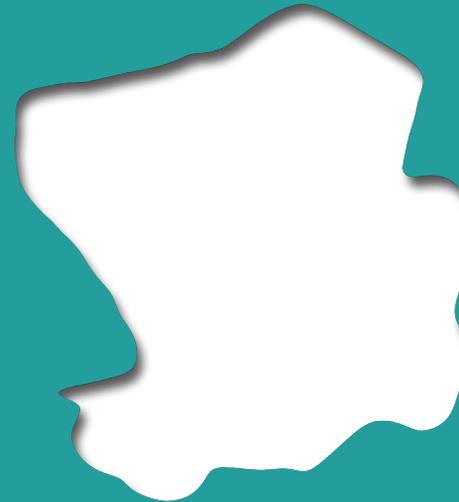


Nuneaton and Bedworth Local Plan (2021-2039) Sustainability Appraisal



Non-Technical Summary

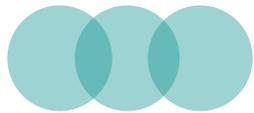
July 2023



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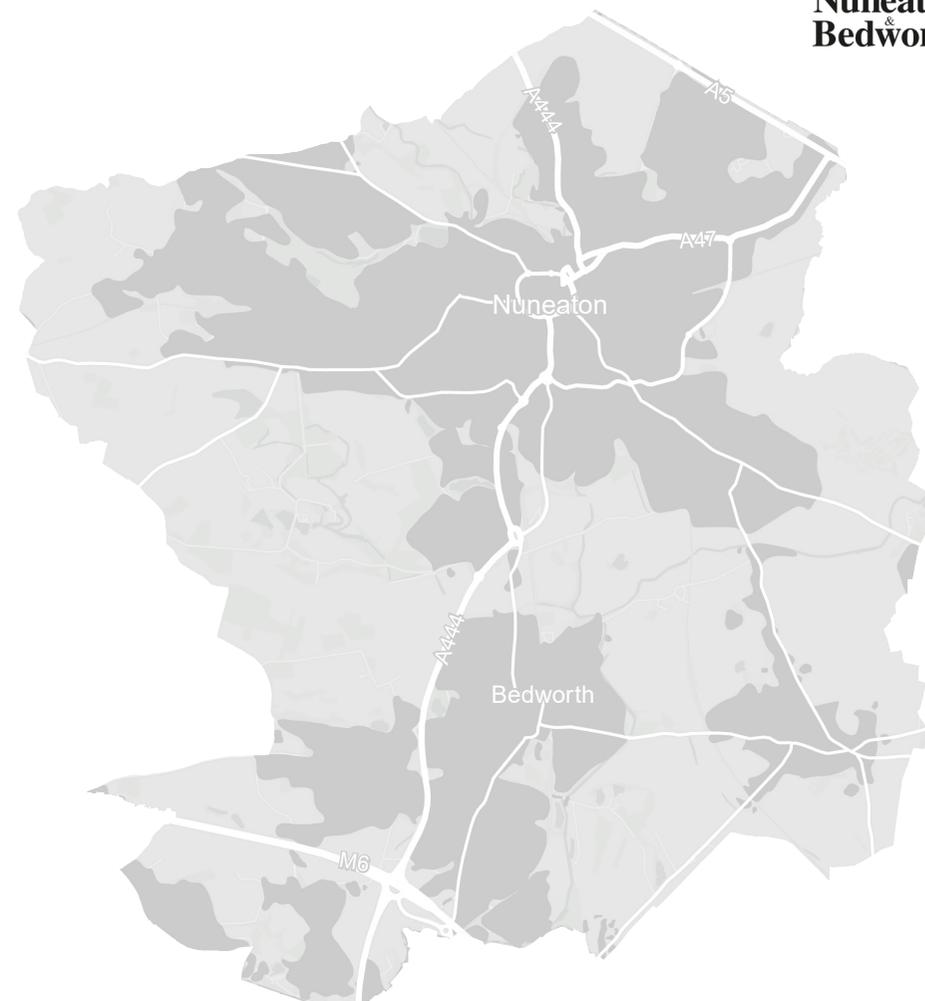
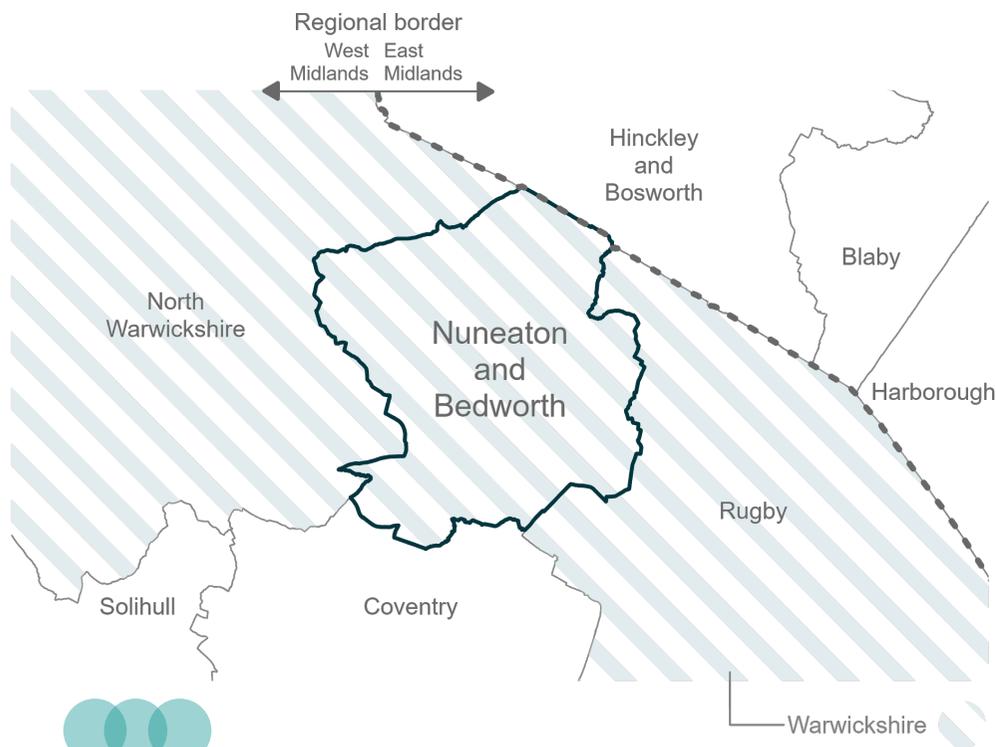
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Introduction

The Borough of Nuneaton and Bedworth is a local planning authority in the West Midlands; it borders Coventry, North Warwickshire, Rugby and Hinckley and Bosworth (which falls within the East Midlands). The area is comprised of a mix of rural and urban settings, with a population of 134,300 (Census, 2021). Large parts of the Borough's countryside are designated Green Belt land, with other key development constraints including flood risk and sites of importance for species and habitats. Nuneaton and Bedworth has good connectivity to Birmingham, Leicester, Coventry and the wider strategic road network (including the M6).



This is a Non-Technical document which concisely summarises the Sustainability Appraisal for the Nuneaton Local Plan (2021-2039). The Local Plan sets out the Borough's spatial strategy in relation to housing and employment growth, with locally specific policies and site allocations which will help to shape the Borough's built environment. The plan includes a set of non-strategic development management policies aimed at avoiding, minimising and mitigating the adverse impacts of development. Once adopted, the Plan will replace the adopted Nuneaton and Bedworth Borough Plan (2011-2031).

Scoping



Process summary

A scoping exercise was carried out to establish the key sustainability issues and objectives for the plan area. The sustainability topics which have been 'scoped in' for consideration within this Integrated Impact Assessment are listed below.

Sustainability Appraisal Themes

- Economic factors
- Social factors
- Biodiversity
- Population and health
- Soil
- Water
- Air quality
- Climatic factors
- Material Assets
- Cultural heritage
- Landscape

Sustainability Appraisal Framework

The scoping stage establishes the baseline position and policy context for the Sustainability Appraisal. This helps to identify the key issues that should be the focus, and the methodology that will be used to undertake the appraisal. These form a framework which provides a way in which the sustainability effects of the Local Plan and alternatives can be identified and analysed based on a structured and consistent approach. The following information details the Sustainability Appraisal objectives under each theme.

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).

Social Factors



Provide decent housing for all, of the right quantity, type, tenure and affordability to meet local needs, in clean, safe and pleasant environments.

Ensure easy and equitable access to services, facilities and opportunities, including jobs and learning, and that people are not disadvantaged with regard to ethnicity, gender, age, disability, faith, sexuality, background or location.

Reduce crime, fear of crime and antisocial behaviour

Address poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantage.

Improve opportunities to participate in the diverse cultural, sport and recreational opportunities the Borough can offer.

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.

Biodiversity



To protect and enhance the natural environment, habitats, species, landscapes and inland waters.

Population and Human Health



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.

Soil



To protect and improve soil quality.



Scoping

Water



Use natural resources such as water efficiently, including by incorporating efficiency measures into new land use and developments, redevelopment and refurbishment.

Ensure that new developments minimise water pollution levels and avoid areas which are at risk from 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.

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.

Climatic Factors



Reduce overall energy use through increased energy efficiency.

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



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.

To ensure the prudent use of resources including the optimum use of previously developed land, buildings and the efficient use of land.

Cultural Heritage

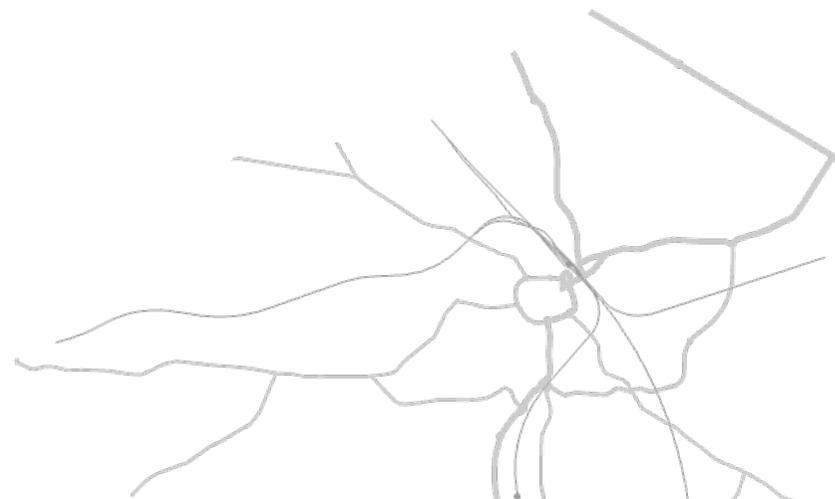


To conserve and enhance the historic environment.

Landscape



To maintain and enhance the quality of landscapes.



Reasonable Alternatives and Plan Appraisals



Options

The consideration of options to deliver the Plan objectives is one way of informing the plan approach, and this has been undertaken at several stages as the plan has been prepared.

Issues and Options Interim SA Report (May 2021): High level policy options including consideration of: Green Belt, housing growth and broad locations and employment growth and broad locations.

Preferred Options Interim SA Report (June 2022): Seven site specific options for the housing strategy and appraisal of individual site options.

Pre-Submission SA Report (July 2023): Appraisal of the Draft Plan and one reasonable alternative, alongside an updated appraisal of site options.

Issues and Options

Earthstar Geographics

The Council undertook an Issues and Options consultation in May 2021, which was accompanied by an Interim SA Report. Given that the detailed elements of the plan had yet to be determined at this stage, the options were relatively high-level. The SA included consideration of the following:

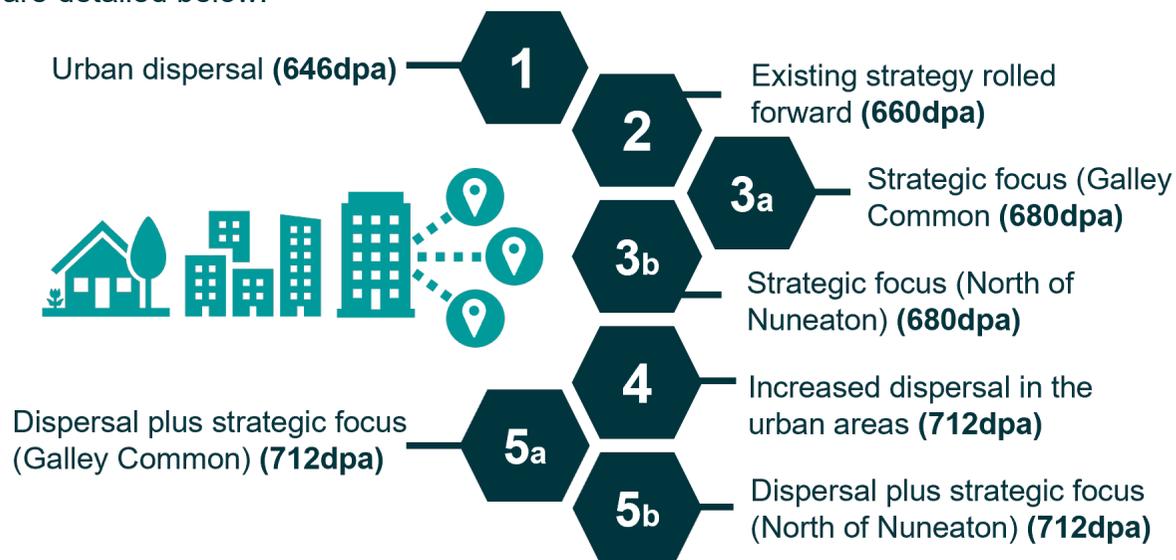
- Compatibility of the vision, aims and objectives of the Plan and the 19 SA Objectives;
- Options for the location of new employment estates;
- Options for non-employment uses in employment estates;
- Options for residential and Green Belt;
- Options for employment and Green Belt;
- Options for location of new residential developments;
- Options for use classes in town centres; and
- Options for frontages in town centres.



Preferred Options

At preferred options stage, the Council identified a preferred approach to housing delivery, which included establishing an appropriate housing target, a spatial strategy and supporting site allocations. This process was informed by consideration of different alternatives both in terms of broad locations of growth and the overall quantum. Site options were also appraised individually.

The Council considered that the most appropriate method for identifying housing needs was to use an alternative standard method calculation, which gave a figure of 646 dwellings per annum. This was therefore taken as the starting point when identifying reasonable amounts of housing delivery. The strategic options for residual housing delivery are detailed below:



Constant elements of the housing supply



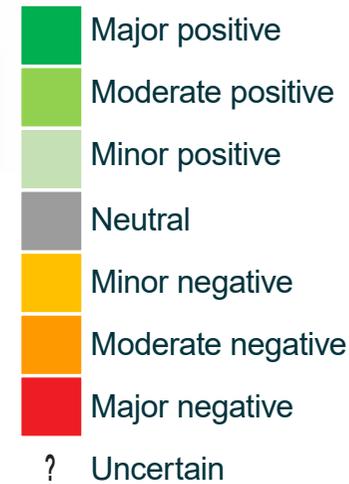
Unreasonable alternatives

- Green Belt release**
- Low growth**



Appraisal of Preferred Options

For each reasonable alternative, an appraisal has been undertaken against the SA Framework. In determining the significance of effects, professional judgement has been applied, being mindful of key effect characteristics including: magnitude, likelihood, duration, timeframe and cumulative effects.



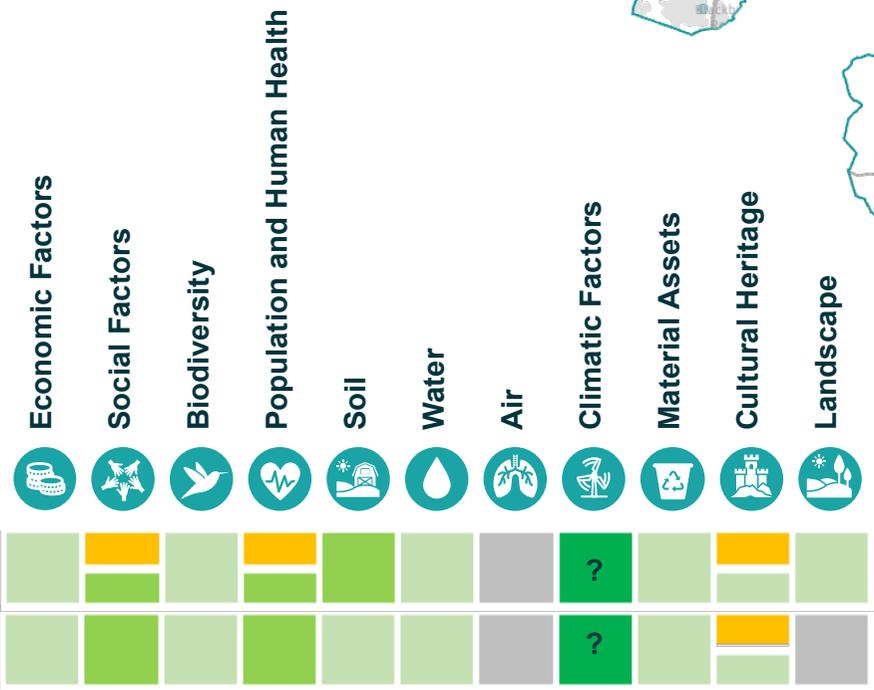
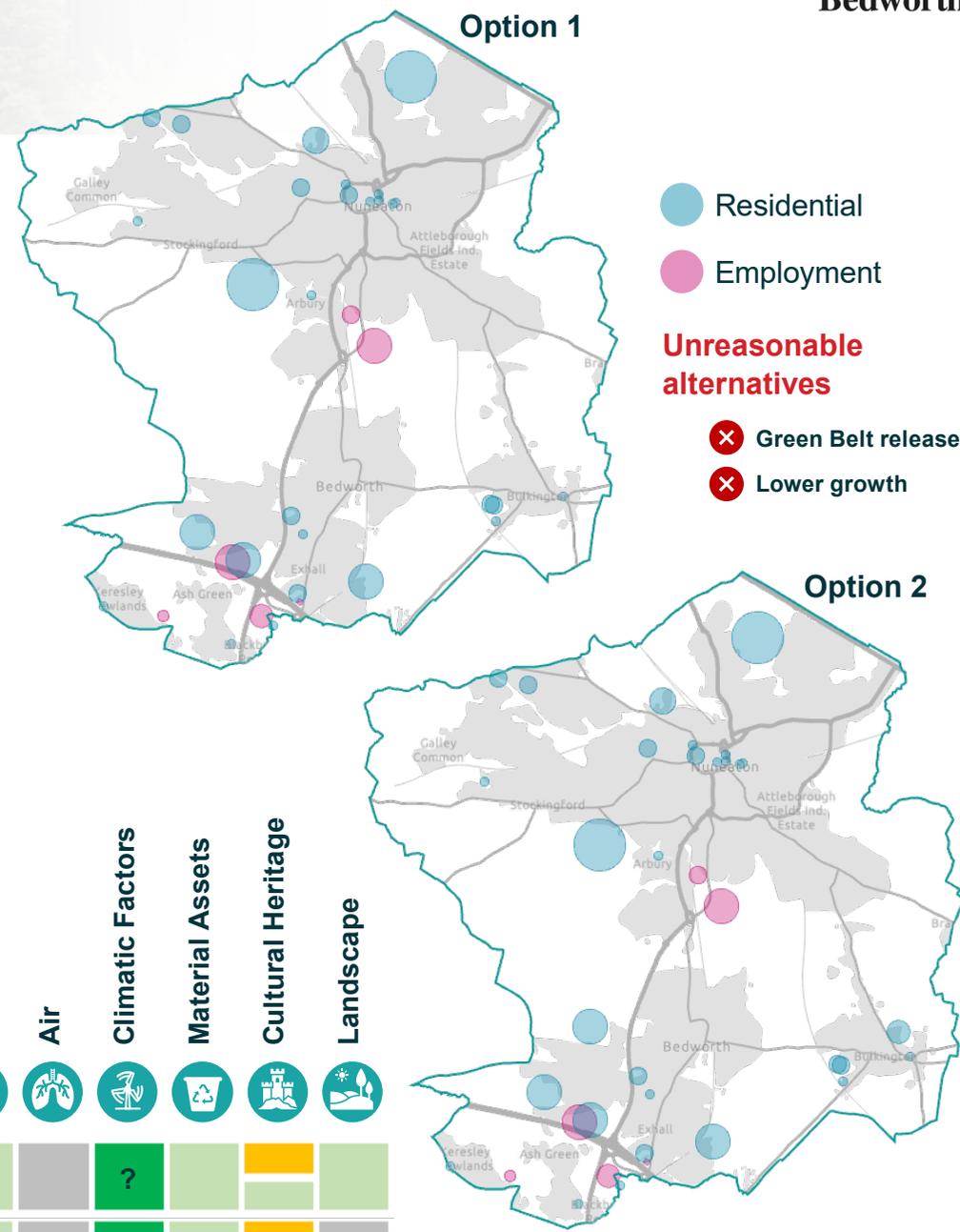
		1. Urban Dispersal	2. Existing Strategy	3a. Galley Common	3b. North Nuneaton	4. Further dispersal	5a. Dispersal + Galley Common	5b. Dispersal + North Nuneaton
Economic Factors		Minor positive	Neutral	Minor positive, Minor negative	Minor positive, Minor negative	Moderate positive	Moderate positive, Minor negative	Moderate positive, Minor negative
Social Factors		Moderate positive, Minor negative	Neutral, Minor negative	Minor positive, Minor negative	Minor positive, Minor negative	Moderate positive	Moderate positive	Moderate positive
Biodiversity		Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral
Population and Human Health		Moderate positive, Minor negative	Neutral	Minor positive, Minor negative	Minor positive, Minor negative	Moderate positive	Moderate positive	Moderate positive
Soil		Minor positive	Neutral	Minor negative	Minor negative	Neutral	Minor negative	Minor negative
Water		Minor positive	Minor positive	Minor positive	Uncertain	Minor positive	Minor positive	Uncertain
Air		Neutral	Neutral	Minor negative	Minor negative	Uncertain	Minor negative	Minor negative
Climatic Factors		Major positive	Major positive	Major positive	Major positive	Major positive	Major positive	Major positive
Material Assets		Minor positive	Neutral	Neutral	Neutral	Neutral	Minor negative	Minor negative
Cultural Heritage		Minor positive, Minor negative	Neutral	Neutral	Neutral	Minor positive, Minor negative	Minor positive, Minor negative	Minor positive, Minor negative
Landscape		Minor positive	Neutral	Moderate negative	Minor negative	Neutral, Minor positive	Minor positive, Moderate negative	Minor positive, Minor negative



Pre-Submission Stage

Following consultation, the Council refined the spatial strategy. The approach was supported by the appraisal of two more focused options, as wider distributions and scales had been tested at the Preferred Options stage. At this stage the Plan period was amended to 2021-2039 (instead of 2024-2039); whilst the dwellings per annum figure was reduced, the overall quantum of new homes planned for remained broadly aligned.

At this stage, the Council considered that there were no further strategic alternatives to test, though the proposed approach (Option 1) seeks to de-allocate two strategic sites (HSG4 and HSG7) due to deliverability concerns. The SA tested the inclusion of these two sites as an alternative approach (Option 2) to the preferred strategy. At this stage, the two reasonable alternatives were tested in combination with proposed Plan policies as two alternative Plan appraisals.



Appraisal of the Plan

Appraisal of the proposed Plan

The preferred strategy seeks deliver the housing and employment provision required to meet the Borough’s needs and ensure the Borough can grow in a sustainable manner, prioritising brownfield land available within the Borough. Following assessment, the approach towards urban dispersal which seeks to allocate a range of sites which are deliverable within the plan period was pursued.

The draft Plan was appraised ‘as a whole’, taking into account the potential for effects associated with new development (primarily the new allocations) but accounting for all of the policies within the Plan.

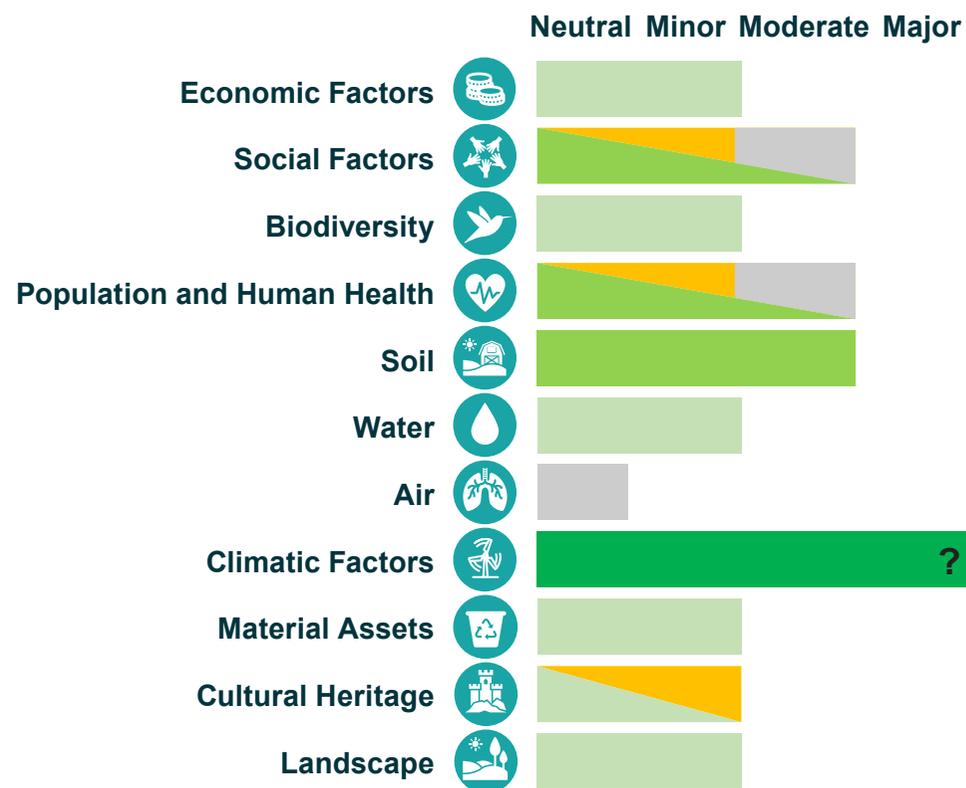
Plan appraisal summary

The Plan is predicted to have mostly positive effects across the SA Framework. The most prominent positive effects relate to climatic factors, as there have been several changes to Plan policies that ought to reduce carbon emissions as well as improving resilience to climate change. The focus of additional sites in areas that could benefit deprived communities is also predicted to have positive effects of moderate significance through the delivery of infrastructure, affordable housing and public realm improvements.

Minor positive effects are also predicted in relation to economic factors, biodiversity, water, material assets, landscape and cultural heritage.

The main negative effects relate to the de-allocation of two strategic sites, which could prevent positive social effects from arising in these

locations. There is also potential for new site allocations to negatively affect the historic environment, but the magnitude of effects would be small. Conversely, by de-allocating these sites, there would be a greater positive effect on soil. Though the significance of effects overall is unlikely to change, the de-allocation of these sites also has positive implications in relation to other SA factors such as Landscape, air quality and material assets.



Appraisal of the Plan

Economic Factors



The approach to employment is likely to have **minor positive effects** on economic factors. Whilst sufficient employment land is identified to meet needs, much of this is already allocated in the Adopted plan, so the effects are unlikely to be significant. That said, where additional / new mixed use and employment sites are identified in the urban areas, this should help to increase their attractiveness, increasing land values and helping to attract investment which will facilitate economic growth. There are also several policy improvements relating to climate change, training and overnight lorry parking that will have benefits for business activity.

Social Factors



Overall, **mixed effects** are predicted with regards to social factors. The additional allocations and policies seeking accessible affordable housing and integrated sustainable transport infrastructure are anticipated to have positive effects on social factors. The focus of development in deprived areas is also likely to create positive effects through provision of more housing choices, new infrastructure, attractive public realm, services and employment opportunities. Whilst some of the sites are currently in areas with limited accessibility, when these are considered along with existing plan allocations, the proposed overall growth is likely to facilitate improved infrastructure and services which would improve accessibility and connectivity. Together, these constitute **moderate positive effects**.

Where strategic sites have been removed from the adopted Plan, the social benefits that would have arisen in these locations will no longer arise. In this respect, **minor negative** effects are predicted. Existing communities might not benefit from new facilities, but ought not to see a major change for the worse.

Biodiversity



When considered on their own, the new site allocations are not expected to give rise to significant effects on biodiversity. However, given the combined growth proposed at strategic level, negative effects are possible in terms of disturbance to local wildlife by various means. The effects will likely be moderated by Plan policies seeking to conserve and enhance biodiversity, and are also offset to an extent by the de-allocation of two strategic sites. Therefore, residual effects would likely be neutral.

Where biodiversity net gains are achieved, longer term effects would be **minor positive**. Given that the majority of sites are unlikely to have a high biodiversity value as a starting point, it is considered that net gain ought to be possible to achieve on most of the sites themselves. The smaller scale nature of the sites could mean that strategic opportunities for net gain are more limited though. There is a degree of uncertainty surrounding the longer-term effects relating to net-gain, but at least 10% ought to be achieved given that it is due to become a legal requirement. There are some additional policy measures introduced through the Plan review that seek to ensure that biodiversity is enhanced and that local features such as trees, hedgerows and ponds are incorporated into new development (both on the strategic sites and for windfall / general development).



Appraisal of the Plan

Population and Human Health

Mixed effects are anticipated overall, the regeneration of deprived areas and policies seeking well designed, accessible homes of varied types and tenures (including affordable homes) along with policies seeking provision of green/ blue infrastructure and sustainable transport, are likely to produce positive effects on population and human health. The additional sites proposed for allocation are generally well located and should have good access to health facilities and other services (by active modes of travel). In combination, **moderate positive** effects are predicted.

On the other hand, the de-allocation of two strategic sites is expected to result these locations not benefiting from a range of services and infrastructures which could have served to improve physical and mental health outcomes. As such, **minor negative** effects are predicted overall.

Soil

The de-allocation of strategic sites which contain agricultural land and would mean that the residual position is one of less soil resources being affected. The promotion of growth on sites which are less appropriate for agricultural development, do not contain soil resources and could help to remediate contamination ought to lead to positive effects. Furthermore, there are several plan policies that prioritise previously developed land, including the remediation of potentially contaminated sites. Consequently, **moderately positive** effects are predicted overall.

Allocated sites that contain agricultural land ought to be surveyed prior to development to confirm which contain best and most versatile land (if any). Where resources are identified, they should be avoided and preserved as much as possible (presuming there are parts of the sites that are of a lower quality).

Water

Overall, the publication Plan is predicted to have mostly neutral effects with regards to water quality, but some improvements in policy requirements relating to water efficiency mean that **minor positive** effects could arise in the longer term. The de-allocation of two large sites is also likely to reduce pressure on waste water networks, which could be an improvement upon the existing situation.

Air

Together, the Plan policies are likely to have a positive effect on air quality, and there is a greater emphasis on carbon neutrality in the publication version (compared to the existing Adopted Plan). Therefore, it is considered likely that efforts to address air quality will be enhanced (both indirectly and directly) as a result of the Plan. Offsetting these benefits is the fact that additional development is proposed in the urban areas, close to air quality management areas. This could bring about some minor negative effects in these particular areas. The magnitude of effects is likely to be limited though, and so overall, the positive effects of Plan policies ought to leave a residual **neutral** effect in terms of air quality.



Appraisal of the Plan

The Plan policies are generally positive promoting sustainable transport and carbon neutrality by 2050, and the scale of new growth proposed in the urban areas is unlikely to lead to significant increases in traffic and congestion.

Negative effects are likely to be minimised as a result of the Borough's spatial strategy which focuses residential and employment growth within accessible, existing urban areas; furthermore, longer term effects may be mitigated due to the anticipated increase in the take-up of electric vehicles.

Where residual negative effects arise in specific locations, these could be further mitigated through the implementation of low emission zones in areas of poor air quality, low-traffic neighbourhoods and car free developments in such areas where feasible.

Climatic Factors



When considering the proposed strategy (which is broadly positive in terms of minimising carbon emissions) alongside improvements to policies in relation to climate change resilience and mitigation, it is predicted that potential **major positive** effects could arise. An element of uncertainty exists as it is uncertain whether measures in relation to climate change would be firm requirements (especially if scheme viability was affected negatively).

In terms of recommendations, the Plan could benefit climate change resilience further by promoting low-traffic neighbourhoods in appropriate circumstances.

Material Assets



Overall, there is a focus on the use of brownfield land and buildings, and several policies are proposed that seek to ensure that natural resources are used efficiently. This gives rise to positive effects with regards to material assets, but these are offset somewhat by the proposed use of some greenfield land. Therefore overall, **minor positive** effects are predicted.



Appraisal of the Plan

Cultural Heritage



Overall, **mixed effects** are predicted (i.e. both positive and negative). Whilst site ABB-4 could adversely impact the character of the Abbey Conservation Area, the policies in the Plan will serve to reduce potential adverse effects, leaving residual **minor negative** effects. The potential for negative effects is also identified associated with site ABB8, which is adjacent to a Grade 1 listed Church. Conversely sites ABB-7 and ABB-8 alongside Plan policies have the potential to enhance the Nuneaton Town Centre Conservation Area through regeneration, which is likely to remove some of the negative elements currently impacting the character of the NTCA generating long term **minor positive** effects on the historic environment.

It is recommended that development proposals with potential impacts on conservation areas should provide a detailed heritage impact assessment and include appropriate mitigation measures to minimise adverse impacts. It would also be beneficial to identify locally important heritage assets and incorporate features into new development. Development at ABB8 needs to ensure that it is of an appropriate height and does not dominate the townscape.

Landscape



Overall, the effects on landscape are predicted to be positive. There would be lesser development on large scale strategic greenfield sites, and the new sites proposed are mostly of a low sensitivity to change. A focus on brownfield regeneration should also help to improve townscape character in Nuneaton.

Though some site allocations in semi-rural locations would result in changes to the character of the landscape, these sites have been assessed as having moderate-high capacity to accommodate development. Furthermore, the regeneration of sites such as ABB6,7,8 is likely to create more attractive areas with enhanced landscape / townscape. Therefore, overall, **minor positive** effects on landscape are predicted.



Mitigation and Monitoring

Recommendations

The sustainability appraisal (SA) of the Nuneaton Local Plan Review has been an iterative process, in which proposals for mitigation and enhancement have been considered.

Issues and Options Stage A range of suggestions were made in the issues and options Interim SA Report, at an early stage of Plan development.

Preferred Options Stage More specific recommendations were made to the Council at later stages of Plan development. These covered a range of themes and sought to address the minor negative effects identified, as well as enhancing the positives.

Monitoring and Next Steps

Monitoring

There is a requirement to outline the measures envisaged to monitor the predicted effects of the Plan. In particular, there is a need to focus on the significant effects that are identified. It is important to track predicted effects to ensure that positive effects are actually realised and to identify any unforeseen negative effects that may occur.

At this stage the monitoring measures have not been finalised, as there is a need to confirm the feasibility of collecting information for individual measures. Wherever possible, measures are aligned with the Local Plan monitoring framework to reduce duplication.

The monitoring measures will be finalised once the Plan is adopted, and will be set out in an SA Statement in accordance with the SEA Regulations.



Next steps

This SA Report has been prepared to accompany the Pre-Submission version of the Local Plan. The report draws together all the SA outputs that have been prepared to date as well as discussing additional appraisal work that may need to be undertaken at future stages.

The final Plan will be 'Submitted' for Examination in Public. The Council will also submit a summary of issues raised (if any) through representations at the Publication stage so that these can be considered by the Government appointed Planning Inspector who will oversee the Examination in Public. At the end of the examination, the Inspector will judge whether or not the Plan is 'sound'.

Further SA work may be required to support the Plan-making process as it moves through Examination (for example the preparation of an SA Addendum to deal with changes / modifications).





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