



**Gypsies, Travellers and Travelling
Showpeople Site Allocations
Development Plan Document
Preferred Options
Sustainability Assessment**

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

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1.0 Introduction

1.1 Background

1.1.1 Nuneaton and Bedworth Borough Council (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;
- Spatial vision for the 7 locality areas including site specific proposals; 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 Plan seeks to guide new development required to meet the needs of the Borough for the period up to 2031. This included the current and future needs of the Gypsy and Traveller Communities. Policy NB 10 of the Borough Plan Submission Document sets out the policy criteria against which new Gypsy and Traveller sites will be judged, it also set out targets for the number of residential and transit pitches to be provide during the plan period to meet the qualitatively assessed need for such facilities. The targets are set out in Table 1 below:

Table 1: Target Pitches

Type	No
Residential pitches	40
Transit pitches	15-20
Travelling show People plots	0



- 1.1.3 The Gypsies, Travellers and Travelling Showpeople (persons) Site Allocations Development Plan Document (the DPD) is being prepared by the Council to identify and allocate suitable sites to meet the criteria and targets set out in Policy NB 10 of the Borough Plan. The DPD is currently at the Preferred Option stage.
- 1.1.4 The DPD 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).
- 1.1.5 WYG have been appointed to undertake a Sustainability Appraisal (incorporating the provisions of the EU SEA Directive) (hereafter referred to as SA) and a Habitats Regulations Assessment (HRA) of the DPD. WYG have experience in completing SAs and SEAs of spatial planning documents and are retained to undertake a sustainability assessment of the wider Borough Plan. This experience and knowledge of the local area has been used in the preparation of this SA. The HRA is presented as a separate 'standalone' document.
- 1.1.6 This document comprises the Sustainability Appraisal Report (SA Report) for the Nuneaton and Bedworth - Gypsies, Travellers and Travelling Showpeople Site Allocations Development Plan Document (2015). 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.



1.2 Nuneaton and Bedworth – Baseline Context

- 1.2.1 Nuneaton and Bedworth Borough is located in the north of Warwickshire, in the West Midlands, containing 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 significantly slower rate of population 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.
- 1.2.2 The Borough has excellent transport links and is situated at the heart of the motorway network and 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).
- 1.2.3 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 base of the Borough's local economy is a mixture of small and medium-sized firms.
- 1.2.4 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 most deprived fifth of England areas and some among the least. A key indication of the scale of the socio-economic challenge facing the Borough can be understood from the 2010 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 2010)



- 1.2.5 In the health profile for the Borough in 2012, male and female life expectancy remains below the average in England at 77.5 for males and 81.9 for females compared to 78.6 for males and 82.6 for females as a national average. (ONS, reviewed April 2014).
- 1.2.6 There are no green spaces in Nuneaton and Bedworth which have a Green Flag Award. (Green Flag Award, reviewed April 2014).
- 1.2.7 The Borough contains 1 European Site (Ensor's Pool Special Protection Area), 2 SSSI's and 3 Local Nature Reserves. (Natural England, reviewed April 2014).
- 1.2.8 The Borough contains 93 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 April 2014).

1.3 Integrated Sustainability Assessment

- 1.3.1 The SA is a powerful tool that can not only evaluate the sustainability of the DPD and ensure that sustainability considerations are reflected in the evolution of the plan and policy preparation.
- 1.3.2 This SA Report is intended to add to the transparency of the process involved in preparing the Preferred Option DPD, as well as ensuring and improving that the principles of sustainable development are at the core of the decision making process. The report provides a wide ranging independent qualitative assessment of the all the preferred site allocations together with the consideration of alternatives options considered during the evolution of the DPD. The report also includes a series of recommendations to be considered by the Council.
- 1.3.3 The SA Report will be made available for public consultation alongside the DPD – Preferred Option.



1.4 Structure of this Sustainability Appraisal Report

1.4.1 This chapter of the SA report provides an introduction to the DPD, the baseline context of Nuneaton and Bedworth Borough and the integrated SA process. The remainder of the report is structured as follows:

- Chapter 2 – provides details of the DPD – Preferred Option Document and sustainability context and objectives of the Plan;
- Chapter 3 – outlines the methodology of the SA;
- Chapter 4 – summary of 'reasonable' alternatives considered;
- Chapter 5 – appraisal of the significant effects associated with the DPD policies and sites;
- Chapter 6 – outlines the residual effects and overall conclusions.

1.5 How to comment on this Sustainability Appraisal Report

1.5.1 This SA is being published for comment alongside the DPD – Preferred Option Document. If you have any comments on this report please respond to:

planning.policy@nuneatonandbedworth.gov.uk



2.0 Sustainability Assessment – Context and Objectives

2.1 Gypsy, Traveller and Travelling Showpeople Development Plan Document

2.1.1 The Gypsy, Traveller and Travelling Showpeople Development Plan Document is part of a suite of Local Development Documents (LDDs) which will guide all new development until 2031.

2.2 Sustainability Context - Policy

2.2.1 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, 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. Key among the Government's priorities is the adoption of more sustainable patterns of travel, reducing the need to travel and reducing the effects of transport. This encourages the careful and sustainable location of development in order to minimise the need for travel.

2.2.2 It is critical that the DPD is based around the priorities for action and the principles of sustainable development.

2.2.3 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.



2.2.4 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.

2.2.5 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*".

2.2.6 Paragraph 17 identifies 12 core land use planning principles that should underpin both plan-making. 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.

2.2.7 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

2.2.8 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

2.2.9 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.

2.2.10 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”*.



2.2.11 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"*.

2.2.12 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"*.

2.2.13 Specific guidance relating to identification of Gypsy and Traveller Sites is set out Planning Policy for Traveller Sites. The Policy states at Paragraph 13 that *"Local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally. Local planning authorities should, therefore, ensure that their policies:*

- a) promote peaceful and integrated co-existence between the site and the local community*
- b) promote, in collaboration with commissioners of health services, access to appropriate health services*
- c) ensure that children can attend school on a regular basis*
- d) provide a settled base that reduces both the need for long-distance travelling and possible environmental damage caused by unauthorised encampment*
- e) provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development*
- f) avoid placing undue pressure on local infrastructure and services*



- g) do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans*
- h) reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability".*

2.2.14 The SA will be used to test that the proposals in the DPD meet the requirement of the Planning Policy Document.

2.3 Relationship between the SA and HRA

2.3.1 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.

2.3.2 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 2.5kms to the south west of Nuneaton. WYG has been commissioned by Nuneaton and Bedworth Borough Council to prepare a Habitats Regulations Assessment of the DPD to consider whether the plan is likely to have significant effects on European habitats or species. A HRA of the DPD Preferred Option Document is presented as a separate 'standalone' document.

2.3.3 The HRA has been prepared in consultation with Natural England and Environment Agency and has assessed all the alternative development sites and polices during the evolution of the DPD Preferred Option Document.



2.3.4 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.



3.0 Methodology of the Sustainability Assessment

3.1 Introduction

- 3.1.1 Under S19(5) of the Act and the SEA Regulations which came into force in England and Wales in July 2004 SA and Strategic Environmental Assessment (SEA) are mandatory for all Local Plans and site allocation documents. S39 of the Act requires Local Plans/DPDs to be prepared with a view to contributing to the achievement of sustainable development. SA is one way of helping fulfil this duty through a structured appraisal of the economic, social and environmental sustainability of the plan. The production of a SA is one of the “*tests of soundness*” on a Local Plan/SPD.
- 3.1.2 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.
- 3.1.3 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.
- 3.1.4 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).
- 3.1.5 Further guidance on the preparation of the SA in relation to the stages of Local Plan production including site allocation documents together with the information to be covered within the SA Report is set out in the Planning Policy Guidance (PPG) dated March 2014. This guidance is considered to be equally relevant to the preparation of an SA form this DPD.





- 3.1.6 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 DPD’s production.
- 3.1.7 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.

3.2 SA Key Steps and Tasks

- 3.2.1 The preparation of this DPD Preferred Option Document and this SA Report relates to Stage B of the five stage SA process set out at Paragraph 11-013 of the Planning Practice Guidance (March 2014) and reproduced at Table 1 below.
- 3.2.2 The findings of this SA Report and all consultation representations received will be reviewed by the Council and used to determine the effectiveness of the DPD to integrate social, economic and environmental objectives into the preparation stages of the Plan.

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

3.3 Stage A - Sustainability Objectives and Scope

3.3.1 The Sustainability Objectives, upon which this SA is based, were developed as part of the SA Stage A for the Borough Plan and represents a key aspect of the Appraisal process. The objectives reflect the sustainability principles and issues relevant to the emerging Borough Plan.

3.3.2 The Sustainability Objectives used in this SA are set out in Table 2 below:

Table 2: Sustainability Objectives

Reference no.	Sustainability Objective
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)
2	To enhance the vitality of town centres
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
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

5	Reduce crime, fear of crime and antisocial behaviour
6	Address poverty and disadvantage taking into account the particular difficulties of those facing multiple disadvantage
7	Improve opportunities to participate in the diverse cultural, sport and recreational opportunities the Borough can offer
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
9	To protect and enhance the natural environment, habitats, species, landscapes and inland waters
10	Improve health and reduce health inequalities by encouraging and enabling healthy active lifestyles and protecting health, as well as providing equitable access to health services
11	To protect and improve soil quality
12	Use natural resources, such as water efficiently, including by incorporating efficiency measures into new land use and developments, redevelopment and refurbishment
13	Ensure that new developments minimise water pollution levels and avoid areas which are at risk from flooding and natural flood storage areas
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

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
16	Reduce overall energy use through increased energy efficiency
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
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
19	To ensure the prudent use of resources including the optimum use of previously developed land, buildings and the efficient use of land
20	To protect and enhance the historic environment
21	To maintain and enhance the quality of landscapes

3.3.3 In order to assess the sites and proposals in this SA against each of the SA objectives in a consistent manner, a number of appraisal questions and associated indicators have been developed and are presented at Appendix A.

Scoping Report

3.3.4 A Borough Plan Scoping Report dated April 2014 presents data on each of the following matters:

- Policy context (review of other plans, policies, programmes and objectives);
- Baseline data review including sources of data, data gaps and trends; and



- Identifying sustainability issues and problems.

3.3.5 The Sustainability baseline for Nuneaton Borough used for the purposes of this Assessment is set out in the Scoping Report. The environmental/sustainability objectives identified within the plans and programmes reviewed and the other baseline information has been used to inform and develop the SA Objectives presented at Table 2.

3.3.6 The Scoping Report was the subject of formal consultation with the public and statutory consultees/stakeholders and the comments received taken into account. This accords with Tasks 1-5 of Stage A.

3.4 Stage B – Refining options and assessing effects

3.4.1 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".

3.4.3 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*'.

Defining 'Significant effects'

3.4.4 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 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?

3.4.5 More 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 includes *"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"*.

3.4.6 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.

3.4.7 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.

3.4.8 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 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 health standards or environmental objectives threatened?
- Are mitigating measures available and is it reasonable to require these?

3.4.9 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 and the definitions set out below were used to judge the potential significance of the specified effect on the plan's objectives.

3.5 Definitions

3.5.1 The following definitions are used in this Environmental Report:

Duration of Effects

3.5.2 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

3.5.3 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 effects	effects that are due to activities that are not part of the plan proposal/policy,
Primary effects	the first effect of a plan proposal/policy;
Secondary effects	effects that are a consequence of a primary effect of the plan proposal/policy;
Combined or interactive 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.

3.5.4 The SA has reviewed all the reasonable options considered during the evolution of the DPD Preferred Options and assessed the significant effects on the environment. A Location Plan of all the sites assessed in this SA is contained at Appendix B.

3.6 Assessing effects

3.6.1 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 DPD. This assessment process is done in the context of the level of information that is currently available for each 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.

3.6.2 This stage offers the opportunity to review the preferred option set out in the DPD in the context of the SA Objectives. This iterative approach is invaluable in allowing the SA to inform the Council's selection approach and explain the assessment that underpins the DPD options. Each of the Policies and Sites set out in this DPD were tested against the sustainability objectives developed for the purposes of this Sustainability Appraisal.

3.6.3 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

3.6.4 It should be noted that the scoring criteria was based on available information in respect of each of the site allocation or policy and has been based on the SA team’s judgment. 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.

3.6.5 The full appraisal results are set out in the matrix presented at Appendix C for each site and Appendix D for each policy. Each matrix contains a summary of the overall environmental effects. A summary of the appraisal results is presented at Chapter 5.



3.7 Stage C – Prepare SA Report

3.7.1 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 DPD.

3.8 Stage D – Consultation on SA Report

3.8.1 The SA report will be published for comment with the DPD Preferred Option Document.

3.9 Stage E – Post adoption Reporting and Monitoring

3.9.1 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.

3.9.2 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 resulted in the Annual Monitoring Report.

3.9.3 The final SA monitoring programme will be included in the SA adoption Statement (once the DPD is adopted) and this will reflect any changes made during the Examination Stage.



4.0 Assessment of Reasonable Alternatives

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.

4.1.3 An independent SA has been undertaken at each stage in the preparation of the Borough Plan. This included a detailed assessment of a variety of alternatives site 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.

Alternative Sites

4.1.4 The Issues and Options - Borough Plan considered eight spatial development options for accommodating the growth requirements for Nuneaton 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 development in or adjacent to the existing urban areas scored higher in sustainability terms.

4.1.5 The evidence base prepared for the Preferred Option Borough Plan includes a background paper entitled '*Gypsy, Traveller and Travelling Showpeople Accommodation Assessment: North Warwickshire and Nuneaton and Bedworth*'. The background paper identified the current and future needs of Travelling Communities in Nuneaton Borough and investigated

the local accommodation provision; characteristics of gypsies and travellers and accommodation need and supply. Based on the findings of the background paper ten sites were identified by the Council as potential allocation which are concluded to the 'reasonable' alternative sites for the purposes of the SEA Regulations.

4.1.6 Five of the Sites, namely GT.A, GT.B, GT.C, GT.D, GT.E, have been identified by the Council in the DPD Preferred Option, namely:

- Land off Mancetter Road, Tuttle Hill; (GT.A)
- Land at Burbages Lane, Ash Green; (GT.B)
- Land at Bottom Meadow, Mile Tree Lane; (GT.C)
- Land at Attleborough; (GT.D) and
- Two Trees Farm. Mile Tree Lane (GT.E).

4.1.7 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. The Assessment matrices for all the site are presented at Appendix C. A summary of the conclusions for each site presented in the Borough Plan – Submission Document is set out in Table 3 below.

Table 3 – Allocated Sites

Site Reference no.	SA Conclusions
Land off Mancetter Road, Tuttle Hill; (GT.A)	Site GT.A has the potential to bring forward 15 pitches which will meet an identified need for specialist housing units and thus represents a significant positive effect on the provision of homes. There will also be indirect positive effects in terms of



	<p>social factors associated with deprivation and poverty together with waste minimisation but a neutral effect on economic factors.</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 the prudent use of resources, soils, landscape (in the short term), 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 on a 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. However, if enhanced public transport measures were brought forward in tandem with the development then the potential impacts could be mitigated in the longer term.</p> <p>The Site is located close to, but outside, the urban area of Nuneaton resulting in a negative effect on access to services, addressing climate change and preserving the vitality of the Town Centre. However, given that nature of the proposal it is likely that the proposed uses could not be accommodated within Town Centre areas. Accordingly, the Site is considered to have a slight adverse impact on the vitality of the Town Centre areas.</p> <p>The Site will have a neutral effect on issues of climatic factors, design/ sense of place, biodiversity, cultural heritage, water resources, sports/cultural facilities and waste minimisation</p>
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	<p>provided that the development accords with other policies in the Borough Plan.</p>
<p>Land at Burbages Lane, Ash Green; (GT.B)</p>	<p>The proposed development will bring forward 15 permanent pitches new housing units which will meet an identified need for specialist housing and thus represents a significant positive effect on the provision of homes. There will also be indirect positive effects in terms of social factors associated with deprivation and poverty together with waste minimisation but a neutral effect on economic factors.</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 the prudent use of resources, soils, landscape (in the short term), 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 on a 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. However, if enhanced public transport measures were brought forward in tandem with the development then the potential impacts could be mitigated in the longer term.</p> <p>The Site will have a neutral effect on climatic factors, provision of sports and recreational facilities, biodiversity, design/sense of place, cultural heritage, water resources (with mitigation), health facilities provided that the development accords with other policies in the Borough Plan.</p>



<p>Land at Bottom Meadow, Mile Tree Lane; (GT.C)</p>	<p>The proposed development will bring forward 3 permanent pitches new housing units which will meet an identified need for specialist housing and thus represents a significant positive effect on the provision of homes. There will also be indirect positive effects in terms of social factors associated with deprivation and poverty together with waste minimisation but a neutral effect on economic factors.</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 (in the short term), prudent use of resources (land) and access to existing services/infrastructure and the vitality of the Town Centres.</p> <p>GT.C is accessed from Mile Tree Lane, a bus route, which offers a direct route to Bulkington District Centre to the north and the Bell Green area of Coventry to the south.</p> <p>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' dependant on public transport. However, if enhanced public transport measures were brought forward in tandem with any development of the Site then this effect could be mitigated resulting in a neutral effect in the longer term.</p> <p>The development of the Site will increase the level of development in the area but also offers the opportunity to recreate and connect existing landscape features, i.e. hedgerows/copse and woodland area, as part of the wider</p>
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	<p>scheme for the Site. The development will also provide the opportunity to create new features and provide 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 climatic factors, provision of sports and recreational facilities, biodiversity, design/sense of place, cultural heritage, water resources (with mitigation), health facilities provided that the development accords with other policies in the Borough Plan.</p>
Land at Attleborough; (GT.D)	<p>The proposed development will bring forward 15 permanent pitches new housing units which will meet an identified need for specialist housing and thus represents a significant positive effect on the provision of homes. There will also be indirect positive effects in terms of social factors associated with deprivation and poverty together with waste minimisation but a neutral effect on economic factors.</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 (in the short term), prudent use of resources (land) and access to existing services/infrastructure and the vitality of the Town Centres.</p> <p>The Site is accessible by car for services, jobs and learning activities and is situated within 250m of a bus stop. 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. However, if enhanced public transport measures were</p>



	<p>brought forward in tandem with the development then the potential impacts could be mitigated in the longer term.</p> <p>The development of the Site will increase the level of development in the area but also offers the opportunity to recreate and connect 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 and provide 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 climatic factors, provision of sports and recreational facilities, biodiversity, design/sense of place, cultural heritage, water resources (with mitigation), health facilities provided that the development accords with other policies in the Borough Plan.</p>
Two Trees Farm, Mile Tree Lane (GT.E).	<p>The proposed development will bring forward 6 permanent pitches new housing units which will meet an identified need for specialist housing and thus represents a significant positive effect on the provision of homes. There will also be indirect positive effects in terms of social factors associated with deprivation and poverty together with waste minimisation but a neutral effect on economic factors.</p> <p>The development of the Site is on previously developed land located outside the existing urban areas and will have a positive effect on soils, and the prudent use of resources (land) and a negative effect on landscape (in the short term), access to existing services/infrastructure and the vitality of the Town Centres.</p>



	<p>GT.E is accessed from Mile Tree Lane, a bus route, which offers a direct route to Bulkington District Centre to the north and the Bell Green area of Coventry to the south.</p> <p>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' dependant on public transport. However, if enhanced public transport measures were brought forward in tandem with any development of the Site then this effect could be mitigated resulting in a neutral effect in the longer term.</p> <p>The development of the Site will increase the level of development in the area but also offers the opportunity to recreate and connect 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 and provide 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 climatic factors, provision of sports and recreational facilities, biodiversity, design/sense of place, cultural heritage, water resources (with mitigation), health facilities provided that the development accords with other policies in the Borough Plan.</p>
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Policies

4.1.8 The Site Allocations are supported by two policies in the DPD Preferred Option, namely:

- GT.1 - Meeting the requirements for Permanent and Transit Sites; and
- GT.2 – Safeguarding Sites.

4.1.9 A Sustainability Assessment of each policy has been undertaken. The Assessment matrices for all the policies are presented at Appendix D. A summary of the conclusions for each site presented in the DPD – Preferred Option is set out in Table 4 below.

Table 4 – Allocated Policies

Site Reference no.	SA Conclusions
GT.1 - Meeting the requirements for Permanent and Transit Sites;	<p>The allocation of specific sites will result in a significant positive effect on social factors via the contribution to the overall specialist housing needs of the Borough. The Policy will have a neutral effect on population and human health.</p> <p>None of the sites are located with Town Centre areas so the allocations will not directly enhance the vitality and viability of the town centres, thus, potentially undermining the town centre's role and regeneration opportunities. However, given that nature of the proposal it is likely that the proposed uses could not be accommodated within Town Centre areas. There is a slight adverse effect on these sustainability objectives.</p> <p>As the policy is solely focussed on the provision of residential pitches to meet the identified need for future gypsy and traveller sites the Policy will have no direct relationship with</p>

	<p>wider environmental or economic factors. Such factors are considered as part of the individual SA assessment for each allocated site.</p>
<p>GT.2 – Safeguarding Sites.</p>	<p>Policy GT2 seeks to safeguard existing sites and thus maintain the overall supply of pitches to fulfil the identified need for Gypsy and Travellers until 2031 resulting in a significant positive effect on social factors, including reducing poverty, via the contribution to the overall specialist housing needs of the Borough. The Policy will have a neutral effect on population and human health.</p> <p>None of the existing sites are located with Town Centre areas so the allocations will have a neutral effect on enhancing the vitality and viability of the town centres and directing development to urban areas.</p> <p>As the policy is solely focussed on the safeguarding of existing residential pitches to meet the identified need for future gypsy and traveller sites the Policy will have no direct relationship with wider environmental or economic factors.</p>

Summary

- 4.1.10 The findings of this SA will be used by the Borough Council to assess, refine and amend the preferred option site allocations and policies for inclusion in the DPD Submission Document.
- 4.1.11 Based on the above, it is considered that the DPD – Preferred Option Document has met the requirements of the SEA Regulations and Stage B of the SA Stages.



5.0 Appraisal of 'significant' environmental effects

5.1 Introduction

- 5.1.1 This section of the report summarises the findings of the Sustainability Assessment of the DPD – Preferred Option Document in respect of any significant effects associated with the SA objectives and also considers the cumulative effects arising from DPD as a whole.
- 5.1.2 If any uncertain effects or difficulties have been encountered as part of the assessment process then these are noted under the relevant sections along-side the assessor's comments.

5.2 Economic factors

- 5.2.1 The DPD – Preferred Option is a specific sites allocation document, purpose of which is to identify and safeguard sufficient residential pitches to meet the quantified needs of the Gypsy and Traveller community in Nuneaton Borough for the period until 2031. All the policies and potential sites had a neutral score against the economic objectives.
- 5.2.2 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. None of the existing sites or proposed allocations are located within the urban areas and so will not directly enhance the vitality and viability of the town centres and potentially undermining the town centre's role and regeneration opportunities. This will result in a significant adverse effect on this objective. However, given that nature of development it is likely that the proposed uses could not be accommodated within Town Centre areas. Based on the above, the DPD is considered to have a slight adverse impact on this Sustainability Objective.



5.2.3 With the exception of **GT.E - Two Trees Farm**, none of the sites are located on previously developed land and are generally in 'out of centre' locations, so scored poorly in terms of contributing to the urban areas and the efficient use of land.

5.3 Social factors

5.3.1 All the proposed pitch allocations (**GT.A-E**) score well against the social objectives. It is the Council's intention to bring forward a range and mix of housing tenures and the DPD Preferred Option Document seeks to deliver on this objective for the Gypsy and Traveller Community. This is likely to contribute positively to reducing poverty, deprivation and social exclusion by virtue of improving access to housing opportunities, thereby delivering an equitable sharing of the benefits of prosperity.

5.3.2 Providing everyone with an opportunity to live in decent and affordable home is a key social target. Housing is a key driver to revitalisation and it is an essential community need and a variety of housing types. The safeguarding of existing pitches and the identification of new pitches will contribute positively to these objectives.

5.3.3 Access to facilities and services is a critical fact and can have the potential for a significant impact on sustainability issues, particularly if the private vehicles are favoured over more sustainable modes of travel. All the allocated sites are situated in 'dispersed locations' which, for the purposes of this assessment, is defined as land outside the Town Centres of Nuneaton and Bedworth. Such dispersed sites scored low in respect of current access to services and facilities.

5.3.4 Sustainable travel and promoting a modal split away from the private car in favour of more sustainable modes such as cycling, walking and public transport together with a reduction in the number of trips and trip length, is a key objective of the wider Borough Plan. The allocated sites are situated on or in close proximity to existing public transport corridors so mitigation, in terms of the provision of enhanced public transport or cycling measures, can



therefore be incorporated with the development proposals resulting in a neutral score for this sustainability objective in the longer term.

5.3.5 The provision of new permanent and transit pitches 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 crime or fear of crime between are currently unknown.

5.4 Biodiversity

5.4.1 Given that allocated sites comprise open land either within agricultural or informal recreation use, the development of the sites have the potential to impact negatively on the Borough's biodiversity assets in the short to medium term. However, in most cases, suitable mitigation or enhancement measures can offset these impacts in the longer term.

5.4.2 The development of the sites, with mitigation, also offers a significant opportunity to improve the Borough's green infrastructure provision and biodiversity assets by creating a strong green infrastructure network throughout the Borough.

5.4.3 Ensor Pool SAC is an internationally protected site associated with principally White Clawed Crayfish. A HRA of the DPD undertaken by WYG has considered the effect on the designated site from the development of the allocated sites. None of the allocated sites have the potential to result in an adverse effect on the SAC.

5.5 Population and Human Health

5.5.1 Enhancing the health of the Borough's population does not exclusively rest on the increased provision of and access to health services but can also include improving access to a variety of housing types. The Health Impact Assessment prepared by Ben Cave Associates



concludes that housing is an important determinant of health and supports the provision of good quality dwellings in the Borough.

- 5.5.2 The development of sites for residential uses will exacerbate current inequalities or access to health care facilities/services and no new health related facilities will be provided as a consequence of this DPD. It is considered that the safeguarding of existing pitches and the development of new permanent and transit pitches housing sites will have a neutral impact on human health and well-being.

5.6 Land Quality and soil

- 5.6.1 All the allocated sites, except **GT.E – Two Trees Farm**, will lead to the loss of productive land quality soils to development and have been scored as a significant adverse effect on this sustainability objective. No mitigation is available. This will result in a negative residual cumulative effect.

5.7 Water resources

- 5.7.1 Water efficiency is a key issue for the Borough Plan and the proposed allocations is likely to increase water demand, posing increased pressure on water resources, unless adequate mitigation is also brought forward. Accordingly, the development of the allocated sites, if unmitigated, might also result in increased ground water abstraction and related pollution effects.
- 5.7.2 The incorporation of water efficiency measures and SuDS within the detailed schemes for the sites will be mandatory at the planning application stage, which will set out suitable site specific mitigation in each case. As all the allocated sites, except **GT.E Two Trees Farm**, comprise an existing 'greenfield' land it is considered that the effect on the use of water resources represents an adverse effect in the short term, however, this is reduced to a



neutral effect in the medium to longer term following the introduction of the specified mitigation measures.

- 5.7.3 A Strategic Flood Risk Assessment Level 1 was undertaken by Halcrow in 2007 which confirms that flood risk is not a major constraint on development in the Borough. A Strategic Flood Risk Assessment - Level 2 of the Borough was undertaken by JBA consulting in 2012 and has been reviewed, as part of the SA process, to identify whether the assessed sites contain land at Flood Risk, namely land falling within Flood Zones 2, 3a and 3b.
- 5.7.4 The NPPF (Paragraph 100) and the associated PPG requires sites either at risk of flooding or over 1ha to be the subject of a Flood Risk Assessment to identify whether site specific flood mitigation measures are required. Where relevant specific flood mitigation measures are identified these will need to be brought forward at the planning application for each of the assessed sites. Based on the provision of the mitigation measures the score for the allocated sites are neutral in the longer term and cumulative effects are unlikely.
- 5.7.5 All the proposed allocations will lead to the inevitable increase of impermeable surfaces resulting in increased surface water run-off and potential pollution of water courses. The creation of new areas of hard-standing associated with the development of each of the assessed sites may, therefore, result in surface water flooding. No information is currently available as to the extent of 'developable land' likely to come forward on individual sites.
- 5.7.6 Based on the above, the development of the greenfield sites are considered to have a slight adverse effect on water resources in the short term but a neutral effect on this sustainability objective in the medium to long term. Cumulative effects are unlikely in the longer term.



5.8 Air Quality

- 5.8.1 All the allocated sites in the DPD are located in 'out of centre' locations and thus would tend to discourage a modal shift away from the car usage resulting in potential increases in traffic, congestion and accidents. However, given that nature of the proposal it is likely that the proposed uses could not be accommodated within Town Centre areas. There is a slight adverse effect on the sustainability objectives associated with air quality.
- 5.8.2 **GT.A – Land at Mancetter Road** may result in an increase in traffic flows through the existing designated AQMAs, therefore this allocation may result in a significant adverse effect on the air quality of the Borough. None of the remaining allocations will affect the designated AQMAs.

5.9 Climatic factors

- 5.9.1 Reducing the causes and impacts of climate change and enduring energy efficiency are critical sustainability objectives and should be given a prominent role within the emerging Borough Plan.
- 5.9.2 The dispersed location of the allocated sites will limit the opportunity to reduce overall energy use or provide centralised energy facilities. It is considered that the DPD will result in a slight adverse effect on this sustainability objective.

5.10 Material Assets

- 5.10.1 All the allocated sites, except **GT.E – Two Trees Farm**, are located on greenfield land outside the Town Centres of Nuneaton and Bedworth and thus result in a significant adverse effect on the prudent and efficient use of resources/land.



5.11 Cultural heritage

5.11.1 The allocated sites generally avoid areas of cultural heritage and, thus offer a neutral effect on protecting and enhancing the Borough's townscape and heritage assets. None of the sites are situated within a Conservation Area or the setting of a heritage asset.

5.11.2 Many of the sites may have archaeological potential and this matter will need to be investigated further at the planning application stage. Subject to the implementation of any relevant mitigation measures the DPD will result in no significant or cumulative effect on cultural heritage coming forward as a result of the proposals in the Plan.

5.12 Landscape

5.12.1 The allocated sites have been reviewed against the relevant Landscape Character Area and the associated 'actions' set out in the Strategic Landscape Assessment prepared by TEP.

5.12.2 It is considered that all the allocated sites will result in some changes to landscape character. In each case, the development of the site will increase the level of hardstanding and potential 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 resulting in landscape enhancements in the longer term.

5.12.3 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 but an overall neutral to positive effect in the medium to long term once the landscaping proposals have started to mature and the linkages become established. In common with all development proposals in these landscape areas, securing a high quality site layout and design will be required to mitigate any adverse effect on the land landscape character.



5.12.4 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.

5.13 Cumulative Effects

5.13.1 Based on the findings of the individual matrices and scale of each of the allocated site and proposed policy it is considered that the DPD Preferred Option 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.



6.0 Residual effects and conclusions

6.1 Introduction

- 6.1.1 This SA has considered each of the sites and policies in the Gypsies, Travellers and Travelling Showpeople (persons) Site Allocations Development Plan Document (DPD) – Preferred Option 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 Preferred Option Document, taken together, will help to achieve relevant environmental, economic and social objectives.
- 6.1.2 The findings of the assessment are presented in Section 5 and conclude that the DPD – Preferred Option Document 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. 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.
- 6.1.3 The provision and agreement of mitigation is key to addressing significant or slight adverse effects associated with the development of the site and polices in the Borough Plan. Subject to the implementation of the mitigation proposed the DPD will not raise any significant adverse or cumulative effects.



APPENDICES