



# **Nuneaton and Bedworth Borough Plan Sustainability Assessment**

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

**October 2015**

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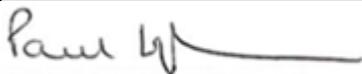


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## 1.0 Introduction

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

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

1.1.3 The Sustainability Appraisal has been undertaken by WYG (formerly Alliance Planning) who are highly experienced in completing SAs and SEAs of spatial planning documents. WYG/Alliance Planning has been retained to undertake a sustainability assessment of the Borough Plan at each stage in its evolution.



- 1.1.4 WYG and Mott Macdonald (MM) have also 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 Borough Plan – Submission Document. The HRA is presented as a separate ‘standalone’ document.
- 1.1.5 This document comprises the Sustainability Appraisal Report (SA Report) for the Nuneaton and Bedworth Borough Plan - Submission 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 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 for the period to 2031, 10,040 new dwellings. This is to be accompanied by the provision of 52 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 79.3km<sup>2</sup>. 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. 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).
- 1.2.4 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 foundation 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 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)
- 1.2.6 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).
- 1.2.7 There are no green spaces in Nuneaton and Bedworth which have a Green Flag Award. (Green Flag Award, reviewed April 2014).
- 1.2.8 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).



1.2.9 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 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 Integrated Sustainability Assessment**

1.4.1 The Nuneaton and Bedworth Borough Plan and accompanying SA, represent an important opportunity to drive forward the sustainability agenda and assist with urban and rural renaissance across the Borough. SA is a powerful tool that can not only evaluate the sustainability of the Borough Plan but also help promote patterns of development and ensure that sustainability considerations are reflected in the evolution of the plan and policy



preparation. An independent Sustainability Assessment has been undertaken at each stage in the preparation Borough Plan.

#### *Borough Plan - Issues and Options*

1.4.2 NBBC commenced work on the production of the Borough Plan in 2009 with the Borough Plan Issues and Options document, the purpose of which was to consult the public on the range of spatial options capable of delivering the vision and objectives of the Plan. The document was the subject of formal public consultation during Summer 2009. The Issues and Options Core Strategy was the subject of a standalone Sustainability Appraisal (SA) prepared for the Council by Alliance Planning (now part of WYG).

1.4.3 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 22<sup>nd</sup> September 2010, it was agreed to change the name of the emerging local development document to the '*Nuneaton and Bedworth Borough Plan.*' The representations received at the Issues and Options stage were taken into account in the preparation of the Borough Plan Preferred Option document.

#### *Borough Plan - Preferred Option*

1.4.4 The Borough Plan Preferred Options Document and the associated SA was the subject of statutory consultation between 5<sup>th</sup> July 2013 and the 30<sup>th</sup> August 2013. A further SA was prepared by Alliance Planning (now part of WYG) to assist in the preparation of the final draft Borough Plan Preferred Options document.

#### *Borough Plan – Call for Sites*

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



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

#### *Borough Plan – Submission Document*

1.4.7 This SA Report is intended to add to the transparency of the process involved in preparing the Borough Plan -Submission Document, 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 sustainability implications of all the preferred and potential spatial development options considered during the previous stages and includes a series of recommendations to be considered by the Council.

1.4.8 The SA Report will be made available for public consultation alongside the Borough Plan – Submission Document.

### **1.5 Structure of this Sustainability Appraisal Report**

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

- Chapter 2 – provides details of the Borough Plan Submission 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 plan policies and sites;
- Chapter 6 – outlines the residual effects and overall conclusions.

## **1.6 How to comment on this Sustainability Appraisal Report**

1.6.1 This SA is being published for comment alongside the Nuneaton and Bedworth Borough Council – Submission Document. If you have any comments on this report please respond to:

[planning.policy@nuneatonandbedworth.gov.uk](mailto:planning.policy@nuneatonandbedworth.gov.uk)



## 2.0 Sustainability Assessment – Context and Objectives

### 2.1 Nuneaton and Bedworth Local Plan

2.1.1 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.

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

- **Statement of Community Involvement (SCI)** - This document adopted September 2015, sets out how and when the Council intends to engage with stakeholders, statutory consultees and the public during the Local Plan preparation process.
- **Borough Plan (BP)** - The Borough Plan will be the first document to be prepared. All other documents and Supplementary Planning Documents (SPD) need to be in general conformity with the Borough Plan. The Borough Plan will set out the spatial vision, strategic objectives and policies, delivery strategy and preferred development options for the Borough.
- **Supplementary Planning Documents (SPD)** – A number of supplementary planning documents are proposed to support the delivery of the Borough Plan policies.
- **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 strategic housing and employment allocations, the Green Belt and



environmental designations such as Sites of Special Scientific Interest (SSSIs) and Local Nature Reserves (LNRs).

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

## 2.2 Previous SA Work

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

- Draft SA Scoping Report<sup>1</sup> and submitted for consultation in September 2005;
- Bedworth Town Centre AAP Issues and Options SA Report<sup>2</sup>;
- Nuneaton Town Centre AAP Issues and Options SA Report<sup>3</sup>; and
- Affordable Housing SPD SA Report, 2007.
- Core Strategy Issues and Options SA Report, 2009;
- Borough Plan SA Scoping Report - Updated September 2012 & April 2014;

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<sup>1</sup> Sustainability Appraisal Scoping Report, September 2005, N&BBC

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

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



- Borough Plan - Preferred Options SA Report 2013; and
- Borough Plan – Interim SA Report – 2014.

2.2.2 The Borough Plan SA will draw upon the findings of these early SA reports where appropriate.

## **2.3 Sustainability Context - Policy**

2.3.1 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.

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

2.3.3 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.



2.3.4 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.

2.3.5 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*".

2.3.6 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.

2.3.7 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*

2.3.8 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*

2.3.9 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.

2.3.10 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”*.

2.3.11 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".*

2.3.12 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*".

## **2.4 Relationship between the SA and HRA**

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

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

2.4.3 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 Borough Plan together the sites put forward in the Borough Plan Submission Document.



2.4.4 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 SPDs. S39 of the Act requires Local Plans/SPDs to be prepared with a view to contributing to the achievement of sustainable development. SA is one way of helping fulfil this duty through a structured appraisal of the economic, social and environmental sustainability of the plan. The production of a SA is one of the “*tests of soundness*” 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 together with the information to be covered within the SA Report is set out in the Planning Policy Guidance (PPG) dated March 2014. The PPG states at paragraph 11-009 “*The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the Local Plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more*



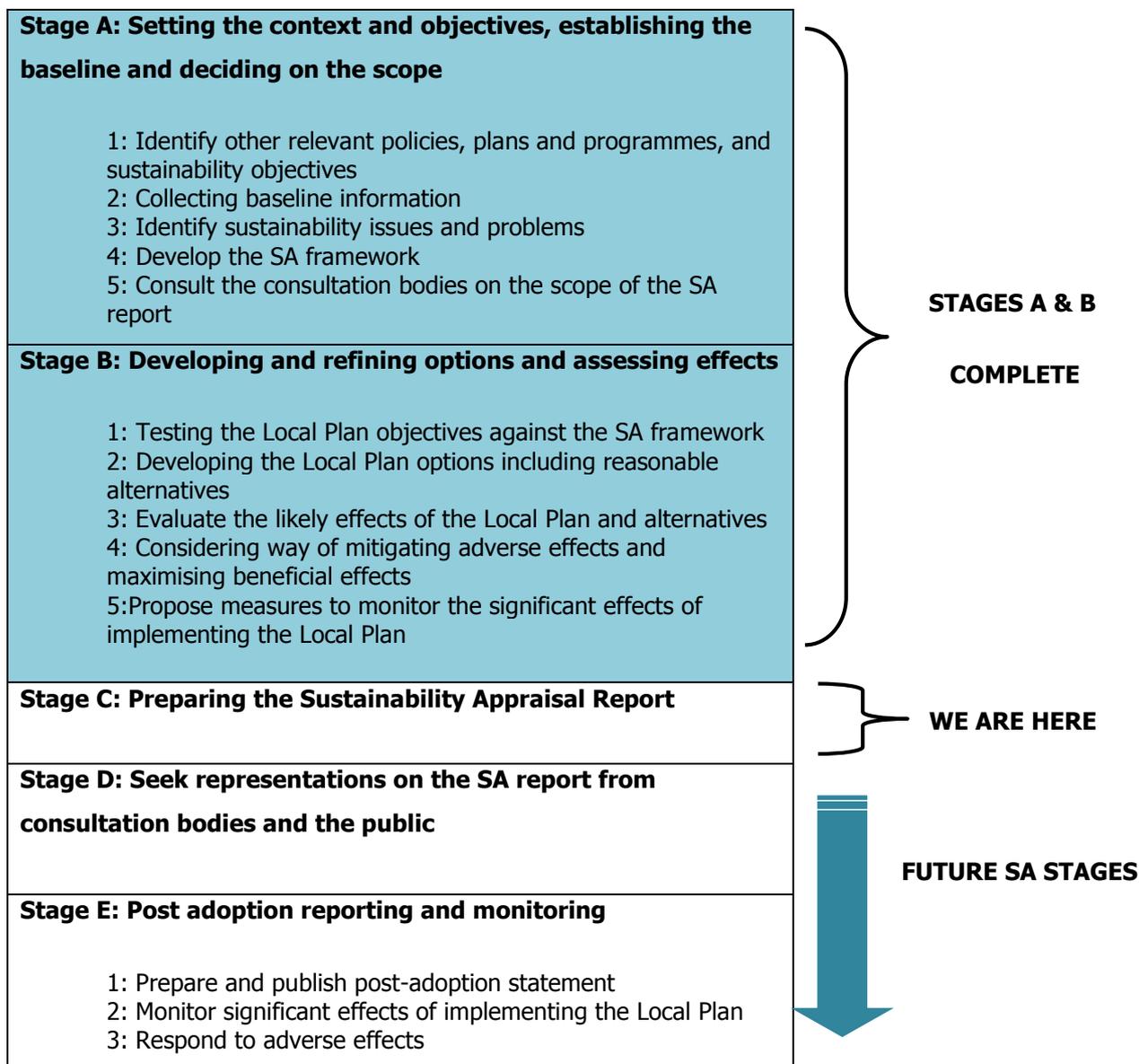
*detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan*". The level of detail set out in this SA Report is considered to be commensurate with the stage of Local Plan production.

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

## **3.2 SA Key Steps and Tasks**

- 3.2.1 The preparation of this SA Report comprises the third major step in the SA of the Nuneaton and Bedworth Borough Plan and relates to Stage C of the five stage SA process set out at Paragraph 11-013 of the Planning Practice Guidance (March 2014). The comments received at the Preferred Option Stage (Stage B), together with a subsequent review of sites put forward at the 'Call for Sites' stage, has facilitated a further evaluation of the Local Plan option and reasonable alternatives available in the SA Report (Stages B2, B3 & B4), See Table 1.
- 3.2.2 The SA Report and all consultation representations received will be submitted to the Secretary of State for Communities and Local Government who will consider the 'soundness' of the Borough Plan and the effectiveness of the Authority to integrate social, economic and environmental objectives into the preparation stages of the Plan.

**Table 1: SA Process Stages**



### 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 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 Following a reassessment by the Council of the Borough Plan Objectives at the Preferred Options stage, it was necessary to review the SA objectives developed for the purposes of the Sustainability Appraisal. Based on the outcome of this review a number of SA objectives were amended. The Borough Plan – Preferred Options Document and associated SA were the subject of formal consultation during July and August 2013.
- 3.3.3 Prior to undertaking this SA, the Sustainability Objectives were reviewed again, taking into account the formal comments received during the Preferred Options consultation period, but it was concluded that they remain *'fit for purpose'* and thus no further changes are proposed.
- 3.3.4 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

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



### *Scoping Report*

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

3.3.7 The Sustainability baseline for Nuneaton Borough is used for the purposes of this Assessment and 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.

3.3.8 Each of the Scoping Reports were the subject of formal consultation with the public and statutory consultees/stakeholders and the comments received taken into account. This 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 Further detail on the nature of the significant environmental issues and the duration of effects to be assessed in the Environmental Report is provided at Schedule 2 of the 2004 Regulations which states that the likely significant effects on the environment 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 An independent SA by WYG (Alliance Planning) has been undertaken at each stage in the preparation of the Borough Plan. The SA has reviewed all the reasonable options considered during the evolution of the Borough Plan and assessed the significant effects on the environment. A list of the potential development sites (employment and housing) and policies appraised in this SA is contained at Appendix B together with a location plan for the sites.



### **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 Borough Plans. 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 options set out in the Borough Plan Submission in the context of the findings of the previous Sustainability Appraisals. This iterative approach is invaluable in allowing the SA to inform the Council's selection approach and explain the assessment that underpins the Submission Document options.
- 3.3.1 Each of the Policies and subject Sites set out in the Borough Plan were tested against the sustainability objectives developed for the purposes of the Sustainability Appraisal. As set out at paragraph 3.3.3 above, the SA objectives were reviewed prior to undertaking this assessment and found to be 'fit for purpose'. The appraisal questions and indicators are presented at Appendix A.
- 3.3.2 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

3.3.3 It should be noted that the scoring 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.

3.3.4 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 Borough Plan.

### 3.8 Stage D – Consultation on SA Report

3.8.1 The SA report will be published for comment with the Borough Plan Submission 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 Borough Plan 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 – Housing*

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 “Strategic Housing – Site Selection”. The background paper set out the approach and conclusions of a two stage sequential site search of suitable land to meet the housing needs of the Borough undertaken by the Council in 2013.



- 4.1.6 The Site selection process considered all the suitable/available sites within the Borough and identified ten Potential Development Areas (PDA 1-10) that were considered most suitable, in planning terms, to contribute to the delivery of the housing needs in the Borough Plan. Based on the Borough-wide search strategic locations represented the most viable sites for new housing development. These area were assessed under the SA Objectives and findings presented in the SA Report 2012.
- 4.1.7 Four of the Potential Development Areas, namely PDA 1/10, PDA3, PDA5 and PDA7, were taken forward by the Council in the Borough Plan Preferred Option as housing land allocations. The Sites were renamed as SHS 1-4 and are shown on Plan at Appendix B.
- 4.1.8 Following the 'call for sites' exercise in 2014, a further fifteen potential housing sites were identified by landowners and potential developers. These additional sites were assessed against the SA Objectives and the findings are presented in the SA Report 2014.
- 4.1.9 The Potential Development Areas and sites identified by landowners/developers as part of the 'call for sites' exercise are considered to represent the extent of available and viable sites in the Borough. This consists of a total of 25 sites which are concluded to the 'reasonable' alternative housing sites for the purposes of the SEA Regulations. A Sustainability Assessment of each Site has been undertaken but it is not the intention of the SA process to rank or prioritise the sites but simply to present the positive or negative sustainability considerations associated with each site.
- 4.1.10 Based on a findings of the Sustainability Appraisal for each Site and other material consideration, The Borough Plan – Submission Document has identified six housing allocation sites, namely:
- North of Nuneaton - **HSG 1** (previously PDA 1/10 and SHS 4);
  - Arbury - **HSG 2** (previously PDA 5 and SHS 2);
  - Gipsy Lane – **HSG 3** (previously PDA 3 and SHA 1);

- Hospital Lane – **HSG 4** (previously PDA 7 and SHS 3);
- Woodlands - **HSG 5** (previously PDA 6); and
- School Lane – **HSG 6** (previously PDA 8).

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

**Table 3 – Allocated Housing sites**

Site Reference no.	SA Conclusions
North of Nuneaton HSG 1 (previously PDA 1/10 and SHS 4)	<p>The proposed development will bring forward circa 3530 new housing units and thus represents a significant positive effect on the provision of homes. There will also be indirect positive effects in terms of economic factors and social factors associated with deprivation and poverty together with waste minimisation.</p> <p>The development of the Site will result in the loss of open agricultural land located outside the existing urban areas and will have a negative effect on the prudent use of resources, soils, landscape (in the short term), provision of sports and recreational facilities, access to services, and the vitality of the Town Centres.</p> <p>The Site is accessible by car for services, jobs and learning activities and is situated between two existing bus routes. The dispersed location of the land will discourage a modal shift</p>



	<p>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, design/sense of place, cultural heritage, water resources (with mitigation), health facilities (with mitigation) provided that the development accords with other policies in the Borough Plan.</p>
<p>Arbury – HSG 2 (Previously PDA 5 and SHS 2)</p>	<p>The proposed development will bring forward circa 1000 new housing units and thus represents a significant positive effect on the provision of homes. There will also be indirect positive effects in terms of economic factors and social factors associated with deprivation and poverty together with waste minimisation.</p> <p>The development of the Site will result in the loss of open agricultural land located outside the existing urban areas and will have a negative effect on the prudent use of resources, soils, historic landscape (in the short to medium term), provision of sports and recreational facilities, access to services, and the vitality of the Town Centres.</p> <p>The Site is accessible by car for services, jobs and learning activities but more limited for residents' dependant on public transport.</p>



	<p>The dispersed location of the land will discourage a modal shift away from the car which in turn will increase traffic movements and travel times with an associated increase in air pollution levels.</p> <p>Although the B102 and B4112, situated close to the Site, are bus routes there is no existing linkage to these routes from the Site, therefore, if enhanced public transport measures were brought forward in tandem with the development they will need to be complimented by the introduction of new strategic highway connections in order to mitigate any potential impacts in the longer term.</p> <p>The Site is situated adjacent to Arbury Estate Historic Park and Gardens which includes Arbury Hall and a number of other listed buildings. Any proposals to develop the Site will need to ensure that the setting of the Historic Park and listed buildings is preserved and where possible enhanced. Accordingly the development of this Site will result in an adverse effect on cultural heritage factors without mitigation but with suitable mitigation it is considered to will result in a neutral or slight positive effect in the longer term.</p> <p>The Site is situated adjacent to the Ensor Pool SAC which is an internationally protected site associated with principally White Clawed Crayfish. A separate HRA of the Borough Plan undertaken by Mott MacDonald has identified a significant adverse effect on the designated site, without mitigation, from the development of the Site for residential development.</p>
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	<p>Any proposals to develop the Site will need to address in detail the mitigation measures proposed to address the potential impact on the SAC and maintain and enhance the integrity of the protected site in the longer term. The HRA has set out potential mitigations measure that will be brought forward as part of the development of the Site.</p> <p>The development of the Site for residential uses will result in the loss of existing hedgerows features and will increase the level of built development in a historic parkland setting. However the Site also offers the opportunity to enhance and create integrated hedgerows/copse and woodland area in the east of the character area to screen existing views of the existing built development as part of the wider landscape scheme for the Site and adjacent historic parkland. The development will also provide the opportunity to provide new green infrastructure linkages with existing woodland/hedgerow features, namely the Griff Brook tributaries and Spring Kidder Wood, resulting in landscape enhancements in the longer term.</p> <p>The Site will have a neutral effect on climatic factors, design/sense of place, water resources (with mitigation), health facilities (with mitigation) provided that the development accords with other policies in the Borough Plan.</p>
<p>Gipsy Lane – HSG 3; (Previously PDA 3 and SHS 1)</p>	<p>The proposed development will bring forward circa 518 new housing units and thus represents a significant positive effect on the provision of homes. There will also be indirect positive effects in terms of economic factors and social factors associated with deprivation and poverty, important</p>



	<p>considerations given the proximity of the Site to the Hill Top area of Nuneaton, together with waste minimisation.</p> <p>The development of the Site will result in the loss of open agricultural land located outside the existing urban areas and will have a negative effect on the prudent use of resources, soils, landscape (in the short term), provision of sports and recreational facilities, access to services, and the vitality of the Town Centres.</p> <p>The Site is accessible by car for services, jobs and learning activities although more limited for residents' dependant on public transport albeit the B4113, Coventry Road is a bus route and SHS1 is situated approximately 750m from the proposed Bermuda Park and Ride facility. The dispersed location of the land will discourage a modal shift away from the car which in turn will increase traffic movements and travel times with an associated increase in air pollution levels. 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 increasing to a positive effect once the proposed park and ride facility is operational.</p> <p>The Site will have a neutral effect on climatic factors, design/sense of place, cultural heritage, water resources (with mitigation), health facilities (with mitigation) provided that the development accords with other policies in the Borough Plan.</p>
<p>Woodlands – HSG 4  (Previously PDA 6)</p>	<p>The Site will bring forward circa 1223 homes and thus represents a significant positive effect on social factors associated with access to decent and affordable housing for</p>



	<p>all. There will also be indirect positive effects in terms of economic factors in the medium to longer term.</p> <p>The Site will result in the loss of high quality agricultural land which has poor accessibility to existing employment, health facilities, education facilities and the town Centre. The dispersed location of the Site would tend to discourage modal shift away from the car which in turn will increase traffic movements.</p> <p>The Site will have a neutral effect on issues of biodiversity, landscape character, water resources, access to sports/cultural facilities and a positive long terms effect on tackling multiple deprivation, climate change, energy use and recycling and provided that the proposed mitigation is provided and development accords with other policies in the Borough Plan.</p>
Hospital Lane - HSG 5 (Previously PDA 7 and SHS 3) and	<p>The proposed development will bring forward circa 676 new housing units and thus represents a significant positive effect on the provision of new homes in the Borough. There will also be indirect positive effects in terms of economic factors and social factors associated with deprivation and poverty together with waste minimisation.</p> <p>The development of the Site will result in the loss of open agricultural land located outside the existing urban areas and will have a negative effect on the prudent use of resources, soils, landscape (in the short term), provision of sports and recreational facilities, access to services, and the vitality of the Town Centres.</p>



	<p>The Site is accessible by car for services, jobs and learning activities and is situated between three existing bus routes. 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 development of the Site will increase the level of built development in the area but also offers the opportunity to 'recreate' and connect existing landscape features as part of the wider scheme for the Site and provide green infrastructure linkages to existing biodiversity features, resulting in landscape enhancements in the longer term. In particular, Cattell's Wood provides an important landscape and visual screen and should be enhanced as part of any development on the Site.</p> <p>The Site will have a neutral effect on climatic factors, design/sense of place, cultural heritage, water resources (with mitigation), health facilities (with mitigation) provided that the development accords with other policies in the Borough Plan.</p>
School Lane – HSG 6 (Previously PDA 8)	<p>The proposed development will bring forward circa 298 homes and thus represents a significant positive effect on the provision of homes. There will also be indirect positive effects in terms of economic factors and social factors associated with deprivation and poverty together with waste minimisation.</p> <p>The development of the Site will result in the loss of open agricultural land located outside the existing urban areas and</p>



	<p>will have a negative effect on the prudent use of resources, soils, landscape (in the short term), provision of sports and recreational facilities, access to services, and the vitality of the Town Centres.</p> <p>The allocation of part of the Site for sports or recreational facilities or the requirement for contributions towards the enhancement of off-site facilities will mitigate the adverse effect on recreational facilities.</p> <p>The Site is accessible by car for services, jobs and learning activities and is situated adjacent to an existing bus route. The dispersed location of the land will discourage a modal shift away from the car which in turn will increase traffic movements and travel times with an associated increase in air pollution levels. 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, design/sense of place, cultural heritage, water resources (with mitigation), health facilities (with mitigation) provided that the development accords with other policies in the Borough Plan.</p> <p>The Site will result in the loss of high quality agricultural land but has good accessibility to existing employment, Health facilities, education facilities within Bedworth Town Centre. Notwithstanding the good accessibility of the Site, its dispersed location would tend to discourage modal shift away from the car which in turn will increase traffic movements.</p>
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	<p>Despite short and medium term adverse effects, in the longer term, the Site will have a neutral effect on issues of water resources, sports/cultural facilities, and a positive effect on landscape character, climatic factors, tackling multiple deprivation, biodiversity material assets and recycling provided that the development accords with other development control policies in the Borough Plan.</p>
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*Alternative Sites – Employment*

- 4.1.12 The Issues and Options - Borough Plan considered eight spatial development options for accommodating the employment 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 employment development in or adjacent to the existing urban areas scored higher in sustainability terms.
- 4.1.13 The evidence base prepared for the Preferred Option Borough Plan includes a background paper entitled "Location and Nature of Employment Growth". The background paper summarises the findings of the Employment Land Review (2010) which considered an assessment of all available land to meet the employment needs of the Borough.
- 4.1.14 The Site selection process considered the ten Potential Development Areas (PDA 1-10) that were considered most suitable, in planning terms, to contribute to the delivery of the housing needs in the Borough Plan. Based on the Borough-wide search these areas all represented the most viable sites for all new development and could potentially accommodate employment land, subject to suitable revisions. These 'revised' areas were assessed for employment uses under the SA Objectives and findings presented in the SA Report 2012.



4.1.15 Seven of the revised areas, namely AR13h, P4 & AR13I, AR13J, AR13K & WB03, and EX19 were taken forward by the Council in the Borough Plan Preferred Option as employment land allocations. The Sites were amalgamated and renamed as ECO1-3.

4.1.16 Following the 'call for sites' exercise in 2014 a further forty-five potential employment sites were identified by landowners and potential developers. These additional sites were assessed against the SA Objectives and the findings are presented in the SA Report 2014.

4.1.17 The Potential Development Areas and sites identified by landowners/developers as part of the 'call for sites' exercise are considered to represent the extent of available and viable sites in the Borough. This consists of a total of 46 sites which are concluded to the 'reasonable' alternative employment sites for the purposes of the SEA Regulations. A Sustainability Assessment of each Site has been undertaken but it is not the intention of the SA process to rank or prioritise the sites but simply to present the positive or negative sustainability considerations associated with each site.

4.1.18 Based on a findings of the Sustainability Appraisal for each Site and other material consideration, The Borough Plan – Submission Document has identified three employment allocation, namely:

- Faultlands (Bermuda East) **EMP 1** - (Previously Econ 2 or AR13J, AR13K & WB03);
- Phoenix Way/Wilsons Lane – **EMP 2** - (Previously NB125 or AR13H, AR13I & P4); and
- Prologis Extension – **EMP 3** - (Previously ECON 3 or EX19).

4.1.19 The Assessment matrices for all the discounted options are presented at Appendix F. A summary of the conclusions for each employment site presented in the Borough Plan – Submission Document is set out in Table 4 below.

**Table 4 – Allocated Employment sites**

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

	<p>The Site is divided by Coventry Road B4113, a bus route, which forms a junction with the A444 to the south west of the Site accordingly the site is accessible by car for services, jobs and learning activities and reasonably well served by public transport. Furthermore, EMP1 is situated adjacent to the proposed Bermuda Park and Ride facility. Accordingly the site is accessible by car for services, jobs and learning activities and reasonable well served by public transport. However, if enhanced public transport measures were brought forward in tandem with the adjacent park and ride development then the potential impacts could be mitigated to a positive effect in the longer term.</p> <p>The development of the Site will increase the level of built development in the area but also offers the opportunity to recreate and connect existing landscape features as part of the wider scheme for the Site and provide green infrastructure linkages to existing biodiversity features, namely the existing adjacent woodland, resulting in landscape enhancements in the longer term.</p> <p>The Site will have a neutral effect on issues of climatic factors, design/sense of place, water resources (in the longer term), cultural heritage, waste minimisation and sports/cultural facilities provided that the development accords with other policies in the Borough Plan.</p>
Phoenix Way/Wilsons Lane - EMP 2	The proposed development will bring forward new employment uses and thus represents a significant positive effect on economic factors. There will also be indirect positive



<p>(NB125 or AR13H, AR13I &amp; P4 );</p>	<p>effects in terms of social factors associated with deprivation, poverty and health.</p> <p>The development of the Site will result in the loss of open land located outside the existing urban areas and will have a negative effect on soils, landscape (in the short term), prudent use of resources (land), the provision of new homes and access to existing services/infrastructure and the vitality of the Town Centres.</p> <p>The location of the Site is dispersed from the Town Centres of either Nuneaton or Bedworth albeit there is a potential direct access to either centre via the A444 situated in close proximity to the Site. The location of the land outside the existing urban areas will increase traffic movements and travel times together with an associated increase in air pollution levels. However, given the scale of the Site it is likely that the proposed employment uses would represent a 'strategic' allocation and thus could not be accommodated within Town Centre areas, therefore, it is considered to have a slight adverse impact on the vitality of the Town Centre areas.</p> <p>The Site is accessible by car for services, jobs and learning activities and reasonable well served by public transport as Wilson Lane is designated as a bus route. Furthermore, the location of the Site and proximity to the junction with the M6 will tend to discourage modal shift away from the car usage and increase traffic movement and associated air pollution levels. However, if enhanced public transport measures were brought forward in tandem with the development then the</p>
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	<p>potential impacts could be mitigated to a neutral effect in the longer term.</p> <p>The development of the Site will increase the level of built development in the area but also offers the opportunity to 'recreate' and connect existing landscape features as part of the wider scheme for the Site and provide green infrastructure linkages to existing biodiversity features, namely the River Stowe resulting in landscape enhancements in the longer term.</p> <p>The Site will have a neutral effect on issues of climatic factors, design/sense of place, water resources (in the longer term), cultural heritage, waste minimisation and sports/cultural facilities provided that the development accords with other policies in the Borough Plan.</p>
Prologis Extension EMP 3 (ECON 3 or EX19).	<p>The proposed development will bring forward new employment uses and thus represents a significant positive effect on economic factors. There will also be indirect positive effects in terms of social factors associated with deprivation, poverty and health.</p> <p>The development of the Site will result in the loss of open agricultural land located outside the existing urban areas and will have a negative effect on soils, landscape, access to services including new homes and the vitality of the Town Centres.</p> <p>EMP 3 is accessed from New Road, a bus route, but there is no direct route to either Town Centre or the strategic highway network. The dispersed location of the land will increase traffic</p>



	<p>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 new highway arrangements connecting the Site to the existing access road between Prologis Park and the A444 then the adverse effect could be mitigated resulting in a neutral effect on this sustainability objective in the longer term.</p> <p>The development of the Site will increase the level of built development in the area but also offers the opportunity to recreate linkages to existing landscape features, i.e. hedgerows/copse and woodland area, as part of the wider scheme for the Site. The development will also provide the opportunity to create new features and provide green infrastructure linkages to existing biodiversity features and woodland resulting in landscape enhancements in the longer term.</p> <p>The Site will have a neutral effect on issues of climatic factors, design/sense of place, water resources, cultural heritage, waste minimisation and sports/cultural facilities provided that the development accords with other policies in the Borough Plan.</p>
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### *Policies - Alternative Options*

- 4.1.20 The Issues and Options - Borough Plan considered a number of spatial issues relevant to Nuneaton Borough. The Sustainability Appraisal considered the environmental effects of each of the spatial issues and recommended policy directions to address each option.
- 4.1.21 The Borough Plan Preferred Option translated these key issues into eight strategic objectives for the emerging Plan. Twenty-three strategic policies were subsequently identified. These draft policies were assessed under the SA Objectives and findings presented in the SA Report 2012.
- 4.1.22 The Borough Plan - Preferred Option also set out all the relevant reasonable alternatives to each of the draft policies including the 'do nothing' option. These alternative options were also taken into account in the SA assessment for each Policy. These options represent the 'reasonable' alternative policy options for the purposes of the SEA Regulations.
- 4.1.23 Based on a findings of the Sustainability Appraisal for each policy and other material consideration, the draft policies were amended and refined. Three policies were either not taken forward or merged with other policies, namely Policy ENV 3 – Urban Character and Design Quality, Policy DEV 5 – Green Belt and Policy DEV3 – Urban Focus and Strategic Sites.
- 4.1.24 A further SA assessment of the revised policies was undertaken and the findings are presented in SA Report 2012. The further SA related to twenty two policies and included new policies, namely, Presumption in Favour of Sustainable Development, Telecommunications, Open Space, Retaining Community Assets and Contamination & Land Stability.
- 4.1.25 Based on the findings of the Sustainability Appraisal for each policy and other material consideration, the draft policies were further amended and refined. The Borough Plan – Submission Document has identified twenty-five policies (**NB1-NB25**) including the separation of the previous policy on Health into 'Health' and 'Sport & Exercise'. The previous



policy assessments have been reviewed and updated for each policy, including the new health and sports policies. The Assessment matrices for all the policies are presented at Appendix D.

### *Summary*

- 4.1.26 The Borough Plan has been the subject of an integrated Sustainable Assessment at each stage of the documents evolution. The findings of the SA have been used by the Borough Council to assess, refine and amend the preferred policy and site options for inclusion in the Borough Plan Submission Document. This has included an assessment of reasonable alternatives in terms of policy wording and site allocations.
- 4.1.27 Based on the above, it is considered that the Borough Plan – Submission Document has met the requirements of the SEA Regulations and Stage B, Task 2 of the SA Stages.



## 5.0 Appraisal of 'significant' environmental effects

### 5.1 Introduction

- 5.1.1 A list of the proposed policies and potential site allocations (employment and housing) appraised in this SA is contained at Appendix B together with a key diagram showing the location of the sites. The full appraisal for each Site and Policy set out in the Borough Plan – Submission Document is presented at Appendix C and D of this report. This section of the report summarises the findings of the Sustainability Assessment of the Borough Plan – Submission Document in respect of any significant effects associated with the SA objectives and also considers the cumulative effects arising from Borough Plan as a whole.
- 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 Borough Plan – Submission Document is an economically driven plan and, thus, offers positive effects in terms of economic criteria in the SA. All the employment policies and potential employment sites score well against the economic objectives.
- 5.2.2 It is the Council's intention to deliver higher levels of growth and competitiveness during the plan period (up to 2031) 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.
- 5.2.3 In order to deliver economic growth and a portfolio of employment sites, the Borough Plan Submission Document will bring forward a number of strategic employment areas. Following the site selection and SA process three strategic sites have been identified in the Submission Document (**EMP 1, EMP 2 and EMP 3**). None of the sites, or the alternatives sites assessed during the SA process, are focusing within the urban areas of Nuneaton and Bedworth but



generally represent land in the vicinity of existing employment areas (Bermuda Park, Prologis Park) together with land in the vicinity of the M6 junction (Phoenix Park).

- 5.2.4 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 and Bedworth Town Centres.
- 5.2.5 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 vitality and viability of Town Centre area but the provision of strategic sites will provide for a range of land and premises for employment uses in attractive and accessible locations (by public transport, foot and cycle). This will lead to an overall enhancement of the Borough in economic terms and indirectly address social factors associated with unemployment and academic attainment.
- 5.2.6 The allocated sites are all located in 'out of centre' locations and thus, have the potential to have a significant adverse score in relation to enhancement of the vitality and viability of the town centres. All the sites are above 0.5ha and so defined as 'strategic' for the purposes of this SA and thus, are considered to be too large to accommodate the associated scale of employment or residential development, namely 20+ dwellings, on a single site within existing Town Centres. In this case the scoring is reduced to slight adverse.
- 5.2.7 The location of new employment areas on land outside the main urban areas and on the edge of existing settlements will help promoting economic growth along transport corridors (A444) and the future key public transport node at Bermuda. The proposed employment and housing sites at Faultlands/Gypsy Lane (**EMP1 and HSG3**) offer the opportunity for



increased mixed use and integration between residential and employment development and the existing employment and residential areas. This will result in a positive cumulative effect.

- 5.2.8 The allocated housing sites will result in a neutral to slight positive effect on economic factors due to jobs and training opportunities created during the construction phase and the long term link between the provision of new homes and retention of employment/trained personnel in the Borough.

### **5.3 Social factors**

- 5.3.1 All the housing allocations (**HSG 1-6**) score well against the social objectives. It is the Council's intention to bring forward a range and mix of housing tenures during the plan period to support the planning of high levels of economic growth. This is likely to contribute to reducing poverty, deprivation and social exclusion by virtue of improving access to housing and employment opportunities, thereby delivering an equitable sharing of the benefits of prosperity.
- 5.3.2 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 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.
- 5.3.3 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 Borough Plan. The allocated sites are situated on or in close proximity to existing public transport corridors 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. **EMP1 and HSG 3** are situated in close proximity to the proposed Bermuda Park and Ride facility resulted in a slight positive score in the longer term providing such measures are integrated with the delivery of the facility. This will result in a positive cumulative effect.

- 5.3.5 Providing everyone with an opportunity to live in decent and affordable home is a key social target. Housing is a key driver to revitalisation and it is an essential community need and a variety of housing types. A steady supply of housing is necessary to generate vitality, facilitate continued economic prosperity, help support local shops and services required by local residents and help achieve the aim of creating mixed and balanced communities. There is a shortage of affordable housing in the Borough. The proposed growth will further increase the pressure for affordable housing. The provision of allocated housing areas will contribute positively to these objectives.
- 5.3.6 A number of the allocated assessed sites (**HSG2/HSG3/EMP1**) offer the potential to improve access to employment opportunities and a variety of housing types to deprived communities in Camp Hill, Bar Pool, Kingswood and Wem Brook wards. This will result in a positive cumulative effect.
- 5.3.7 The provision of new development has the potential to result in an effect on crime and fear of crime. Crime rates are currently high in the Borough but are steadily falling. Crime may, if not mitigated, increase in line with proposed growth levels. However, in the absence of further information on the type and nature of the specific developments to confirm any correlation between sites and 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 The assessed sites in the vicinity of **Arbury Estate (HSG2)** are situated adjacent to the Ensor Pool SAC which is an internationally protected site associated with principally White Clawed Crayfish. A HRA of the Borough Plan undertaken by Mott MacDonald has identified a significant adverse effect on the designated site, without mitigation, from the development of these sites.
- 5.4.4 The development of **HSG2** for housing will need to address in detail the mitigation measures proposed to address the potential impact on the SAC and maintain and enhance the integrity of the protected site in the longer term. The HRA has set out potential mitigations measure that will be taken forward. If the proposed mitigation is agreed, and undertaken in tandem with the development of the site, this will result in a neutral effect on the SAC in the long term.

## 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 also relies in part on improving access to rewarding jobs, a variety of housing types, open space, leisure and recreation facilities. The **Health Impact Assessment** prepared by Ben Cave Associates concludes that housing and employment are both important determinants of health and supports the provision of good quality dwellings in the Borough. It is considered that the development of new housing sites



for a range and mix of affordable housing tenures will improve social inclusion for residents consequently having positive impacts on human health and well-being.

- 5.5.2 The development sites for residential uses will exacerbate current inequalities or access to health care facilities/services. However, if proposals are accompanied by contributions to new and enhanced health facilities the development of land for residential uses will result in a neutral impact on population and health in the longer term.
- 5.5.3 Employment activity can also have an indirect positive effects on human health in the longer term. The Health Impact Assessment concludes that *"getting people into employment is critically important in reducing inequalities in health"* and supports the provision of good quality jobs, in tandem with new dwellings, in the Borough. The development of the allocation employment sites will result in an in-direct positive effect on promoting health lifestyles.
- 5.5.4 The proposed housing and employment sites **HSG2, HSG3 and EMP1** offer additional benefits as they will provide employment opportunities and housing to deprived individuals and communities within the vicinity of the Camp Hill, Bar Pool, Kingswood and Wem Brook wards. This will result in a positive cumulative effect.

## 5.6 Land Quality and soil

- 5.6.1 All the allocated sites 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 significant housing and employment growth has the capacity 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 design stage for the development proposals 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 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 new development is likely to 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 As set out at 3.10.5 above, the detailed assessment of flood risk for each site, including the production of a Surface Water Management Plan, will be mandatory at the planning application stage. The Flood Risk Assessment (FRA) should adopt a sequential approach to



the on-site scheme design which steers building and access routes to areas of lowest flood risk within the boundary of the Site development. The FRA should also set out suitable site specific mitigation measures including those required to assessed surface water flooding from any existing drains that cross the sites. Mitigation measure will need to be installed prior to the occupation of development and will include the use of porous paving, green roofs and other sustainable urban drainage systems.

5.7.7 **Policy NB21** to manage flood risk and water quality is included in the Borough Plan in order to ensure all new development is accompanied by suitable mitigation measures. The policy should allow for site specific measures to be agreed at the planning application stage.

5.7.8 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 to occur in the longer term.

## 5.8 Air Quality

5.8.1 All the allocated sites 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. In addition, these sites will not make efficient use of existing infrastructure, promote compact mixed use development or reduce the need to travel.

5.8.2 These sites are, therefore, considered to result in a significant adverse impact on the sustainability objective to focus development in urban areas and a slight adverse effect on objective to increase the use of public transport, cycling or walking without mitigation. However as the allocated sites are located in close proximity to a public transport corridor, new development offers the opportunity to bring forward enhanced public transport or cycling measures in tandem with new development resulting in a neutral effect on this sustainability objective in the long term.



5.8.3 None of the allocated sites will result in an increase in traffic flows through the existing designated AQMAs, therefore the proposals will not result in a significant residual adverse effect on the air quality of the Borough.

## 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. A proportion of on-site energy usage could be provided by micro-generation facilities (as ground source heat pumps, water source heat pumps, photovoltaic panels) and energy efficiency measure incorporated in the layout and design of the employment units. Accordingly, and assuming the proposed mitigation is incorporated, it is considered that the allocated sites will have an adverse effect on this sustainability objective in the short to medium term reducing to a neutral effect in the long term as new energy facilities come forward.

5.9.3 The provision of district heating systems or similar maybe appropriate, and should be fully considered, for the larger sites or where there is a cluster of potential development sites, namely **HSG1, HSG3 and EMP 3**. For the purposes of the Sustainability Assessment, it is assumed that allocated sites (including clusters) under 20Ha (EMP3, HSG3) may not be suitable or of a sufficient size to bring forward such measures and the assessment has taken this into account.

5.9.4 **Policy NB22** to encourage energy efficiency or bring forward decentralised energy facilities in suitable locations is included in the Borough Plan in order to ensure all new development makes an appropriate and increasing contribution to the energy supply of the Borough. The policies should allow for site specific renewable energy measures to be agreed at the planning application stage.



5.9.5 The dispersed location of the allocated sites will also results in an adverse effect on the efficient use of existing infrastructure, promotion of compact mixed use development or reducing the need to travel. However, opportunities to mitigate carbon dioxide emissions via sustainable construction e.g. energy efficiency, sustainable design, demolition and construction may be brought forward as part of the development of the sites. **Policy NB22** should allow for site specific initiatives to be agreed at the planning application stage. Such initiatives, will result in a neutral impact on this sustainability objective.

## 5.10 Material Assets

5.10.1 All the allocated sites 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.

5.10.2 The development of sites will result in an indirect effect on the issue of waste generation and recycling which is likely to increase, both construction and occupation phases, due to the associated increase in economic activity and household numbers. However, the provision of integrated recycling facilities as part of the overall development and the promotion of sustainable construction measures will result in a slight positive effect on this objective in the longer term. **Policy NB23** should allow for site specific initiatives to be agreed at the planning application stage. Such initiatives, will result in a neutral impact on this sustainability objective.

## 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.

5.11.2 **HSG2** is situated adjacent to Arbury Estate Registered Park and Gardens which includes Arbury Hall, a Grade 1 Listed Country House, and a number of other listed buildings. These proposals will need to be carefully designed and sited to ensure that the setting of the



Historic Park and/or listed buildings are preserved and where possible enhanced. A site specific heritage assessment of the sites will need to be undertaken at the planning application stage to ensure that all important historic assets are not adversely affected by the development of the Site.

5.11.3 **Policy NB24** (Valuing and Conserving our Historic Environment) requires that new development proposals take full account of the characteristics and setting of the heritage asset to ensure that features of historic interest are protected and conserved.

5.11.4 The implementation of the policy will therefore result in no significant or cumulative effect on cultural heritage coming forward as a result of the proposals in the Plan.

## 5.12 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 of varying degrees. The development of the sites for employment or housing uses will generally result in the loss of existing open agricultural land fields and features that provide separation between existing built up areas. In each case, the development of the site will increase the level of built development in the local area but also offers the opportunity to recreate and connect existing landscape features 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. However, an overall neutral to positive effect in the medium to long term should derive once the landscaping proposals have started to mature and the linkages become established.



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.

5.12.5 The implementation of **Policy NB15 - Green Infrastructure and Policy NB25–Landscape Character** will therefore result in no significant or cumulative effect on landscape character

### **5.13 Cumulative Effects**

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

### **5.14 Conclusions**

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

5.14.2 The assessment concludes that the Submission 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.

5.14.3 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 Borough Plan will not raise any significant adverse effects or cumulative effects.



## 6.0 Residual effects and conclusions

### 6.1 INTRODUCTION

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

6.1.2 Based on this review a range of mitigation measures have been identified. If implemented, the mitigation measures will ensure that no residual effects are associated with the proposals set out in the Borough Plan – Submission Document. The main conclusions and, where appropriate, proposed mitigation are summarised under key sustainable themes:

### 6.2 ECONOMIC FACTORS

6.2.1 All the sites assessed score well against the economic objectives.

6.2.2 None of the allocated employment sites assessed are focusing within or adjacent to the urban areas of Nuneaton and Bedworth, which are the most sustainable locations in the Borough, but generally represent land in the vicinity of existing employment areas (Bermuda Park, Prologis Park), principal routes well served by public transport including land in the vicinity of the M6 junction (Phoenix Park).

### 6.3 SOCIAL FACTORS

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



## **6.4 BIODIVERSITY**

- 6.4.1 The majority of the allocated sites will result in the loss of existing habitat and features of biodiversity interest. However, the development of the sites offers the opportunity to create or enhance green infrastructure linkages and new biodiversity features (woodlands, water bodies etc) as part of an overall landscaping/biodiversity scheme for the Site.
- 6.4.2 The policies in the Borough Plan will protect and enhance existing biodiversity features and opportunities to incorporate 'green infrastructure' features in new development makes a positive contribution to the natural assets of the Borough.

## **6.5 POPULATION AND HUMAN HEALTH**

- 6.5.1 Housing and employment are both important determinants of health and the provision of good quality dwellings and new employment opportunities in the Borough are supported.
- 6.5.2 The development sites for residential uses will exacerbate current inequalities or access to health care facilities/services and thus proposals to develop land for residential uses should be accompanied by contributions to new and enhanced health facilities.

## **6.6 SOIL/LAND QUALITY**

- 6.6.1 The allocated sites will lead to the loss of productive agricultural land and quality soils to development that cannot be mitigated.
- 6.6.2 This represents a negative residual cumulative effect.

## **6.7 WATER RESOURCES**

- 6.7.1 Water efficiency is a key issue for the Borough Plan and significant housing and employment growth has the capacity to increase water demand, posing increased pressure on water resources, unless adequate mitigation is also brought forward.



6.7.2 A number of the allocated sites contain land at Flood Risk, namely land falling within Flood Zones 2, 3a and 3b and will need to be the subject of a Flood Risk Assessment to assess building and access routes to areas of lowest flood risk within the boundary of the Site and identify whether site specific flood mitigation measures are required.

6.7.3 The Borough Plan include policies that incorporate water efficiency measures and SuDS within any detailed scheme for all sites. Mitigation measure will need to be installed prior to the commencement of development and will include the use of porous paving, green roofs and other sustainable urban drainage systems.

## **6.8 AIR QUALITY**

6.8.1 All the allocated sites 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. In addition, these sites will not make efficient use of existing infrastructure, promote compact mixed use development or reduce the need to travel.

6.8.2 However as the allocated sites are located in close proximity to a public transport corridor, new development offers the opportunity to bring forward enhanced public transport or cycling measures in tandem with new development resulting in a neutral effect on this sustainability objective in the long term.

6.8.3 None of the allocated sites will result in an increase in traffic flows through the existing designated AQMAs, therefore the proposals will not result in a significant residual adverse effect on the air quality of the Borough.

## **6.9 CLIMATIC FACTORS**

6.9.1 Policies are included in the Borough Plan to encourage energy efficiency or bring forward decentralised energy facilities in order to ensure all new development makes an appropriate contribution to the energy needs of the Borough.



## **6.10 MATERIAL ASSETS**

6.10.1 Policies in the Borough Plan will encourage waste minimisation and recycling/recovery of resources in order to ensure all new development makes an appropriate contribution to meeting this objective.

## **6.11 CULTURAL HERITAGE**

6.11.1 All 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.

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

6.11.3 Policies in the Borough Plan requires that new development proposals take full account of the characteristics and setting of the heritage asset to ensure that features of historic interest are protected and conserved. to prepare a heritage assessment for each site to ensure that features of historic interest are not present on or in the vicinity of the site.

6.11.4 The implementation of the policy will therefore result in no significant or cumulative effect on cultural heritage coming forward as a result of the proposals in the Plan.

## **6.12 LANDSCAPE**

6.12.1 All the allocated sites will result in some change to the local landscape. In each case, the development of the site will increase the level of built development in the local area but also offers the opportunity to recreate and connect existing landscape features or provide green infrastructure linkages as part of a wider scheme for the site.

6.12.2 Policies in the Borough Plan will ensure that the development of each site will result in landscape enhancements in the longer term.



## **6.13 CONCLUSIONS**

6.13.1 This SA has considered each of the sites and policies in the Borough Plan – Submission Document against the agreed Sustainability Objectives agreed at Stage A of the SA process.

6.13.2 The assessment concludes that the Submission 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.

6.13.3 Subject to the implementation of the mitigation proposed the Borough Plan will not raise any significant adverse residual or cumulative effects.

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