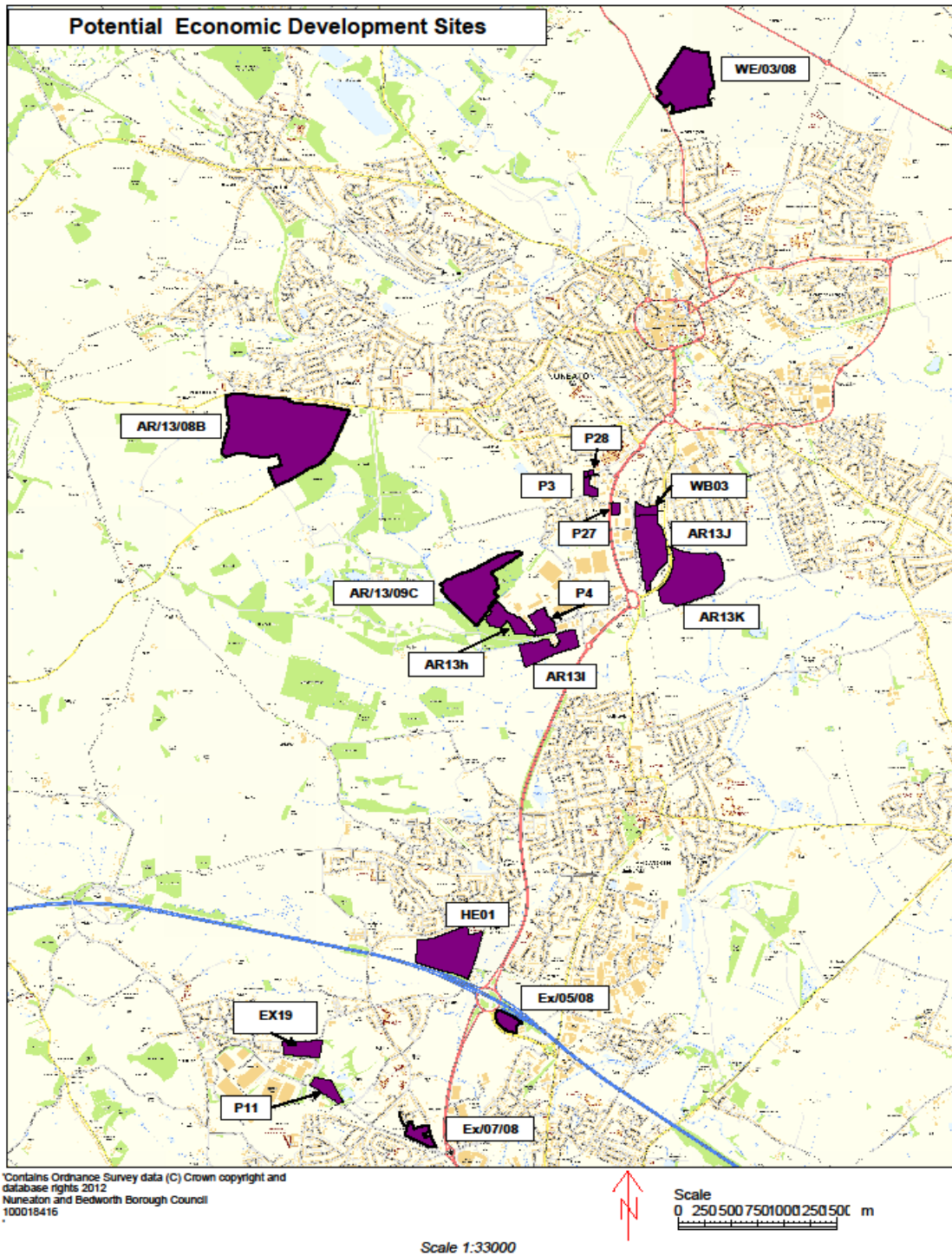
Issues and option stage

- 4.1.73 The Issues and Options - Borough Plan considered eight spatial development options for accommodating the employment growth requirements for Nuneaton and Bedworth 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.
- 4.1.74 The Council identified a number of small scale sites within the urban areas to contribute to the employment needs of the Borough but, as acknowledged in the Issues and Options Borough Plan, were unable to accommodate all its employment growth requirement on previously developed and thus open countryside or Green Belt land will need to be released.

Preferred Options stage

- 4.1.75 The Borough Council's preferred spatial option, identified at the issues and options stage, was carried forward into a more detailed site selection process at the Preferred Options stage. The Spatial Options were set out in Policies DEV 1-3 of Preferred Options Borough Plan.
- 4.1.76 The evidence base prepared for the Preferred Options 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.
- 4.1.77 The Site selection process considered the 16 Potential Economic Development Areas (see **Plan 4.5**) 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.

Plan 4.5 – Potential Economic Development Areas – 2013





- 4.1.78 Based on the Borough Council's preferred spatial option the opportunities to accommodate new employment growth in the urban areas was considered first but these were considered as being limited. The Borough Plan Preferred Options sought to bring forward new areas adjacent to Nuneaton and Bedworth's urban areas. The Borough Plan's approach sought to reduce the geographic spread of development in order to encourage the viability and vitality of the existing urban areas and contribute to the economic growth in deprived areas.
- 4.1.79 The 2013 SA report for the Preferred Options concluded that each of the Potential Economic Development Areas 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 which included a review of the findings of the SA. The Preferred Options Borough Plan states "*Large scale or 'strategic' urban extensions offer the best opportunity to deliver the range of infrastructure needed to support new development. New development outside the urban areas will take place on a limited number of large sustainable urban extensions to Nuneaton and Bedworth*".
- 4.1.80 The Preferred Options Borough Plan 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 as employment land allocations. The Sites were amalgamated and renamed as ECO1-3 and are shown on **Plan 4.2**.

Submission Stage

- 4.1.81 Changes in the scale and 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 Preferred Options Borough Plan. This resulted in the Borough Plan seeking to accommodate a reduced level of new employment land (circa 52ha) during the Plan Period which was also extended until 2031. This represented a change in the direction of the Borough Plan from being 'economically driven', as set out in Preferred Option Policy Dev 1, to one meeting objectively assessed employment need. The consequence being that the employment land requirement was reduced together with the number of allocated sites for employment purposes.



4.1.82 Following the 'call for sites' exercise in 2014 a further forty-five potential employment sites were identified by landowners and potential developers. These additional sites were assessed together with sites previously allocated in the Preferred Options Borough Plan (ECON 1-3) against the SA Objectives and the findings are presented in an 'interim' SA Report 2014. The findings of the 'interim' 2014 SA report were used by the Council to review the available land in a consistent manner to identify those sites that meet the Local Plan and Sustainability Objectives.

4.1.83 The selection of these sites by the Borough Council was based on the findings of the SA whilst meeting wider planning policy requirements. The review confirmed that the previously selected sites known as Bermuda 1 (ECON 1) and the eastern part of Bermuda 2 (ECON2), known as Coventry Road, were the least sustainable and may not be viable. The sites were excluded from the next stage of the Borough Plan. The land at Prologis (ECON 3) was retained and an additional site, namely, EMP 3 – Phoenix Way/Wilsons Lane was included.

On this basis, the findings of the 2014 'interim' SA the Council took forward three employment land allocations in the Borough Plan – Submission Draft. These are shown as EMP1-3 of **Plan 4.3**.

Reasonable Alternatives considered at the Publication Plan stage

4.1.84 Since the publication of the Borough Plan Submission Document the Council has commissioned an updated Employment Land Review (2016) that seeks to identify the employment land needs in the Borough including unmet employment from the Coventry City Council administrative area which cannot be accommodated within its boundary. This review has identified a target requirement of 113 Ha of employment land during the plan period.

4.1.85 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.

4.1.86 This assessment work reviewed 7 strategic employment sites of which were considered to be viable and were included in the Borough Plan - Publication Plan (2017) and were the subject of a SA. The Sites are referenced EMP 1, 2 and 4-7.



- 4.1.87 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).
- 4.1.88 The access to the **Land at Griff Lane** raised significant concerns regarding landscape, ecology and heritage issues. No mitigation could be identified to overcome these concerns and the only alternative access to the land required the acquisition of third party land. On this basis, the development of the Site was not deliverable during the plan period and is not a reasonable alternative site option.
- 4.1.89 The **Land at Prologis** forms part of a designated Prologis Country Park and Local Wildlife Site which raised significant concerns from Warwickshire County Council regarding loss of ecology and amenity. No mitigation could be identified to overcome or off-set these concerns. On this basis, the development of the Site was not considered deliverable during the plan period.
- 4.1.90 The Potential Economic Development Areas, strategic employment sites and sites identified by landowners/developers as part of the various 'call for sites' exercises are considered to represent the extent of available and viable sites in the Borough. This consists of a total of 46 sites which are concluded to be 'reasonable' alternative housing sites for the purposes of the SEA Regulations. A summary of each of the 'alternative' sites considered as part of the SA are presented at Appendix E. A Sustainability Assessment of each site has been undertaken 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.
- 4.1.91 The selection of sites in the Borough Plan has been informed by the findings of the SA Reports. A number of sites have been assessed, and reassessed, as part of the SA during the evolution of the Borough Plan. This has taken into account updated information prepared as part of the formal evidence base for the Plan.
- 4.1.92 During the Examination Hearings the allocated strategic employment sites were reviewed and tested against the comments raised by residents, statutory bodies and other stakeholders.
- 4.1.93 An updated review 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 (**MM22 and MM117**).

4.1.94 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 (**MM123**).

4.1.95 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 (**MM9**).

4.1.96 The Borough Plan Publication Plan incorporating Main Modifications seeks to allocate sites to meet the objectively assessed need for employment land in the Borough in full and as much of Coventry's overspill as possible. As the need targets are led by the Borough Council's ability to identify deliverable and viable sites it is concluded that the 'reasonable' alternatives sites are the following six employment allocation sites, namely:

- Faultlands (Bermuda East) **EMP 1** - (Previously Econ 2 & AR13K);
- Pickards Way/Wilsons Lane – **EMP 2** - (Previously NB125 or AR13H, AR13I & P4);
- Land at Prologis Park – **EMP 3** (previously EMP 3 and ECON 3);
- Coventry Road – **EMP 4** - (Previously Econ 2 or AR13J & WB03);
- Longford Road – **EMP 6**;
- Bowling Green Lane – **EMP 7** (Previously HE01).

4.1.97 The Assessment matrices for all the employment site options are presented at Appendix E. For completeness the matrices for the Land at Griff Lane are also included.



4.1.98 Each of the site options has a dedicated 'delivery policy'. The assessment has considered the allocation and the associated policy, including any Main Modifications, as a package. A summary of the conclusions for each housing site/policy presented in the Borough Plan – Publication Plan incorporating Main Modifications is set out in Table 9 below.

Table 9 – Allocated Employment sites

Site/Policy Reference no.	Conclusions
Faultlands – EMP 1 (Econ 2 or AR13J, AR13K & WB03);	<p>This Site is within the Green Belt.</p> <p>The proposed development will bring forward new employment uses and thus represents a significant positive effect on economic factors. There will also be indirect positive effects in terms of social factors associated with deprivation, poverty and health.</p> <p>The development of the Site will result in the loss of open land located outside the existing urban areas and will have a negative effect on soils, landscape (in the short term), prudent use of resources (land), the provision of new homes and access to existing services/infrastructure and the vitality of the Town Centres.</p> <p>The location of the Site is dispersed from the Town Centres of either Nuneaton or Bedworth albeit there is a direct access to either centre via the A444 situated to the south west of the Site. The location of the land outside the existing urban areas will increase traffic movements and travel times together with an associated increase in air pollution levels. However, given the scale of the Site it is likely that the proposed employment uses would represent a 'strategic' allocation and thus could not be accommodated within Town Centre</p>



	<p>areas, therefore, it is considered to have a slight adverse impact on the vitality of the Town Centre areas.</p> <p>The Site is divided by Coventry Road B4113, a bus route, which forms a junction with the A444 to the south west of the Site accordingly the site is accessible by car for services, jobs and learning activities and reasonably well served by public transport. Furthermore, EMP1 is situated in close proximity to Bermuda Park and Ride facility. Accordingly the site is accessible by car for services, jobs and learning activities and reasonable well served by public transport. However, if enhanced public transport measures were brought forward in tandem with the adjacent park and ride development then the potential impacts could be mitigated to a positive effect in the longer term.</p> <p>Enhanced public transport measures (MM101) and proportionate contributions to improvements the provision of footway/cycleway linkages along the, existing canal towpath (including cross the canal (MM100)), Gipsy Lane Canal Bridge Strengthening Works (MM103) will be brought forward in tandem with the development to ensure that potential impacts are mitigated in the longer term.</p> <p>The development of the Site will increase the level of built development in the area but also offers the opportunity to recreate and connect existing landscape features as part of the wider scheme for the Site and provide green infrastructure linkages to existing biodiversity features, including Griff Hollows LWS (MM108) and habitats within the Griff and Wem Brooks (MM113), resulting in landscape enhancements in the longer term (MM109).</p> <p>The Site will have a neutral effect on issues of climatic factors, design/sense of place, water resources (in the longer term), cultural heritage, waste minimisation and sports/cultural facilities provided that the development accords with other policies in the Borough Plan.</p>
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<p>Pickards Way/Wilsons Lane - EMP 2 (NB125 or AR13H, AR13I & P4);</p>	<p>This Site is within the Green Belt.</p> <p>The proposed development will bring forward new employment uses and thus represents a significant positive effect on economic factors. There will also be indirect positive effects in terms of social factors associated with deprivation, poverty and health.</p> <p>The development of the Site will result in the loss of open land located outside the existing urban areas and will have a negative effect on soils, landscape (in the short term), prudent use of resources (land), the provision of new homes and access to existing services/infrastructure and the vitality of the Town Centres.</p> <p>The location of the Site is dispersed from the Town Centres of either Nuneaton or Bedworth albeit there is a potential direct access to either centre via the A444 situated in close proximity to the Site. The location of the land outside the existing urban areas will increase traffic movements and travel times together with an associated increase in air pollution levels. However, given the scale of the Site it is likely that the proposed employment uses would represent a 'strategic' allocation and thus could not be accommodated within Town Centre areas, therefore, it is considered to have a slight adverse impact on the vitality of the Town Centre areas.</p> <p>The Site is accessible by car for services, jobs and learning activities and reasonable well served by public transport as Wilson Lane is designated as a bus route. Furthermore, the location of the Site and proximity to the junction with the M6 will tend to discourage modal shift away from the car usage and increase traffic movement and associated air pollution levels. However, if enhanced public transport measures were brought forward in tandem with the development then the potential impacts could be mitigated to a neutral effect in the longer term.</p>
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	<p>The development of the Site will increase the level of built development in the area but also offers the opportunity to 'recreate' and connect existing landscape features as part of the wider scheme for the Site and provide green infrastructure linkages to existing biodiversity features, namely the River Stowe resulting in landscape enhancements in the longer term.</p> <p>The Site will have a neutral effect on issues of climatic factors, design/sense of place, water resources (in the longer term), cultural heritage, waste minimisation and sports/cultural facilities provided that the development accords with other policies in the Borough Plan.</p>
<p>EMP 3 - Land at Prologis Park (MM117) (previously EMP 3 and ECON 3);</p>	<p>This Site is within the Green Belt.</p> <p>The proposed development will bring forward 5.3 ha of new employment uses and thus represents a significant positive effect on economic factors. There will also be indirect positive effects in terms of social factors associated with deprivation, poverty and health.</p> <p>The development of the Site will result in the loss of open agricultural land located on the edge of the existing urban areas and will have a negative effect on soils, landscape, access to services including new homes and the vitality of the Town Centres.</p> <p>EMP 3 is accessed from New Road, a bus route, but there is no direct route to either Town Centre or the strategic highway network. The dispersed location of the land will increase traffic movements and travel times together with an associated increase in air pollution levels.</p> <p>The development of the Site will increase the level of built development in the area but also offers the opportunity to recreate linkages to existing landscape features, i.e. hedgerows/copse and woodland area, as part of the wider scheme for the Site. The development will also provide the opportunity to create new features</p>



	<p>and provide green infrastructure linkages to existing biodiversity features and woodland resulting in landscape enhancements in the longer term.</p> <p>The Site will have a neutral effect on issues of climatic factors, design/sense of place, water resources, cultural heritage, waste minimisation and sports/cultural facilities provided that the development accords with other policies in the Borough Plan.</p>
<p>EMP 4 – Coventry Road (Previously Econ 2 or AR13J & WB03)</p>	<p>This Site is within the Green Belt.</p> <p>The proposed development will bring forward <u>approximately 9Ha gross (8.6ha net)</u> (MM122) new employment uses and thus represents a significant positive effect on economic factors. There will also be indirect positive effects in terms of social factors associated with deprivation, poverty and health.</p> <p>The development of the Site will result in the use of previously developed land located adjacent to the existing urban areas and will have a positive effect on soils, landscape, access to services and the vitality of the Town Centres.</p> <p>To the south of the Site is the Griff Hollows LWS. The proposed development will be brought forward for development in combination with off-site ecological mitigation. The development of the Site for employment uses will come forward as part of a wider biodiversity enhancement scheme for the land to the south of the site that is designated as a Local Wildlife Site. The enhancement scheme will result in the enhancement of the habitat connectivity of the Griff Hollows LWS, a key element of this will be the re-opening of the culvert to enable mammals to connect along ecological corridors (MM119 and MM120). This represents a positive effect biodiversity considerations.</p>



	<p>The location of the Site is dispersed from the Town Centres of either Nuneaton or Bedworth albeit there is a direct access to either centre via the B4113 and A444 situated to the south west of the Site. The location of the land on the edge of the existing urban areas will increase traffic movements and travel times together with an associated increase in air pollution levels. However, given the scale of the Site it is likely that the proposed employment uses would represent a 'strategic' allocation and thus could not be accommodated within Town Centre areas, therefore, it is considered to have a slight adverse impact on the vitality of the Town Centre areas.</p> <p>EMP 4 is accessed from B4113 Coventry Road, a bus route, which forms a junction with the A444 to the south west of the Site accordingly the site is accessible by car for services, jobs and learning activities and reasonably well served by public transport. Furthermore, EMP4 is situated adjacent to Bermuda Park and Ride facility. Accordingly the site is accessible by car for services, jobs and learning activities and reasonable well served by public transport.</p> <p>The development of the Site will increase the level of built development in the area but also offers the opportunity to recreate and connect existing landscape features as part of the wider scheme for the Site and provide green infrastructure linkages to existing biodiversity features.</p> <p>The Site will have a neutral effect on issues of climatic factors, design/sense of place, water resources (in the longer term), cultural heritage, waste minimisation and sports/cultural facilities provided that the development accords with other policies in the Borough Plan.</p>
EMP 6 – Longford Road	<p>This Site is within the Green Belt.</p> <p>The proposed development will bring forward new employment uses and thus represents a significant positive effect on economic factors.</p>



	<p>There will also be indirect positive effects in terms of social factors associated with deprivation, poverty and health.</p> <p>The development of the Site will result in the loss of open agricultural land located outside the existing urban areas and will have a negative effect on soils, landscape, access to services including new homes and the vitality of the Town Centres.</p> <p>The Site will result in the loss of high quality agricultural land.</p> <p>The Site is accessible by car for services, jobs and learning activities and is situated adjacent to an existing bus route. The dispersed location of the land will discourage a modal shift away from the car which in turn will increase traffic movements and travel times with an associated increase in air pollution levels. Enhanced public transport measures, including improvements to Longford Road will be brought forward in tandem with the development that will mitigate any potential impacts in the longer term.</p> <p>The Site will have a neutral effect on climatic factors, design/sense of place, cultural heritage, water resources (with mitigation), health facilities (with mitigation) provided that the development accords with other policies in the Borough Plan.</p> <p>Despite short and medium term adverse effects, in the longer term, the Site will have a neutral effect on issues of water resources, landscape character, sports/cultural facilities and a positive effect on climatic factors, tackling multiple deprivation, biodiversity material assets and recycling provided that the development accords with other development control policies in the Borough Plan.</p>
<p>EMP 7 – Bowling Green Lane</p>	<p>This Site is within the Green Belt.</p> <p>The proposed development will bring forward new employment uses and thus represents a significant positive effect on economic factors.</p>



	<p>There will also be indirect positive effects in terms of social factors associated with deprivation, poverty and health.</p> <p>The development of the Site will result in the loss of open agricultural land located outside the existing urban areas and will have a negative effect on soils, landscape, access to services including new homes and the vitality of the Town Centres.</p> <p>EMP 7 is accessed from Bowling Green Lane New Road, a bus route, but there is no direct route to either Town Centre. Primary access for vehicles to the Site will be provided from a new signalised junction on Bowling Green Lane and HGVs the subject of a Routing Strategy directing vehicles along School Lane (MM124). The dispersed location of the land will increase traffic movements and travel times together with an associated increase in air pollution levels.</p> <p>The Site is relatively accessible by car but access to services, jobs and learning activities will be limited for residents' dependent on public transport. Enhanced public transport measures will be brought forward in tandem with new highway arrangements including any upgrades required along Bowling Green Lane and School Lane (in conjunction with HSG 6) (MM124) and the cycle network (MM125) mitigating effect to a neutral effect on this sustainability objective in the longer term.</p> <p>The development of the Site will increase the level of built development in the area but also offers the opportunity to reinforce linkages to existing landscape features, i.e. boundary hedgerows/copse and woodland area, as part of the wider scheme for the Site.</p> <p>The Site will have a neutral effect on issues of climatic factors, design/sense of place, water resources, cultural heritage (subject to mitigation (MM126)), waste minimisation and sports/cultural</p>
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	facilities provided that the development accords with other policies in the Borough Plan.
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Summary

- 4.1.99 The general locations of all the current strategic employment sites accord with the preferred spatial options (Option 3 (a, b and c) and Option 4) agreed at the Issues and Options stage.
- 4.1.100 The previous SA's and subsequent viability work 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 access facilities. These are set out in the individual sites matrices.

Policies - Alternative Options

- 4.1.101 The Issues and Options - Borough Plan considered a number of spatial issues relevant to Nuneaton and Bedworth Borough. The Sustainability Appraisal considered the environmental effects of each of the spatial issues and recommended policy directions to address each issue. The recommendations were identified as 'mitigation and enhancements' to the emerging Borough Plan. The Council agreed to bring forward a variety of Borough wide policies to meet the recommendations. The Borough Council's response to each of the recommendations for mitigation and enhancement in the SA Report (2009) is set out in Appendix G.
- 4.1.102 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.
- 4.1.103 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. These options represent the 'reasonable' alternative policy options for the purposes of the SEA Regulations.



- 4.1.104 The recommendations were identified as 'mitigation and enhancements' to the Borough Plan Preferred Options. The Borough Council's response to each of the recommendations for mitigation and enhancement in the SA Report (2012) is set out in Appendix G.
- 4.1.105 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 confirmed that 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.
- 4.1.106 The Policy Direction at the Preferred Option stage envisaged an 'economically driven' plan based on a 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 0.7% growth rate.
- 4.1.107 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.
- 4.1.108 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.
- 4.1.109 The recommendations were identified as 'mitigation and enhancements' to the Borough Plan – Submission Draft. The Borough Council's response to each of the recommendations for mitigation and enhancement in the SA Report (2009) is set out in Appendix G.
- 4.1.110 The submission draft of the Borough Plan – Publication Draft 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 proposed site allocations. A new Policy on protecting the Green Belt has also been introduced. The above policy changes are not a consequence of the SA process.

4.1.111 During the Hearing Examinations two 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.

Summary

4.1.112 The Borough Plan has been the subject of an integrated Sustainable Assessment at each stage of the document's evolution. The findings of the SA have been used by the Borough Council to assess, refine and amend the preferred policy and site options for inclusion in the Borough Plan Submission Document. This has included an assessment of reasonable alternatives in terms of policy wording and site allocations.

4.1.113 The details set out above comprise the Local Plan Options and reasonable alternatives considered as part of the production of the Borough Plan – Publication Plan incorporating Main Modifications. These options meet the requirements of the SEA Regulations and Task B2 of the SA Stages.



5.0 Appraisal of 'significant' environmental effects associated with Borough Plan – Publication Plan inc. Main Modifications

5.1 Introduction

5.1.1 An appraisal of the proposed policies and site allocations (employment and housing) in the Borough Plan – Publication Plan incorporating Main Modification appraised in this SA is contained at Appendix E. This section of the report summarises the findings of the Sustainability Assessment of the Borough Plan – Publication Plan incorporating Main Modifications in respect of any significant effects associated with the SA objectives and also considers ways of mitigating adverse effects and any cumulative effects arising from the Borough Plan as a whole. This accords with Tasks B3 and B4 of the five stage SA process. The findings are presented in accordance with the groups of policies in the Borough Plan – Publication Plan incorporating Main Modifications.

5.2 Assumptions, uncertainties and difficulties

5.2.1 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.

5.2.2 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 other 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 of the policy options on the Sustainability Objectives.



- 5.2.3 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 uncertain effects to a minimum.
- 5.2.4 A number 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 (Policy DS7). The Council justified the removal of these sites within 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.
- 5.2.5 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 rather make assumptions that may be inconsistent.
- 5.2.6 If any other uncertain effects or difficulties have been encountered as part of the assessment process then these are noted under the relevant sections alongside the assessor's comments.

5.3 Vision and Objectives

- 5.3.1 The SA scores for the Borough Plan Visions and Objectives are presented in Appendix G.
- 5.3.2 The overall vision for Nuneaton and Bedworth Borough 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.



5.3.3 No conflicts between SA objectives or the Borough Plan objectives were identified.

5.4 Development Strategy

5.4.1 The SA scores for nine Development Strategy policies are presented in Table 5.1 below. Policies DS5 and DS6 include residential allocations and employment allocations. A summary of the SA scores for these allocations are set out in Table 4.1 and Table 4.2 on Section 4 and the overall score is shown in Table 5.1 below.

5.4.2 The Borough Plan – Publication Plan incorporating Main Modifications offers positive effects in terms of the economic criteria in the SA. All the employment policies and potential employment sites score well against the economic objectives.

5.4.3 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.

5.4.4 Policies DS8 and DS9 (**MM29 and MM30**) 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.

5.4.5 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.

Table 5.1 Summary of SA scores for the Development Strategy Policies

Sustainability Objective	DS1 - Presumption	DS2 - Settlement Hierarchy	DS3 - Development Principles	DS4 - Overall Development Needs	DS 5 - Residential Allocations	DS 6 - Employment Allocations	DS 7 - Green Belt	DS 8 - Monitoring of Housing Trajectory	DS 9 Review
1. Strong, stable and sustainable economy	+	0	0	++	+	++	++	+	++
2. Vitality of town centres	+	++	++	+	+	0	0	+	+
3. Decent and affordable housing	+	0	0	++	++	/	++	++	++
4. easy and equitable access to services & facilities	+	+	+	0	0	0	0	0	0
5. Crime & fear of crime	+	?	?	?	?	?	/	?	?
6. Poverty	+	0	0	+	+	+	0	+	+
7. Cultural, sport and recreational opportunities	+	+	+	0	0	/	/	0	0
8. Design	+	0	0	0	0	0	0	0	0
9. Natural environment	+	0	0	0	0	0	0	0	0
10. Health	+	0	0	+	+	+	/	+	+
11. Soils	+	0	+	--	--	--	0	-	-
12. Natural resources/ water efficiency	+	0	0	0	0	0	0	0	0
13. Water pollution/ flooding	+	0	0	0	0	0	0	0	0

14. Air Quality	+	++	++	0	0	0	0	0	0
15. Efficient use of infrastructure	+	++	++	0	0	0	0	0	0
16. Energy	+	+	+	0	0	0	0	0	0
17. Climate change	+	+	+	0	0	0	0	0	0
18. Waste minimisation, reuse, recycling and recovery	+	0	0	0	0	0	0	0	0
19. Prudent use of resources	+	0	++	0	0	0	0	0	0
20. Historic environment	+	0	0	0	0	0	0	0	0
21. Landscape	+	0	0	0	0	0	0	0	0

5.4.6 Nuneaton and Bedworth’s regeneration is closely linked to the revitalisation of the Borough’s image, in particular the regeneration of the existing main urban areas, improved self-sufficiency and the attraction of a skilled labour force. The allocation of employment land is intended to encourage economic growth in line with population growth and, in turn, revitalise Nuneaton and Bedworth Town Centres. However, this could have a negative effect on **SA objective 11: Soil Resources**.

5.4.7 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 provided 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.



- 5.4.8 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 both as individual development site allocations and under the overarching housing allocations Policy DS7 (see Table 5.1).
- 5.4.9 All the strategic 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.
- 5.4.10 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.
- 5.4.11 In terms of proposed allocations, only two of the sites (HSG 11 – Tuttle Hill, HSG 12 - Former Hawkesbury Golf Course 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 in social factors associated with unemployment and academic attainment.
- 5.4.12 The location of new employment areas on land outside the main urban areas and on the edge of existing settlements will help promote 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.



5.5 Housing

- 5.5.1 The SA scores for three Housing policies are presented in Table 5.2 below.
- 5.5.2 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 to provide 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 (**MM127**). The provision of allocated housing areas will contribute positively to these objectives.
- 5.5.3 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.
- 5.5.4 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.
- 5.5.5 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.
- 5.5.6 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.

Sustainability Objective	H1 - Housing	H2 – Affordable Housing	H3 – Gypsies and Travellers
1. Strong, stable and sustainable economy	/	/	/
2. Vitality of town centres	/	/	/
3. Decent and affordable housing	++	++	+
4. easy and equitable access to services & facilities	/	/	/
5. Crime & fear of crime	/	/	/
6. Poverty	+	+	+
7. Cultural, sport and recreational opportunities	/	/	/
8. Design	/	/	/
9. Natural environment	/	/	/
10. Health	+	+	+
11. Soils	/	/	/
12. Natural resources/ water efficiency	/	/	/
13. Water pollution/ flooding	/	/	/
14. Air Quality	/	/	/
15. Efficient use of infrastructure	/	/	/
16. Energy	/	/	/
17. Climate change	/	/	/



18. Waste minimisation, reuse, recycling and recovery	/	/	/
19. Prudent use of resources	/	/	/
20. Historic environment	/	/	/
21. Landscape	/	/	/

Table 5.2 Summary of SA scores for the Housing Policies

5.5.7 A number of the proposed allocations (**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.

5.6 Employment

5.6.1 The SA scores for three Employment policies are presented in Table 5.3 below.

5.6.2 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 (**MM138**).

5.6.3 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**.



- 5.6.1 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.
- 5.6.2 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 effects on a relatively high proportion of the SA objectives as there is protection built into these policies could therefore 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.

Sustainability Objective	E1 – Nature of Employment Growth	E2 – Existing Employment Estates
1. Strong, stable and sustainable economy	++	++
2. Vitality of town centres	++	++
3. Decent and affordable housing	/	/
4. Easy and equitable access to services & facilities	/	/
5. Crime & fear of crime	?	?
6. Poverty	+	+
7. Cultural, sport and recreational opportunities	/	/
8. Design	0	0
9. Biodiversity	0	0
10. Health	+	+
11. Soils	--	+
12. Natural resources/ water efficiency	0	0
13. Water pollution/ flooding	0	0
14. Air Quality	0	0
15. Efficient use of infrastructure	+	+
16. Energy	0	0
17. Climate change	0	0

18. Waste minimisation, reuse, recycling and recovery	0	0
19. Prudent use of resources	+	++
20. Historic environment	0	0
21. Landscape	0	0

Table 5.3 Summary of SA scores for the Employment Policies

5.7 Town Centres

5.7.1 The SA scores for three Town Centre policies are presented in Table 5.4 below.

5.7.2 The Town Centre Policies are likely to have neutral or positive effects 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.

5.7.3 **Policies TC1, TC2 and TC3** seeks to priorities' development in town centres including tourism and heritage activities (**MM141**) 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.

5.7.4 No likely negative effects (either minor or significant) are identified in relation to any of the SA objectives.

Sustainability Objective	TC1 – Town Centre Requirements	TC2 – Nature of Town Centre Growth	TC3 – Hierarchy of Centres
1. Strong, stable and sustainable economy	++	++	0
2. Vitality of town centres	++	++	++
3. Decent and affordable housing	/	/	/
4. easy and equitable access to services & facilities	+	+	++
5. Crime & fear of crime	?	?	?
6. Poverty	+	+	0
7. Cultural, sport and recreational opportunities	+	+	0
8. Design	0	++	0
9. Natural environment	0	+	0
10. Health	0	+	0
11. Soils	++	+	/
12. Natural resources/ water efficiency	0	+	0
13. Water pollution/ flooding	0	+	0
14. Air Quality	+	+	++
15. Efficient use of infrastructure	++	++	++
16. Energy	0	0	+
17. Climate change	0	+	+

18. Waste minimisation, reuse, recycling and recovery	0	0	0
19. Prudent use of resources	++	++	0
20. Historic environment	0	+	0
21. Landscape	0	+	0

Table 5.4 Summary of SA scores for the Town Centre Policies

5.8 Health, safe and inclusive communities

5.8.1 The SA scores for six Healthy, Safe and inclusive communities' policies are presented in Table 5.5 below.

5.8.2 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 sufficient open spaces and sport facilities available together with essential infrastructure such as healthcare and educational facilities and green infrastructure to meet the needs of the growing population and thus that there are fewer inequalities resulting from poor access to health services and facilities.

5.8.3 **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.

Sustainability Objective	HS1 – Ensuring the delivery of Infrastructure	HS2 – Strategic Accessibility and Sustainable Transport	HS3 – Telecommunications	HS4 – Retaining Community Facilities	HS5 - Health	HS6 – Sport and Exercise	HS 7 Creating a Healthy Food Environment
e1. Strong, stable and sustainable economy	+	+	+	/	/	/	/
2. Vitality of town centres	+	0	/	+	+	/	+
3. Decent and affordable housing	0	/	/	/	/	/	/
4. easy and equitable access to services & facilities	++	+	/	++	+	+	+
5. Crime & fear of crime	+	/	/	/	?	?	?
6. Poverty	+	/	/	+	/	/	/
7. Cultural, sport and recreational opportunities	+	+	/	+	+	++	+
8. Design	/	/	+	/	/	/	/
9. Natural environment	+	/	+	+	/	/	/
10. Health	+	/	/	+	++	+	++
11. Soils	/	/	/	/	/	/	/
12. Natural resources/ water efficiency	+	/	/	/	/	/	/
13. Water pollution/ flooding	+	/	/	/	/	/	/
14. Air Quality	0	++	/	/	0	0	0
15. Efficient use of infrastructure	0	0	/	/	0	0	0
16. Energy	0	+	/	/	/	/	/
17. Climate change	0	+	/	/	/	/	/

18. Waste minimisation, reuse, recycling and recovery	0	/	/	/	/	/	/
19. Prudent use of resources	/	/	/	/	/	/	/
20. Historic environment	+	/	+	/	/	/	/
21. Landscape	+	/	+	+	/	/	/

Table 5.5 Summary of SA scores for the Health, Safe and Inclusive communities Policies

- 5.8.4 **Policy HS2** is also likely to have a significant positive effect on **SA Objectives 14**: air quality across the Borough (**MM145**), **SA Objective 16**: energy, **SA Objective 17**: climate change as it supports future intelligent mobility infrastructure (**MM147**), improvements to the walking and cycling network and encourages developments that will contribute to improved and enhanced green infrastructure and improved connectivity.
- 5.8.5 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.
- 5.8.6 **Policy HS5 (MM155)** 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 (**MM151**). This Policy will have a significant positive effect on **SA Objectives 10**: Health and positive effect on **SA Objective 2**: Town centres.
- 5.8.7 **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.
- 5.8.8 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.



5.9 Natural Environment

- 5.9.1 The SA scores for five Natural Environment policies are presented in Table 5.6 below.
- 5.9.2 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.
- 5.9.3 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.
- 5.9.4 In the case of **Policies NE1 and NE2**, a significant positive effect is identified for this objective as the policies seeks to protect and enhance green infrastructure and open space 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 mean 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.
- 5.9.5 **Policy NE3 (MM161)** protects designated features of biodiversity and geodiversity and will have a significant positive effect on **SA Objective 9**: natural environment.
- 5.9.6 **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 will allow for site specific measures to be agreed at the planning application stage. **Policy NE2 (MM159)** as modified confirmed that new open space can multi-function as flood storage.
- 5.9.7 **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.



- 5.9.8 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 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 offer the opportunity to recreate and connect existing landscape features resulting in long term landscape improvements.
- 5.9.9 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.
- 5.9.10 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.
- 5.9.11 No significant negative effects have been identified for any of the Natural Environment policies in relation to the SA objectives.

Sustainability Objective	NE1 – Green Infrastructure	NE2 – Open Space	NE3 – Biodiversity and Geodiversity	NE4 – Managing Flood Risk & Quality	NE5 – Landscape Character
1. Strong, stable and sustainable economy	/	/	/	/	/
2. Vitality of town centres	+	0	/	/	/
3. Decent and affordable housing	/	/	/	/	/
4. easy and equitable access to services & facilities	/	/	/	/	/
5. Crime & fear of crime	?	?	/	/	/
6. Poverty	0	/	/	/	/
7. Cultural, sport and recreational opportunities	+	++	/	/	/
8. Design	+	+	/	/	+
9. Natural environment	++	++	++	+	+
10. Health	++	++	/	/	/
11. Soils	+	+	+	+	+
12. Natural resources/ water efficiency	0	+	/	++	/
13. Water pollution/ flooding	0	+	/	++	/
14. Air Quality	+	+	/	/	/
15. Efficient use of infrastructure	/	/	/	/	/
16. Energy	/	/	/	/	/
17. Climate change	+	/	+	+	/

18. Waste minimisation, reuse, recycling and recovery	/	/	/	/	/
19. Prudent use of resources	/	/	/	/	/
20. Historic environment	+	/	/	/	/
21. Landscape	++	++	+	+	++

Table 5.6 Summary of SA scores for the Natural Environment Policies

5.10 Built Environment

5.10.1 The SA scores for four Built Environment policies are presented in Table 5.7 below.

5.10.2 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**.

5.10.3 Because of the nature of the **Policy BE2 and Policy BE3 (MM167 and MM168)** have significant positive effects on **SA Objective 17: Climate Change**.

5.10.4 **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.

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



Sustainability Objective	BE1 – Contamination & Land Instability	BE2 – Renewable & Low Carbon Energy	BE3 – Sustainable Design & Construction	BE4 – Valuing & Conserving our historic environment
1. Strong, stable and sustainable economy	/	/	?	/
2. Vitality of town centres	/	/	/	+
3. Decent and affordable housing	/	/	++	/
4. easy and equitable access to services & facilities	/	/	/	/
5. Crime & fear of crime	/	/	++	/
6. Poverty	/	/	/	/
7. Cultural, sport and recreational opportunities	/	/	/	/
8. Design	/	/	++	+
9. Natural environment	+	/	/	/
10. Health	+	/	/	/
11. Soils	/	/	++	/
12. Natural resources/ water efficiency	/	/	++	/
13. Water pollution/ flooding	+	/	/	/
14. Air Quality	/	/	/	/
15. Efficient use of infrastructure	/	/	/	/
16. Energy	/	0	++	/
17. Climate change	/	++	++	/

18. Waste minimisation, reuse, recycling and recovery	/	/	+	/
19. Prudent use of resources	++	/	+	/
20. Historic environment	/	/	/	++
21. Landscape	/	/	/	/

5.7 Summary of SA scores for the Built Environment Policies

5.11 Cumulative Effects

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

5.12 Conclusions

5.12.1 This SA has considered each of the sites and policies in the Borough Plan – Publication Plan incorporating Main Modifications against the agreed Sustainability Objectives agreed at Stage A of the SA process. The role of the SA process is to promote sustainable development by assessing the extent to which the Submission Document, taken together, will help to achieve relevant environmental, economic and social objectives.

5.12.2 The assessment concludes that the Publication Plan incorporating Main Modifications will generally result in a neutral to positive effect on the majority of the SA objectives, although some site allocations and policies have sustainable merits and drawbacks. In each case suitable mitigation or actions have been proposed that will, if implemented, result in the best sustainability score. However this is not possible in all cases, either due to the scale, nature or location of the site or the absence of detailed information, and where relevant these factors are noted.



5.12.3 The provision and agreement of mitigation is key to addressing significant or slight adverse effects associated with the development of the sites and policies in the Borough Plan. Subject to the implementation of the mitigation proposed the Borough Plan will not raise any significant adverse effects or cumulative effects.



6.0 Mitigation and enhancement (Task B4)

6.1 Introduction

- 6.1.1 As the Borough Plan has developed, the draft policies and site allocations were subjected to an SA which suggested a number of mitigation and enhancement measures.
- 6.1.2 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.
- 6.1.3 Appendix H contains a table setting out the mitigation and enhancement measures suggested at each stage of the SA process together with the Councils response.
- 6.1.4 During the evolution of the Borough Plan the evidence base has expanded and more detailed environmental assessment work has been undertaken on each of the proposed site allocation options. The increased information has resulted in the identification of the specific items of mitigation and enhancement which are summarised at the end of each of the site matrices. The suggested mitigation is also set out as criteria in the relevant site allocation policy which is the appropriate 'delivery vehicle' to ensure the enhancement is brought forward in tandem with the site allocation.
- 6.1.5 For the purposes of this SA, it is assumed in all cases that the suggested mitigation will be undertaken. Based on the above, no further mitigation measures are identified for the Borough Plan – Publication Plan incorporating Main Modifications.



7.0 Monitoring (Task B5)

7.1 Monitoring

- 7.1.1 The SEA Regulations state *"the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action"*. The Environmental Report is required to provide information *"a description of the measures envisaged concerning monitoring"*. Monitoring proposals are designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.
- 7.1.2 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. The proposed monitoring indicators proposed in this SA Report are set out in Appendix H and cross referenced to the baseline data presented in the Scoping Report.
- 7.1.3 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 (**MM172 – MM174**). 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.
- 7.1.4 Data on the link between crime and fear of crime levels in respect on the effects of new development is difficult to obtain as identified in Section 5.2. No monitoring has been identified to address this effect.
- 7.1.5 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.



7.2 Next Steps

- 7.2.1 This SA 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.
- 7.2.2 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.



8.0 Conclusions

8.1 Introduction

- 8.1.1 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 findings of this SA Report will contribute to determining the right balance of sustainable development in the Borough.
- 8.1.2 Based on this review a range of mitigation measures have been identified. If implemented, the mitigation measures will ensure that no residual effects are associated with the proposals set out in the Borough Plan – Publication Plan incorporating Main Modifications. The main conclusions are summarised under key sustainable themes:

8.2 Economic Factors

- 8.2.1 All the sites assessed score well against the economic objectives.
- 8.2.2 None of the allocated employment sites assessed are focusing within urban areas but all are located adjacent to the urban areas of Nuneaton and Bedworth, which are the most sustainable locations in the Borough, and generally represent land in the vicinity of existing employment areas (Bermuda Park), principal routes well served by public transport including land in the vicinity of the M6 junction (Phoenix Park).

8.3 Social Factors

- 8.3.1 All the housing sites assessed score well against the social objectives.
- 8.3.2 The allocated housing sites comprise an acceptable mix of small scale sites focusing within urban areas and strategic sites located adjacent to the urban areas of Nuneaton, Bedworth, Bulkington, Keresley and Ash Green/Neals Green which are the most sustainable locations in the Borough. The sites are generally located close to existing centres (or will bring forward additional facilities) and in the vicinity of principal routes well served by public transport.



8.3.3 The policies in the Borough Plan will facilitate high quality design and a sense of place in order to ensure all new development makes a positive contribution to townscape quality and the wider public realm.

8.4 Biodiversity

8.4.1 The majority of the allocated sites will result in the loss of existing habitat and features of biodiversity interest. However, the development of the sites offers the opportunity to create or enhance green infrastructure linkages and new biodiversity features (woodlands, water bodies etc) as part of an overall landscaping/biodiversity scheme for the Site.

8.4.2 The policies in the Borough Plan will protect and enhance existing biodiversity features and opportunities to incorporate 'green infrastructure' features in new development makes a positive contribution to the natural assets of the Borough.

8.5 Population and Human Health

8.5.1 Housing and employment are both important determinants of health and the provision of good quality dwellings and new employment opportunities in the Borough score well against these sustainability objectives.

8.5.2 The provision of new health care facilities/services, or contributions towards them, as part of all development sites for residential uses represents a positive effect on this objective and enhanced health facilities for the Borough as a whole.

8.6 Soil/Land Quality

8.6.1 The allocated sites will lead to the loss of productive agricultural land and quality soils to development that cannot be mitigated.

8.6.2 This represents a negative residual cumulative effect.



8.7 Water Resources

- 8.7.1 Water efficiency is a key issue for the Borough Plan and significant housing and employment growth has the capacity to increase water demand, posing increased pressure on water resources. The provision of new facilities, or contributions towards them, as part of all development sites represents a neutral effect on this objective in the longer term.
- 8.7.2 All the allocated sites will need to be the subject of a Flood Risk Assessment to assess building and access routes to areas of lowest flood risk within the boundary of the Site and identify whether site specific flood mitigation measures are required. The Borough Plan will have neutral effect on this objective in the longer term.

8.8 Air Quality

- 8.8.1 All the allocated sites are located within or adjacent to existing urban areas and thus would tend to encourage a modal shift away from the car usage resulting in the efficient use of existing infrastructure, promote compact mixed use development or reduce the need to travel. The developments will also result in potential increases in traffic, congestion and accidents.
- 8.8.2 Given the sustainable location of the allocated sites in close proximity to a public transport corridor, new development offers the opportunity to bring forward enhanced public transport or cycling measures in tandem with new development resulting in a neutral effect on this sustainability objective in the long term.
- 8.8.3 Only HSG 11 will result in an increase in traffic flows through an existing designated AQMA, namely the Midland Road AQMA. However, the scale of the development at circa 200 dwellings is considered unlikely to result in a significant residual adverse effect on the air quality of the Borough.

8.9 Climatic Factors

- 8.9.1 Policies are included in the Borough Plan to encourage energy efficiency or bring forward decentralised energy facilities in order to ensure all new development makes an appropriate contribution to the energy needs of the Borough. The Borough Plan will make a neutral to positive effect on this sustainability objective in the long term.



8.10 Material Assets

8.10.1 Policies in the Borough Plan will encourage waste minimisation and recycling/recovery of resources in order to ensure all new development makes an appropriate contribution to meeting this objective. The Borough Plan will make a neutral to positive effect on this sustainability objective in the long term.

8.11 Cultural Heritage

8.11.1 All proposed site allocations avoid areas of cultural heritage and, thus offer a neutral effect on protecting and enhancing the Borough's townscape and heritage assets.

8.11.2 Any proposals to develop sites in close proximity to Registered Parks and Gardens and/or listed buildings must ensure that the setting of the historic features are preserved and where possible enhanced.

8.11.3 Policies in the Borough Plan require 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.

8.11.4 The Borough Plan will make a neutral effect on this sustainability objective in the long term.

8.12 Landscape

8.12.1 All the allocated sites will result in some change to the local landscape. 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 or provide green infrastructure linkages as part of a wider scheme for the site.

8.12.2 Policies in the Borough Plan will ensure that the development of each site will conserve and enhance the existing landscape character. The Borough Plan will make a neutral to positive effect on this sustainability objective in the long term.



- 8.12.3 This SA has considered each of the sites and policies in the Borough Plan – Publication Plan incorporating Main Modifications against the agreed Sustainability Objectives agreed at Stage A of the SA process.
- 8.12.4 The assessment concludes that the Publication Plan incorporating Main Modifications will generally results in a neutral to positive effect on the majority of the SA objectives, although some site allocations and policies have sustainable merits and drawbacks. In each case suitable mitigation or actions have been proposed that will, if implemented, result in the best sustainability score.
- 8.12.5 Subject to the implementation of the mitigation proposed the Borough Plan will not raise any significant adverse residual or cumulative effects.

