

Nuneaton and Bedworth Borough Local Plan Review

Sustainability Appraisal

SA Adoption Statement

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Quality information

Prepared by	Checked by	Verified by	Approved by
Ishaq Khan	Ian McCluskey Associate Director	Nick Chisholm Batten Technical Director	Nick Chisholm Batten Technical Director

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Prepared for:
Nuneaton and Bedworth Borough Council

Prepared by:
AECOM Limited
100 Embankment
Cathedral Approach
Salford M3 7FB
United Kingdom

T: +44 161 601 1700
aecom.com

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1. Introduction

Background

- 1.1 Nuneaton and Bedworth Borough Council (NBBC) has prepared a new Local Plan to replace the adopted Nuneaton and Bedworth Borough Plan (2011-2031). The Nuneaton and Bedworth Borough Local Plan Review (2021-2039) will be the key planning policy document for the borough and will guide decisions on the use and development of land.
- 1.2 The Local Plan was submitted to the Government for examination by an appointed Planning Inspector in February 2024. Examination hearings were held in July, September and October 2024. Following these, NBBC consulted on the Main Modifications (to the submitted Local Plan) for a six-week period ending on 14th July 2025. The Local Plan was subsequently recommended for adoption at a Full Council meeting on 10th December 2025.
- 1.3 A parallel process of Sustainability Appraisal (SA) was undertaken alongside strategy development, led by consultants AECOM. SA is a systematic process for evaluating the economic, social and environmental consequences of proposed plans, strategies, or programmes to ensure sustainability issues are fully integrated and addressed at the earliest appropriate stage of decision making, with a view to promoting sustainable development.
- 1.4 SA has been undertaken to address the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (hereafter referred to as the “SEA Regulations”). SA incorporates the requirement for SEA and widens the scope of the assessment to also include social and economic issues.

This SA Adoption Statement

- 1.5 Regulation 16 of the SEA Regulations sets out the post-adoption procedures for the SEA, and requires that, as soon as reasonably practicable after the adoption of a plan for which an SA/SEA has been carried out, the planning authority must make a copy of the plan publicly available alongside a copy of the SA Report and an ‘SEA adoption statement’, and inform the public and consultation bodies about the availability of these documents. The consultation bodies are Historic England, Natural England and the Environment Agency.
- 1.6 This document is the SA (incorporating the Strategic Environmental Assessment) Adoption Statement to accompany the adoption of the Nuneaton and Bedworth Borough Local Plan Review (2021-2039).
- 1.7 The SA Adoption Statement describes the process, how the findings of the SA were taken into account and informed the development of the Local Plan, and the monitoring indicators that will be applied to check the accuracy of predicted effects and to monitor progress against sustainability objectives.

2. The ‘story’ of plan-making and SA up to the point of adoption

Introduction

- 2.1 This section considers each of the main plan-making and SA steps in turn. It is common for the plan-making and SA process to involve numerous iterations of the draft Plan, which was also the case for the Nuneaton and Bedworth Borough Local Plan Review.

Key plan making milestones

- 2.2 This section outlines the key milestones throughout the plan-making process and the key elements of the Local Plan that were developed during each stage.

Identifying issues and collecting evidence

- 2.3 At an Extraordinary Meeting of the Full Council held on 15th May 2019, Members agreed that a review of the Borough Plan should commence.
- 2.4 Work commenced immediately thereafter on various evidence base reports to inform the Local Plan review.

Issues and Options stage

- 2.5 The early stages of plan-making focused on scoping out the key issues and potential options, along with initial stakeholder engagement. A Regulation 18 consultation document, setting out the main challenges for Nuneaton and Bedworth and possible approaches to addressing them, was consulted upon between 11th June and 6th August 2021.
- 2.6 After the consultation, NBBC reviewed all responses to help shape the emerging Local Plan.

Preferred Options stage

- 2.7 NBBC opted for a preferred options stage instead of moving directly to Regulation 19 because key evidence was still being prepared and there were concerns that a sound plan could not be provided in the time frame particularly given the changes emanating from the updated National Planning Policy Framework (issued in July 2021) and associated National Planning Practice Guidance. A preferred options stage also allowed more meaningful public and Member engagement before submission.
- 2.8 The draft Preferred Options document was consulted upon between 13th June and 22nd July 2022, and the comments received were reviewed to inform the development of the Local Plan.

Submission Draft Local Plan consultation

- 2.9 NBBC submitted the Local Plan to the Secretary of State for Levelling Up, Housing and Communities in February 2024, in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended.
- 2.10 The Regulation 19 consultation took place between 4th September and 16th October 2023.

Modifications

- 2.11 Following the Examination hearings, NBBC published proposed modifications to the Local Plan for public consultation between 2nd June and 14th July 2025. Following this consultation, the Planning Inspector's final report on the Local Plan (dated 8th October 2025), concluded that with the Inspectors' recommended Main Modifications the Local Plan is considered 'sound'.

SA preparation alongside the Local Plan

- 2.12 This section outlines the key stages and outputs from the SA process and how they related to the preparation of the Local Plan.

Scoping

- 2.13 The SA process commenced with the preparation and consultation on the SA Scoping Report. The SA Regulations require consultation with Historic England, Natural England and the Environment Agency when deciding on the scope and level of detail of the information that must be included in the SA Report. As such, these authorities were consulted on an SA Scoping Report between 5th February and 12th March 2021.
- 2.14 The scoping information (including the evidence base for the SA) was subsequently updated to reflect the comments from consultation bodies. The updates to the scope of the SA were presented in the Interim SA Report prepared in May 2021, giving consultees another opportunity to comment.
- 2.15 The scope was revisited and updated throughout the plan-making process. However, the underlying key issues remained fundamentally the same as those agreed during the initial scoping consultation. Therefore, the SA framework remained appropriate.

Interim SA work (2021-2023)

- 2.16 SA was carried out to support and inform decision-making at key stages throughout the preparation of the Local Plan.
- 2.17 Following the identification of the Local Plan's issues and opportunities, a draft vision, set of aims and objectives were developed. These were subsequently appraised to determine their compatibility with the SA objectives.

- 2.18 A key element of the SA process has been the appraisal of ‘reasonable alternatives’ for the Local Plan. The SEA Regulations are not prescriptive as to what constitutes a reasonable alternative, stating only that the SA Report should present an appraisal of the “*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*”.
- 2.19 At the issues and options stage, high-level options were appraised and presented for consultation in the Interim SA Report (May 2021) published alongside the issues and options consultation between June and August 2021. The SA considered alternatives relating to:
- 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
 - Options for frontages in town centres
- 2.20 At the preferred options stage, informed by earlier plan-making and SA work, a more refined set of reasonable alternatives were developed. These focused on identifying an appropriate housing requirement and a suitable spatial strategy and supporting site allocations, using NBBC’s alternative standard method calculation of 646 dwellings per annum as the starting point. The strategic options for meeting the residual housing need assessed at this stage are set out below:
- 1. Urban dispersal (646dpa)
 - 2. Existing strategy rolled forward (660dpa)
 - 3a. Strategic focus (Galley Common) (680dpa)
 - 3b. Strategic focus (North of Nuneaton) (680dpa)
 - 4. Increased dispersal in the urban areas (712dpa)
 - 5a. Dispersal plus strategic focus (Galley Common) (712dpa)
 - 5b. Dispersal plus strategic focus (North of Nuneaton) (712dpa)
- 2.21 The outcomes of the appraisal were fed back to NBBC to aid decision-making in relation to the preferred options for the draft Local Plan. This approach also helped ensure that clear reasons could be identified by the Council for progressing the preferred options and rejecting alternative options.
- 2.22 The seven options for housing growth and distribution along with an appraisal of reasonable site options and an appraisal of the draft Local Plan were collated in an Interim SA Report (June 2022) and consulted upon alongside the preferred options consultation in June and July 2022.

SA of the Submission Draft Local Plan

- 2.23 The SA Report (July 2023) was published alongside the Submission Draft of the Local Plan for Regulation 19 consultation, which was subsequently submitted to government for independent examination. It provided an appraisal of the Local Plan ‘as a whole,’ focusing on policies, site allocations and the overall strategy.
- 2.24 The SA Report also summarised the interim steps in the appraisal process that helped to inform plan-making, including:
- Consideration and appraisal of spatial strategy options and policy choices relating to housing and employment growth and distribution, Green Belt release and policy options for town centre use class and frontages;
 - Appraisal of all ‘reasonable’ site options; and
 - Appraisal of draft policies.

SA Report Addendum: Appraisal of Modifications

- 2.25 Following the Local Plan examination hearings, an update to the SA was undertaken in March 2025 to take account of the proposed Main Modifications.
- 2.26 This involved screening the Main Modifications to identify those that could potentially lead to substantial changes to the SA findings / give rise to significant effects. The Main Modifications that were ‘screened in’, were then considered in further detail to identify if there were any reasonable alternatives, and to establish the implications of the changes to the plan in sustainability terms.
- 2.27 All proposed Main Modifications were screened to determine whether additional SA work was required. Most modifications involved minor changes to text for clarifications, factual updates, or wording improvements, and were therefore screened out, as they were not considered significant for the purposes of the SA and were inherently unlikely to give rise to significant effects or alter the overall conclusions.
- 2.28 A small number of Main Modifications were identified as requiring further consideration in the SA. These included: removing policing and justice contribution requirements from site policies; deleting the Kingswood Road allocation (a playing pitch); updating the housing supply to reflect latest planning information, resulting in a lower overall supply; reinstating Strategic Policy SHA7 (East of Bulkington) as an allocation due to its planning status; tightening the water efficiency standard from 110 to 100 litres per person per day; removing the requirement for connection to district heating networks; and removing certain wastewater treatment contribution requirements.
- 2.29 NBBC explored whether there were any reasonable alternatives in relation to the proposed Main Modifications, but no further alternatives were identified as needing to be appraised through further SA work. The SA found that the Modifications do not lead to significant changes to the overall sustainability performance of the Local Plan.

3. The influence of the SA on decision-making

Introduction

- 3.1 Essentially, SA must feed-into and inform plan-making in two ways:
1. Appraisal of alternatives and draft policies should inform preparation of the draft Plan.
 2. The SA Report, and consultation responses received during the Draft Plan / SA Report consultation, should inform plan finalisation.
- 3.2 This section briefly discusses the key elements of the SA process, and how the findings were fed into the plan-making process. There is a focus on explaining how sustainability considerations have been taken into account and influenced plan-making, including as a result of alternatives appraisal, site assessments, policy appraisal, and consultation on Local Plan / SA documents.

Influencing plan objectives

- 3.3 A compatibility assessment was undertaken and recommendations made to ensure that there are no conflicts between the SA objectives and the emerging Local Plan objectives. Broadly speaking, the objectives were compatible and did not pose any significant concern.

Influencing the spatial strategy

- 3.4 The SA identified and appraised a range of reasonable alternatives with the aim of informing the spatial strategy of the Local Plan. At the issues and options stage, options for the distribution of employment uses and the use of Green Belt for housing and employment uses were considered.
- 3.5 At the preferred options stage, the SA findings were used to aid the formulation of an urban dispersal approach. It was considered that the benefits of this approach would outweigh the alternative approaches that involved Green Belt release or strategic sites at Galley Common or North of Nuneaton. The outputs from this stage helped NBBC to consolidate its position with regard to its focus on the urban dispersal approach and no Green Belt release.

Influencing site allocations

- 3.6 The SA was integrated within the Council's site selection process and played an integral role in guiding the selection and refinement of site allocations throughout plan preparation. It assessed all reasonable site options against the SA framework, providing a consistent basis for comparing alternatives and identifying those with fewer constraints or clear opportunities for positive sustainability outcomes. For sites taken forward, the SA highlighted mitigation and enhancement measures to address potential adverse effects, informing recommendations on which sites could be allocated and the policy measures to be applied.

Influencing policy content

- 3.7 After draft policies were prepared, they were appraised against the SA framework to determine their likely positive and negative effects. At this stage, the SA also set out mitigation and enhancement measures, which the Council took into account when refining the policies.
- 3.8 Chapter 11 of the SA Report (July 2023) sets out a list of recommendations made within the SA in relation to the Local Plan content and how these were taken into account by NBBC when finalising the policies. This resulted in some amendments being made to policies.

Influencing the Main Modifications

- 3.9 Further SA was undertaken at this stage to understand the implications of the proposed Main Modifications. A report was prepared in March 2025 setting out the findings and subsequently published to allow effective consultation on the Modifications.
- 3.10 Following a screening process, a small number of Modifications were identified for further exploration in the SA. This involved exploring potential alternatives, though no further alternatives were identified as needing to be appraised. The Main Modifications were also subjected to appraisal both individually and considered 'as a whole'.
- 3.11 The Modifications were identified as having positive, neutral and negative implications, but none of these were found to be significant or to lead to significant changes to the SA Report findings. No mitigation or enhancement measures were identified throughout the appraisal process at this stage.

4. Monitoring

Introduction

- 4.1 The SEA Regulations require that: *“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”*.
- 4.2 The purpose of monitoring is to measure the significant sustainability effects of a plan, as well as to measure success against the plan’s objectives. This will enable appropriate interventions to be undertaken if monitoring highlights negative trends relating to the relevant elements identified in the SA Report. It is therefore beneficial for the monitoring strategy to build upon existing monitoring systems. To this end, many of the indicators of progress chosen for the Local Plan reflect data that is already being routinely collected by NBBC and its partner organisations. It should also be noted that monitoring can provide useful information to inform the development of future plans and programmes, including future iterations of the Local Plan.
- 4.3 **Table 4.1** presents proposed monitoring measures to track the implementation of the Local Plan in relation to areas where the SA has identified significant effects or opportunities to improve sustainability performance. It also identifies areas of uncertainty within the appraisal findings and recommends monitoring actions to help ensure that the anticipated benefits of the Local Plan are realised.

Table 4.1: Proposed SA monitoring measures for the Nuneaton and Bedworth Borough Local Plan Review

SA Topic	Proposed Monitoring Measures
Economic Factors <p>Overall, 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.</p>	<p>Monitor the supply and delivery of allocated sites and report annually through the Authority Monitoring Report (AMR, DS4a)</p> <p>Number of employee jobs by industry (ONS dataset JOBS03)</p> <p>Ratio of workplace based employment to residence-based employment.</p>

SA Topic

Proposed Monitoring Measures

Social Factors

Overall, mixed effects are predicted. The new allocations and policies seeking accessible affordable housing and integrated sustainable transport infrastructure are anticipated to have positive effects. 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.

Monitor the supply and delivery of allocated sites and report annually through the Authority Monitoring Report (*AMR, DS4a*)

Number of affordable dwellings built each year (*AMR, H2a*)

Delivery of infrastructure set out within the Infrastructure Delivery Plan (*AMR, HS1a*)

% of new major residential dwellings for M4(2) and 5% for M4(3) (*AMR, H5a*)

Health of district and local centres (*AMR, TC3a*)

Number of applications granted which are not mitigated against, following objection on transport grounds

Biodiversity

Given the cumulative growth proposed negative effects are possible in terms of disturbance to local wildlife. 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 positive. It is unclear the extent to which this would be beyond a minimum of 10% net gain. However, 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). This contributes to overall minor positive effects.

Trends in the condition of SSSI, Special Area of Conservation and local wildlife sites (*AMR, NE3a*)

Development resulting in less than 10% gains for biodiversity (*AMR, NE3b*)

Development causing a loss of Local Biodiversity Action Plan habitats and species (*AMR, NE3c*)

SA Topic

Proposed Monitoring Measures

Population and 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 also predicted.

Delivery of infrastructure set out within the Infrastructure Delivery Plan (*AMR, HS1a*)

Loss or gain of community facilities (*AMR, HS4a*)

Monitor the number of applications granted contrary to the Health Impact Assessment Recommendations (*AMR, HS5a*)

Soil

In conclusion, 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, moderate positive effects are predicted overall.

Loss of open space (*AMR, HS6c*)

Development of a potentially contaminated or unstable site (*AMR, BE1a*)

Water

Overall, the 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.

The number of planning permissions granted contrary to the advice of the Environment Agency on grounds of risk to water quality (*AMR, NE4b*)

B3: State of the Water Environment (*Environment Agency*)

SA Topic

Proposed Monitoring Measures

Air Quality

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 Borough Plan Local Plan Review (compared to the existing adopted 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. Overall, a residual neutral effect is predicted in terms of air quality.

Annual mean concentration of Nitrogen Dioxide, Particulate Matter PM10 and PM2.5 ($\mu\text{g}/\text{m}^3$) (*Local Air Quality Management Indicators*)

Distance of strategic network cycle routes (*AMR, NE1b*)

Climatic Factors

The proposed strategy is broadly positive in terms of minimising carbon emissions, and there have also been improvements to policies in relation to climate change resilience and mitigation. Therefore, 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).

Emissions per capita by sector (*DESNZ / ONS*)

Proposals for small wind turbines in conformity with criteria (*AMR, BE2a*)

Submission of a completed Sustainable Design and Construction Checklist for all new developments (*AMR, BE3a*)

The number of planning permissions granted contrary to advice on grounds of flood risk (*AMR, NE4a*)

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.

% of household waste sent for recycling, composting or reuse (*WasteDataFlow*)

Waste generation per capita (*WasteDataFlow*)

SA Topic

Proposed Monitoring Measures

Cultural Heritage

Overall, mixed effects are predicted (i.e. both positive and negative). Of the new allocations, there could be some adverse effects on the character of Conservation Areas, and listed buildings. However, there is also potential for development on allocated sites to enhance the Nuneaton Town Centre conservation Area through regeneration. The Plan policies are also supportive of the protection and enhancement of the historic environment. Minor positive effects and minor negative effects are predicted.

Conservation Areas with an up-to-date assessment and management plan

Planning applications granted contrary to advice on heritage grounds

Landscape

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. Therefore, overall, minor positive effects on landscape are predicted.

Development given planning permission in highly valued landscape areas (*AMR, NE5a*)

