



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

## **Non-Technical Assessment**

### **Non-Strategic Residential Sites**

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

**January 2018**



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## 1.0 Introduction

### 1.1 Background

- 1.1.1 WYG is commissioned to undertake a Sustainability Appraisal (SA) in support of the Nuneaton and Bedworth Borough Plan.
- 1.1.2 A Sustainability Appraisal Report (SA Report 2017) for the Nuneaton and Bedworth Borough Plan - Publication Submission (2017) was issued in January 2017. The SA Report 2017 included an assessment of Policy DS5 (Residential Allocations) and each of the site specific strategic residential sites set out in Policies HSG 1 to 11 and EMP 2. Policy DS5 also listed 23 non-strategic residential allocations located principally within the existing urban areas of Nuneaton and Bedworth.
- 1.1.3 This document comprises a standalone Sustainability Appraisal Report (SA Report) for the Nuneaton and Bedworth Borough Plan - Publication Submission (2017) to consider the non-strategic residential sites only.
- 1.1.4 The SA is a mechanism for considering and communication the likely effects of a draft plan, and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse effects and enhancing the positives. The SA of the Local Plan is a legal requirement.
- 1.1.1 Under S19(5) of the Act and the SEA Regulations which came into force in England and Wales in July 2004 SA and Strategic Environmental Assessment (SEA) are mandatory for all Local Plans and SPDs. S39 of the Planning and Compulsory Purchase Act requires Local Plans/SPDs to be prepared with a view to contributing to the achievement of sustainable development. SA is one way of helping fulfil this duty through a structured appraisal of the economic, social and environmental sustainability of the plan. The production of a SA is one of the "*tests of soundness*" on a Local Plan/SPD.
- 1.1.5 In order to accord with the requirement in the SEA Regulations and associated guidance together with a consistent assessment process this SA Report has been undertaken using the same methodology and approach as the 2017 SA Report. As a consequence, background details regarding the context and objectives of the SA have been repeated and updated as necessary.



- 1.1.2 The requirement to undertake SEA is established in the EU by the European Directive 2001/42/EC, 'the Assessment of the Effects of Certain Plans and Programmes on the Environment' (commonly known as the SEA Directive). The SEA Directive is transposed into English law by the SEA Regulations.
- 1.1.3 SEA and SA are closely linked. SA aims to integrate sustainability issues into decision making by appraising the plan or strategy using environmental, social and economic objectives, whilst SEA also aims to facilitate sustainable development but its emphasis is on integrating environmental considerations into decision making through analysis of environmental issues.
- 1.1.6 SA/SEA is a five stage process. Figure 1 below sets out each of the stages and the stage currently reached.

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

<p><b>Stage D: Seek representations on the SA report from consultation bodies and the public</b></p>
<p><b>Stage E: Post adoption reporting and monitoring</b></p> <p>1: Prepare and publish post-adoption statement  2: Monitor significant effects of implementing the Local Plan  3: Respond to adverse effects</p>

**Figure 1: SA Process Stages**

1.1.7 This document comprises the Sustainability Appraisal Report Non-Technical Summary (NTS) for the Nuneaton and Bedworth Borough Plan - Publication Draft (2017) to consider the non-strategic residential sites only. The report meets the requirements of a 'Non-Technical Summary' set out at Paragraph 12 and Schedule 2 of the SEA Regulations 2004.

## 1.2 Stage A – Scoping

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

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

Ref no.	Sustainability Objective	Link to topics in SEA Regulations
1	Achieve a strong, stable and sustainable economy and prosperity for the benefit of all the Borough's inhabitants, through on-going investment (public and private)	Population Material assets
2	To enhance the vitality of town centres	Material Assets



3	Provide decent and affordable housing for all, of the right quantity, type, tenure and affordability to meet local needs, in clean, safe and pleasant environments	Material Assets
4	Ensure easy and equitable access to services, facilities and opportunities, including jobs and learning, and that people are not disadvantaged with regard to ethnicity, gender, age, disability, faith, sexuality, background or location	Population Human Health
5	Reduce crime, fear of crime and antisocial behaviour	Population
6	Address poverty and disadvantage taking into account the particular difficulties of those facing multiple disadvantage	Population Human Health
7	Improve opportunities to participate in the diverse cultural, sport and recreational opportunities the Borough can offer	Population Human Health Material Assets
8	Encourage land use and development that creates and sustains well-designed, high quality built environments, that help to create and promote local distinctiveness and sense of place	Material Assets
9	To protect and enhance the natural environment, habitats, species, landscapes and inland waters	Fauna Flora
10	Improve health and reduce health inequalities by encouraging and enabling healthy active lifestyles and protecting health, as well as providing equitable access to health services	Population Human Health
11	To protect and improve soil quality	Soil
12	Use natural resources, such as water efficiently, including by incorporating efficiency measures into new land use and developments, redevelopment and refurbishment	Water
13	Ensure that new developments minimise water pollution levels and avoid areas which are at risk from flooding and natural flood storage areas	Water
14	Increase use of public transport, cycling and walking as a proportion of total travel in order to reduce road traffic congestion, pollution and accidents	Material Assets Air Human Health
15	Ensure development is primarily focused in urban areas, and makes efficient use of existing physical infrastructure and reduces need to travel, especially by private car	Air Material Assets
16	Reduce overall energy use through increased energy efficiency	Material Assets
17	Minimise the Borough's contribution to the causes of climate change by reducing emissions of greenhouse gases from transport, domestic, commercial and industrial sources	Material Assets



18	Encourage and enable waste minimisation, reuse, recycling and recovery to divert resources away from the waste stream, including the use of recycled materials where possible	Material Assets
19	To ensure the prudent use of resources including the optimum use of previously developed land, buildings and the efficient use of land	Material Assets
20	To protect and enhance the historic environment	Cultural Heritage inc. architectural and archaeological heritage
21	To maintain and enhance the quality of landscapes	Landscape



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

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

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

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

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

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

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

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

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

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



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

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

1.3.4 To meet the above objectives and overall vision, the Borough Plan seeks to bring forward a proportionate level of new development for the plan period of 13,374 new dwellings. This is to be accompanied by the provision of 98.6 hectares of employment land and a key consideration for the Council, is to accommodate this growth and associated infrastructure, whilst protecting the Borough’s built and natural environment and delivering a high quality of life for the Borough’s residents, visitors and workers.

#### 1.4 Baseline Context – Key Sustainability Issues

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

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

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



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



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



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

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

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



## 2.0 Sustainability Assessment – SA Framework and Objectives

### 2.1 The Framework

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

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

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

SA Objective	Appraisal Questions
<b>Economic Factors</b>  Achieve a strong, stable and sustainable economy and prosperity for the benefit of all the Borough's inhabitants, through on-going investment (public and private)	Will it meet the employment needs of the local community?
	Will it help diversify the economy?
	Will it enhance the vitality of urban centres?
	Will it support small businesses?
	Will it ensure an appropriate supply of employment sites within the Borough to support sustainable economic development?
	Will it provide employment land near to the potential workforce?

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

SA Objective	Appraisal Questions
disadvantaged with regard to ethnicity, gender, age, disability, faith, sexuality, background or location	<p>Will it ensure that education and skills infrastructure meets projected future demand and need?</p> <p>Will it reduce inequalities in education and skills across the Borough?</p> <p>Will it support provision of communication infrastructure, including broadband?</p>
Reduce crime, fear of crime and antisocial behaviour	Will it promote the reduction of crime rates?
	Will it encourage the adoption of principles to 'design out' crime in housing and employment sites?
Address poverty and disadvantage taking into account the particular difficulties of those facing multiple disadvantage	Will it reduce poverty and exclusion in those areas most effected?
Improve opportunities to participate in the diverse cultural, sport and recreational opportunities the Borough can offer	Will it ensure that facilities and locations for cultural activities are protected and provided?
	Will it protect and create high quality or valued recreational spaces and avoid erosion of recreational function?
Encourage land use and development	Will it require good urban design to create attractive, high quality environments where people will choose to live, work and invest?

SA Objective	Appraisal Questions
that creates and sustains well-designed, high quality built environments, that help to create and promote local distinctiveness and sense of place	<p>Will it promote design that enhances townscapes and streetscapes?</p> <p>Will it improve the quality of the built environment through high standards of sustainable design and construction of new and existing buildings?</p>
<p><b>Biodiversity</b></p> <p>To protect and enhance the natural environment, habitats, species, landscapes and inland waters</p>	<p>Will it improve the landscape and ecological quality of the countryside?</p> <p>Will it protect and enhance species, habitats and sites at risk?</p> <p>Will it protect and enhance the natural environment, whether designated or not, including habitats, species, landscapes and controlled waters, particularly maintaining European sites, SSSIs and LNRs to a favorable standard?</p> <p>Will it support development that incorporates improvements to wildlife habitats?</p> <p>Will it increase access to woodlands, wildlife and geological sites and green spaces particularly near/ in urban areas?</p>
<p><b>Population and Human Health</b></p> <p>Improve health and reduce health inequalities by encouraging and enabling healthy</p>	<p>Will it diminish inequalities in mortality, health and wellbeing across the Borough?</p> <p>Will provide and improve access to health and social care services?</p> <p>Will it promote healthy lifestyles and opportunities for exercise?</p> <p>Will it promote opportunities to participate in sport?</p>

SA Objective	Appraisal Questions
active lifestyles and protecting health, as well as providing equitable access to health services	Will it protect, provide and enhance the provision of quality open space?
	Will it prevent noise and light pollution?
<b>Soil</b>  To protect and improve soil quality	Will it minimise development on Greenfield land?
	Will it reduce the amount of derelict, degraded and underused land?
	Will it reduce the quantity of contaminated land in the Borough?
	Will it retain the best quality agricultural land (1, 2 and 3a)?
<b>Water</b>  Use natural resources, such as water efficiently, including by incorporating efficiency measures into new land use and developments, redevelopment and refurbishment	Will it promote the balance between water supply and demand?
	Will it encourage water efficiency and conservation?
	Will it minimise adverse effects in ground and surface water quality?
	Will it protect and enhance the quality of watercourses?
Ensure that new developments minimise water pollution levels and	Will it avoid developments in areas being at risk from fluvial, sewer or groundwater flooding?

SA Objective	Appraisal Questions
avoid areas which are at risk from flooding and natural flood storage areas	
<b>Air</b>  Increase use of public transport, cycling and walking as a proportion of total travel in order to reduce road traffic congestion, pollution and accidents	Will it maintain and improve local air quality?
	Will it reduce traffic congestion and improve road safety?
	Will it reduce the movement of goods by road/lorry?
Ensure development is primarily focused in urban areas, and makes efficient use of existing physical infrastructure and reduces need to travel, especially by private car	Will it focus development in the major urban areas?
	Will it promote compact, mixed-use developments with good accessibility to local facilities and service that reduce the need to travel?
	Will it reduce the number and length of journeys made by car?
	Will it promote alternative, more sustainable modes of transport to the car (including walking and cycling) through location of housing, employment sites, services and facilities, and appropriate infrastructure for sustainable modes of transport?

SA Objective	Appraisal Questions
<b>Climatic Factors</b>  Reduce overall energy use through increased energy efficiency	Will it reduce or minimise greenhouse gas emissions?
	Will it increase the proportion of energy generated from renewable and low carbon sources, including by micro-generation, CHP, district heating and transportation?
Minimise the Borough's contribution to the causes of climate change by reducing emissions of greenhouse gases from transport, domestic, commercial and industrial sources	Will it contribute to the creation of a low carbon economy and minimise the Borough's contribution to the causes of climate change by reducing emissions of greenhouse gases from transport, domestic, commercial and industrial sources?  Will it promote the adoption of climate change adaptation and climate proofing principles in planning and design?
<b>Material Assets</b>  Encourage and enable waste minimisation, reuse, recycling and recovery to divert resources away from the waste stream, including the use of recycled materials where possible	Will it reduce waste arisings (household and commercial)?
	Will it increase recycling and composting rates and encourage easily accessible recycling systems?
	Will it promote re-use of resources?

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



## 3.0 Assessment of Reasonable Alternatives

### 3.1 Introduction

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

*(a) Implementing the plan or programme; and*

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

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

3.1.3 As part of the preparation of the Borough Plan, the Council has undertaken a detailed Strategic Housing Land Availability Assessment (SHLAA) process which has considered a total of 169 potential housing areas. Each of these sites have been reviewed against defined planning, environmental, availability and deliverability criteria. All the sites that have meet the criteria set out in the SHLAAA have been allocated as potential housing allocations in Policy DC5, either as strategic or non-strategic sites. As all the non-strategic housing areas have been allocated it is considered that there are no other reasonable alternative non-strategic housing sites.

3.1.4 The Borough Plan Publication Submission seeks to allocate twenty-three non-strategic sites to contribute to meeting the objectively assessed need for the Borough in full and as much of Coventry's overspill as possible. As the need targets are led by the Borough Council's ability to identify deliverable and viable sites it is concluded that the 'reasonable' alternatives sites are the following twenty-three non-strategic housing allocation sites, namely:



- **NUN015** - Land at Donnithorne Avenue, Nuneaton
- **NUN043** - Stockingford Sports and Social Club and Bungalow, Nuneaton
- **NUN047/NUN051** - King Edward Road, Nuneaton
- **NUN060** - Pine Tree Road, Bedworth
- **NUN061** Rear of 25-39 Whitburn Road, Bedworth
- **NUN065** New Inn Public House, Bulkington
- **NUN075** Read of Park Road flats, Bedworth
- **NUN174** Charity Docks, Land rear of Furnance Road/Beechwood Road, Bedworth
- **NUN181** Land of Stockley Road, Hawkesbury
- **NUN191** St Marys Road Depot, Nuneaton
- **NUN239** Armson Road, Bedworth
- **NUN242** Hawkesbury PumpHouse, Heritage Drive, Hawkesbury
- **NUN245** 21 Church Road, Nuneaton
- **NUN258** 14-16 The Square, Attleborough, Nuneaton
- **NUN263** Land rear of Aldi, Park Road, Bedworth
- **NUN286/NUN317** Land rear of Burbages Lane, Ash Green
- **NUN305** Land at Bucks Hill, Nuneaton
- **NUN318** Land rear of Marston House Farm, Nuneaton Road, Bulkington
- **NUN323** Acacia Crescent, Bedworth
- **NUN348** Vale view opposite number 84, Nuneaton
- **NUN350** Disused garage site, Raveloe Drive, Nuneaton
- **NUN352** Former play area, Cheveral Road, Bedworth



- **NUN356** The Elizabeth Centre, Bedworth

- 3.1.5 The Assessment matrices for all the housing site options are presented at Appendix D of the SA Report (2017).
- 3.1.6 The general locations of all the current non-strategic housing sites accord with the preferred spatial options to reuse previously developed land and focus development within the urban area of Nuneaton and Bedworth agreed at the Issues and Options stage.
- 3.1.7 The areas of future mitigation that have been incorporated into the current iterations of the Sites, i.e. the protection of important views and heritage landscapes, requirements for enhanced public transport facilities/infrastructure and provision of new local centres and facilities. These are set out in the matrices for individual sites.
- 3.1.8 The details set out above comprise the Local Plan Options and reasonable alternatives for non-strategic housing allocation considered as part of the production of the Borough Plan – Publication Document. These options meet the requirements of the SEA Regulations and Task B2 of the SA Stages.



## 4.0 Appraisal of the Non-Strategic Residential Allocations

### 4.1 Introduction

4.1.1 A Sustainability Assessment of the non-strategic site allocations in the Borough Plan – Publication Submission has been undertaken. This section of the report summarises the findings of the Sustainability Assessment of the non-strategic site allocations in the Borough Plan – Publication Submission in respect of any significant effects associated with the SA objectives and also considers ways of mitigating adverse effects and any cumulative effects arising from the allocations. This accords with Tasks B3 and B4 of the five stage SA process.

### 4.2 Assumptions, uncertainties and difficulties

4.2.1 An appraisal of environmental effects inevitably relies on assumptions and an element of subjective judgement. Where assumptions have been made in the assessment process these have been noted on the individual site matrix.

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

4.2.3 One sustainability objective has remained difficult to assess, namely, crime and fear of crime. This is not due to the availability of the baseline data but because the effect of new development or policy requirements on this objective is notoriously difficult to predict as it is also reliant on factors outside the planning process. Whilst every effort has been made to assess the Borough Plan against this SA Objective on a positive, negative or neutral basis, the assessors preferred to record an 'uncertain' effect than rather make assumptions that may be inconsistent.

4.2.4 If any other uncertain effects or difficulties have been encountered as part of the assessment process then these are noted under the relevant sections alongside the assessor's comments.



### 4.3 Non -Strategic Housing Allocations

- 4.3.1 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. The provision of allocated housing areas will contribute positively to all the social objectives. There is a shortage of affordable housing in the Borough. All the allocated sites will provide an element of affordable housing as per the requirements of Policy H2.
- 4.3.2 All the housing allocations score well against the social objectives. This is likely to contribute to reducing poverty (**SA Objective 6**), improving health (**SA Objective 10**), deprivation and social exclusion by virtue of improving access to housing (**SA Objective 3**) and employment opportunities, thereby delivering an equitable sharing of the benefits of prosperity.
- 4.3.3 The allocated housing sites are generally situated in 'urban locations' or on previously developed land and thus score well in terms of the promoting the vitality and viability of Nuneaton and Bedworth to Town Centres (**SA Objective 2**), access to services and facilities, protection of soils (**SA Objective 11**), efficient use of infrastructure (**SA Objective 15**), prudent use of resources (**SA Objective 19**) and reducing the need to travel as the sites are generally served well by public transport.
- 4.3.4 The allocated housing sites will result in a neutral to slight positive effect on economic factors due to jobs and training opportunities created during the construction phase and the long term link between the provision of new homes and retention of employment/trained personnel in the Borough.
- 4.3.5 The provision of new development has the potential to result in an effect on crime and fear of crime. Crime rates are currently high in the Borough but are steadily falling. Crime may, if not mitigated, increase in line with proposed growth levels. However, in the absence of further information on the type and nature of the specific developments to confirm any correlation between sites and **SA Objective 5**: Crime or Fear of Crime between are currently unknown.



- 4.3.6 The allocated housing sites are likely to have a positive effect on **SA Objectives 14**: air quality, **SA Objective 16**: energy, **SA Objective 17**: climate change as they maximise the use of previously developed land and reduce the need to travel but also supporting existing walking and cycling network.
- 4.3.7 The **Health Impact Assessment** prepared by Ben Cave Associates concludes that housing is an important determinant of health and supports the provision of good quality dwellings in the Borough. It is considered that the development of new housing sites for a range and mix of affordable housing tenures will improve social inclusion for residents, consequently having positive impacts on human health and well-being.
- 4.3.8 A large number of positive effects have been identified on the non-allocated sites for the Natural Environment considerations as they cover specific topics such as biodiversity, green infrastructure, flood risk and landscape. All the sites are likely to have either neutral or positive effects on **SA Objective 9**: natural environment and **SA Objective 11**: soils as their primary purpose is to protect and enhance biodiversity in the Borough together with **SA Objective 21**: Landscape.
- 4.3.9 Each of the non-strategic site allocations will require site specific measures to be agreed at the planning application stage to manage flood risk and water quality. However, as this is a requirement of Policy NE4 it is considered that the overall effect is neutral.
- 4.3.10 None of the site allocations will result in a long term adverse effect on **SA Objective 21**: Landscape and the majority of the sites will positively contribute to landscape character by providing the opportunity to install landscaping/biodiversity enhancements as part of the site design.
- 4.3.11 None of the site allocations will result in an adverse effect on the characteristics and setting of a heritage asset. However, careful considerations in the design of the Hawkesbury Pump House scheme (**NUN242**) to ensure that this existing feature of historic interest is protected and conserved.



#### **4.4 Cumulative Effects**

- 4.4.1 Based on the findings of the individual matrices for each allocated site it is considered that the Borough Plan – Publication Submission 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.



## 5.0 Mitigation and enhancement

### 5.1 INTRODUCTION

- 5.1.1 As part of the SA process a number of mitigation and enhancement measures have been suggested for each non-strategic site allocations. These are summarised at the end of each of the site matrices.
- 5.1.2 For the purposes of this SA, it is assumed in all cases that the suggested mitigation will be undertaken. Based on the above, no further mitigation measures are identified for the non-strategic allocations set out in Borough Plan – Publication Submission.



## 6.0 Monitoring and Next steps

### 6.1 INTRODUCTION

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

### 6.2 Monitoring

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

6.2.2 Monitoring will be focused on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken. The proposed monitoring indicators are set out in Appendix H of SA 2017. The findings of this SA do not alter or amend the indicators set out in the 2017 Report.

6.2.3 In particular, data on crime and fear of crime levels in respect on the effects of new development will be discussed with Warwickshire Police to infill a deficiency that occurred during this SA process.

6.2.4 The collected monitoring data will be presented as part of the Borough Council's Annual Monitoring Report. The data will be reviewed annually to identify any unexpected trends or unforeseen adverse effects at an early stage.



### **6.3 Next Steps**

- 6.3.1 This SA has been prepared to support the non-strategic allocations set out in the Borough Plan Publication Submission. Consultation on this version of the Plan is taking place in early 2018.
- 6.3.2 The Borough Plan Publication Submission is the subject of an Examination in Public which commenced in August 2017. Any consultation response will be submitted to the Inspector appointed by the Secretary of State for Communities and Local Government to assess the 'soundness' of the Borough Plan in order to assist in determining the effectiveness of the Authority to integrate social, economic and environmental objectives into the preparation stages of the Plan.

(Report title goes here)

