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1 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 spatial vision, strategic objectives for the Borough, a spatial strategy, core policies and a 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. To inform the preparation of the Borough Plan the Council has prepared a Preferred Option Document, which sets out the spatial vision for the Borough, the objectives to deliver the vision and the preferred spatial development option to accommodate the growth over the plan period.
- 1.1.2 In June 2009, The Council prepared a Core Strategy - Issues and Options document that was the subject of public consultation during Summer 2009. The Issues and Options Core Strategy was the subject of a standalone Sustainability Appraisal (SA).
- 1.1.3 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 have been taken into account in the preparation of the Borough Plan Preferred Option document.
- 1.1.4 Alliance Planning and Mott Macdonald (MM) have been appointed to undertake a Sustainability Appraisal (incorporating the provisions of the EU SEA Directive) (hereafter referred to as SA) and Habitats Regulations Assessment (HRA) of the emerging Nuneaton and Bedworth Borough Plan. The HRA is presented as a separate 'standalone' document.
- 1.1.5 This SA Report provides the results of the independent assessment of the Borough Plan. The emerging 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 helps deliver sustainable patterns of development and ensure that sustainability considerations are reflected in the evolution of the plan and policy preparation.

- 1.1.6 This SA Report is intended to add to the transparency of the process involved in preparing the Borough Plan Preferred Option Document, as well as ensuring and improving the sustainability of decisions taken. The SA Report will be made available for public consultation alongside the Borough Plan – Preferred Option Document. The SA Report and all consultation representations received will be used by the Council to inform the preparation of the Borough Plan – the Submission Document.

1.2 CONTEXT

- 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 seeks to bring forward a proportionate level of new development between the period 2010 and 2028, 7,900 new dwellings. This is to be accompanied by the provision of 83 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.
- 1.2.2 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.
- 1.2.3 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. The Borough is a 19-minute drive to Birmingham International Airport, a 37-minute drive to Nottingham East Midlands Airport, one of the UK's fastest growing airports and Nuneaton is served by the West Coast Mainline.
- 1.2.4 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.

1.2.5 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 492th (compared to 1,087 in 2007) out of 32,482 SOAs in England. Placing it within the top 1.5% most deprived SOAs in England.

1.3 NUNEATON AND BEDWORTH'S COMMITMENT TO SUSTAINABILITY AND CLIMATE CHANGE

1.3.1 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."


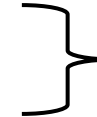

1.3.2 The Nuneaton and Bedworth Borough Plan and the accompanying, SA and HRA will have a key role in delivering the aims and targets of the Nottingham Declaration on Climate Change and the Warwickshire Climate Change Strategy. The SA will help ensure that the Borough Plan is prepared with a view to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

1.4 PURPOSE OF THIS SUSTAINABILITY APPRAISAL REPORT

1.4.1 This SA Report documents the outcome of the SA into the Borough Plan – Preferred Options. This report provides a broad independent qualitative assessment of the sustainability implications of the emerging preferred spatial development options. It also includes a series of recommendations to be considered by the Council in future stages of Core Strategy preparation.

1.4.2 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 process set out in the ODPM (now DCLG) SA guidance¹. Stage A of the SA process was completed and consulted upon with statutory consultees and stakeholders between 5 November 2008 and 12 December 2008. A number of comments were received and appropriate amendments to the Scoping Report were made.

Table 1: SA Stages and Tasks

<p>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</p> <ul style="list-style-type: none"> • A1: Identifying other relevant policies, plans and programmes, and sustainability objectives. • A2: Collecting baseline information. • A3: Identifying sustainability issues and problems. • A4: Developing the SA framework. • A5: Consulting on the scope of the SA. 	 <p>STAGE A AND STAGE B COMPLETE</p>
<p>Stage B: Developing and refining options and assessing effects</p> <ul style="list-style-type: none"> • B1: Testing the DPD objectives against the SA framework. • B2: Developing the DPD options. • B3: Predicting the effects of DPD. • B4: Evaluating the effects of the DPD. • B5: Considering way of mitigating adverse effects and maximising beneficial effects. • B6: Proposing measures to monitor the significant effects of implementing the DPDs. 	
<p>Stage C: Preparing the Sustainability Appraisal Report</p> <ul style="list-style-type: none"> • C1: Preparing the SA Report. 	 <p>WE ARE HERE</p>
<p>Stage D: Consulting on the preferred options of the DPD and SA Report</p> <ul style="list-style-type: none"> • D1: Public participation on the preferred options of the DPD and the SA Report • D2(i): Appraising significant changes. • D2(ii): Appraising significant changes resulting from representations. • D3: Making decisions and providing information. 	 <p>FUTURE SA STAGES</p>
<p>Stage E: Monitoring the significant effects of implementing the DPD</p> <ul style="list-style-type: none"> • E1: Finalising aims and methods for monitoring. • E2: Responding to adverse effects. 	

¹ Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, November 2005

1.4.3 The Nuneaton and Bedworth Core Strategy Preferred Options document was the subject of public consultation in Summer 2009. The consultation comments received have fed into the preparation of this SA Report and the SA Framework, which was deemed a robust framework to evaluate the Nuneaton and Bedworth Borough Plan.

1.5 NUNEATON AND BEDWORTH LOCAL PLAN

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

1.5.2 The Nuneaton and Bedworth Local Plan will consist of the following LDDs:

- **Statement of Community Involvement (SCI)** - This document adopted December 2006, sets out how and when the Council intends to engage with stakeholders, statutory consultees and the public during the LDF preparation process.
- **Borough Plan Development Plan Document (DPD)**- The Borough Plan will be the first DPD to be prepared. All other DPDs 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.
- **Area Action Plans (AAPs)** – An AAP is proposed to support the Town Centre Quarter proposals.
- **Borough Plan Proposals Map**- The Proposal Map will illustrate the adopted land use policies and proposals set out in the DPDs, all land allocations and areas of protection. For example housing, employment and retail allocations, the Green Belt and environmental designations such as Sites of Special Scientific Interest (SSSIs) and Local Nature Reserves (LNRs).

- **Annual Monitoring Report (AMR)**- Every LPA is required under the Act to publish an AMR. The AMR will assess the Council's progress in preparing its LDDs and in implementing its policies.

1.6 PREVIOUS SA WORK

1.6.1 A substantial amount of work has already been undertaken on the Nuneaton and Bedworth LDF and consequently, the Council has prepared the following SA documents:

- Draft SA Scoping Report² and submitted for consultation in September 2005;
- Bedworth Town Centre AAP Issues and Options SA Report³;
- Nuneaton Town Centre AAP Issues and Options SA Report⁴; and
- Affordable Housing SPD SA Report, 2007.
- Core Strategy Issues and Options SA Report, 2009.

1.6.2 The Core Strategy SA will draw upon the findings of these early SA reports where appropriate.

1.7 SUSTAINABILITY CONTEXT

1.7.1 Sustainable development is now 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.

1.7.2 It is critical that the Borough Plan is based around the priorities for action and the principles of sustainable development.

² Sustainability Appraisal Scoping Report, September 2005, N&BBC

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

⁴ Nuneaton Town Centre AAP Issues and Options SA Report, June 2007, N&BBC

- 1.7.3 The Government's general statements of planning policy is set out in the National Planning Policy Framework (NPPF) which establish the policies and principles which should be taken into account in the preparation of development plans and consideration of individual proposals.
- 1.7.4 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.
- 1.7.5 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*".
- 1.7.6 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.
- 1.7.7 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

1.7.8 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

1.7.9 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.

1.7.10 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*”.

1.7.11 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*”.

1.7.12 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*”.

1.7.13 The SA process has been undertaken by Alliance Planning at each stage of the Local Plan's evolution and is based on a review of the evidence base prepared for the Plan. A list of the Development Plan Evidence base is presented at Appendix A.

1.8 SUSTAINABILITY APPRAISAL BACKGROUND

1.8.1 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/DPDs and SPDs. 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/DPD.

1.8.2 The requirement to undertake SEA is established in the EU by the European Directive 2001/42/EC, '*the Assessment of the Effects of Certain Plans and Programmes on the Environment*' (commonly known as the SEA Directive). The SEA Directive is transposed into English law by the SEA Regulations.

1.8.3 SEA and SA are closely linked. SA aims to integrate sustainability issues into decision making by appraising the plan or strategy using environmental, social and economic objectives, whilst SEA also aims to facilitate sustainable development but its emphasis is on integrating environmental considerations into decision making through analysis of environmental issues.

1.8.4 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. In November 2005 the Government published guidance entitled '*Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*'⁵. This guidance adopts an integrated approach to SEA and SA. It describes a single appraisal process, that meets the legal requirements of both the SEA Directive and the Act. This approach is confirmed at Paragraph 165 of the NPPF (See paragraph 1.7.11 above).

⁵ Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, November 2005

2.0 TESTING OF BOROUGH PLAN OBJECTIVES

2.1 INTRODUCTION

2.1.1 This is the first task in SA Stage B and represents a key opportunity to ensure that the Borough Plan objectives reflect sustainability principles and that sustainability issues are given full recognition early on in the evolution of the Core Strategy.

2.1.2 The Borough Plan objectives developed by the Council have been tested for their compatibility with the SA objectives detailed in the SA Framework developed during SA Stage A. This process helped clarify any potential conflicts and identify any inconsistencies and incompatibilities between the Borough Plan and SA objectives. The Borough Plan objectives were tested using the symbols shown below. The results of the compatibility assessment are set out in Table 4.

C	Objectives are compatible	N	Objectives are not compatible
?	Uncertainty over compatibility	-	No relationship between objectives

2.1.3 The development of the Borough Plan objectives is an iterative process and which has been reviewed at each stage of plan preparation. The objectives set out in the Issues and Options Report have been reviewed by the Council and amended in line with the current scenarios have been reopened. For completeness, the amended objectives against the sustainability objectives to ensure compatibility. The Borough Plan objectives are set out in Table 2 below:

Table 2 – Borough Plan Objectives

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.
2.	To seek employment opportunities that will support the diversification of the Borough's economy and improve job opportunities for residents. In particular: <ul style="list-style-type: none"> a. Improve existing employment sites, in particular at: <ul style="list-style-type: none"> • Attleborough • Bayton Road • Bermuda

- b. Provide additional employment land that is attractive to investors in the following locations:
 - Large expansion at the Bermuda estate
 - Small extension to Prologis.
- c. Enable growth in a diverse range of sectors, particularly focusing on the following sectors;
 - 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.

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.

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

- a. Affordable housing of different tenures to meet identified housing need.
- b. Housing options to meet the needs of the increasing number of older people in the Borough.
- c. Providing smaller properties in Nuneaton, family housing in Bedworth and supporting the private rented sector across the Borough.
- d. Aspirational housing that will attract residents who can make a significant investment in the development of businesses in the area.
- 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.

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 Relief Road
 - An Eastern Relief Road
 - Connectivity improvements

- Education 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.

6. To ensure that new development enhances and improves 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.
- 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.

7. 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

<p>surface water attenuation and using water sustainably.</p> <ul style="list-style-type: none">c. Protect and enhance the Borough's ecological network, in particular priority habitats and species and minimising impacts on biodiversity.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 photo-voltaics 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.
<p>8. To create healthy and strong communities by:</p> <ul style="list-style-type: none">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 Pingles Leisure centre and other local facilities.d. Reducing crime and antisocial behaviour through good design, raising aspirations and providing opportunities for the young.e. Creating well planned and integrated communities that foster cohesion and accessibility for all.

2.1.4 Following the review of the amended Borough Plan Objectives, 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 have been amended. Table 3 below sets out the previous and proposed SA objectives together with the reasoning for the change. The proposed SA objectives have been used as part of this Preferred Option SA.

Table 3 – Sustainability Objectives

Reference no.	Previous Sustainability Objective	Proposed Sustainability Objective	Notes
ECONOMIC FACTORS			
1	Achieve a strong, stable and sustainable economy and prosperity for the benefit of all the Borough's inhabitants	<i>Achieve a strong, stable and sustainable economy and prosperity for the benefit of all the Borough's inhabitants, through <u>on-going investment (public and private)</u></i>	Key Objective –proposed to be amended to include on-going investment. See comment on Objective (ref. no. 6) below.
2	To enhance the vitality of town centres	<i>To enhance the vitality of town centres</i>	Key Objective - no change proposed
3	To promote sustainable tourism	Delete	It is unclear why the issue of sustainable tourism was separated from the general economic objective (ref. no. 1).
SOCIAL FACTORS			
4	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	<i>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</i>	Key Objective - no change proposed
5	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	<i>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</i>	Key Objective - no change proposed
6	Promote investment in future prosperity, including on-going investment and engagement in learning and skills development	Delete	This objective overlaps with the general economic objective (ref. no 1) and access to services for jobs and learning in Social objective (ref. no. 5).

7	Reduce crime, fear of crime and antisocial behaviour	<i>Reduce crime, fear of crime and antisocial behaviour</i>	Key Objective - no change proposed
8	Address poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantage	<i>Address poverty and disadvantage taking into account the particular difficulties of those facing multiple disadvantage</i>	Key Objective - no change proposed
9	Improve opportunities to participate in the diverse cultural, sport and recreational opportunities the Borough can offer	<i>Improve opportunities to participate in the diverse cultural, sport and recreational opportunities the Borough can offer</i>	Key Objective - no change proposed
10	Encourage land use and development that creates and sustains well-designed, high quality built environments that incorporate green space, encourage biodiversity, and promote local distinctiveness and sense of place	<i>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</i>	Poor design is something that has come up at our Working Group quite a lot. I've re-worded this to avoid any repetition elsewhere
11	Enable communities to influence the decisions that affect their neighbourhoods and quality of life	Delete	This objective is focused on community participation in local decisions but is not a robust enough objective by which to assess Core Strategy objectives. It is suggested that this objective is deleted.
ENVIRONMENTAL - BIODIVERSITY			
12	To protect and enhance the natural environment, habitats, species, landscapes and inland waters	<i>To protect and enhance the natural environment, habitats, species, landscapes and inland waters</i>	Key Objective - no change proposed
ENVIRONMENTAL - POPULATION			
13	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	<i>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</i>	Key Objective - no change proposed

ENVIRONMENTAL - SOILS			
14	To protect and improve soil quality	<i>To protect and improve soil quality</i>	Key Objective - no change proposed
ENVIRONMENTAL - WATER			
15	Use natural resources, such as water efficiently, including by incorporating efficiency measures into new land use and developments, redevelopment and refurbishment	<i>Use natural resources, such as water efficiently, including by incorporating efficiency measures into new land use and developments, redevelopment and refurbishment</i>	Key Objective - no change proposed
16	Minimise water pollution levels	Delete	This objective deals specifically with water pollution levels which can be incorporated in a wider water objective based on Objective (ref. no. 17). See comment on Objective (ref. no. 17) below.
17	Ensure that new developments avoid areas which are at risk from flooding and natural flood storage areas	<i>Ensure that new developments <u>minimise water pollution levels and avoid areas which are at risk from flooding and natural flood storage areas</u></i>	Key Objective – Expand objective to include reference to water pollution levels previously in Objective (ref. no. 16).
ENVIRONMENTAL - AIR			
18	Increase use of public transport, cycling and walking as a proportion of total travel in order to reduce road traffic congestion, pollution and accidents	<i>Increase use of public transport, cycling and walking as a proportion of total travel in order to reduce road traffic congestion, pollution and accidents</i>	Key Objective - no change proposed
19	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	<i>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</i>	Key Objective - no change proposed

ENVIRONMENTAL – CLIMATIC FACTORS			
20	Reduce overall energy use through increased energy efficiency	<i>Reduce overall energy use through increased energy efficiency</i>	Key Objective - no change proposed
21	Minimise the Borough's contribution to the causes of climate change by reducing emissions of greenhouse gases from transport, domestic, commercial and industrial sources	<i>Minimise the Borough's contribution to the causes of climate change by reducing emissions of greenhouse gases from transport, domestic, commercial and industrial sources</i>	Key Objective - no change proposed
22	Implement a managed response to the unavoidable impacts of climate change, ensuring that the design and planning process takes into account predicted changes in the Borough's climate	Delete	This objective overlaps with Objective (ref. no. 21) and so is considered to be unnecessary.
ENVIRONMENTAL – MATERIAL ASSETS			
23	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	<i>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</i>	Key Objective - no change proposed
24	Encourage land use and development that optimises the use of previously developed land, buildings and the efficient use of land	<i>To ensure the prudent use of resources including the optimum use of previously developed land, buildings and the efficient use of land</i>	This specific objective relates directly to the general objective (ref. no. 25). It is proposed to merge these objectives as suggested.
25	To ensure the prudent use of resources	Delete	See comment on Objective (ref. no. 24) above.
26	Encourage local sourcing of food, goods and materials	Delete	The purpose of this objective is addressed within the general material assets objective (ref. no. 24), as amended.
ENVIRONMENTAL – CULTURAL HERITAGE			
27	To protect and enhance the historic environment	<i>To protect and enhance the historic environment</i>	Key Objective - no change proposed
ENVIRONMENTAL – LANDSCAPE			
28	To maintain and enhance the quality of landscapes	<i>To maintain and enhance the quality of landscapes</i>	Key Objective - no change proposed

- 2.1.5 In order to assess the Preferred Options sites and proposals against each of the SA objectives in a consistent manner a number of appraisal questions and associated indicators have been prepared. The appraisal questions and indicators are presented at Appendix B.
- 2.1.6 Each of the Preferred Option Sites and Polices were also assessed against the SA objectives in the short, medium and long terms. For the purposes of this SA, short term is defined as 1-4 years, medium term is 4-8 years and the long term is 8 years+.

Table 4: Compatibility between Borough Plan Objectives and amended SA objectives

Abridged Borough Plan Objectives	Abridged SA Objectives																					
	Economic Factors		Social Factors						Biod'y	Population	Soil	Water		Air		Climatic Factors		Material Assets		Heritage	Landscape	
	Achieve a Strong and Sustainable Economy	Enhance Town Centre Viability	Affordable Housing for all	Access to Services		Reduce Crime	Address Poverty	Cultural Activities	Urban Design	Protect Natural Environment	Improve Human Health	Soil Quality	Water Efficiency	Water pollution and Flood Risk	Public Transport	Focus in Urban Area	Energy Efficiency	Minimise contribution to Climate Change	Minimise Waste	Use of PDL	Protect Historic Environment	Maintain and enhance Quality of landscape
1. To use economically driven growth to help regenerate the Borough	C	C	C	?	?	C	C	?	?	C	?	?	?	?	?	?	?	?	?	?	?	?
2. Provide diverse employment opportunities	C	C	?	C	C	C	C	?	?	C	?	?	?	?	?	?	?	?	?	?	?	?
3. Develop and diversify Nuneaton & Bedworth town centres	C	C	C	C	?	C	C	?	?	C	?	?	?	C	C	?	?	?	C	?	?	?
4. Provide the size, type and mix of Housing to meet Borough's needs	C	C	C	?	C	C	-	?	?	C	?	?	?	?	?	?	?	?	?	?	?	?

Abridged Borough Plan Objectives	Abridged SA Objectives																				
	Economic Factors		Social Factors						Biod'y	Population	Soil	Water		Air		Climatic Factors		Material Assets		Heritage	Landscape
	Achieve a Strong and Sustainable Economy	Enhance Town Centre Viability	Affordable Housing for all	Access to Services		Reduce Crime	Address Poverty	Cultural Activities	Urban Design	Protect Natural Environment	Improve Human Health	Soil Quality	Water Efficiency	Water pollution and Flood Risk	Public Transport	Focus in Urban Area	Energy Efficiency	Minimise contribution to Climate Change	Minimise Waste	Use of PDL	Protect Historic Environment
5. Improved Infrastructure and facilities in the Borough	C	C	C	C	C	C	C	?	?	C	?	?	?	C	?	?	C	?	?	?	?
6. Enhance & improve the quality & appearance of existing urban area	C	C	-	-	C	C	C	C	?	C	?	?	?	C	C	?	?	?	C	?	C
7. Address Climate Change	C	C	-	-	-	C	-	?	C	C	C	C	C	C	C	C	C	C	C	?	?
8. Create healthy and strong communities	C	C	C	C	C	C	C	?	?	C	?	?	?	C	?	?	?	?	?	?	?

- 2.1.7 The compatibility assessment indicates that the Borough Plan objectives are broadly compatible with the SA objectives. The Borough Plan objectives are generally consistent with the sustainable principles and identify the need to create sustainable and balanced communities. It is considered the successful implementation of the Borough Plan objectives will aid the diversification of the Borough's economy, raise environmental quality and contribute to regeneration and revitalisation of the Borough's main urban areas. Furthermore, the assessment demonstrates that there are no incompatibilities and only a number of uncertainties between the Borough Plan Objectives and the SA Objectives.
- 2.1.8 There are however, some uncertainties between the Borough Plan objectives concerning the delivery of the economically driven growth (objective 1), additional employment sites (objective 2), continued development of Nuneaton and Bedworth town centres (objective 3), provision of a mix of housing types (objective 4), infrastructure provision (objective 5), addressing climate change and encouraging sustainability (objective 7) and creating a healthy and strong communities (objective 8) and a number of the SA Objectives (biodiversity, soil, water, climatic factors, material assets, cultural heritage and landscape).
- 2.1.9 The implementation of the Borough Plan objectives will clearly have significant economic and social benefits for the Borough's community, workers and visitors. Whilst the Preferred Option Borough Plan sets out the broad locations for new development in the Borough, the nature of development, infrastructure design, extent of energy efficiency and renewable energy adopted in building design (for example inappropriate renewable energy schemes could have significant adverse effects on landscape, the built and natural environment) is unknown at this stage of Borough Plan preparation.
- 2.1.10 In order to ensure these incompatibilities do not come to light it will be important that the Borough Plan reflects the following:-
- Commits to high standards of energy efficiency;
 - Provides policies for supporting sustainable design, demolition and construction;
 - Ensures new design and layout of new development supports sustainable waste management;
 - Supports the use of and generation of renewable energy;
 - Ensure that new development makes a positive contribution to the environment and is carried out to high environmental standards;

- Adopts high environmental standards;
- Ensures a high standard of design in all new development; and
- Monitors the implementation of environmental standards.

2.1.11 If these measures are not adopted and suitable mitigation measures implemented then there is the potential for significant negative impacts on the local community and the natural environment resulting from the planned growth. The result of this being the sustainability objectives of the plan not being met.

3 APPRAISAL OF THE PREFERRED DEVELOPMENT OPTIONS

3.1 INTRODUCTION

- 3.1.1 The Borough Plan Preferred Options Report sets out a number of policies and broad locations of new development in the Borough. A list of the Preferred Option policies and Potential Development Areas (PDAs) appraised in this SA is contained at Appendix C together with a location plan for the PDAs.
- 3.1.2 The Borough Plan is supported by an extensive evidence base and this is presented at Appendix A. It has been taken into account in the preparation of the SA.

3.2 APPRAISAL PURPOSE

- 3.2.1 SA is an extremely powerful tool in the development and refinement of development plan document options. This stage offers the opportunity to appraise the Borough Plan Preferred Option Report and document the findings, so that plan-makers can work towards a Borough Plan Submission Document. This is an invaluable stage of the SA which will help inform the Borough Plan Preferred Option consultation process and assist the Council to develop, select and explain the assessment that underpins the Preferred Development option.
- 3.2.2 The assessment provides a means by which the relative merits of the individual options can be assessed. The appraisal process will ascertain the environmental, social and economic effects of each option as well as the identification of issues to be addressed later in the Borough Plan preparation process. The recommendations will also assist the sustainability performance of the options.

3.3 METHOD OF THE APPRAISAL

- 3.3.1 Each of the proposed Borough Plan Policies and sites were tested against the sustainability objectives developed for the purposes of the Sustainability Appraisal. As set out at paragraph 2.1.4 above, the SA objectives were amended following a review of the Borough Plan Objectives.

3.3.2 The assessment considers the effects of the preferred option on the environment. The performance of each policy and site allocation option 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 significant negative effect
-	Option likely to result in a negative effect

3.3.3 It should be noted that the scoring was based on available information in respect of each of the options and has been based on the SA team’s judgment. Although mitigation measures have been proposed within the appraisal table the preferred options have been scored on the basis that no mitigation measures have been applied.

3.3.4 The full appraisal results are set out in the matrix presented at Appendix D and Appendix E for the Preferred Policies and Potential Development Areas (PDAs) respectively. Each matrix contains a summary of the overall environmental effects. A summary of the main appraisal findings is set out in 3.4 below.

3.4 NUNEATON AND BEDWORTH ASSESSMENT SUMMARY

3.4.1 This section of the report summarises the main sustainability implications of the emerging policies and site allocations which have been prepared by the Council to accommodate Nuneaton and Bedworth's growth between up to 2028.

3.5 ECONOMIC FACTORS

3.5.1 The Preferred Option document has been developed to contribute to employment diversity and economic growth. The Borough Plan is an economically driven plan and, thus, offers positive effects in terms of economic criteria in the SA. All the employment allocations score well against the economic objectives.

3.5.2 It is the Council's intention to deliver higher levels of growth and competitiveness with the provision of 75ha of employment land between 2010 and 2028 and to capitalise on the Borough's excellent transport links with both Nuneaton and Bedworth easily accessible from the M1, M5, M6, M42 and the M69. Increased accessibility to town centre facilities through the improvements to Nuneaton and Bedworth rail stations under all options will improve quality of life, promote economic growth and enhance the Borough's image.

3.5.3 In order to deliver this economic growth and a portfolio of employment sites, the Preferred Option has identified ten strategic employment areas which are principally focusing within the urban areas of Nuneaton and Bedworth together with land in the vicinity of the M6 junction. The provision of these sites provide for a range of land and premises for employment uses in attractive and accessible locations (by public transport, foot and cycle).

3.5.4 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 a significant level of employment land is intended to encourage significant economic growth and, in turn, revitalise Nuneaton, Bedworth Town Centres. However, as a number of the sites are located in edge of centre locations, they score neutral in relation to enhancement of the vitality and viability of the town centres.

3.5.5 The growth target for the Borough Plan is 1.5% and whilst this is recognised as an ambitious target, it is anticipated to deliver integrated social benefits. For comparison purposes, the SA has reviewed the environmental effects of a baseline, 0.5%, 1% and 2% Growth Rates (Appendix D). The provision of a variety of employment opportunities across a range of locations, is considered to be essential to meeting the

Council growth target and is also a cornerstone of economic sustainability. A significant number of jobs will be created in accessible locations i.e. existing town centres, along the A444, A5 (T), A4254 and the M6.

- 3.5.6 The Borough Plan Preferred Option document also seeks to retain existing employment estates (Policy ECON1) and this represents a positive effect in terms of economic factors.
- 3.5.7 The location of new employment areas on land outside the main urban areas and on the edge of existing settlements, will help avoid the over-dependence on Nuneaton and Bedworth town centres as well as promoting economic growth along transport corridors (A444) and at a key public transport node at Bermuda. The proposed mix of new employment areas outside the edge and within the existing urban areas, set out in the Borough Plan Preferred Option Document, offers the opportunity for increased mixed use and integration between residential and employment development and the opportunity to create thriving mixed use town centres.
- 3.5.8 Nuneaton and Bedworth Town Centres are divided into seven and four distinct quarters, respectively, which offer the opportunity for sustainable retail growth during the Borough Plan period. The sustainable benefits offered by these Town Centre locations means that these are the principle focus for new retail floorspace development. The identification of specific quarters will ensure that the character of defined areas can be preserved. In overall terms, this represents a positive economic and environmental effect.
- 3.5.9 The Borough Plan also includes at Policy ECOM 4 a defined Hierarchy of Centres. This policy will ensure that large scale retail development is directed to the most sustainable locations, i.e. Town Centres, but that local services meeting the needs of local residents is also retained. The provision of defined supporting infrastructure and retail facilities are also important complimentary factors in the delivery of new employment and housing areas.

3.6 SOCIAL FACTORS

- 3.6.1 All the housing allocations score well against the social objectives. Policy HOU 1 and HOU2 seek to bring forward a range and mix of housing tenures that offers the opportunity for residents to access an affordable home. It is the Council's intention to deliver 7,900 new dwellings in the Borough between 2010 and 2028 to support the planning of high levels of economic growth. This is likely to contribute to reducing poverty and social exclusion by virtue of improving access to housing, employment and open space opportunities, thereby delivering an equitable sharing of the benefits

of prosperity. No specific policy has been identified to address the potential to deliver life long learning and on the-job-training as part of the new employment opportunities. This opportunity should be considered by the Council in taking forward the Development Plan.

- 3.6.2 Access to facilities and services is a critical fact and can have a significant impact on sustainability issues. Particularly if the private car is favoured over more sustainable modes of travel. This is an important issue as it is considered that the Borough's future growth requirements will increase pressure on Nuneaton and Bedworth's transport infrastructure. The proposed Site Allocations have been the subject of a strategic highway assessment by Warwickshire Highways Authority. A number of on-site and off-site improvements have been identified and these measures should be set out in the justification for each allocation.
- 3.6.3 Sustainable travel and promoting modal split in favour of more sustainable modes such as cycling, walking and public transport is addressed in the Sustainable Transport Policy INF 3. The modal shift away from the private car towards other sustainable modes of transport and to reduce the number of trips and trip length, is a key objective of the Borough Plan and Policy INF 3 will have a positive effect on this objective.
- 3.6.4 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 will be required to be delivered by Policy HOU2. 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. Policy DEV 4 will ensure that new development is brought forward in a phased and integrated manner and thus represents a positive social effect.
- 3.6.5 A full range of household sizes for all income levels and ages, will help reduce the levels of outward commuting, will help attract business and improve the supply of employees. Policy HOU 2 seeks to deliver a range of housing types, including family housing, but ultimately this will depend on implementation of the policy at the development management stage.
- 3.6.6 There is a shortage of affordable housing in certain areas of the Borough. The proposed growth will further increase the pressure for affordable housing. The findings of the 2012 Nuneaton and Bedworth Strategic Housing Market Assessment show there is an annual need for 430 affordable homes across the Borough. Policy

HOU1 seeks to deliver a proportion of affordable housing and will thereby help meet the Borough's affordable housing need and help foster diversity and social cohesion. The development of this Policy was a recommendation within the SA at the Issues and Options stage and thus is welcomed.

- 3.6.7 The proposed allocations at PDA 2 and PDA 3 have the potential to improve access to employment opportunities and a variety of housing types to deprived communities in Camp Hill, Bar Pool and Hill Top wards.
- 3.6.9 The Preferred Option has identified (Policies DEV 1/ HOU 3) the provision of 32-34 residential pitches and 5 transit pitches for gypsies and travellers in the Borough. Gypsies and travellers are socially excluded groups and by endorsing new pitches the Preferred Option seeks to promote social inclusion. The social inclusion of all community groups will ensure and promote balanced and fully integrated communities and is a positive effect on this objective.

3.7 BIODIVERSITY

- 3.7.1 Given the extent of required growth, the Preferred Option document has the potential to impact negatively on the Borough's biodiversity assets in both urban and countryside areas. The Preferred Option does seek to protect and enhance existing biodiversity and geodiversity areas (Policy ENV1) and also offers the opportunity for significant ecological enhancement and habitat creation.
- 3.7.2 The proposed allocations at Arbury is likely to have a detrimental effect on Ensor's Pool SAC, SSSI and LNR. The impacts on SSSI's, LNRs and the SAC would need to be addressed.
- 3.7.3 The extent of negative impacts on the natural environment varies within the assessment matrix, but it is considered that in most cases, suitable mitigation or enhancement measures can offset these.
- 3.7.4 The Borough Plan offers a significant opportunity to improve the Borough's green infrastructure provision and to see the potential of public open spaces, ecological and geological sites improved and enhanced to create a strong green infrastructure throughout the Borough. Policy INF 2 relating to Green Infrastructure, will have a positive effect on this objective. The Policy also offers the opportunities to enhance and connect the Borough's network of ecological and geological sites.

3.7.5 The protection and enhancement of the Borough's existing green infrastructure is important to help conserve natural assets, protect local distinctiveness and minimise habitat fragmentation. It is important to appreciate that green infrastructure is not merely a series of green corridors linking biodiversity sites and habitats, but a network of multifunctional green spaces.

3.7.6 The Core Strategy offers the opportunity to further re-invigorate the Borough's landscape as a major environmental, recreational, transport and economic asset. Policy ENV 2 seeks to maintain and preserve the distinctive landscape character areas of the Borough. This will have a positive effect on the SA objective.

3.8 POPULATION AND HUMAN HEALTH

3.8.1 Enhancing the health of the Borough's population does not exclusively rest on the increased provision of and access to health services but also about improving access to rewarding jobs, a variety of housing types, open space, leisure and recreation facilities. It is considered that the proposals and policies to improve economic inclusion and provide public open spaces consequently having positive impacts on social inclusion, human health and well being. Employment activity can have long term positive effects on human health and well being. The provision of an ambitious level of economic growth can result in overall sustainability benefits. Furthermore the integration of opportunities for physical activity into peoples' daily lives at no or low cost, through the increased access to leisure facilities and open spaces, be it urban public spaces or the open countryside. The development of a mix of uses in sustainable locations will contribute to this objective.

3.8.2 The proposed Site housing and employment allocations PDA 2, PDA 3, WB03, AR13J and AR13K offer additional benefits as they will provide employment opportunities and housing to deprived individuals and communities within Camp Hill, Bar Pool and Hill Top wards.

3.9 LAND QUALITY AND SOIL

3.9.1 All the proposed Greenfield development options will lead to the loss of productive land quality soils to development. The Preferred Option document only identifies a small number of sites on previously developed land. The creation of green space in Policy INF2 presents opportunities for soil creation.

3.9.2 Policy DEV5 seeks to protect the existing Green Belt and designate two new areas:

- Land South of the Longshoot and north of the railway, Nuneaton, and

- Land west of the A444 and south of Bedworth Lane, Bedworth.

3.9.3 The Policy represents a positive effect on this SA objective and offers the opportunity to improve access and use of the Green Belt for recreational uses.

3.10 WATER RESOURCES

3.10.1 Water efficiency is a key issue for the Borough Plan as the significant planned housing and employment growth will result in increased water demand. Policy CLIM 1 addresses issues relating to reduced water consumption and water efficiency and Policy CLIM 3 deals with the need to manage flood risk by incorporating sustainable drainage systems to manage surface-water run off such as the use of porous paving, green roofs, SUDs in new developments. These policies have the potential for a positive effect on this SA objectives.

3.10.2 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 Assessment of the proposed allocations has identified site specific mitigation measures and thus, the score for various sites varies from neutral to slight adverse.

3.10.3 Policy CLIM 1 seeks to deliver modern principles and standards to new development, the use of modern methods of construction and environmental standards will help reduce risks to water resources. The use of sustainable urban drainage systems will also help mitigate risk of groundwater and surface water pollution.

3.10.4 Linked to flood risk, is the issue of run off rates from development. All new development is likely to lead to the inevitable increase of impermeable surfaces resulting in increased water run off and potential pollution of water courses. Policy CLIM 3 seeks to manage flood risk on and off site. This Policy represents a positive effect on this SA objective.

3.11 AIR QUALITY

3.11.1 It is considered that the preferred development options will have mixed outcomes in respect of air quality. Impacts on air quality have been considered in relation to the potential for the preferred option to deliver sustainable patterns and locations of development. Increasing the modal share of public transport and fewer car based journeys will be key to reducing air quality impacts.

3.11.2 Based on the Council's growth targets, it is considered that traffic growth is likely to increase due to the level of planned housing and employment growth. Furthermore, Housing Allocations PDA1, PDA 2, PDA 10 and employment Allocation WE/03/08 are considered to result in a significant adverse effect on the air quality, as these options will result in an increase in traffic flows through the existing designated AQMAs.

3.12 CLIMATIC FACTORS

3.12.1 Reducing the causes and impacts of climate change is a critical sustainability objective. Sustainability and increasing energy efficiency, should be given a prominent role within the Borough Plan as the housing growth and the anticipated increased economic activity in the Borough will significantly increase energy demand. Policy CLIM 1 and CLIM 2 relates to energy efficiency and the generation of renewable and low carbon energy, and these have the potential to address these matters and represent a positive effect.

3.12.2 Ensuring development does not contribute to greenhouse emissions and, thus, climate change should be an integrated part of the essential infrastructure for all the proposed development areas, including both residential and commercial buildings. Incorporating renewable energy and energy efficient design, both at the macro scale (e.g. macro renewable energy projects) and micro scale (integration of micro-sale renewables into housing, such as ground source heat pumps, water source heat pumps, photovoltaic panels) should be encouraged.

3.13 MATERIAL ASSETS

3.13.1 Although the Preferred Option Document includes development of brownfield land within the Borough's existing urban areas, the proposed allocation are principally focused on greenfield land which results in the loss of high quality agricultural land. No mitigation is available to address this loss. In general terms, the Preferred Option result in an overall adverse effect on material assets.

3.13.2 The Preferred Option does not currently address the issue of waste and recycling and with waste arisings likely to increase due to the increase in economic activity and household numbers this offers a negative impact on this objective. It is recommended that Policy CLIM1 is amended to refer to waste and recycling matters.

3.14 CULTURAL HERITAGE

- 3.14.1 The growth requirements set out in the Borough Plan could negatively impact on the character and distinctive qualities of the Borough's town centres and Conservation Areas, as well as the setting of the Borough's listed buildings, SAMs and Registered Parks and Gardens. Policies ENV3 and ENV 4 and seeks to protect local character and enhance locally important sites and buildings. Furthermore the proposed site allocations, generally avoid areas of cultural heritage and, thus offer a positive effect on this objective. It is important to protect and enhance the Borough's townscape and heritage assets as it acts as an important lure for new residents, visitors and businesses.
- 3.14.2 The Borough Plan addresses density and design issues at Policy ENV3 and this Policy seeks to preserve the character and appearance of the town centre's and the distinctive qualities.

3.15 LANDSCAPE

- 3.15.1 The proposed allocations in the Borough Plan have been the subject of a Strategic Landscape Assessment.
- 3.15.2 It is considered that all development proposals will result in some changes to landscape character. Moreover, all options involve Green Belt and/ or greenfield development have potential adverse impacts on biodiversity and landscape. While adverse impacts on biodiversity may be mitigated adverse impacts on the landscape are less easily overcome.
- 3.15.3 Policy ENV2 is key to ensuring that any future development proposals can be integrated without an adverse effect on landscape issues. The Strategic Landscape Assessment for the proposed allocations has identified site specific mitigation measures and thus, the score for various sites varies from positive to slight adverse on this sustainability objective.

3.16 CONCLUSIONS

- 3.16.1 The Preferred Option Document generally results in a neutral to positive effect on the majority of the SA objectives, although each proposal has sustainable merits and drawbacks.
- 3.16.2 On balance, the Preferred Option will 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.

4 MITIGATION MEASURES

4.1 INTRODUCTION

4.1.2 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. It is considered that the Borough Plan offers the right balance of sustainable development but can be further enhanced through the application of a range of mitigation measures and recommendations which should be incorporated into future stages. The proposed recommendations are summarised under key sustainable themes:

4.2 ECONOMIC FACTORS

- It is important that the Borough Plan is not prepared in isolation to development options in adjoining authorities. The Localism Act 2011 confirms that the 'Duty to Cooperate' is a test of 'soundness' for emerging Local Plans. Links between adjoining authorities is currently unclear.
- Consideration should be given to the inclusion of policies to ensure training and recruitment of local residents to ensure they are the ones who benefit from employment opportunities.
- Inclusion of policies to encourage tourism.

4.3 SOCIAL FACTORS

- The Borough Plan should include policies to facilitate educational achievement and local recruitment and training policies.

4.4 BIODIVERSITY

- No recommendations

4.5 POPULATION AND HUMAN HEALTH

- Inclusion of policy that aims to maximise leisure development located in accessible locations and is supported by existing transport infrastructure.

4.6 SOIL/LAND QUALITY

- Inclusion of policy to ensure soils which have an ecological function are stripped and re-used.

4.7 WATER RESOURCES

- No recommendations

4.8 AIR QUALITY

- No recommendations

4.9 CLIMATIC FACTORS

- Include policies requiring waste management and recycling to be considered in the design of development proposals.

4.10 MATERIAL ASSETS

- No recommendations

4.11 CULTURAL HERITAGE

- No recommendations

4.12 LANDSCAPE

- Where there is a contiguous boundary with existing development consideration should be given to the creation of a landscaped green buffer between existing and proposed development.
- Edge treatment will need to be a key consideration, ensuring the transition between urban areas and the countryside is clear.

5 NEXT STEPS

5.1 INTRODUCTION

- 5.1.1 This SA Report will be made available for public consultation alongside the Borough Plan Preferred Option. All representations received and the SA results set out in this report will be used by the Council to inform the preparation of the Borough Plan Submission Document.

Consultation Responses

If you have any comments on the contents of this SA Report please send responses to:

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