



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

- spatial vision;
- strategic objectives for the Borough;
- key policies;
- 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 has 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 – Publication Draft. The Sustainability Appraisal Report (SA Report 2017) for the Nuneaton and Bedworth Borough Plan - Publication Draft (2017) was issued in January 2017.



- 1.1.5 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. This document comprises a standalone Sustainability Appraisal Report (SA Report) for the Nuneaton and Bedworth Borough Plan - Publication Draft (2017) to consider the non-strategic residential sites only.
- 1.1.6 This SA report meets the requirements of an 'Environmental Report' set out at Paragraph 12 and Schedule 2 of the SEA Regulations 2004 and a 'Sustainability Appraisal Report' required by Section 19 (5) (b) of the Planning and Compulsory Purchase Act 2004. The SA report has also been prepared in line with the Government Guidance entitled 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents: Guidance on Regional Planning Bodies and Local Planning Authorities' dated November 2005.
- 1.1.7 In order to accord with the requirement in the SEA Regulations and guidance set out in Paragraph 1.1.6 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.

1.2 Nuneaton and Bedworth –Borough Plan – Purpose and Objectives

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

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

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



Objective 1

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



Objective 2

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

- a) *Maintain and improve existing employment sites. Key sites include:*
- *Attleborough*
 - *Bayton Road*
 - *Bermuda*
- b) *Provide additional employment land that is attractive to investors in the following locations:*
- *Faultlands*
 - *Phoenix Way/ Wilsons Lane*
 - *Coventry Road*
 - *Caldwell Road*
 - *Longford Road*
 - *Bowling Green Lane*
- c) *Enable growth in a diverse range of sectors, particularly focusing on the following;*
- *Business services*
 - *Construction*
 - *Distribution & retail*
 - *Health*
 - *Transport and communications*
 - *Engineering.*
- d) *Encourage offices and other high value employment generators in Nuneaton and Bedworth Town Centres*
- e) *Use growth to promote training and educational facilities and opportunities which will improve the skills of the current and future labour market.*
- f) *Improve accessibility, via public transport, to job opportunities in the Borough and in nearby towns such as Coventry, Hinckley, Leicester and Atherstone.*



Objective 3

To continue to develop and diversify Nuneaton and Bedworth Town Centres so they each have a distinctive and individual role in serving the Borough which is supported by lower order centres in a retail hierarchy. In particular:

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

Objective 4

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

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

Objective 5

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



- a) *A step change in public transport provision along a North-South corridor to link Nuneaton and Bedworth to Atherstone and Hinckley in the north and Coventry, Warwick and Leamington in the south.*
- b) *Improved access to existing facilities, particularly the Borough's two town centres and major leisure and community facilities (e.g. Bermuda, George Eliot Hospital, the Colleges and the Pingles and Bedworth Leisure Centres).*
- c) *Retention and improvement of local shopping, health and other community facilities.*
- d) *New development that integrates the required infrastructure and service provision to support it and where appropriate includes improvements to existing infrastructure and services. This includes:*
 - *A northern distributor road*
 - *Connectivity improvements*
 - *Education provision*
 - *Emergency services provision*
 - *Leisure improvements*
 - *Sustainability measures*
- e) *A Green Infrastructure network of high quality, well connected, multi-functional open spaces, corridors and links that deliver benefits to the landscape, wildlife and the public in line with the priority projects identified from the Borough's five green infrastructure zones.*

Objective 6

To create healthy, safe and strong communities by:

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



Objective 7

To ensure that new development enhances and improves the quality and appearance of the existing urban area. In particular:

- a) Important open spaces such as Riversley Park, Miners Welfare Park, Whittleford Park and Community and Local parks are protected and enhanced. Landscape character, historic, geological and natural features such as Arbury Historic Park and Garden, Stockingford Railway Cutting and Ensor's Pool are protected and enhanced.*
- b) Derelict, contaminated and untidy sites are brought back into beneficial use.*
- c) Minimise the negative impact of development and make improvements where possible to air quality in Air Quality Management Areas.*
- d) Maximise opportunities to use the River Anker, Wem Brook, the Coventry Canal and Ashby Canal as attractive focal points for open space and new development where there is no negative impact on the green network or the water quality.*
- e) Infill development positively responds to local character and does not result in town cramming.*
- f) High quality and sustainable design and construction in line with design standards.*

Objective 8

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

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



- 1.2.3 To meet the above objectives and overall vision, the Borough Plan seeks to bring forward a proportionate level of new development for the period to 2031, 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.

1.3 Baseline Context

- 1.3.1 Nuneaton and Bedworth Borough is located in the north of Warwickshire, in the West Midlands. It contains the second largest population (approximately 120,000) in the County but is the smallest in geographical area at 79.3km². The towns of Nuneaton and Bedworth are thriving communities, although the Borough traditionally has had a 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.
- 1.3.2 The Borough has excellent transport links and is situated at the heart of the motorway network. Both Nuneaton and Bedworth are easily accessible from the M1, M5, M6, M42 and the M69. Nuneaton is served by the West Coast Mainline with services to Crewe and London Euston and is also within easy reach of Birmingham International Airport (20 minute drive) and East Midlands Airport (40 minute drive).
- 1.3.3 The Borough has a diverse economy and the most prominent business sector is manufacturing. Other significant sectors are Wholesale & Retail Trade, Health & Social Work and Transport Storage and Communication. The business foundation of the Borough's local economy is a mixture of small and medium-sized firms.
- 1.3.4 There are however, significant pockets of deprivation in Nuneaton and Bedworth with the Borough suffering from the highest levels of deprivation in Warwickshire. The level of deprivation in the Borough varies widely, with some areas among the fifth most deprived areas of England and some among the least. A key indication of the scale of the socio-economic challenge facing the Borough can be understood from the 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).

- 1.3.5 In the health profile for the Borough in 2012, male and female life expectancy remains below the average in England at 78.4 for males and 82.7 for females compared to 79.6 for males and 83.2 for females as a national average. (ONS, reviewed September 2016).
- 1.3.6 There are no green spaces in Nuneaton and Bedworth which have a Green Flag Award. (Green Flag Award, reviewed September 2016).
- 1.3.7 The Borough contains 1 European Site (Ensor's Pool Special Protection Area), 2 SSSI's and 3 Local Nature Reserves and 25 SINC's. (Natural England, reviewed September 2016).
- 1.3.8 The Borough contains 94 Listed Buildings and has 5 Conservation Areas that are designated for their 'special architectural or historic interest, the character or appearance of which is desirable to preserve or enhance'. (English Heritage, reviewed September 2016).

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

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

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

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



1.5 Integrated Sustainability Assessment

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

Borough Plan - Issues and Options

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

1.5.3 During the Issues and Options consultation period the document was known as the Nuneaton and Bedworth Core Strategy, but at the Council's Cabinet meeting on the 22nd September 2010, it was agreed to change the name of the emerging local development document to the '*Nuneaton and Bedworth Borough Plan*.' The representations received at the Issues and Options stage were taken into account in the preparation of the Borough Plan Preferred Option document and the subsequent SA.

Borough Plan - Preferred Option

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



Borough Plan – Call for Sites

- 1.5.5 Following a subsequent review of the Borough's housing and employment needs, the Council identified the need for more growth than previously estimated in the Preferred Option Document and a call for new development sites was undertaken in Spring 2014.
- 1.5.6 An independent assessment of the new development sites suggested by landowners/agents as part of the further 'Call for Sites' in Spring 2014, together with a review of the sites put forward in the consultation process for the Borough Plan Preferred Option document against agreed sustainability objectives was undertaken by Alliance Planning (now WYG). An 'interim' SA report of the findings of the independent assessment of these sites was prepared in February 2015. The findings of the interim SA Report has assisted in the preparation of the Borough Plan Submission Document.

Borough Plan – Submission Document

- 1.5.7 A further SA was prepared by WYG to assist in the preparation of the Borough Plan – Submission Document. The SA took account of consultation responses and the findings in the SA for the Preferred Options stage Borough Plan and the interim SA associated with the 'Call for Sites' process. A copy of the 'Interim' SA and Submission Document SA are also presented at Appendix A.
- 1.5.8 The Borough Plan Submission Document and the associated SA were the subject of statutory consultation between October and December 2015.

Borough Plan – Publication Submission

- 1.5.9 An SA Report (2017) was prepared of the Borough Plan - Publication Draft and takes into account the findings of all the previous SA reports to ensure that the principles of sustainable development are at the core of the decision-making process in a transparency and open manner. The findings of the SA Report have assisted in the preparation of the Borough Plan Submission Document, i.e. the subject of this assessment.



1.5.10 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. The report also considers the choices that have been made on the final options set out in the Publication Draft together with clarification as to how the SA has been used in this decision making process.

1.5.11 The SA Report was made available for public consultation alongside the Borough Plan – Submission Document.

Borough Plan – Publication Submission – Non-strategic residential allocations

1.5.12 This SA Report has been prepared to assess the non-strategic residential allocations contained in the Borough Plan - Publication Submission and follows the approach and methodology set out in the previous SA reports to ensure that the principles of sustainable development are at the core of the decision-making process.

1.5.13 The report provides a wide ranging independent qualitative assessment of the sustainability implications associated with the non-strategic residential allocations and their relationship to the spatial development options considered during the previous stages.

1.6 Structure of this Sustainability Appraisal Report

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

- Chapter 2 – outlines the methodology of the SA;
- Chapter 3 –provides sustainability context and objectives of the Plan;
- Chapter 4 – appraisal of ‘reasonable’ alternatives considered;
- Chapter 5 – appraisal of the significant effects associated with the plan policies and sites;
- Chapter 6 – outlines the residual effects;
- Chapter 7 – Monitoring; and



- Chapter 8 - Conclusions/Next Steps.

1.7 How to comment on this Sustainability Appraisal Report

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

planning.policy@nuneatonandbedworth.gov.uk



2.0 Methodology of the Sustainability Assessment

2.1 Introduction

- 2.1.1 Under Section S19(5) of the Planning and Compulsory Purchase Act 2004 and the SEA Regulations which came into force in England and Wales in July 2004, SA and Strategic Environmental Assessment (SEA) are mandatory for all Local Plans and SPDs. S39 of the Act requires Local Plans/SPDs to be prepared with a view to contributing to the achievement of sustainable development. SA is one way of helping fulfil this duty through a structured appraisal of the economic, social and environmental sustainability of the plan. The production of a SA is one of the “*tests of soundness*” of a Local Plan/SPD.
- 2.1.2 The requirement to undertake SEA is established in the EU by the European Directive 2001/42/EC, ‘*The Assessment of the Effects of Certain Plans and Programmes on the Environment*’ (commonly known as the SEA Directive). The SEA Directive is transposed into English law by the SEA Regulations.
- 2.1.3 SEA and SA are closely linked. SA aims to integrate sustainability issues into decision making by appraising the plan or strategy using environmental, social and economic objectives, whilst SEA also aims to facilitate sustainable development but its emphasis is on integrating environmental considerations into decision making through analysis of environmental issues.
- 2.1.4 Although the requirement to undertake both SA and SEA is mandatory, it is possible to satisfy the requirements of both parties of the legislation, through a single appraisal process. This approach is confirmed at Paragraph 165 of the NPPF (See paragraph 1.7.11 above).
- 2.1.5 Further guidance on the preparation of the SA in relation to the stages of Local Plan production together with the information to be covered within the SA Report is set out in the Planning Policy Guidance (PPG) dated March 2014. The PPG states at paragraph 11-009 “*The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the Local Plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate*”



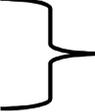
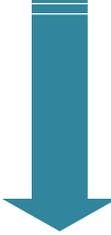
for the content and level of detail in the Local Plan'. The level of detail set out in this SA Report is considered to be commensurate with the stage of Local Plan production.

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

2.2 SA Key Steps and Tasks

- 2.2.1 SA/SEA is a five stage process. Figure 1 below sets out each of the stages and the stage currently reached.
- 2.2.2 The preparation of this SA Report for non-strategic residential allocations comprises the third major step in the SA of the Nuneaton and Bedworth Borough Plan and relates to Stage C of the five stage SA process set out at Paragraph 11-013 of the Planning Practice Guidance (March 2014). The comments received on the previous SA Reports associated with the Issues and Options, Preferred Option and Submission Borough Plan together with a subsequent review of sites put forward at the 'Call for Sites' stage, has facilitated a further evaluation of the Borough Plan options and reasonable alternatives considered available in this SA Report. These are considered in more detail in Section 3.

Table 1: SA Process Stages

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



2.2.3 The SA Report will be reviewed and updated in light of all consultation representations received. 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.

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

Tasks A1-A3 – Sustainability Context and baseline

2.3.1 The Sustainability Objectives upon which this SA is based were developed as part of the SA Stage A and represent a key aspect of the Appraisal process. The scoping stage of a SA involves the collation of evidence relating to the baseline position and policy context for the Borough Plan, culminating in a series of key sustainability issues and problems that should be a focus for the SA and to establish a sustainability framework. A summary of the findings of the baseline review of relevant policies, plans and programmes is set out in Section 3.

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

Table 2 – Sustainability Issues

SEA/ SA Topic	Sustainability Issues
Economic Factors	<ul style="list-style-type: none"> • The unemployment rate for Nuneaton and Bedworth (5.5%) is higher than national (5.1%) but lower than the regional (5.7%) averages. • The economic active rate in Nuneaton and Bedworth (69.7%) is lower regional (74.8%) and national (77.8%) averages. • Average gross weekly pay in Nuneaton and Bedworth (£488.70) is below the national (£492.50) and regional average (£529.60). • Nuneaton and Bedworth is situated in the heart of the motorway network and both towns are easily accessible from the M6, M69, M42, M40, M1 and the A5 running north of Nuneaton. • Residential uses within Nuneaton town centre are currently limited. • Development and investment is required for the town centres to strengthen their position in light of the potential threats from competing centres. • The evening economy is more geared towards younger people in pubs and bars and offers little variety. Enhancements to the A3 offer (restaurants and cafes) are seen as an opportunity.



Social Factors	<ul style="list-style-type: none"> • It is very difficult for people to purchase houses, especially first time buyers. • There is an annual need for 85 affordable homes across the Borough. • There are no green spaces in Nuneaton and Bedworth managed to a Green Flag Award Standard. • The Borough has a higher crime rate per 1,000 population than the county average. • The number of people attaining NVQ levels 1 – 5 has increased over the past ten years. • There has been a significant increase in the number of buildings that are open to the public which are also accessible to disabled people. • The number of visits to the museum has decreased and there is potential to improve the tourist and cultural facilities in the Borough. • Poorer perceptions of public safety than the county average. • Nuneaton and Bedworth has the highest levels of deprivation in Warwickshire.
Biodiversity	<ul style="list-style-type: none"> • The Borough has 1 European Site, 2 SSSIs, 3 LNRs, 25 SINC. • The two SSSI sites in the Borough are in favorable condition. • Threat to biodiversity from development, land management and climate change. • The Borough has the lowest number of local nature reserves in the County. • Nuneaton and Bedworth has a lower accessibility to woodlands than county and regional levels. • Threat to biodiversity from non-native species • Threat to Ensor’s Pool from bio-security risks
Population	<ul style="list-style-type: none"> • The Borough currently has a relatively large working population (16-60) and has a slightly older population than the Warwickshire average. • The population is an ageing one, which in future years is likely to create additional social care needs. • Population is predicted to increase by 7.6% from 125,409 to 134,889 between 2011 – 2031, which is much lower than the national average at 14.6%. • Just over 60% of the population are Christian, which is higher than both the regional and national average. • 91.4% of the population in Nuneaton and Bedworth are white, which is higher than West Midlands and England’s average.
Human Health	<ul style="list-style-type: none"> • Male and female life expectancy remain below the England average and is one of the lowest in Warwickshire, although life expectancy in the Borough has increased for both male and females. • The level of deprivation in Nuneaton and Bedworth varies widely, with some areas among the most deprived fifth of England areas and some among the least. • There is a corresponding difference in life expectancy between least and most deprived areas with a gap of between 7.1 and 10.7 years for men, and between 3.2 and 6.6 years for women.
Soil	<ul style="list-style-type: none"> • The percentage of new homes being built on previously developed land increased from 06/07 to 12/13
Water	<ul style="list-style-type: none"> • There has been a gradual improvement in chemical water quality nationally but this has not mirrored in Nuneaton and Bedworth.



	<ul style="list-style-type: none"> • 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. • Nuneaton and Bedworth has the lowest percentage of good biological water quality through 2001 to 2006 compared to other local authorities in Warwickshire. The average is significantly lower than both Warwickshire and England. • A number of weirs, engineered channels and culverted sections of watercourse in Nuneaton and Bedworth are preventing natural processes from improving the river habitat. These create impoundments; promote sediment and siltation deposits which degrade the habitat affecting WFD status, while also creating barriers to fish movement. • Nuneaton and Bedworth has a number of Main River and ordinary watercourses.
Air	<ul style="list-style-type: none"> • Air pollutant levels in the Borough have steadily decreased and it is anticipated that this trend will continue. • Car ownership levels are generally in line with both regional and national averages • The majority of people travel to work by car , with 44.0% of the Borough's population travelling to work by car, which is above the national average of 34.9% • The number of residents commuting over 30km in the Borough has increased by a third. • A high dependency on private car for commuting results in congestion and negative impacts on air quality. • A low volume of public transport use is a major contributor to reduced air quality. • The National Air Quality Objective for the level of nitrogen dioxide is likely to be exceeded in the declared AQMA around the Leicester Road traffic gyratory system. • Around 4,000 residents are commuting over 30km to work • 49% of the Borough's population travels to work by car for journeys under 2km. Journeys of this distance are the most likely to be transferred to more sustainable forms of transport.
Climatic Factors	<ul style="list-style-type: none"> • Carbon emissions per capita is lower than regional and national averages
Material Assets	<ul style="list-style-type: none"> • The percentage of household waste being recycled and composted is increasing steadily.
Cultural Heritage	<ul style="list-style-type: none"> • There are two buildings at risk in the Borough which are: Park Farmhouse in Arbury Park and The Tea House in Arbury Park.
Landscape	<ul style="list-style-type: none"> • Additional dwellings could place further pressures on the green belt and surrounding landscape. • The countryside surrounding the Borough is protected by green belt, area of restraint or countryside designations, which direct development pressures away from sensitive landscapes and help to protect biodiversity.



Inter-relationships

- 2.3.3 Each of the SA topics and issues listed in Table 2, whilst presented individually, have clear inter-relationships. For example, an increase in population can result in increased pressure on community facilities and infrastructure or traffic generation and thus air quality.
- 2.3.4 The main inter-relationships between each of the SA topics considered in this SA is discussed in the Scoping Report (2016) and summarised in the table of Sustainability Issues and Options at Appendix A2 of this SA Report. This enables any potential synergies to be exploited and any potential inconsistencies and incompatibilities to be identified and addressed. Where relevant these are discussed in the site or policy matrices.
- 2.3.5 No other potential inconsistencies were identified during the SA process.

Task A4 – Develop the SA Framework/Objectives

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



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

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

2.3.10 The Sustainability Objectives used in this SA are set out in Table 3. Table 3 also shows how all of the topics set out in the SEA Regulations are linked to the SA objectives.

Table 3 – Sustainability Objectives (SO)

Ref. no.	Sustainability Objective	Link to topics in SEA Regulations
1	Achieve a strong, stable and sustainable economy and prosperity for the benefit of all the Borough's inhabitants, through on-going investment (public and private)	Population Material assets
2	To enhance the vitality of town centres	Material Assets
3	Provide decent and affordable housing for all, of the right quantity, type, tenure and affordability to meet local needs, in clean, safe and pleasant environments	Material Assets
4	Ensure easy and equitable access to services, facilities and opportunities, including jobs and	Population

	learning, and that people are not disadvantaged with regard to ethnicity, gender, age, disability, faith, sexuality, background or location	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,	Material Assets

	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	Material Assets
20	To protect and enhance the historic environment	Cultural Heritage inc. architectural and archaeological heritage
21	To maintain and enhance the quality of landscapes	Landscape

2.3.11 In order to assess the sites and proposals against each of the SA objectives in a consistent manner, a number of appraisal questions and associated indicators have been developed. These are set out at Appendix B.2 and Table 4 below.

Table 4 – SA Questions and Indicators

SA Objective	Appraisal Questions	Indicators
Economic Factors		
Achieve a strong, stable and sustainable economy and prosperity for the benefit of all the Borough's inhabitants, through on-going investment (public and private)	Will it meet the employment needs of the local community?	GDP per head
	Will it help diversify the economy?	GDP per worker % of working age people in employment
	Will it enhance the vitality of urban centres?	Proportion of unemployed people claiming benefits who have been unemployed for more than one year
	Will it support small businesses?	Number and survival of business start-ups
	Will it ensure an appropriate supply of employment sites within the Borough to support sustainable economic development?	Vacant land, properties and derelict land
	Will it provide employment land near to the potential workforce?	

SA Objective	Appraisal Questions	Indicators
	<p>Will it encourage investment to develop deprived areas and focusing resources in areas of greatest need?</p> <p>Will it promote sustainable tourism?</p>	
To enhance the vitality of town centres	Will it improve the economic viability of town centres?	
	Will it maintain a balanced mix of development?	
Social Factors		
Provide decent and affordable housing for all, of the right quantity, type, tenure and affordability to meet local needs, in clean,	Will it increase the supply of affordable housing?	Affordable dwellings completed as a % of all new housing completions
	Will it promote a range of housing types and tenure?	House price to income ratio
	Will it reduce the number of unfit/non-decent/empty homes?	

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

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

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

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

SA Objective	Appraisal Questions	Indicators
<p>quality built environments, that help to create and promote local distinctiveness and sense of place</p>	<p>Will it promote design that enhances townscapes and streetscapes?</p> <p>Will it improve the quality of the built environment through high standards of sustainable design and construction of new and existing buildings?</p>	<p>Retention and enhancement of townscape assets</p>
Biodiversity		
<p>To protect and enhance the natural environment, habitats, species, landscapes and inland waters</p>	<p>Will it improve the landscape and ecological quality of the countryside?</p> <hr/> <p>Will it protect and enhance species, habitats and sites at risk?</p>	<p>Area of land designated as a local nature reserve per 1,000 population</p>

SA Objective	Appraisal Questions	Indicators
	<p>Will it protect and enhance the natural environment, whether designated or not, including habitats, species, landscapes and controlled waters, particularly maintaining European sites, SSSIs and LNRs to a favorable standard?</p>	<p>% area of land designated as sites of special scientific interest (SSSI) within the Borough in favourable condition</p> <p>Proportion of developed land that is derelict</p> <p>Farmland bird populations</p>
	<p>Will it support development that incorporates improvements to wildlife habitats?</p>	<p>Woodland bird populations</p>

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

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

SA Objective	Appraisal Questions	Indicators
	Will it reduce the quantity of contaminated land in the Borough?	degraded/ lost to development
	Will it retain the best quality agricultural land (1, 2 and 3a)?	
Water		
Use natural resources, such as water efficiently, including by incorporating efficiency measures into new land use and developments, redevelopment and refurbishment	Will it promote the balance between water supply and demand?	Household water use and peak demand
	Will it encourage water efficiency and conservation?	Average per capita water consumption in new build and existing development
	Will it minimise adverse effects in ground and surface water quality?	
	Will it protect and enhance the quality of watercourses?	% of watercourses in 'good' or 'fair' biological and chemical quality
Ensure that new developments minimise water pollution levels and avoid areas which are at risk from	Will it avoid developments in areas being at risk from fluvial, sewer or groundwater flooding?	Number of properties located in Flood Risk Zone 2 or 3

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

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

SA Objective	Appraisal Questions	Indicators
Minimise the Borough's contribution to the causes of climate change by reducing emissions of greenhouse gases from transport, domestic, commercial and industrial sources	<p>Will it contribute to the creation of a low carbon economy and minimise the Borough's contribution to the causes of climate change by reducing emissions of greenhouse gases from transport, domestic, commercial and industrial sources?</p> <p>Will it promote the adoption of climate change adaption and climate proofing principles in planning and design?</p>	Carbon dioxide emissions by sector and per capita
Material Assets		
Encourage and enable waste minimisation, reuse, recycling and recovery to divert resources away from the waste stream, including the use of recycled materials where possible	Will it reduce waste arisings (household and commercial)?	Total waste arisings Amount of waste being generated, recycled, recovered, going to landfill Household waste recycling rates
	Will it increase recycling and composting rates and encourage easily accessible recycling systems?	
	Will it promote re-use of resources?	
To ensure the prudent use of resources including the optimum use of	Will it encourage land use and development that optimises the use of previously developed land and buildings?	% of new housing developed on previously developed land

SA Objective	Appraisal Questions	Indicators
<p>previously developed land, buildings and the efficient use of land</p>	<p>Will it focus retail and office development in town centres?</p>	<p>% of resident population travelling over 20km to work</p>
	<p>Will it encourage housing development which makes more efficient use of land; and seek greater intensity of development at places with good public transport accessibility?</p>	<p>Loss of greenfield and/or greenbelt land</p>
	<p>Will it encourage maximum efficiency and appropriate use of materials, particularly from local and regional sources?</p> <p>Will it require new developments to incorporate renewable, secondary, or sustainability sourced local materials in buildings and infrastructure?</p> <p>Will it safeguard reserves of exploitable minerals from sterilisation by other developments?</p> <p>Will it encourage local sourcing of food, goods and materials?</p>	<p>Levels of minerals and aggregate use replaced by recycled or substitute materials</p> <p>Construction and demolition waste going to landfill</p>
<p>Cultural heritage</p>		
<p>To protect and enhance the historic environment</p>	<p>Will it protect and enhance sites, features and areas of historical, archaeological and cultural value?</p>	<p>Number of listed buildings (Grade I and II*) at risk</p>

SA Objective	Appraisal Questions	Indicators
	Will it improve access to buildings of historical/cultural value?	Number of registered Parks and Gardens at risk
Landscape		
To maintain and enhance the quality of landscapes	Will it enhance and manage the character and appearance of the Borough's landscapes, maintaining and strengthening local distinctiveness and sense of place?	% of Character Areas showing no change or showing change consistent with existing character area descriptions
	Will it protect and enhance the character and settings of the towns and village?	Number of Village or Local Area Design Statements that have been adopted as planning guidance

2.4 Stage B – Developing and Refining options and assessing effects

2.4.1 A Sustainability Appraisal (SA) should meet all of the requirements of the Strategic Environmental Assessment (SEA) Directive and the [Environmental Assessment of Plans and Programmes Regulations 2004](#). Regulation 12 (2) of the 2004 Regulations states that where an environmental assessment is required an environmental report shall be prepared to "*identify, describe and evaluate the likely significant effects on the environment of –*

(a) Implementing the plan or programme; and

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



- 2.4.2 An assessment of 'reasonable' alternatives to the selected plan is required to meet the requirements of Regulation 12 of the 2004 Regulations and in doing so, identify and evaluate their sustainability impacts. The Regulations imply that alternatives that are not reasonable do not need to be subject of the SA process. For the purposes of the SA it is assumed that unreasonable alternatives include non-strategic residential options that do not meet the objectives of the plan or national policy (e.g. the National Planning Policy Framework) or are unavailable or undeliverable.
- 2.4.3 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.
- 2.4.4 The SA findings are not the only factors taken into account when determining site allocations to be taken forward in a plan. Indeed, there will often be an equal number of positive and negative effects identified for each option such that it is not possible to 'rank' them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting allocated sites for their plan. The preferred options considered in the SA are discussed in Section 4.

2.5 Defining 'Significant effects'

- 2.5.1 An important factor to be identified as part of the scoping exercise of the environmental report prepared under the 2004 Regulations is the definition of '*likely significant effects*'. The 2004 Regulations (Schedule 1) specify the criteria that should be taken into account when determining likely significant effects. These criteria, which principally relate to the characteristics of the effects arising from the plan and the value and vulnerability of the area likely to be affected, are as follows:
- How valuable and vulnerable is the area that is being impacted?
 - What is the duration and how probable, frequent, long lasting and reversible are the effects?

- What is the magnitude and spatial scale of the effect?
- What is the cumulative nature of the effects?

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

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

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

2.5.4 A significant effect arises as a result of a minor impact on a resource of national value or a major impact on a resource of local value. In addition, the accumulation of many non-significant effects on similar local resources geographically spread throughout the scheme may give rise to an overall significant effect.

2.5.5 This approach to assessing and assigning significance to an environmental effect relies upon such factors as legislative requirements, guidelines, standards and codes of practice, consideration of the SA/SEA Regulations, the advice and views of statutory consultees and other interested parties and expert judgement. Based on the above, the following questions are relevant in evaluating the significance of potential environmental effects:

- Is the effect positive or negative?
- Which risk groups are affected and in what way?
- Is the effect reversible or irreversible?
- Does the effect occur over the short, medium or long term?
- Is the effect continuous or temporary? Does it increase or decrease with time? Is it of local, regional, national or international importance?



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

2.5.6 Each policy/proposal was assessed (guided by the above questions) to identify the potential impact on the SA objectives. A combination of expert judgment, analysis of baseline data and the definitions set out below were used to judge the potential significance of the specified effect on the plan's objectives.

2.6 Definitions

2.6.1 The following definitions are used in this Environmental Report:

Duration of Effects

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

- Short-term Less than two years
- Medium-term Two to five years
- Long-term Five to twenty years



Nature of Effects

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

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



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

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

2.7 Assessing effects

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

- 2.7.2 This stage offers the opportunity to review the non-strategic allocations set out in the Borough Plan Publication 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 Publication Draft Document.
- 2.7.3 Each of the non-strategic site allocations set out Policy DC5 in the Borough Plan were tested against the sustainability objectives developed for the purposes of the Sustainability Appraisal. As set out at paragraph 2.3.5 above, the SA objectives were reviewed prior to undertaking this assessment and found to be ‘fit for purpose’. The SA Objectives, appraisal questions and indicators are presented at Table 4.
- 2.7.4 The assessment considers the effects of the allocated non-strategic site on the environment. The performance of each site allocation was scored using the following seven-point scale:

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

- 2.7.5 The appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an



option or policy on the SA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. However, scores are relative to the scale of proposals under consideration.

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

Assumptions

- 2.7.7 The scoring was based on available information in respect of each of the non-strategic site allocations and has been based on the SA team's judgement. In order to ensure consistency in the appraisal of the sites a set of appraisal questions were developed to enable the SA team to consider each effect within clear parameters. Where mitigation measures have been proposed within the appraisal table, the long term effects have been scored on the basis that the mitigation measures have been applied.

Difficulties Encountered

- 2.7.8 It is a requirement of the SEA Regulations that consideration is given to any data limitations or other difficulties that are encountered during the SA process.
- 2.7.9 There was a need to ensure that a large number of site options could be appraised consistently. This was achieved by the use of assumptions relating to each SA objective, as described above.
- 2.7.10 Each of the individual site matrices include, to a greater or lesser degree, specific mitigation. For the purpose of the SA it is assumed that the proposed mitigation is delivered and the SA objective is 'scored' accordingly. To ensure consistency we have assumed that an SA score may only be increase by one place on the scoring matrix i.e. a negative effect is changed to a neutral effect.

2.8 Stage C – Prepare SA Report

- 2.8.1 This document is the SA report referenced at Stage C. The report outlines the significant effects on the environment, social and economic factors of the Borough Plan in respect of the non-strategic residential allocations only.



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

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

SEA Regulation Requirements	Section of SA report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I):	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2, 3 & Appendix A1
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Section 2, 3 & Appendix A2
c) The environmental characteristics of areas likely to be significantly affected;	Section 2 & Appendix A2
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Section 2 & Appendix A2
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation	Section 2 & Appendix A1
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary,	Section 4 & 5 Appendices D & E



cumulative, synergistic, short, medium and long term permanent and temporary, positive and negative effects)	
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 6 & Appendix G
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Section 5 & Appendix
i) a description of measures envisaged concerning monitoring in accordance with Art. 10;	Section 7 & Appendix H
j) a non-technical summary of the information provided under the above headings	A separate non-technical summary document has been prepared.
<p>The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2)</p>	
<p>Consultation: authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Art. 5.4)</p>	<p>Consultation on the SA Scoping Report was undertaken between in October 2016.</p>
<p>authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)</p>	<p>Consultation is being undertaken in relation to the Publication version of the Borough Plan</p>

other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7).	N/A
Taking the environmental report and the results of the consultations into account in decision-making (Art. 8)	
<p>Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted under Art.7 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> • the plan or programme as adopted • a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and • the measures decided concerning monitoring (Art. 9) 	To be addressed after the Borough Plan is adopted.
Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10)	To be addressed after the Borough Plan is adopted.
Quality assurance: Environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12).	This report has been produced in line with current guidance and good practice for SEA/SA.

2.9 Stage D – Consultation on SA Report

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



2.10 Stage E – Post adoption Reporting and Monitoring

- 2.10.1 The SEA Regulations require the significant environmental effects to plans and programmes to be monitored in order to identify at an early stage unforeseen adverse effects.
- 2.10.2 The Borough Plan sets out a monitoring programme to identify if the policies and site allocations meet the overall Plan Objectives and Vision. This programme will allow the Council to monitor the success of individual policies and also monitor the baseline environmental, social and economic conditions of the Plan area. The results of the monitoring programme will be presented in the Annual Monitoring Report.
- 2.10.3 The final SA monitoring programme will be included in the SA adoption Statement (once the Borough Plan is adopted) and this will reflect any changes made during the Examination Stage.



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

3.1 Nuneaton and Bedworth Borough Plan

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

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

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



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

3.2 Previous SA Work

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

- Draft SA Scoping Report¹ and submitted for consultation in September 2005;
- Bedworth Town Centre AAP Issues and Options SA Report²;
- Nuneaton Town Centre AAP Issues and Options SA Report³; and
- Affordable Housing SPD SA Report, 2007.
- Core Strategy Issues and Options SA Report, 2009;
- Borough Plan SA Scoping Report - Updated September 2012, April 2014 & September 2016;
- Borough Plan - Preferred Options SA Report 2013;
- Borough Plan – Interim SA Report – 2014;
- Borough Plan – SA Report – 2015; and
- Borough Plan – Publication Draft - SA Report - 2017

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

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

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



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

Scoping Report

3.2.3 A draft Borough Plan Scoping Report was originally published in September 2005. Based on the time period that elapsed, the original Scoping Report was reviewed and updated in September 2012, April 2014 and September 2016. The Scoping Report presents data on each of the following matters:

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

3.2.4 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). A complete list of the bodies and individuals consulted on each stage of the SA and a summary of the comments received, together with the responses to each comment is presented at Appendix C.



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

- 3.3.1 The Borough Plan is not prepared in isolation but is greatly influenced by other plans, policies and programmes and by broader sustainability objectives. The adopted plan needs to be consistent with international and national guidance together with relevant environmental protection legislation.
- 3.3.2 Appendix A of the Borough Plan SA Scoping Report (2016) sets out a comprehensive list of the policy documents that are relevant to the preparation of the Borough Plan together with a summary of the relevance of each document to the Borough Plan and, more specifically, this SA. This list has been revised and update since it was originally presented in the SA Scoping Report (2009) to ensure that the review remains up to date and reflects the scope of the full Borough Plan. All these documents have been taken into account in the development of the SA objectives and the overall appraisal process. The comprehensive list of the plans, policies and programmes is presented at Appendix B1 together with confirmation as to the relevant sustainability objectives.

Key International plans, policies and programmes

- 3.3.3 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the "SEA Directive") and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the "Habitats Directive") are particularly significant as they require Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) to be undertaken in relation to the Borough Plan.
- 3.3.4 These processes have been undertaken in an iterative and integrated manner in tandem with the production of the plan in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and can be mitigated. This matter is discussed further at Section 3.5 of this report.



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

Key National plans, policies and programmes

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

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

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

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

3.3.10 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.

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

Conserving and Enhancing the Natural Environment

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

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

Conserving and Enhancing the Historic Environment

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

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



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

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

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

Local Plans, policies and programmes

3.3.17 At the sub-regional and local levels there are a wide range of plans and programmes that are specific to Warwickshire and Nuneaton Borough, and which provide further context for the emerging Borough Plan. These plans and programmes relate to issues such as housing, employment land, transport, renewable energy and green infrastructure and have also been reviewed at Appendix A1.

Summary

3.3.18 Based on the review of the relevant policies, plans and programmes the key sustainability issues and problems for the Borough were identified. These are set out in full in Appendix A2 but are summarised below:

- Reduce greenhouse gas emissions and improve air quality;
- Encourage use of renewable and sustainable sources of energy;

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

3.3.19 The SEA Regulations require the SA report to consider the inter-relationships between the sustainability issues and problems identified and likely evolution of the relevant aspects of the current state of the environment without the Borough Plan being implemented. Appendix A2 of this report describes the interrelationships between the key issues and the likely evolution of each of the key sustainability issues if the Borough Plan was not adopted.

3.4 Baseline information (Task A2)

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

3.5 Relationship between the SA and HRA

- 3.5.1 In accordance with Article 6(3) of the EU Habitats Directive an assessment is required where a plan or project not directly connected to or necessary to the management of a European protected site for nature conservation (i.e. designated and proposed/candidate SPA's and SAC's sites) may give rise to significant effects upon a the designated site. The Habitats Directive is primarily transposed in England under the Conservation of Habitats and Species Regulations 2010.
- 3.5.2 Nuneaton and Bedworth Borough has one designated European site within its boundary, namely Ensor Pool SAC, designated due to the presence of white-clawed crayfish. The Site is situated approximately 2.5km to the south west of Nuneaton. WYG has been commissioned by Nuneaton and Bedworth Borough Council to prepare a Habitats Regulations Assessment of the Borough Plan to consider whether the plan is likely to have significant effects on European habitats or species. A HRA of the Borough Plan Publication Draft is presented as a separate 'standalone' document.
- 3.5.3 PPG states at paragraph 11-011 that "*the sustainability appraisal should take account of the findings of a Habitats Regulations Assessment, if one is undertaken*". The conclusion of the standalone HRA have been reviewed in the production of this SA Report.
- 3.5.4 In recent years, the population of white-clawed crayfish has been diminishing from the Ensor Pool SAC and has now completely disappeared. Natural England has undertaken a programme to reintroduce the species but this has proved unsuccessful. In consultation with the Environment Agency, Natural England have confirmed that the ecological importance for this Site no longer exists and the Site can be put forward for de-classification. On this basis, Natural England will not object to development in close proximity of the SAC.



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

4.1 Introduction

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

(a) Implementing the plan or programme; and

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

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

4.1.3 An independent SA by WYG (Alliance Planning) has been undertaken at each stage in the preparation of the Borough Plan. The SA (2017) reviewed all the reasonable options considered during the evolution of the Borough Plan and assessed the significant effects on the environment. This included a detailed assessment of a variety of alternative sites and policy options against the SA objectives of the Borough Plan. These options, taken together, are considered to meet the requirement for ‘reasonable’ alternatives in the 2004 Regulations.

4.1.4 A summary of the findings of the various SA reports and why the preferred approach has been selected were set out at Section 4 of the SA (2017). This accords with Task B2 of the SEA five stage process. These findings are not repeated in this SA report.



Strategic Site Options for Housing

- 4.1.5 The Borough Council has identified a housing requirement of 13,374 dwellings over the plan period. This figure has evolved as the plan has developed but is supported by a robust evidence base and an appraisal of growth scenarios which have, in turn, been fully reviewed and assessed against the agreed Sustainability Objectives developed in this SA. The Borough Council agreed that the option that meets the objectively assessed needs of the Borough as much as possible of Coventry's shortfall (Option A) is the preferred approach for housing growth.
- 4.1.6 A number of spatial options were identified and tested through the various stages of the SA to help determine how the future housing requirements could be distributed across the Borough.
- 4.1.7 The Council identified a number of small scale sites (non-strategic sites) within the urban areas to contribute to the housing needs of the Borough but were unable to accommodate all its housing growth requirement on previously developed land and thus open countryside or Green Belt land (Strategic site allocations) would need to be released. This SA considers the non-strategic residential allocations.
- 4.1.8 An assessment of 'reasonable' alternatives to the selected plan is required to meet the requirements of Regulation 12 of the 2004 Regulations and in doing so, identify and evaluate their sustainability impacts. The Regulations imply that alternatives that are not reasonable do not need to be subject of the SA process. For the purposes of the SA it is assumed that unreasonable alternatives include non-strategic residential options that do not meet the objectives of the plan or national policy (e.g. the National Planning Policy Framework) or are unavailable or undeliverable.
- 4.1.9 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 SHLAA 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.



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

4.1.11 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

4.1.12 The Assessment matrices for all the housing site options are presented at Appendix D.

Summary

4.1.13 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.

4.1.14 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.

4.1.15 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.



5.0 Appraisal of 'significant' environmental effects associated with the Non-Strategic Housing Allocations

5.1 Introduction

5.1.1 An appraisal of non-strategic site allocations appraised in this SA is contained at Appendix D together with a key diagram showing the location of the sites. This section of the report summarises the findings of the Sustainability Assessment of the Borough Plan – Publication Document in respect of any significant effects associated with the SA objectives and also considers ways of mitigating adverse effects and any cumulative effects arising from the Borough Plan as a whole. This accords with Tasks B3 and B4 of the five stage SA process.

5.2 Assumptions, uncertainties and difficulties

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

5.2.2 It is a requirement of the SEA Regulations that consideration is given to difficulties that are encountered during the SA process. This could include any data limitations or other the availability of other relevant assessments. As the Borough Plan has evolved the evidence base for the document



has expanded and been refined resulting in a more robust understanding of the effects of the site options on the Sustainability Objectives.

- 5.2.3 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.
- 5.2.4 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.

5.3 Non -Strategic Housing Allocations

- 5.3.1 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.
- 5.3.2 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.
- 5.3.3 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.



- 5.3.4 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.
- 5.3.5 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.
- 5.3.6 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.
- 5.3.7 The **Health Impact Assessment** prepared by Ben Cave Associates concludes that housing is an 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.
- 5.3.8 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 a 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.
- 5.3.9 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.
- 5.3.10 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.



5.3.11 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.

5.4 Cumulative Effects

5.4.1 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.

5.5 Conclusions

5.5.1 This SA has considered each of the non-strategic allocations in the Borough Plan – Publication Submission 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.

5.5.2 The assessment concludes that the non-strategic site allocations will result in a neutral to positive effect on the majority of the SA objectives. In each case suitable mitigation or actions have been proposed that will, if implemented, result in the best sustainability score.

5.5.3 The provision and agreement of mitigation is key to addressing significant or slight adverse effects associated with the development of the site and policies in the Borough Plan. Subject to the implementation of the mitigation proposed none of the non-strategic allocations in the Borough Plan will raise any significant adverse effects or cumulative effects.



6.0 Mitigation and enhancement (Task B4)

6.1 Introduction

- 6.1.1 As the Borough Plan has developed, the site allocations were subjected to an SA which suggested a number of mitigation and enhancement measures.
- 6.1.2 The emerging Borough Plan was prepared positively and therefore there was little scope for suggesting mitigation measures as no significant negative effects were identified. However, there was some scope for enhancement.
- 6.1.3 Mitigation and enhancement measures suggested for each of the non-strategic allocations is set out at each site matrix presented at Appendix D.
- 6.1.4 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.



7.0 Monitoring (Task B5)

7.1 Monitoring

- 7.1.1 The SEA Regulations state *"the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action"*. The Environmental Report is required to provide information *"a description of the measures envisaged concerning monitoring"*. Monitoring proposals are designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.
- 7.1.2 Monitoring will be focused on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken. The proposed monitoring indicators 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.
- 7.1.3 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.
- 7.1.4 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.

7.2 Next Steps

- 7.2.1 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.
- 7.2.2 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.



8.0 Conclusions

8.1.1 Introduction

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

8.1.3 WYG has 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 – Publication Draft. The Sustainability Appraisal Report (SA Report 2017) for the Nuneaton and Bedworth Borough Plan - Publication Draft (2017) was issued in January 2017.

8.1.4 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. This document comprises a standalone Sustainability Appraisal Report (SA Report) for the Nuneaton and Bedworth Borough Plan - Publication Draft (2017) to consider the non-strategic residential sites only.

8.1.5 This SA has considered each of the non-strategic allocations in the Borough Plan – Publication Submission 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.

8.1.6 The assessment concludes that the Publication Draft will result in a neutral to positive effect on the majority of the SA objectives. In each case suitable mitigation or actions have been proposed that will, if implemented, result in the best sustainability score.



- 8.1.7 The provision and agreement of mitigation is key to addressing significant or slight adverse effects associated with the development of the site and policies in the Borough Plan. Subject to the implementation of the mitigation proposed none of the non-strategic allocations in the Borough Plan will raise any significant adverse effects or cumulative effects.
- 8.1.8 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 proposed non-strategic allocations in the Borough Plan – Publication Submission.

(Report title goes here)

