

Nuneaton and Bedworth Borough Plan Review

Sustainability Appraisal

Second Interim Report: Regulation 18

June 2022

Quality information

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1. Introduction

Background

- 1.1 AECOM is commissioned by Nuneaton and Bedworth Borough Council to undertake a Sustainability Appraisal (SA) of the Local Plan review for Nuneaton and Bedworth. The SA encapsulates the requirements of a strategic environmental assessment (SEA).
- 1.2 The SA is being undertaken alongside the development of the Local Plan, with the intention of aiding the decision-making process.
- 1.3 At the current stage, the Council has built upon previous plan-making steps and has identified a preferred approach to housing and employment strategy as well as making amendments to several policies.

This Interim Report

- 1.4 This document is an interim report which documents the SA process at this stage. The report is structured as follows:

Section 2 Plan details

Section 3 What is the Scope of the SA?

Section 4 Identifying alternatives

Section 5 Appraisal of the draft Plan and alternatives

Section 6: Appraisal of reasonable site options

Section 7: The preferred approach

Section 8 Recommendations

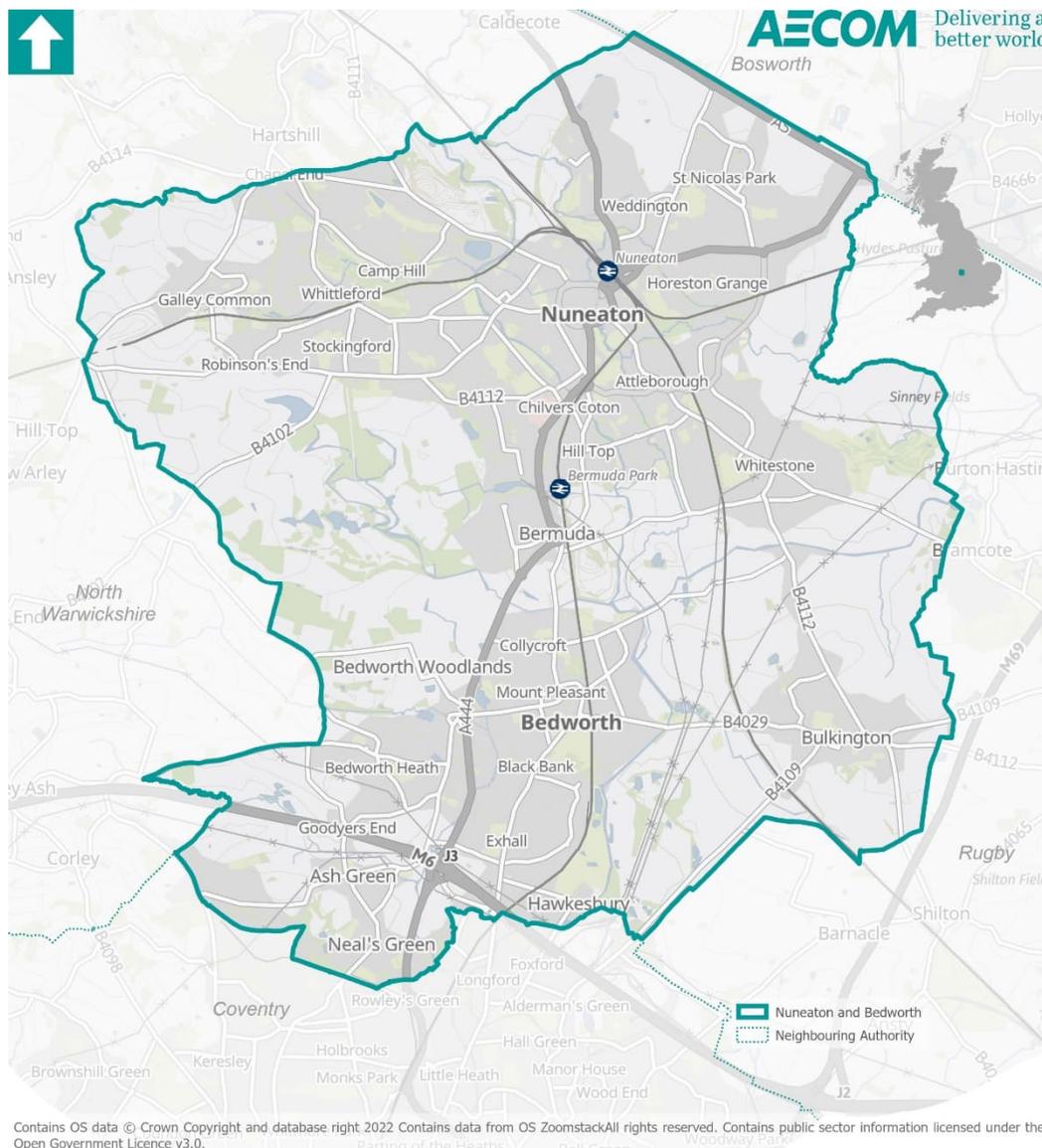
Section 9 Next steps

2. Plan details

Introduction

- 2.1 The Council committed to undertaking an immediate review of the adopted Borough Plan following the publication of the updated National Planning Policy Framework. It is only considered necessary to focus on aspects of the Adopted Plan where changes are required to reflect the current policy context and evidence.
- 2.2 In particular, there is a need to review the strategy for housing and employment, respond to the climate change emergency, support sustainable transport, protect and enhance environmental assets, and ensure development is inclusive.
- 2.3 It is intended that the updated Plan will guide development from 2024 through to 2039. The Plan area is illustrated on Figure 2.1 below and will cover the whole of Nuneaton and Bedworth Borough.

Figure 2.1 The Plan area



Plan-making to date

- 2.4 The emerging Plan is at 'preferred options' stage, but several steps have already been undertaken to gain a better understanding of the key issues and how these can be addressed.
- 2.5 A consultation was undertaken in June / July 2021 called the 'Issues and Options Consultation Draft' for the Borough Plan Review. This document introduced the key issues facing Nuneaton and Bedworth alongside a range of options to address these.
- 2.6 An interim SA Report was prepared by the Council alongside the issues and options document which set out the following information:
- Scoping information (context review, baseline information, key issues and methods)
 - Appraisal of vision and objectives
 - Appraisal of a range of high level options covering the topics of:
 - New employment locations (3 options)
 - Existing employment (5 options)
 - Location of housing in urban areas versus Green Belt (3 options)
 - Location of employment in the urban areas versus Green Belt (3 options)
 - Spatial options for housing (3 options)
 - Protection of primary and secondary frontages (7 options)
- 2.7 Much of the information in the first interim SA Report is not replicated in this second interim SA Report to ensure that readers focus on the salient issues at this stage of plan making. However, all aspects of the sustainability appraisal process will be brought together in a full SA Report at Regulation 19 stage.

3. What is the scope of the SA?

Introduction

3.1 The aim here is to summarise the scope of the SA, i.e. the sustainability themes and objectives that should be a focus of the SA. Full details of the process and outputs can be found in the SA Scoping Report.

Consultation

3.2 The SEA Regulations require that “when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are the Environment Agency, Historic England, and Natural England. As such, these authorities were consulted over between 5th February 2021 and 12th March 2021. The Environment Agency, Historic England, and Natural England were consulted. Responses received were taken into account and updates presented in the Interim SA Report (May 2021), giving consultees another chance to comment.

The SA framework

3.3 Table 3.1 presents a list of objectives, supporting criteria and monitoring indicators that form the back-bone of the SA scope. Together they comprise a ‘framework’ under which to undertake assessment.

Table 3.1: The SA Framework

Objective	Criteria	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?	% of working age people in employment (nomisweb.co.uk) [ref. A/1].
	Will it help diversify the economy?	Average gross weekly pay (nomisweb.co.uk) [ref. A/3].
	Will it support small businesses?	Business deaths and births (ons.gov.uk) [ref. A/4].
	Will it maintain a balanced mix of development?	
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	Will it promote a range of housing types and tenure?	Affordable dwellings completed (NBBC data) [refs. H2b and H2c]. Average house prices (landregistry.data.gov.uk) [ref. B/3a].

Objective	Criteria	Indicators
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	Will it maintain and enhance existing facilities?	% of workforce qualified to NVQ 3+ (nomisweb.co.uk) [ref. B/10].
	Will it put unacceptable pressure on existing services and community facilities?	People of working age in employment (nomisweb.co.uk) [ref. A/1].
	Will it improve access to local services and facilities?	% of population of working age claiming key benefits (nomisweb.co.uk) [ref. A/2].
	Will it ensure that education and skills infrastructure meet projected future demand and need?	Employment rate (nomisweb.co.uk) [ref. A/1].
	Will it reduce inequalities in education and skills across the Borough?	Index of local deprivation (gov.uk) [ref. B/7].
Reduce crime, fear of crime and antisocial behaviour	Will it promote the reduction of crime rates?	Recorded robberies; burglaries; vehicle crimes percentage (data.warwickshire.gov.uk) [ref. B/8].
	Will it encourage the adoption of principles to 'design out' crime in housing and employment sites?	
Address poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantage	Will it reduce poverty and exclusion in those areas most effected?	Wage/income levels- gross weekly pay (nomisweb.co.uk) [ref. A/3].
Improve opportunities to participate in the diverse cultural, sport and recreational opportunities the Borough can offer	Will it ensure that facilities and locations for cultural activities are protected?	Leisure floor space (NBBC data) [ref. DS2c].
	Will it protect and create high quality or valued recreational spaces and avoid erosion of recreational function?	Change to open space (NBBC data) [ref. HS6c].
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	Will it require good urban design to create attractive, high quality environments where people will choose to live, work and invest?	New residential and commercial developments integrating Secure By Design principles (NBBC data) [ref. BE3d].

Objective	Criteria	Indicators
Biodiversity		
To protect and enhance the natural environment, habitats, species, landscapes and inland waters	Will it protect and enhance species, habitats and sites at risk?	Development causing habitat net losses (NBBC data) [ref. NE3b].
	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?	Development causing a loss of LBAP habitats and species (NBBC data) [ref. NE3c]. Planning permission granted on designated statutory sites and sites with high biodiversity distinctiveness (NBBC data) [ref. NE3d].
	Will it support development that incorporates improvements to wildlife habitats?	
	Will it increase access to green spaces?	
	Will it contribute to adaptation to climate change and ecological networks?	
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	Will it diminish inequalities in mortality, health and wellbeing across the Borough?	Mortality rates - all and from heart disease and stroke, and cancer (fingertips.phe.org.uk) [refs. I/4, I/5 and I/6].
	Will it promote healthy lifestyles and opportunities for exercise?	Life expectancy at birth (ons.gov.uk) [ref. I/1].
	Will it promote opportunities to participate in sport?	Change to open space (NBBC data) [ref. HS6c].
	Will it protect, provide and enhance the provision of quality open space?	Parks/open spaces attaining 'Green Flag' status (NBBC data).
	Will it prevent noise and light pollution?	
Soil		
To protect and improve soil quality	Will it minimise development on Greenfield land?	Land on brownfield land register (NBBC data).

Objective	Criteria	Indicators
	Will it reduce the amount of derelict, degraded and underused land?	Land on contaminated land register (NBBC data).
	Will it reduce the quantity of contaminated land in the Borough?	
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?	No satisfactory indicator identified, current ones are too broad.
	Will it encourage water efficiency and conservation?	
	Will it minimise adverse effects in ground and surface water quality?	
	Will it protect and enhance the quality of watercourses?	
Ensure that new developments minimise water pollution levels and avoid areas which are at risk from flooding and natural flood storage areas	Will it avoid developments in areas being at risk from fluvial, sewer or groundwater flooding?	The number of planning permissions granted contrary to advice of Environment Agency on grounds of flood risk (NBBC data) [ref. NE4a].
	Will it provide habitat creation?	
	Will it support the connection of blue corridors?	
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?	Pollutant levels (NBBC data) [ref. E/1].
	Will it reduce traffic congestion and improve road safety?	Number of AQMAs (NBBC data) [ref. E/2].
Ensure development is primarily focused in urban areas, and makes efficient use of existing physical infrastructure and reduces need to travel, especially by private car	Will it focus development in the major urban areas?	Proportion of adults walking for travel (gov.uk) [ref. E/6].
	Will it promote compact, mixed-use developments with good accessibility to local facilities and service that reduce the need to travel?	Proportion of adults cycling for travel (gov.uk) [ref. E/6].

Objective	Criteria	Indicators
	Will it reduce the number and length of journeys made by car?	
	Will it promote alternative, more sustainable modes of transport to the car (including walking and cycling) through location of housing, employment sites, services and facilities, and appropriate infrastructure for sustainable modes of transport?	
Climatic Factors		
Reduce overall energy use through increased energy efficiency	Will it reduce or minimise greenhouse gas emissions?	Carbon dioxide emissions by sector and per capita (gov.uk) [ref. G/1].
	Will it increase the proportion of energy generated from renewable and low carbon sources, including by micro-generation, CHP, district heating and transportation?	
Minimise the Borough's contribution to the causes of climate change by reducing emissions of greenhouse gases from transport, domestic, commercial, and industrial sources	Will it contribute to the creation of a low carbon economy and minimise the Borough's contribution to the causes of climate change by reducing emissions of greenhouse gases from transport, domestic, commercial and industrial sources?	Carbon dioxide emissions by sector and per capita (gov.uk) [ref. G/1].
	Will it promote the adoption of climate change adaption and climate proofing principles in planning and design?	
	Will it promote sustainable urban drainage systems?	
Material Assets		
Encourage and enable waste minimisation, reuse, recycling, and recovery to divert resources away from the waste stream, including the use of	Will it reduce waste arising (household and commercial)?	LACW recycled and composted (NBBC data) [refs. J/1 and J/3].
	Will it increase recycling and composting rates and encourage easily accessible recycling systems?	

Objective	Criteria	Indicators
recycled materials where possible	Will it promote re-use of resources?	
To ensure the prudent use of resources including the optimum use of previously developed land, buildings and the efficient use of land	Will it encourage land use and development that optimises the use of previously developed land and buildings?	Housing developments on previously developed land (NBBC data) [no ref. but reported in AMR].
	Will it encourage development which makes more efficient use of land; and seek greater intensity of development at places with good public transport accessibility?	
Cultural heritage		
To conserve and enhance the historic environment	Will it conserve and enhance sites, features and areas of historical, archaeological and cultural value?	Number of listed buildings (Grade I and II*) at risk (historicengland.org.uk) [ref. K/1]. Loss of designated historic assets (NBBC data) [ref. BE4b].
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?	Development given planning permission in highly valued landscape areas (NBBC data) [ref. NE5a].

4. Identifying alternatives

Alternative strategies for housing delivery

- 4.1 At the current stage of plan making, the Council has sought to identify a preferred approach to housing delivery, which includes establishing an appropriate housing target, a spatial strategy and supporting site allocations. This has been informed by consideration of different alternatives both in terms of broad locations of growth and the overall quantum. Sites have also been appraised individually.
- 4.2 The alternatives appraisal work at this stage sought to build on previous stages of plan making and SA, and therefore the alternatives are described in greater detail compared to those explored at issues and options stage.
- 4.3 Following from issues and options stage and drawing upon the latest evidence of housing needs and supply, the Council identified several alternatives that were considered to be reasonable. The options are summarised in table 4.1 below, setting out the broad assumptions about the level of growth and locations for growth that would be involved. Each option is also supported by a map which shows the key sites that would be rolled forward from the existing Adopted Plan and the additional sites that would be involved under each option.
- 4.4 The Council consider that the most appropriate method for identifying housing needs is to use an alternative standard method calculation, which gives a figure of 646 dwellings per annum. This has been taken as the starting point when identifying reasonable amounts of housing delivery.
- 4.5 There are various elements of supply that would remain constant across each of the options. These are as follows:
 - Commitments (Full and outline planning permissions) and completions are assumed to come forward.
 - Windfall assumption of 22dpa
 - 10% deduction for non-delivery on small sites.
 - Existing strategic allocations in the Adopted Local Plan that are still considered appropriate and deliverable will be carried forward.

Table 4.1 Strategic options for housing delivery (residual housing)

Strategic option	Approx dpa	Assumptions
1.Urban dispersal	646 dpa	Two strategic sites in the adopted Local Plan would be de-allocated (HSG4 Woodlands and HSG7 East of Bulkington ¹). Additional sites to be allocated in the urban area (primarily focused in Nuneaton) to substitute for the de-allocation of these strategic sites.
2.Existing strategy rolled forward	660 dpa	Strategic sites HSG4 and HSG7 would be rolled forward, meaning that no additional sites would need to be found to meet the housing requirement.
3a.Strategic focus (Galley Common)	680 dpa	Rather than substituting HSG4 and HSG7 with urban dispersal, growth could be directed to a new strategic location at Galley Common. There is an assumption that strategic growth would need to be at least 1000 dwellings to create the economies of scale required to support social and transport infrastructure improvements.
3b) Strategic focus (North of Nuneaton)	680 dpa	Rather than substituting HSG4 and HSG7 with urban dispersal, growth could be directed to further growth at the strategic location north of Nuneaton.
4) Increased dispersal in the urban areas	712 dpa	To increase flexibility and choice in housing delivery it is reasonable to test an option that involves additional site allocations throughout the urban areas. There are a range of sites available that could potentially be involved as illustrated on the accompanying map for this option.
5a) Dispersal plus strategic focus (Galley Common)	712 dpa	To increase flexibility in delivery, a mix of urban dispersal plus a strategic growth location at Galley Common could be pursued.
5b) Dispersal plus strategic focus (North of Nuneaton)	712 dpa	To increase flexibility in delivery, a mix of urban dispersal plus strategic growth north of Nuneaton could be pursued.

¹ No planning application has been submitted for HSG4 Woodlands and there is no indication that an application may be forthcoming. Significant infrastructure is required to be delivered and there is no indication of when this will happen or be funded. The lack of delivery for the HSG4 has, and continues to have, a bearing on the Council's Housing Trajectory which informs the Five Year Housing Land Supply. For HSG7 a pre-application submission was received in August 2021. This has indicated issues that may compromise potential delivery of the site.

Figure 4.1 Housing Strategy Option 1: Urban Dispersal

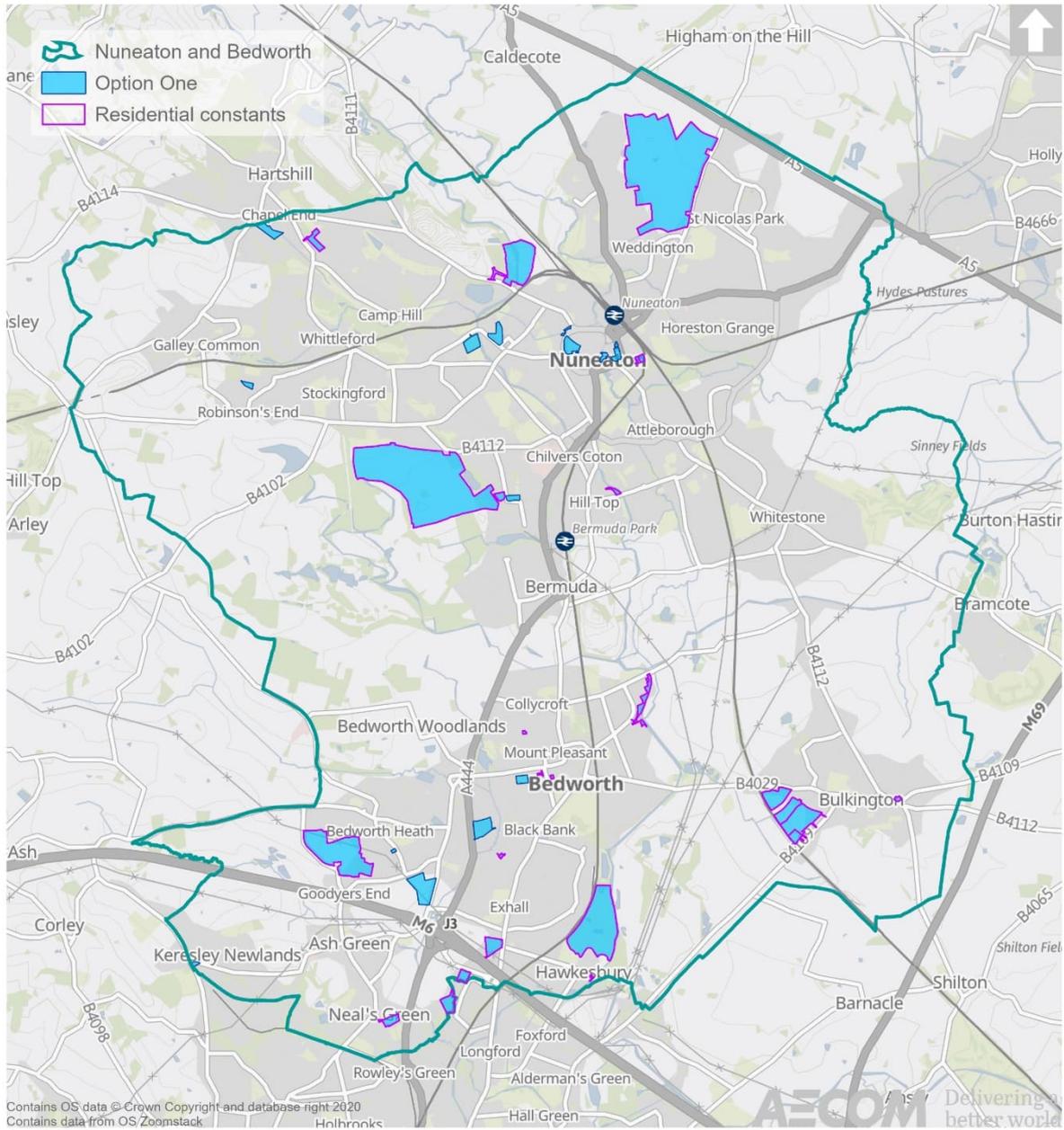


Figure 4.3 Housing Strategy Option 3a: Galley Common Strategic Location

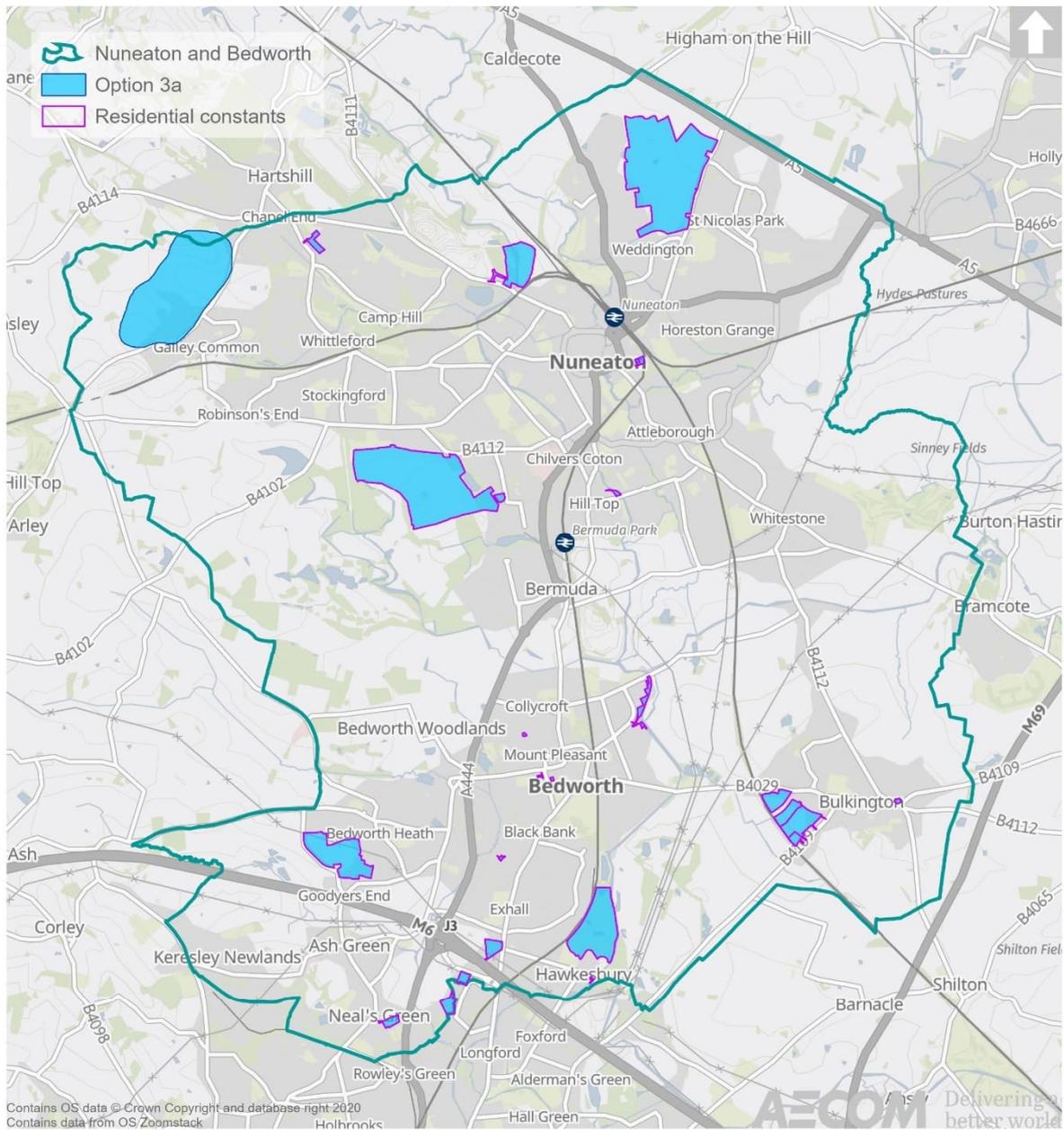


Figure 4.4 Housing Strategy Option 3b: North Nuneaton Strategic Location

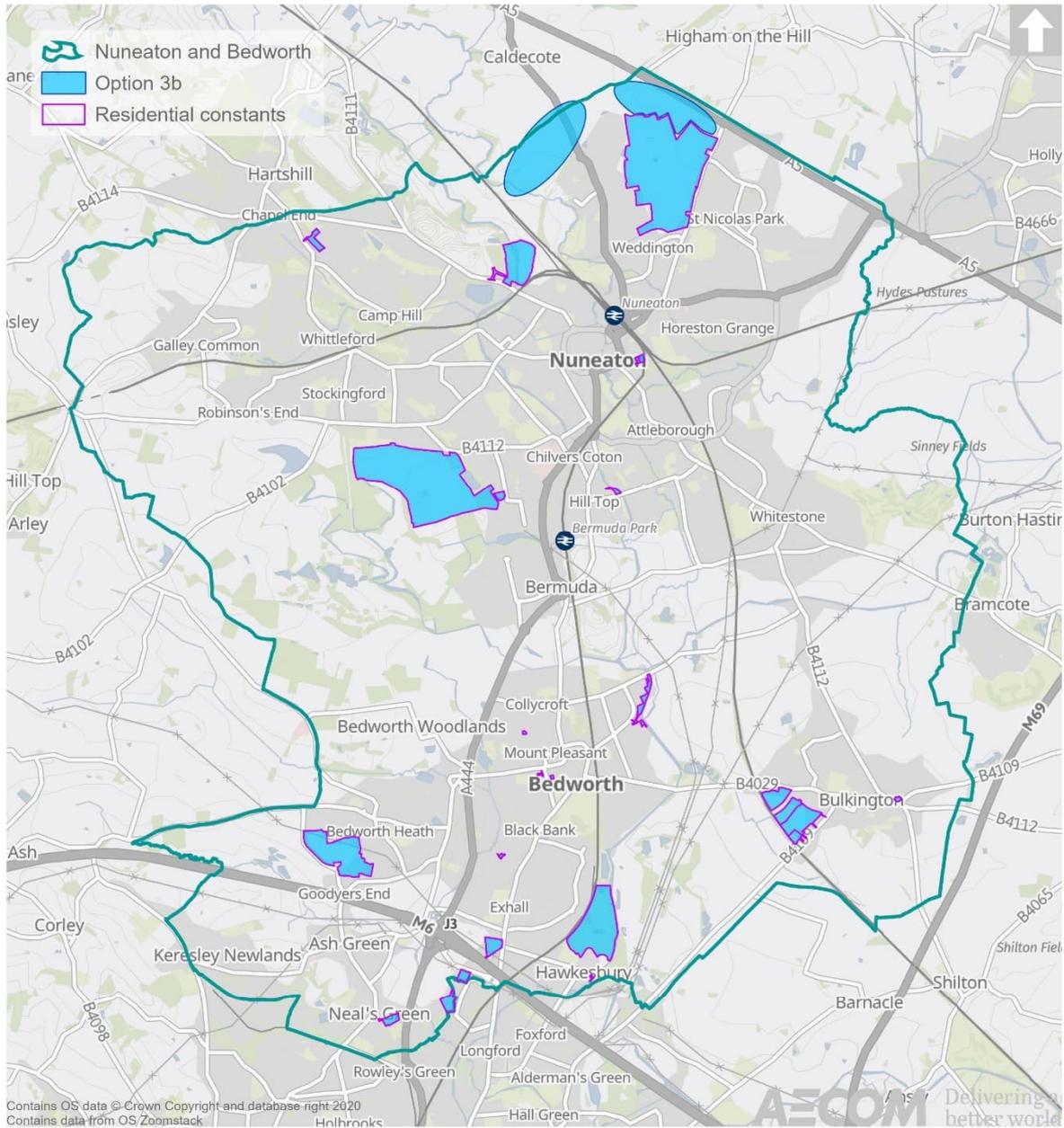


Figure 4.5 Housing Strategy Option 4: Increased urban dispersal

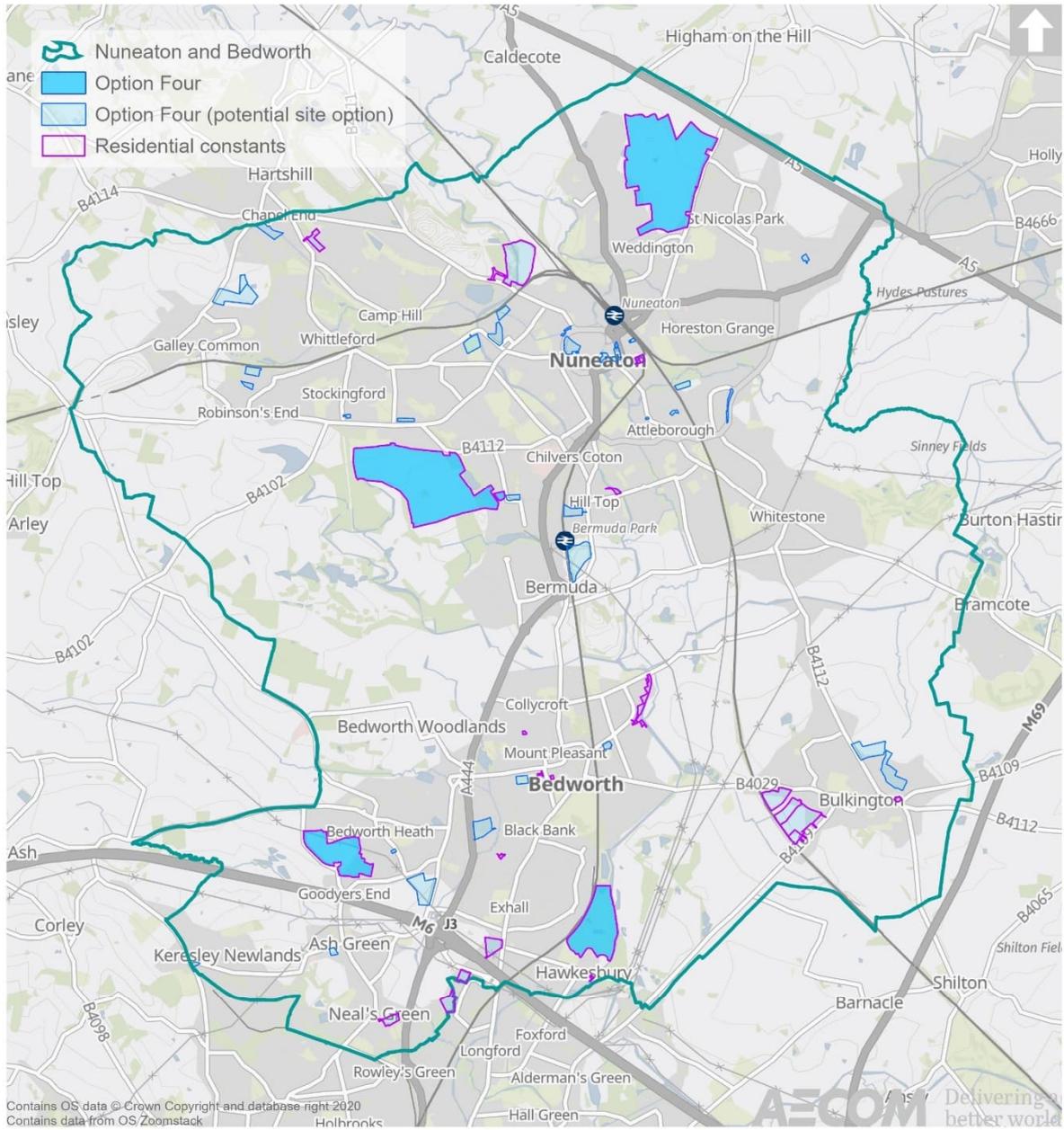


Figure 4.6 Housing Strategy Option 5a: Urban dispersal plus strategic growth at Galley Common

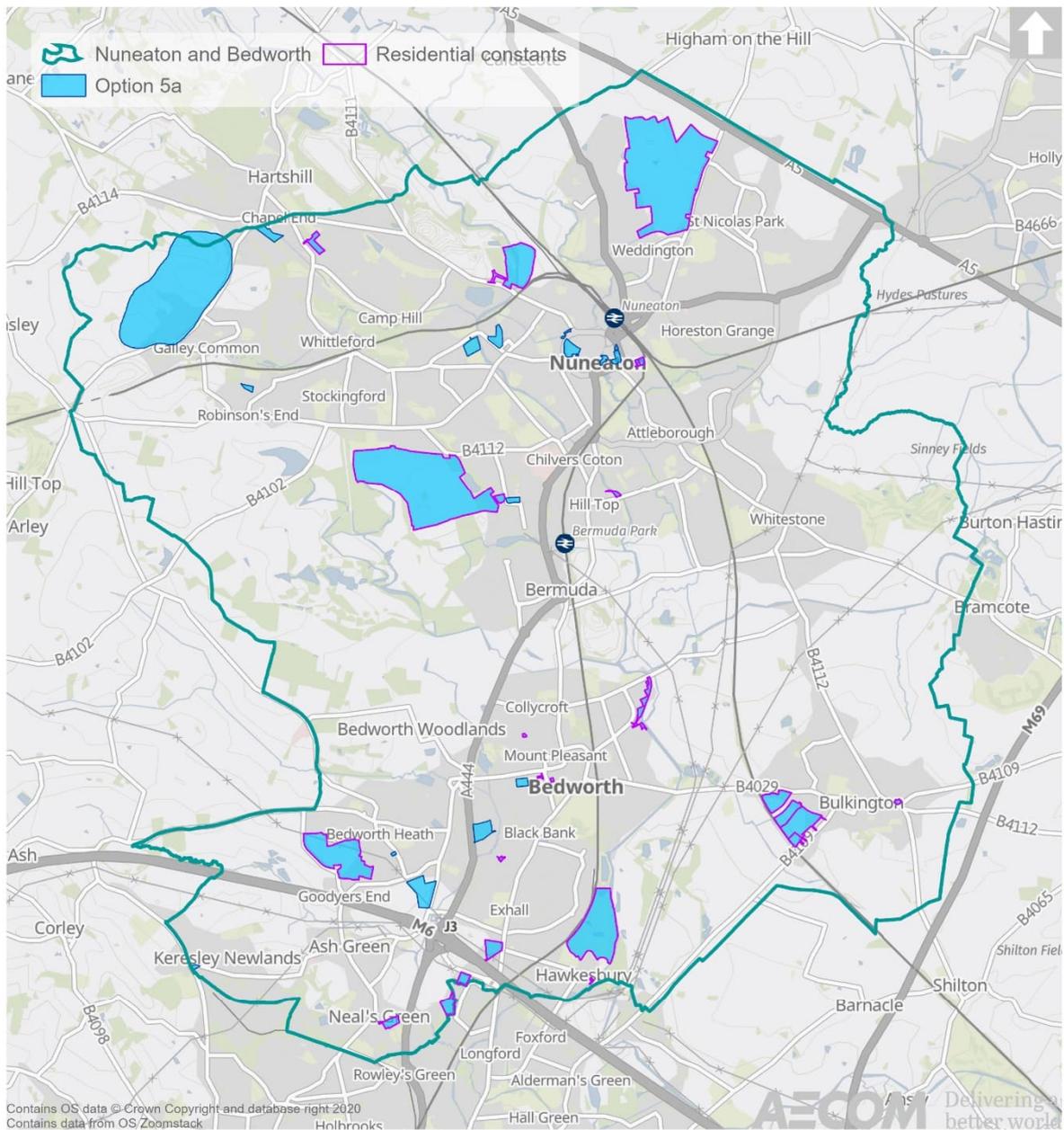
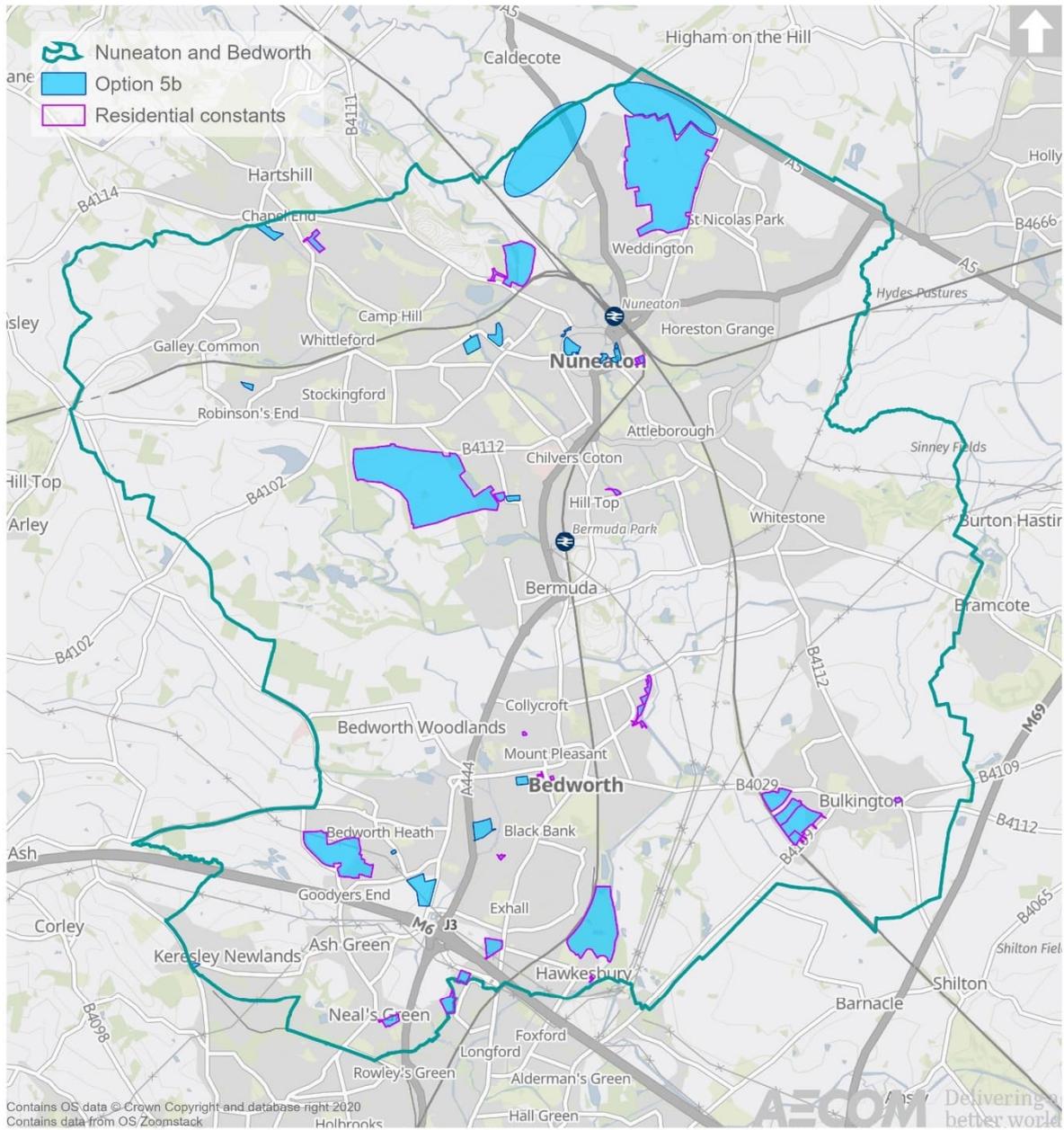


Figure 4.7 Housing Strategy Option 5b: Urban dispersal plus strategic growth at North Nuneaton



Unreasonable alternatives

Green Belt release

- 4.6 The Council consider it unnecessary to continue exploring the potential for Green Belt release to deliver housing growth. There are sufficient sites within the urban area and the countryside that are not Green Belt and these would well exceed identified housing needs for the Borough. Even in the event that needs may increase in response to changes in evidence or cross boundary issues, it is still considered that there are sufficient non-green belt sites to explore first.

Low growth

- 4.7 The Council consider it unreasonable to plan for a level of housing that would not be likely to meet identified needs under the alternative standard methodology projection. There do not appear to be any special circumstances or overriding issues that would justify lower levels of housing delivery in Nuneaton and Bedworth than the proposed approach.
- 4.8 Although the household projections scenario suggests that 425dpa would be an appropriate amount of housing to plan for, this would already be exceeded by simply continuing with the strategy (and all allocated sites) in the currently adopted Local Plan. It is considered unreasonable to de-allocate a larger amount of strategic sites when there is evidence of delivery and longer term strategies for such locations that are already underway.

5. Appraisal of the draft Plan (and reasonable alternatives)

Introduction

- 5.1 For each reasonable alternative, an appraisal has been undertaken against the SA Framework.
- 5.2 In determining the significance of effects, professional judgement has been applied, being mindful of key effect characteristics including: *magnitude, likelihood, duration, time-frame and cumulative effects*. A range of information sources have been utilised to inform judgements:
- Geographical Information Systems data (which sets out a high level appraisal of each reasonable site options).
 - Inputs from technical studies.
 - Reference to the Scoping Report and first Interim SA Report.
- 5.3 Whilst every effort is taken to predict effects accurately, there is a degree of uncertainty that must be acknowledged given the strategic nature of the appraisal. In particular, the level of detail is less granular with regards to specific on site characteristics, so there is a reliance on higher level datasets (for example; the presence of designated environmental assets).
- 5.4 It is important to ensure a consistent comparison between the options. For this reason, the same high-level assumptions are made with regards to mitigation and enhancement. Rather than taking into account specific scheme details (which may be available for some locations and not others), the appraisal identifies the baseline situation for each site and how development could affect this.
- 5.5 This is not to say that such effects could not be different when mitigation and enhancement considerations are fully appreciated. In this respect, all of the options have been considered equally alongside the draft Plan policies within the Borough Plan Preferred Options consultation document.

Summary of effects

- 5.6 Table 5.1 below presents a visual summary of the appraisal findings for each of the reasonable alternatives. Following this is a discussion of the effects of each option and a brief comparison of how the options perform comparatively.
- 5.7 The full appraisal of each the proposed preferred options version of the Plan and the reasonable alternatives is provided in Appendix A.

Table 5.1: Summary of appraisal findings

SA Topic	1. Urban dispersal	2. Existing strategy	3a. Galley Common	3b. North Nuneaton	4. Further Dispersal	5a. Dispersal + Galley Common	5b. Dispersal + North Nuneaton
1. Economic factors	Light Green	Grey	Light Green	Yellow	Light Green	Yellow	Light Green
2. Social factors	Light Green	Yellow	Light Green	Yellow	Light Green	Light Green	Light Green
3. Biodiversity	Grey	Grey	Grey	Grey	Grey	Grey	Grey
4. Population and health	Light Green	Grey	Light Green	Yellow	Light Green	Light Green	Light Green
5. Soil	Light Green	Grey	Yellow	Yellow	Grey	Yellow	Yellow
6. Water	Light Green	Light Green	Light Green	?	Light Green	Light Green	?
7. Air quality	Grey	Grey	Yellow	Yellow	?	Yellow	Yellow
8. Climatic factors	Green	Green	Green	Green	Green	Green	Green
9. Material assets	Light Green	Grey	Grey	Grey	Grey	Yellow	Yellow
10. Cultural Heritage	Light Green	Grey	Grey	Grey	Light Green	Yellow	Light Green
11. Landscape	Light Green	Grey	Yellow	Yellow	Grey	Light Green	Yellow

Interpreting the significance of effects

Major positive	Green
Moderate positive	Light Green
Minor positive	Very Light Green
Neutral	Grey
Minor negative	Yellow
Moderate negative	Orange
Major negative	Red
Uncertainty	?

Discussion of options

- 5.8 Taking a 'business as usual' approach would involve continuing the existing strategy in the Adopted Local Plan. In most respects, this would have neutral effects because there would be little change. However, it could be negative in terms of housing as several of the strategic sites have not come forward readily. Positive effects would be expected to arise as a result of improvements to policies relating to natural resources (particularly water) and climate change.
- 5.9 Each of the other options would make slight changes to the existing spatial strategy. For option 1, an urban dispersal approach is taken and several sites in the adopted local plan would no longer be allocated. The effects of this are mixed. There are benefits in terms of housing, as a wider range of additional sites are proposed rather than strategic sites which are not showing signs of delivery. Several of these sites are brownfield and / or of a lower environmental quality than strategic sites they would 'substitute' and therefore the effects on landscape, soil and material assets would be minor positives. Similarly, the location of development is in locations that should support good access to services and help benefit areas in need of regeneration. Some negative effects could arise though in terms of cultural heritage and new communities being close to areas of poor air quality.
- 5.10 Rather than pursuing a dispersed approach to residual housing, the alternative would be to find strategic locations for growth. Two have been identified as reasonable options, and both perform very similar to one another. The main difference relates to landscape, as the Galley Common option is likely to lead to more significant negative effects given the sensitivity of land in this location.
- 5.11 Compared to the urban dispersal approach these two approaches both perform worse with regards to several sustainability factors. This includes landscape as previously mentioned, soil (given that greater amounts of greenfield land and agricultural land would be affected) and air quality given that these are out of town locations and would likely lead to greater car trips.
- 5.12 The two strategic location options are less likely to lead to negative effects in terms of cultural heritage compared to urban dispersal. They would also be likely to have positive effects on socio-economic factors, but the potential to have benefits for deprived communities is slightly less than an urban dispersal approach.
- 5.13 As the scale of growth increases under an urban dispersal approach (Option 4), the positive effects in relation to housing, economy and population rise from minor to moderate, reflecting an increased range of housing and supporting infrastructure and investment. Despite this increase in growth, the only additional negative effects are likely to arise in relation to air quality (due to an overall increase in car traffic that could arise in the urban areas near to AQMAs). Compared to a lower growth scenario, the effects in relation to soil and material assets are less positive given that there could be an increased amount of greenfield land involved.

5.14 Combining an urban dispersal approach with additional strategic locations for growth would also result in higher overall housing growth. As such, the positive effects for social and economic factors are also likely to increase accordingly. However, increased negative effects are predicted with regards to material assets associated with increased use of greenfield land and natural resources. The regeneration benefits in the urban areas would still arise under these approaches as they would involve an element of urban dispersal. However, compared to option 4, both options 5a and 5b are slightly less favourable in terms of several sustainability topics. This relates to the greenfield nature of strategic growth, and the poorer relationship with employment opportunities and existing infrastructure compared to Option 4.

6. Appraisal of reasonable site options

- 6.1 To help inform the appraisal of strategic options as well as to aid the decision making process with regards to site allocations, a range of reasonable site options were identified by the Council and have been tested through the SA process.
- 6.2 The methodology for determining potential effects is provided at Appendix B.
- 6.3 A Microsoft Excel spreadsheet has been prepared at this stage with information about each site and how they perform against the site appraisal criteria. The sheet is too large to display in a report and is more easily digested by interrogating the spreadsheet itself (which is Appendix C to this interim SA Report).
- 6.4 When the SA Report is prepared a proforma for each reasonable site option will be prepared.

7. The preferred approach

Summary of the preferred approach

- 7.1 At this stage, the Council has identified Option 1 (Urban Dispersal) as its preferred approach. The housing growth target is based on the interim findings of a housing and employment land study undertaken by Icen Projects, which uses an ‘alternative standard projection’.
- 7.2 In terms of distribution, the Council seeks to deliver a ‘brownfield first’ approach to make maximum use of underused or vacant sites within the urban areas before looking at countryside areas. No Green Belt sites are identified. This approach is consistent with national policy and accords with the vision and objectives for the Plan review.
- 7.3 The SA findings are broadly supportive of this approach, demonstrating that (compared to the alternatives) there would be fewer negative effects on landscape, soil and air quality, with more significant positive effects in terms of social factors and population.
- 7.4 In terms of other plan policies, the Plan has been strengthened with regards to several factors, notably; climate change, natural resource protection, biodiversity net gain, and design quality. This is reflected by the positive effects highlighted below in table 7.1.
- 7.5 The matrix below illustrates the overall effects of the preferred options Plan (i.e. the proposed allocations and any other amendments to the adopted Plan policies considered together). This corresponds to Option 1 discussed in section 5 and Appendix A.

Table 7.1: Summary of effects for the preferred options Local Plan

SA Topic	Overall effects	
1. Economic factors	Minor +ve effects	
2. Social factors	Moderate +ve effects	Minor -ve effects
3. Biodiversity	Neutral effects	
4. Population and human health	Moderate +ve effects	Minor -ve effects
5. Soil	Minor -ve effects	
6. Water	Minor +ve effects	
7. Air quality	Neutral effects	
8. Climatic factors	Major +ve effects ?	
9. Material assets	Minor +ve effects	
10. Cultural Heritage	Minor +ve effects	Minor -ve effects
11. Landscape	Minor +ve effects	

8. Recommendations

8.1 The Sustainability Appraisal (SA) of the Nuneaton and Bedworth Local Plan review has been an iterative process, in which proposals for mitigation and enhancement have been considered. A range of suggestions were made in the issues and options Interim SA Report which have not been repeated here.

8.2 At this stage, the following recommendations are made in the context of the preferred options version of the Plan. These seek to address the minor negative effects identified, as well as enhancing the positives.

- 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). It is acknowledged this may be difficult given the small scale of the sites involved, but perhaps community allotments or gardens could be introduced.
- Promote low emission zones in areas of poor air quality (AQMA's).
- The Plan could benefit climate change further by promoting car-free neighbourhoods in appropriate circumstances.
- 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. Development at ABB8 needs to ensure that it is of an appropriate height and does not dominate the townscape; a site specific policy would be useful in this respect.
- Identify and allocate / safeguard opportunity areas for nature recovery (in conjunction with nature recovery strategies).
- Consider introducing a policy clause that allows carbon offsetting where it is not possible to achieve the required carbon reductions on development sites directly.
- Require developments to demonstrate how the embodied carbon and resource use of materials and construction has been minimised.

9. Next steps

- 9.1 This report presents the outcomes of an interim step in the SA and plan-making process. The focus has been on identifying and appraising different alternatives for the preferred option draft Plan. The main point of difference for the alternatives relates to the delivery of housing, with policy changes being considered consistently in all other respects.
- 9.2 A full SA Report will be prepared to accompany the draft Plan. This will draw together all the SA outputs that have been prepared to date as well as discussing additional appraisal work that will be undertaken.
- 9.3 There may be a need to appraise further alternatives with regards to housing and employment strategy and site allocations. Factors that will be taken into account in this respect include changes / updates to evidence and consultation responses.
- 9.4 Comments on this Interim SA Report are welcomed, particularly in relation to the following elements:
 - Have the full range of reasonable alternatives been considered in relation to housing growth and distribution? If not, what further reasonable alternatives are there?
 - Is it appropriate to roll forward suitable strategic site allocations in the Adopted Plan as constant elements of the land supply position for each housing option? If not, why?
 - Should alternative strategies for employment growth be explored and if so what are these?
 - Is it appropriate to rely upon site options to support the choice of employment sites?
 - Should further alternatives be tested in relation to other plan issues (bearing in mind that a wide range of issues have already been explored at issues and options stage)?
 - Do the predicted effects for the preferred options Plan (and reasonable alternatives) seem reasonable and justified?
 - Are there any recommendations for mitigation and enhancement?

Appendix A: Appraisal of alternatives

SA Topic 1	Economic Factors	
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Option 1: Urban dispersal

The proposed approach focuses additional residential development in existing, well connected, urban areas close to employment opportunities and services, and is therefore likely to attract business investment and workforce to the area producing favourable effects on economic growth within the Borough. Some of the additional residential sites, such as EXH1 are in very close proximity to employment sites (EMP3) which is likely to make these locations attractive to both employers and workforce reducing the need to travel further afield to access employment opportunities.

In terms of residential and employment growth, the picture is similar to the adopted Plan. Several sites in the adopted plan have been 'de-allocated', which could mean that benefits in these locations for economic factors are no longer realised to the same extent. However, the additional sites identified for development in the Plan shift the emphasis to the inner urban areas, so benefits here (in areas in need of regeneration) would likely be greater.

The strategic employment allocations in the adopted Plan total 86.3 ha, none of which have been developed. Of these original allocations one site, EMP7, may now only deliver 5.3ha (of the original 26 ha planned) which leaves a total of 65.6 of the original site allocations still available for employment development. The evidence base produced for the Borough Plan Review indicates there is a need for an additional 65.6 ha of employment land up to 2041². Therefore, the strategic allocations in the adopted plan and are sufficient to deliver the recently assessed employment land need.

The additional employment site allocation at site ABB12 would contribute an additional 0.5 ha and sites ABB6, ABB7 and BAR1 would provide further mixed use (employment/ residential) land of just under 5.5 ha. These are centrally located with respect to employment opportunities and services. Furthermore, the mixed-use sites are likely to create housing and employment opportunities due to increased footfall and benefits provided by existing infrastructure and amenities. A portion of an existing employment allocation has been earmarked for housing, which means the amount of employment land is reduced in this location. However, overall, the Plan still identifies sufficient land to meet employment needs.

Policy BE3 (Sustainable design and construction) promotes placemaking and requires proposals to contribute to local distinctiveness and character of surrounding neighbourhoods. The policy seeks sustainable new commercial development requiring these to meet BREEAM 'very good standard' where feasible. This is likely to give businesses/ investors additional environmental credentials helping promote their image which is likely to attract investment into the area.

Several other plan policies will continue to contribute positive effects to economic factors such as those that promote accessibility, high quality environments and infrastructure provision. Amendments to the Adopted Plan that are likely to bring about additional benefits relate to an increased focus on climate change resilience (which is positive for economic activity in the longer

² Icenl, the 'Coventry and Warwickshire Housing and Economic Needs Assessment Employment Needs Paper' (January 2022)

term) and specific mention of the need to support overnight lorry parking (beneficial for distribution activities).

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 and overnight lorry parking that will have benefits for business activity.

Appraisal of reasonable alternatives

Option 2: Continuation of existing strategy

This approach would include the allocation of a large site for residential development at Bedworth Woodlands which is relatively close to the strategic employment sites south west of Bedworth with good access to the motorway network via the nearby A444. Therefore, this may help address some of accessibility (to employment sites) issues currently experienced in the Borough producing minor positive effects on employment. However, this approach would not produce the additional positive synergies created through the regeneration schemes and the mixed use developments within Nuneaton's town centre described above. The effects of development associated with strategic growth at the Woodlands and Bulkington East may also not arise in a timely manner if no schemes come forward in these locations despite being allocated in the Adopted Plan (as is currently the case). This could have negative connotations for economic factors by holding back housing growth. On balance, neutral effects are predicted.

Option 3: Strategic location focus

This option would include a large strategic residential development site at Galley Common to the north western boundary of the Borough on the border with North Warwickshire. This relatively distant from existing employment centres within the plan area and does not benefit from the same level of access to the motorway network as the rest of the Borough. Consequently, this site may potentially exacerbate the current poor accessibility issues associated with employment sites. However, it would offer employment opportunities in terms of construction and also through the creation of new services and local retail to serve new and existing communities. There would also be increased footfall in Galley Common, potentially boosting economic factors. This approach would not involve urban dispersal to the same extent as option 1 and thus lacks the positive effects associated with such allocations. On balance, a mix of **minor positive** and **minor negative effects** are likely with regards to economic factors.

Whilst the large scale growth proposed north of Nuneaton is relatively close to main centre within Nuneaton and enjoys relatively good access via the A5 and A444 to the rest of the Borough, it is fairly distant from the main strategic employment locations and therefore not optimal in terms of addressing some of the accessibility issues currently experienced with respect to employment sites. This approach would not involve urban dispersal to the same extent as option 1 and thus lacks the positive effects associated with such allocations. However, it will bring further growth into Nuneaton supporting further employment and investment in this area. These are minor positive effects. On balance, a mix of **minor positive** and **minor negative effects** are likely with regards to economic factors.

Option 4: Increased dispersal in the urban areas

The greater scale of growth proposed under this option would require the allocation of additional sites within the existing urban areas including at locations close to strategic employment sites (e.g. around the M6 to the South and at near Bermuda Park) and main (and local) centres within the Borough. Although this option could involve small sites (e.g. north west of the Borough) that are relatively remote from existing employment sites and the highway network, in the main the site options are well connected to the rest of the Borough and in close proximity to main centres of employment and services. The additional housing provision under this option is likely to create more housing options in the market including the provision of more affordable housing. This is likely to have positive effects on employment as it will help attract particularly younger workforce who may not otherwise be able to access housing. Additionally, this option also benefits from the central Nuneaton regeneration mixed use sites. Therefore, this option is likely to produce **moderately positive effects** overall.

Option 5: Dispersal plus strategic focus

This option (5a) includes the above discussed allocations for Option 1 plus a large strategic site at Galley Common. The latter is relatively remote from main centres of employment and services. That said, the additional growth and larger strategic site are likely to generate more housing options in the market including more affordable housing which will help attract workforce to the area. On balance this option is anticipated to engender mixed effects, **moderately positive** ones associated with the increased housing choice and all the benefits associated with the previous option, on the one hand, and **minor negative effects** due to the relative remoteness of the Galley Common site from existing employment and services, on the other.

Option 5b is likely to have similar effects to Option 3a, with the strategic growth and its associated effects centred on north Nuneaton. It would therefore be likely to result in **moderately positive** effects due increased housing choice and AH provision and **minor negative effects** due to the relative remoteness of the northern strategic sites from the main employment areas in the Borough.

Appraisal summary table (Economic Factors)

Strategic option	Approximate Scale of growth	Effects summary	
1) Proposed approach (dispersal)	646 dpa	Minor +ve	
2) Existing strategy rolled forward	660 dpa	Neutral	
3a) Strategic focus (Galley Common)	680 dpa	Minor +ve	Minor -ve
3b) Strategic focus (North of Nuneaton)	680 dpa	Minor +ve	Minor -ve
4) Increased dispersal in the urban areas	710 dpa	Moderate +ve	
5a) Dispersal plus strategic focus (Galley Common)	710 dpa	Moderate +ve	Minor -ve
5b) Dispersal plus strategic focus (North of Nuneaton)	710 dpa	Moderate +ve	Minor -ve

SA Topic 2	Social Factors	Minor -ve effects	Moderate +ve effects
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Option 1: Urban dispersal

The adopted Nuneaton and Bedworth Borough Plan (NBBP) provides over 14,000 new dwellings or 703 dpa over the adopted Plan period (2011-2031). The Council's Borough Plan monitoring report (2020/2021)³ shows that 4,243 net dwellings have been completed since start of the adopted Plan period (2011) which leaves a further 9,917 dwellings to be completed over the 10 years to 2031 which is around 992 dpa. The report states that there have been 601 completions during 2022/21 which indicates under delivery, though this may be partly attributable to the Covid-19 pandemic. In terms of affordable housing (AH) the report shows 20.6% of housing delivered in 2020/21 was AH (rented and ownership tenures) which 24% lower than the AH delivered in the previous year but when provision is considered over the past 5 year period, AH delivery is on an upward trend.

The additional sites proposed for allocation have relatively good access to local facilities, but a mixed performance in relation to public transport (Table 1). However, the majority of the sites are adjacent, or in close proximity to, larger site allocations (strategic and non-strategic sites in the adopted Plan) where economies of scale may facilitate improved local facilities and enhance public transport. Therefore, the additional growth concentrated in this area can potentially facilitate improved infrastructure, services and public transport through the economies of scale generated.

Table 1 Accessibility to facilities and public transport

Reference	Accessibility to Local Facilities	Public Transport
HEA-3	Green	Yellow
BAR-1	Green	Green
EXH-14	Green	Green
ABB-4	Green	Yellow
BED-6	Green	Yellow
ARB-1	Yellow	Green
ABB-5	Green	Green
KIN-2	Green	Yellow
EXH-1	Yellow	Red
ABB-7	Green	Green
ABB-8	Green	Green
ABB-6	Green	Green
ABB-2	Green	Yellow
GAL-7	Yellow	Yellow

Several sites have been proposed for 'de-allocation', including strategic sites at 'The Woodlands' and 'East of Bulkington'. Benefits in terms of social infrastructure would not be realised at the Woodlands (as per existing policy HSG4), meaning that a new local school, open space improvements and other facilities would not be delivered. Likewise, financial contributions associated with East of Bulkington (as per existing policy HSG7) would not arise. In terms of social outcomes, the effects are therefore less positive in respect of these two locations in particular. Conversely, some residents may have had amenity concerns and the omission of these sites would resolve these. On balance, negative effects are predicted though in terms of social outcomes. Piecemeal development is considered less likely to deliver the same benefits as strategic growth.

The Borough has the highest levels of deprivation across Warwickshire ranking 101st most deprived local authority district nationally (out of 317)⁴. In this context some of the additional allocations such

³ [Nuneaton & Bedworth Borough Council Borough Plan Monitoring report \(2020-2021\)](#)

⁴ Index of Multiple Deprivation (2019)

as KIN2, ABB6, ABB7 and ABB8, fall within the 10% most deprived neighbourhoods in the country) are likely to engender positive effects. The allocations will provide residents with more housing options including more affordable tenures with positive knock on effects on health and employment leading to improved living conditions and incomes.

Policy H2 (Affordable housing) is likely to have favourable effects as it seeks 25% AH on plots of 15 or more dwellings or 2 units on schemes of 10-14 dwellings split 26% intermediate tenures to 74% social/affordable rents. The provision is required on site of development. Policy HS2 (Strategic accessibility and sustainable transport) requires development to ensure adequate accessibility to all principal modes of transport and be well connected to strategic facilities and maximise sustainable transport achieving a 15% minimum modal shift.

A range of plan policies will continue to have benefits with regards to social factors, particularly those that support high quality design, environmental enhancements, retention and improvement of community facilities. In terms of amendments, the main benefits are likely to arise in relation to climate change resilience (which ought to have knock on benefits in terms of 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 improve 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.

Appraisal of reasonable alternatives

There are common elements to each of the strategic options, which are not the focus of the appraisal at this stage. However, each option is treated in the same way with regards to how existing and newly drafted Plan policies would apply.

Option 2: Continuation of existing strategy

Under this approach, neutral effects would be expected alongside some minor negative effects. No additional site options would be necessary, and the sites that are currently adopted would continue to be supported. The majority of sites are functionally connected to the built-up areas of the Borough, ensuring accessibility and greater opportunities to reduce deprivation through access to a higher density of jobs, amenities and services. That said, where some sites have not looked likely to come forward for housing over the current plan period, future housing delivery may be restricted by the potential for sites to continue to be allocated despite deliverability concerns, potentially leading to the aforementioned negative effects.

Option 3: Strategic location focus

Strategic growth at Galley Common would be likely to direct growth away from some current allocations, pulling development and its associated infrastructures from more deprived areas (largely within Nuneaton and Bedworth's built-up areas) and directing it to an area which is less deprived (Galley Common). That said, this area of strategic growth may still provide some benefits to surrounding pockets of deprivation, especially to the south of the railway line. The large growth would be likely to improve the accessibility of the area, through increased provisions of shops and services as well as improved sustainable travel options linked to the development. In relation to housing, whilst a large strategic site may offer some concerns relating to deliverability and locational choice, this would be expected to be of a similar magnitude to the concerns relating to a lack of historic delivery on existing allocations. A large site may offer the opportunity to improve design led solutions to crime and disadvantaged communities, such as green and open space and recreation facilities. Overall, mixed **minor positive** and **minor negative** effects are likely.

Strategic growth to the north of Nuneaton would be expected to see effects aligned with those set out under Option 3a (strategic growth at Galley Common). As such, mixed **minor positive** and **minor negative** effects are likely.

Option 4: Increased dispersal in the urban areas

At an increased scale of growth, there is a range of additional sites within the existing urban areas that could be allocated (compared to option 1). This approach would be unlikely to divert growth away from more deprived areas as the site options include an array of sites within more deprived areas. Housing delivery could see an increase in viability due to the potential to replace sites which may have deliverability concerns with sites which may offer a more feasible site to develop. Most sites options are within the built-up area and hence would benefit from local shops and services in some instances, as well as there being an increased potential to allocate sites nearby to public transport access nodes. That said, this option would be less likely to offer focused sustainable transport routes or services, due to the more dispersed nature of potential allocations. In terms of design, including open space provision and measures to improve safety (including crime), this option would be unlikely to deliver large scale improvements, though the anticipated delivery would be likely to be broadly aligned with that which would occur as part of the existing plan. Overall, **moderate positive effects** are predicted as the scale of growth would allow for greater flexibility in meeting housing needs. Whilst the potential for strategic infrastructure to be secured as part of large scale development would be more limited, the spread of growth across the urban areas should ensure that new development is well located in terms of services and could benefit deprived communities.

Option 5: Dispersal plus strategic focus

A strategic focus of growth to the west of Galley Common alongside the sites (and associated effects) which are seen under Option One would be anticipated to deliver an increase in accessibility for the area and its surrounding communities, this would be expected to be realised through the delivery of new and improved sustainable transport options as well as an increase in local employment, shops and services. The site would be likely to deliver recreational facilities and a high standard of design which may improve place-making and potentially help to deter crime. The uplift in housing delivery would be beneficial for the Borough, with the diversified selection of sites offsetting potential delivery risks which can be associated with strategic growth. Whilst the strategic growth would not be in an area of especially heightened deprivation, the smaller sites within the existing built-up area would help to provide more affordable housing which may alleviate some potential housing pressures. Overall, this approach would be likely to offset some of the potential negative effects seen under

Option 3a and provide more positive effects which are associated with Option 3a. It would therefore be likely to result in moderate positive effects.

Option 5b would largely mimic that set out under Option 5a, though with the strategic growth and its associated effects concentrated towards the north of Nuneaton. Overall, this would be likely to result in moderate positive effects.

Appraisal summary table (Social Factors)

Strategic option	Approximate Scale of growth	Effects summary	
1) Proposed approach (dispersal)	646 dpa	Mod +ve	Minor -ve
2) Existing strategy rolled forward	660 dpa	Neutral	Minor -ve
3a) Strategic focus (Galley Common)	680 dpa	Minor +ve	Minor -ve
3b) Strategic focus (North of Nuneaton)	680 dpa	Minor +ve	Minor -ve
4) Increased dispersal in the urban areas	710 dpa	Moderate +ve	
5a) Dispersal plus strategic focus (Galley Common)	710 dpa	Moderate +ve	
5b) Dispersal plus strategic focus (North of Nuneaton)	710 dpa	Moderate +ve	

SA Topic 3	Biodiversity	Neutral
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Option 1: Urban dispersal

The Borough supports a range of species and habitats. In terms of designated biodiversity sites; there is one European site (Ensor's Pool Special Area of Conservation SAC), two Sites of Special Scientific Interest (SSSI) (Ensor's Pool and Griff Hill Quarry) and three Local Nature Reserves (LNR) (Galley Common, Ensor's Pool and Bedworth Sloughs). Generally, the proposed residential sites are not predicted to give rise to significant effects on the above sites with the exception of the residential development site at Kingswood recreation ground and Kingswood Rd. (KIN2) which are adjacent to Galley Common LNR. The latter represents an easily accessible natural area noted as being particularly beneficial for education⁵. The proposed housing sites in this location are adjacent to the LNR which may produce additional disturbance pressures on ecology within the LNR. Similarly, site BAR-1 (mixed residential / employment) is over 1km from Ensor's Pool LNR and separated from it by existing development and roads and therefore not anticipated to produce significant effects on the LNR.

In terms of employment sites, site WEM3 is around 1km away from the Ensor's Pool LNR, however this 3.5 ha employment site (on Coventry Rd.) is separated from the LNR by the railway line, the A444 and existing development therefore there are no direct pathways for the proposed site to impact the LNR. Similarly, the employment sites EHX13 and EMP2 are not expected to have direct impacts on the Bedworth Slough's LNR as they are 3km and 2km away, respectively, and separated by major highways and existing development.

There are several tree preservation orders in the vicinity of proposed residential, mixed and employment sites (BAR-1, EXH14, BED-4, NUN263 and ABB-7) whilst these are protected through the TPO, insensitive design can reduce the amenity value of such trees and /or harm them.

There are also some local features such as trees, hedgerows and watercourses where development sites could lead to some disturbance. For example:

- GAL7 is adjacent to a 'destination park', and contains habitat on the edge of the site boundary associated with Bar Pool Brook. There are no designated habitats, but there is potential for some minor negative effects in terms of increased disturbance from residential development.
- POP2 is a canal side environment, which contains some vegetation, but is generally not considered to be of high value for biodiversity. Sensitive development is therefore unlikely to have a significant effect.

The proposed approach no longer involves development on several strategic sites within the current adopted plan (i.e. East of Bulkington and Woodlands). These sites are both greenfield and contain local features such as hedgerows, trees and water courses. The Woodlands site also included and was adjacent to Local Wildlife sites. No longer developing these areas is therefore likely to lead to less negative effects compared to the adopted local plan.

In terms of the Borough Plan Review policies; NE3 (Biodiversity and geodiversity) seeks to conserve ecological networks and services including locally designated biodiversity sites. Where adverse impacts are likely, a mitigation strategy to halt and reverse biodiversity loss and achieve a minimum 10% net gains, would be required. DS1 (Presumption in favour of suitable development) supports

⁵ TEP report: Nuneaton and Bedworth Landscape Character Assessment

environmental protection, the planting of trees and orchards. Policy DS3 (Development principles) requires all new development to be sustainable and to provide environmental mitigation and enhancement. The policy includes reference to the ten characteristics of the National Design Guide which includes the requirement to: prioritise nature so that diverse ecosystems can flourish and to support and enhance biodiversity (Nature enhanced and optimised characteristic).

Policy HS2 (Strategic accessibility and sustainable transport) addresses the transport implications of new development, requiring these demonstrate suitable demand management measures, maximise connectivity to strategic facilities and maximise sustainable transport options including walking and cycling. The policy sets a target of 15% (minimum) modal shift to non-car uses. Policy BE3 (Sustainable design and construction) requires development proposals to include the provision of trees and promote sustainable transport.

When considered on their own the new site allocations are not expected to give rise to significant effects on biodiversity. However, given the cumulative growth proposed at strategic level, negative effects are possible in terms of disturbance to local wildlife. The effects will likely be moderated by borough plan preferred options 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**. 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.

Appraisal of reasonable alternatives

There are common elements to each of the strategic options, which are not the focus of the appraisal at this stage. However, each option is treated in the same way with regards to how existing and newly drafted Plan policies would apply.

Option 2: Continuation of existing strategy

Under this approach, **neutral effects** would be expected. No additional site options would be necessary, and the sites that are currently adopted would continue to be supported. There are no major biodiversity constraints on these sites. Taking account of the Plan policies, the position in the longer term could be positive if net gains are achieved.

Option 3: Strategic location focus

Further strategic growth to the north of Nuneaton is not within close proximity to any designated habitats, but there are parcels of priority habitat scattered nearby that could potentially be negatively affected. Effects would be anticipated to be minor though and given the strategic nature of development should be possible to avoid entirely. As such, neutral effects are predicted overall. As per the other options, when taking plan policies into account, the longer term effects could be positive if net gain is achieved.

Strategic growth at Galley Common would not be likely to have direct effects on designated wildlife habitats as there are none adjacent to the site or with notable pollution pathways. However, there are swathes of land in this location that are currently under countryside agreements, which often include measures to manage biodiversity. There is a presumption that with development any biodiversity value could be adversely affected. However, the strategic nature of development should enable sensitive areas to be avoided and for new green infrastructure to be introduced. As such,

neutral effects are predicted overall. As per the other options, when taking plan policies into account, the longer term effects could be positive if net gain is achieved.

Option 4: Increased dispersal in the urban areas

At an increased scale of growth, there is a range of additional sites within the existing urban areas that could be allocated (compared to option 1). Broadly speaking, there are sufficient sites with limited biodiversity sensitivities to allow for a higher scale of growth to be accommodated whilst still not giving rise to significant negative effects. As such, neutral effects are predicted for option 4.

Option 5: Dispersal plus strategic focus

The addition of a strategic location to dispersed growth in the urban areas is predicted to have neutral effects for both North of Nuneaton and Galley Common locations. Individually, none of the sites or broad locations are significantly constrained with regards to biodiversity, and cumulatively the effects would not be considered to lead to negative effects on the overall condition of biodiversity across the Plan area. As such neutral effects are predicted for 5a and 5b.

Appraisal summary table (Biodiversity)

Strategic option	Approximate Scale of growth	Effects summary
1) Proposed approach (dispersal)	646 dpa	Neutral
2) Existing strategy rolled forward	660 dpa	Neutral
3a) Strategic focus (Galley Common)	680 dpa	Neutral
3b) Strategic focus (North of Nuneaton)	680 dpa	Neutral
4) Increased dispersal in the urban areas	710 dpa	Neutral
5a) Dispersal plus strategic focus (Galley Common)	710 dpa	Neutral
5b) Dispersal plus strategic focus (North of Nuneaton)	710 dpa	Neutral

The additional sites proposed for growth are broadly located in areas that are not constrained by biodiversity designations or the presence of important habitats. Alternative options whether these be sites or strategic locations are also not overly sensitive and for all of the locations, it ought to be possible to avoid negative effects, apply mitigation and achieve net gain. This remains the case if the overall scale of growth increases, as cumulatively the effects are not thought likely to be significant. Therefore, for all options neutral effects are predicted. This also takes account of the existing plan policies and proposed amendments, which would continue to help guide development. In the longer term, for all options positive effects should arise if net gain is achieved, with perhaps greater potential to achieve this at strategic locations.

Option 1: Urban dispersal

Nuneaton and Bedworth has the highest levels of deprivation across Warwickshire, ranking 101st most deprived local authority district⁶ nationally (out of 317). Several of the additional residential site allocations (KIN2, ABB6, ABB7 and ABB8) fall within deprived areas (amongst the 10% most deprived in the country). Allocating new dwellings here has the potential to provide additional affordable housing that is accessible and well located with respect to services, education and employment opportunities. Residents in deprived areas can often be prevented from accessing suitable housing options so providing additional well designed housing in such locations can provide residents with more housing options including more affordable tenures with positive knock on effects on health and employment leading to improved living conditions and incomes.

With regards to accessibility, all of the sites with the exception of ARB, EXH1 and GAL7 are within close proximity to a range of services and facilities. This should enable and encourage active modes of travel, which are positive in terms of health and wellbeing. Plan policies seeking provision of accessible cycle routes, footways and on-site bus infrastructure and allocating sites for mixed residential and employment uses should also help in this respect.

Several additional proposed sites are intercepted by PRowS (KIN-2, EXH-1, ABB2, GAL-7) which could potentially lead to the paths being lost or changed beyond recognition. This is likely to adversely impact activities such as walking, cycling and horse riding unless specific measures are taken to retain or create new PRowS. In this respect, policy DS3 could be helpful as it requires new development to comply with Building for a Healthy Life principles which promote the integration of walking, cycling, public transport, and green and blue infrastructure into new development leading to beneficial effects on physical and mental wellbeing.

However, this is addressed in Policy SA1 (development principles on strategic sites) which seeks to protect existing PRowS stating that these should be incorporated into new development wherever possible. The policy also promotes accessible new community, sport, physical activity and play facilities. This doesn't apply to newly allocated sites, and it is recommended that it is.

Policies H1 (Range and mix of housing) and H2 (Affordable housing) seek to provide an appropriate mix of housing types, sizes and tenures (including intermediate tenures and social/ affordable rents) to meet assessed needs over the Plan period. This is to include housing suited for older people such as, extra care and residential care homes. These would be required to comply with accessibility standards; M4(3) building regulations or higher. The policy is predicted to have positive effects on health and wellbeing as it is likely to allow residents to continue living near to their current homes, friends and family and to lead more independent lives for longer.

Policy BE3 (Sustainable design and construction) seeks to provide safe, inclusive, accessible and healthy environments for all through placemaking strategies and adherence to the National Model Design Codes' ten characteristics. The latter promote attractive/ distinctive and accessible design, safe, social and inclusive public spaces and healthy, functional homes.

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

⁶ [Indices of deprivation 2019](#)

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, some of the additional sites could affect Public Rights of Way, there is some loss of open space, and some development is proposed in close proximity to AQMAs. These could all lead to negative effects, but taking plan policies into account there is potential for these to be mitigated. As such, only **minor negative effects** are predicted overall.

Appraisal of reasonable alternatives

Option 2: Continuation of existing strategy

Under this approach, no additional site options would be necessary, and the sites that are currently in the adopted plan would continue to be supported. The majority of sites are functionally connected to the built-up areas of the Borough, providing opportunities to reduce deprivation through better access to jobs, amenities and services. However, this option does not include the regeneration sites in Nuneaton's town centre which is within the 10% most deprived areas in the country. Therefore, this option will not realise the benefits that could otherwise be achieved from some of the areas that are in the most need for investment and regeneration. Consequently, **neutral effects** are likely as a result.

Option 3: Strategic location focus

This option directs growth to a strategic location at Galley Common, which is amongst the 30% least deprived neighbourhoods in the country. Whilst the large scale of development could potentially produce more affordable housing and local services it could divert investment away from more deprived areas of the Borough. It is also relatively remote from the main centres of employment and services and therefore less likely to facilitate improved access to jobs and services (though some local facilities would be expected to be secured). This approach would not involve urban dispersal to the same extent as Option 1 and thus lacks the positive effects associated with such allocations. Several public rights of way could also be severed or adversely affected as a result of development in this location, as well as there being a loss of greenspace. Overall, mixed effects are predicted. There ought to be some **minor positives** relating to new development and accompanying services. However, there would be a loss of greenspace, PROWs and accessibility to services might not be ideal. As such **minor negative effects** are predicted.

Under option 3b, strategic growth is proposed north of Nuneaton. This location broadly sits within the 30% and 10% least deprived areas nationally and therefore is less likely to address deprivation issues currently experienced within the Borough. Again, these sites are likely to facilitate more affordable housing due to the larger scale but they are relatively distant from the main strategic employment locations. Several public rights of way and greenspace could also be severed or adversely affected as a result of development in this location. Overall, **minor negative effects** are likely as this option could divert investment away from the most deprived areas and is less likely to provide improved access to the main employment sites. There ought to be some **minor positives** relating to new development and accompanying services.

Option 4: Increased dispersal in the urban areas

This option includes development within the most deprived areas of the Borough (amongst the 10 – 20% most deprived in the country) such as at central Nuneaton. The majority of allocated sites are

well connected to the rest of the Borough and in close proximity to main centres of employment and services. The additional housing provision under this option is likely to create more housing choice in the market including the provision of affordable housing. Therefore, moderate positive effects are predicted as the development will include investment in the most deprived areas of the Borough, improving access to jobs and services and the additional growth will generate improved/ new infrastructure and produce more housing choice including affordable homes. Given the dispersed nature of growth within the urban areas, the effects on greenspace, PROWs and the capacity of healthcare services ought not to be an issue. However, the opportunity to secure strategic improvements may also be more limited.

Option 5: Dispersal plus strategic focus

This option (5a) would still produce the same positive effects discussed for the previous option as it would include development in the most deprived areas of the Borough. The substantial additional site at Galley Common is not within a deprived area (amongst the 30% least deprived) but the large site is likely to produce more affordable housing, new infrastructure and community benefits. On balance this option is anticipated to engender moderate positive effects due to the investment in deprived areas and higher growth likely to produce more affordable housing and community benefits such as green space and enhanced healthcare provision.

Option 5b is likely to have similar effects to 5a, with two large strategic sites at the northern boundary of the borough. Though the effects are broadly similar this option is slightly preferable as the strategic sites allocated are less remote than in 5a with better access to central Nuneaton and the main highways network but overall are expected to be on par with option 5a namely moderately positive overall.

Appraisal summary table (Population and Human Health)

Strategic option	Approximate Scale of growth	Effects summary	
1) Proposed approach (dispersal)	646 dpa	Moderate +ve	Minor -ve
2) Existing strategy rolled forward	660 dpa	Neutral	
3a) Strategic focus (Galley Common)	680 dpa	Minor +ve	Minor -ve
3b) Strategic focus (North of Nuneaton)	680 dpa	Minor +ve	Minor -ve
4) Increased dispersal in the urban areas	710 dpa	Moderate +ve	
5a) Dispersal plus strategic focus (Galley Common)	710 dpa	Moderate +ve	
5b) Dispersal plus strategic focus (North of Nuneaton)	710 dpa	Moderate +ve	

SA Topic 5	Soil	Minor negative effects
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Option 1: Urban dispersal

In addition to sites that are currently allocated in the existing local plan, an additional range of sites are proposed, which cover a mix of greenfield and brownfield sites. Sites GAL7, EXH3 and BED6 include less than 10ha of Grade 3 agricultural land in total, some of this potentially includes Grade 3a, best and most versatile (BVM) agricultural land. Developing these sites would have negative effects, through a direct loss of soil resources. This could include good quality (BVM) agricultural land if the Grade 3 areas are found to be Grade 3a (rather than 3b).

Conversely, positive effects are predicted through the remediation of sites with potential contamination issues such as BED6, ABB6-8, STN1 and ARB3.

Furthermore, strategic sites 'the Woodlands' and 'East of Bulkington' are proposed to be de-allocated, which reduces the likely loss of soil resources that would have occurred here (approximately 40ha of grade 3 land).

Policy DS3 is likely to have favourable effects on preserving BVM agricultural land as it prioritises previously developed and underutilised land for new development. The policy also limits development outside settlement boundaries to agricultural, forestry and leisure uses.

In conclusion, the allocation of greenfield sites (strategic and non-strategic) comprising BVM agricultural land will have very small negative effects on soil resources. However, in the context of the quantity and quality of soil resources across the authority and in the surrounding areas, the effects are not considered to be significant. This is helped by the de-allocation of several sites that also contain agricultural land and would mean that the residual position is one of less soil resources being affected. Furthermore, there are several plan policies that prioritise previously developed land, including the remediation of potentially contaminated sites. Consequently, **minor 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). It is acknowledged this may be difficult given the small scale of the sites involved, but perhaps community allotments or gardens could be introduced.

Appraisal of reasonable alternatives

There are common elements to each of the strategic options, which are not the focus of the appraisal at this stage. However, each option is treated in the same way with regards to how existing and newly drafted Plan policies would apply.

Option 2: Continuation of existing strategy

Neutral effects are predicted as the situation would likely remain the same with regards to a loss of agricultural land at allocated strategic sites in particular. There is an element of uncertainty given that development in these locations has not been forthcoming (i.e. this could lead to speculative development elsewhere on higher grades of agricultural land).

Option 3: Strategic location focus

Opportunity areas near to Galley Common are classified as Grade 3 agricultural land, but it is unclear whether this is Grade 3a or 3b. Nevertheless, a loss of greenfield land would arise as a result of this strategy, some of which could be of a higher grade than land at 'The Woodlands'. Therefore, potential minor negative effects are predicted.

Additional growth to the north of Nuneaton would overlap with areas of Grade 3 land. More granular surveys have been undertaken in parts of this location suggesting that much of the land is Grade 3b. However, there are parcels of Grade 3a and Grade 2 land that could also be affected. If growth in this location was proposed to 'replace' needs that would not be met at allocated sites in the current adopted Plan, then minor negative effects would arise (given that the land appears to be of a slightly higher quality).

Option 4: Increased dispersal in the urban areas

With increased dispersal it is more likely that additional greenfield sites would be required within and on the periphery of the urban area. This could lead to some minor negative effects with regards to soil and land resources. However, several sites in the urban area do not consist of agricultural land and so the extent of effects could be limited despite additional growth. In this respect, neutral effects are predicted (particularly when factoring in that soil resources on de-allocated sites would be 'protected').

Option 5: Dispersal plus strategic focus

Dispersal on sites in the urban area would have some positive effects as discussed for Option 1. However, the addition of a strategic location for growth whether this be at Galley Common or North of Nuneaton would lead to a slight increase in the amount of soil resources lost to development. Therefore, minor negative effects are predicted.

Appraisal summary table (Soil)

Strategic option	Approximate Scale of growth	Effects summary
1) Proposed approach (dispersal)	646 dpa	Minor positive
2) Existing strategy rolled forward	660 dpa	Neutral ?
3a) Strategic focus (Galley Common)	680 dpa	Minor negative
3b) Strategic focus (North of Nuneaton)	680 dpa	Minor negative
4) Increased dispersal in the urban areas	710 dpa	Neutral ?
5a) Dispersal plus strategic focus (Galley Common)	710 dpa	Minor negative
5b) Dispersal plus strategic focus (North of Nuneaton)	710 dpa	Minor negative

SA Topic 6	Water	Minor positive effects
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Option 1: Urban dispersal

The majority of new proposed sites are in areas of low flood risk (Flood Zone 1) and therefore the potential for pollution issues associated with flooding are considered to be limited in this respect. Where sites are within flood zones 2 and 3 (for example ABB7, ABB6) the potential for pollution is higher, but several plan policies should help to mitigate negative effects. This includes policies that seek to improve resilience to climate change and to implement green infrastructure (i.e. policies DS1, DS3, SA1 and BE3). Policy NE4 will also be important as it requires the incorporation of sustainable drainage (SuDS) systems to manage surface water run-off, and there are likely to be knock on benefits with regards to water quality. On balance, neutral effects are predicted.

None of the proposed additional sites fall within groundwater source protection zones, and therefore in this respect, neutral effects are predicted in terms of water quality. Likewise, development at such sites is considered unlikely to lead to direct pollutant run-off into watercourses (the majority of sites are distant from watercourses).

In terms of wastewater treatment, the location of newly identified sites in the urban area in a dispersed manner (and the relatively low total amount of new homes) should mean that existing facilities can accommodate growth without negative effects on water quality. The dwellings per annum in the preferred options plan is actually lower than the current adopted Plan, and so in this respect there ought to be limited pressures on wastewater infrastructure as a result of the Plan review.

Policy BE3 is likely to have minor positive effects in terms of conserving water resources as it calls for development to include rainwater harvesting and to maximise water efficiency so that it meets the higher standard for buildings regulations with regards to water efficiency (110 litres/person per day).

Overall, the preferred options draft 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.

Appraisal of reasonable alternatives

There are common elements to each of the strategic options, which are not the focus of the appraisal at this stage. However, each option is treated in the same way with regards to how existing and newly drafted Plan policies would apply.

Option 2: Continuation of existing strategy

Overall, this option is predicted to have mostly neutral effects with regards to water quality and flood risk (given that no changes to site allocations are proposed), but some improvements in policy requirements relating to water efficiency mean that **minor positive effects** could arise in the longer term.

Option 3: Strategic location focus

Further strategic growth to the north of Nuneaton could be accommodated within areas classed as flood zone 1. However, there are parts of this location that are intersected by flood zones 2/3. It would be expected that such areas could be avoided as well as measures taken to secure sustainable

drainage. However, the potential for negative effects is slightly higher compared to the Galley Common location. This brings some uncertainty. As with any of the options, greater requirements in relation to natural resources should lead to **minor positive effects** in the longer term in terms of water use and quality.

Strategic growth at Galley Common would fall within areas at risk of flood zone 1. Development would be expected to implement sustainable urban drainage systems and in line with plan policies would need to secure sufficient utilities infrastructure and avoid water pollution. In this respect, neutral effects on water quality are expected. As with any of the options, greater requirements in relation to natural resources should lead to **minor positive effects** in the longer term.

Option 4: Increased dispersal in the urban areas

At an increased scale of growth, there is a range of additional sites within the existing urban areas that could be allocated (compared to Option 1). Broadly speaking, there are sufficient sites in flood zones 1 that allow for a higher scale of growth to be accommodated. The overall scale and dispersal of growth is also considered unlikely to put undue pressure on water treatment facilities. As such, neutral effects are predicted for option 4 in this respect. Some improvements in policy requirements relating to water efficiency mean that **minor positive effects** could arise in the longer term.

Option 5: Dispersal plus strategic focus

The addition of a strategic location to dispersed growth in the urban areas is unlikely to lead to significant effects with regards to water quality, flood risk or water use.

As per all the other options, plan policies ought to mean that development performs better in respect of natural resources including water usage. These are **minor positive effects**.

Appraisal summary table (Water)

Strategic option	Approximate Scale of growth	Effects summary
1) Proposed approach (dispersal)	646 dpa	
2) Existing strategy rolled forward	660 dpa	
3a) Strategic focus (Galley Common)	680 dpa	
3b) Strategic focus (North of Nuneaton)	680 dpa	?
4) Increased dispersal in the urban areas	710 dpa	
5a) Dispersal plus strategic focus (Galley Common)	710 dpa	
5b) Dispersal plus strategic focus (North of Nuneaton)	710 dpa	?

SA Topic 7	Air	Neutral effect
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Option 1: Urban dispersal

The majority of growth proposed in the Plan is already committed or allocated in the adopted Plan. Therefore, additional effects in terms of air quality are not likely to be major given the spread of new development proposed. Furthermore, the majority of new homes will be well located with regards to public transport. Given that the majority of sites are also within the urban areas, this should enable and encourage active forms of travel such as walking and cycling. The level of car trips associated with new development in the urban areas of Nuneaton are therefore considered unlikely to lead to significant effects on air quality. However, some residential development will be in relatively close proximity to existing areas of poor air quality, and could contribute additional pressures as well as exposing residents to poor air quality.

The Borough has two air quality management areas (AQMA) these are located at Leicester Rd. Gyrotory and at Central Avenue/ Midland Rd. in Nuneaton. Site ABB6 is adjacent to the Central Av./ Midland Rd. AQMA and Site ABB8 is 240 m respectively from the Leicester Rd. Gyrotory AQMA and therefore potentially negative effects are likely in terms of additional pressures.

Several Plan policies should help to mitigate negative effects with regards to air quality.

DS3 (development principles) is likely to have favourable impacts on air quality as it requires all development to be sustainable and contribute to net zero carbon emissions targets. The policy limits development in more remote locations (outside settlement boundaries) to agricultural, forestry and leisure uses which should help ensure residential development is confined to accessible locations close to services and employment.

Similarly, policy SA1 (development principles on strategic sites) is positive as it encourages sustainable travel such as walking and cycling by promoting the integration of public rights of way, pedestrian and cycle links into green/open space networks and the wider area and the provision of cycle parking.

Policy HS1 (Ensuring the delivery of infrastructure) promotes the provision of infrastructure to address new development needs. Whilst the policy requires development to demonstrate how it addresses carbon neutral emissions by 2050 it also supports provision of overnight lorry parking therefore it's likely to produce mixed effects (positive and negative).

Policy H2 (Strategic accessibility and sustainable transport) is positive as it requires development proposals to address accessibility to all modes of transport to drive carbon neutrality, demand management measures, provision of EV charging points, connectivity and maximisation of sustainable transport options. Proposals are required to target 15% modal shift to non-car based travel as a minimum. Similarly, policy BE3 (sustainable design and construction) promotes sustainable transport.

Policy HS2 addresses issues such as air quality requiring proposals to consider cumulative impacts and ensure they do not exacerbate air quality issues including measures such as EV charging points and dust management plans. The policy calls for maximising sustainable transport, setting a modal shift target of 15% as a minimum.

A range of policies that seek to improve the natural environment and green infrastructure are also likely to be beneficial in terms of air quality as green infrastructure can help to mitigate air pollution and to encourage sustainable travel.

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 proposed preferred options version (compared to the existing Adopted Plan). Therefore, it is considered likely that efforts to address air quality will be enhanced 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.

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. Any negative effects are also likely to be counteracted by the spatial strategy which focuses residential and employment growth within existing urban areas and 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 (AQMA) and car free developments in such areas where feasible.

Appraisal of reasonable alternatives

Option 2: Continuation of existing strategy

Under this approach, **neutral effects** would be expected as most of the proposed growth is already allocated in the adopted Plan making additional significant effects in terms of air quality unlikely. Furthermore, focussing growth within the urban areas, should facilitate active forms of travel such as walking and cycling. Therefore, the level of car trips associated with new development in the urban areas of Nuneaton are unlikely to lead to significant effects on air quality. However, some residential development will be in relatively close proximity to existing areas of poor air quality, and could contribute additional pressures as well as exposing residents to poor air quality but the magnitude of effects is likely to be limited though given the mitigation measures in Plan policies such as HS2.

Option 3: Strategic location focus

Further strategic growth to the north west of Nuneaton is likely to lead to increased car journeys due to the relative remoteness of the site from main locations of employment and services. Development could also add more car trips to routes into Nuneaton with a possibility of increased congestion through the AQMA within central Nuneaton.

However, some of the adverse effects will be offset by the scale of development which would provide more scope for integrating sustainable transport infrastructure (walkways and cycleways) and may produce the economies of scale required to produce enhanced public transport services. As such, minor **negative effects** are predicted overall.

The strategic growth sites north of Nuneaton benefit from a better location than the Galley Common site in the previous option. These have good access to the highway network and relatively close to the major employment and services provision within central Nuneaton. The large scale of the sites would produce the same benefits highlighted in the previous option. However, the sites are relatively remote from the main employment areas south of the Borough which is likely to result in more car journeys to access employment. This leaves residual **minor negative** effects overall, but the likelihood of journeys into Nuneaton (where AQMA exist) itself are likely to be lower compared to strategic growth north of Nuneaton (reducing the likelihood of such effects).

Option 4: Increased dispersal in the urban areas

Increased growth is more likely to lead to increased car journeys, though this is not likely to be significant. The effects would be offset to an extent by the focusing of growth within urban areas of the Borough thus benefiting from existing infrastructure and services. However, an increased scale of growth could possibly lead to increased development near to or within AQMAs, which gives rise to uncertain minor negative effects.

Option 5: Dispersal plus strategic focus

Dispersal on sites in the urban area would have some positive effects as discussed for the previous option. However, the additional strategic allocation at Galley Common (option 3a) is likely to lead to increased car journeys due to the relative remoteness of the site. This will be partially offset by the scale of the strategic site which is likely to produce new/ enhanced sustainable transport, resulting in minor negative residual effects.

Whilst the strategic sites North of Nuneaton are better located with respect to Nuneaton's town centre than the Galley Common site, they are still relatively distant from the main centres of employment south of the Borough and could also put additional pressure on AQMAs in Nuneaton itself. However, this is counterbalanced by the size of the sites which would be likely to lead to more investment in integrated sustainable transport infrastructure. As such, minor negative effects are predicted overall.

Appraisal summary table (Air Quality)

Strategic option	Approximate Scale of growth	Effects summary
1) Proposed approach (dispersal)	646 dpa	Neutral
2) Existing strategy rolled forward	660 dpa	Neutral
3a) Strategic focus (Galley Common)	680 dpa	Minor -ve
3b) Strategic focus (North of Nuneaton)	680 dpa	Minor -ve
4) Increased dispersal in the urban areas	710 dpa	Minor -ve [?]
5a) Dispersal plus strategic focus (Galley Common)	710 dpa	Minor -ve
5b) Dispersal plus strategic focus (North Nuneaton)	710 dpa	Minor -ve

SA Topic 8	Climatic Factors	Major +ve effect ?
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Option 1: Urban dispersal

New housing growth is allocated in mostly well located sites within existing built up areas with good access to public transport, employment and services. This should facilitate public transport usage, walking and cycling engendering positive effects on climate change mitigation as it serves to reduce the number and duration of car journeys and facilitates modal shift.

With regards to emissions from the built environment, the additional sites allocated in the Plan are unlikely to present opportunities for district energy schemes (given their relatively small scale). However, it is likely that they will be built to higher standards of design given the enhanced emphasis on climate change in the Plan.

There is a stronger emphasis on climate change throughout the amended Plan, with additional clauses added to several policies encouraging or requiring the use of sustainable materials and contributing to carbon neutrality. For example:

- Policy DS1 requires development to address issues such as the use/ safeguarding of natural resources, adaptation to climate change and to a net zero economy, including the planting of trees and orchards.
- Policy DS3 supports the utilisation of previously developed land and the bringing back into use of underutilised buildings. The latter serves to conserve land resources (e.g. greenfield, open space and agricultural land) and recycle embedded carbon within existing buildings through re-use/ adaptation. Home working is also promoted within the policy which should reduce the need to travel to work. Additionally, the policy requires that development complies with the Building for a Healthy Life⁷ design toolkit which comprises 12 principles including the integration of walking, cycling and public transport within neighbourhoods, cycle and green and blue infrastructure. The implementation of these principles within new development is likely to reduce reliance on private cars and facilitate modal shift.
- SA1 clause 16 states that '*new proposals will need to ensure that development includes fundamental mitigation for climate change, carbon reduction leading to neutral emissions by 2050 and for a nature recovery strategy*'. This is reiterated in policies H1 (Range of and mix of housing) and HS1 (Ensuring the delivery of infrastructure). These changes are likely to improve the performance of the rolled forward strategic site allocations in terms of climate change mitigation.
- Policy HS2 (strategic accessibility and sustainable transport) promotes sustainable modes of transport requiring proposals to address accessibility to all modes of transport including demand management measures and maximisation of sustainable transport options to achieve 15% modal shift to non-car based uses.
- Policies BE3 and BE4 seek to conserve non-renewable resources, requiring development to minimise the use of non-renewable resources and waste. Proposals are also required to install rainwater harvesting systems, integrate passive solar design, minimise air, noise, soil and light pollution. Non domestic development is required to meet the Building Research Establishment's Environment Assessment Method (BREEAM) where feasible.

⁷ [Building for a Healthy Life](#)

Considered holistically, the preferred options Plan is predicted to have a positive effect with regards to climate change. The amount of growth per annum is lower than the current Adopted Plan, and additional sites are within the urban areas, which should help to minimise increases in carbon from new development. Furthermore, several policies have been strengthened in relation to sustainable use of resources and carbon neutrality. This should ensure that new development performs better than would be the case at the moment and so **major positive effects** are likely.

With respect to climate change adaptation, whilst the majority of sites are in areas of low flood risk (Flood Zone 1), some of the allocated residential sites are in Flood Zone 2 or 3 (ARB1, ABB3, EXH1, ABB7) which engenders potentially negative effects with respect to climate change adaptation. Several policies will help to mitigate these effects though. For example Policy NE4 (Managing flood risk and water quality) requires site specific flood risk assessments for large developments and the provision of mitigation measures for up to 1% annual flood probability plus an allowance for climate change in flood risk areas. Other measures required are floor levels set no lower than 600 mm above the 1% annual probability plus climate change allowance flood level. The policy also requires the incorporation of sustainable drainage (SuDS) systems to manage surface water run-off. Overall, the negative effects of sites located in flood zones 2 and 3 are partly mitigated through measures introduced in policy NE4.

A range of other Plan policies could also help in respect of climate change resilience, and there have been amendments to several policies to strengthen the focus on climate change. For example:

- DS3 is beneficial as it requires new development to be resilient to climate change and to provide environmental mitigation and enhancement.
- Policy SA1 (Development principles on strategic sites) promotes the retention and enhancement of hedgerows, trees and green infrastructure (GI) which is likely to have multiple beneficial effects in terms of resilience, such as reducing heat island effects, providing shading, reducing rainwater flows into sewer systems thus conserving energy (for pumping and water treatment) and replenishing ground water reserves. The policy also seeks the integration of existing rights of way into green/open space networks and provision of new pedestrian and cycle links to the sider area, secure cycle parking which will encourage active travel.
- The Plan policies promote tree and orchard planting.

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 **major positive effects** could arise. An element of uncertainty exists as it is uncertain whether measure sin 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 car-free neighbourhoods in appropriate circumstances.

Appraisal of reasonable alternatives

There are common elements to each of the strategic options, which are not the focus of the appraisal at this stage. However, each option is treated in the same way with regards to how existing and newly drafted Plan policies would apply.

Option 2: Continuation of existing strategy

Neutral effects are anticipated with regards to planned development as there would be a continuation of allocations in the Adopted Plan. However, as per Option 1 there would still be an enhanced focus on climate change mitigation and resilience through the updated policies. At strategic sites, it is possible that strategic enhancements could be achieved in relation to climate change resilience and also economies of scale to implement low carbon technologies. Overall, potential major positive effects are predicted.

Option 3: Strategic location focus

Development at strategic sites could potentially bring opportunities to achieve strategic enhancements to green infrastructure, helping with regards to climate change resilience. There may also be good potential for delivering economies of scale in terms of climate change mitigation measures. In terms of emissions from transport, the strategic locations are on the periphery of the urban areas, and could encourage car travel. However, it is likely that there could be some improvements to public transport secured as part of strategic growth. Considering the proposed improvements to a range of plan policies, it is therefore predicted that potential major positive effects could arise for both locations. The Galley Common location could bring additional benefits if development helps to support the reopening of a passenger rail station in this location. However, this has uncertainties.

Option 4: Increased dispersal in the urban areas

The additional growth in the urban areas ought to be relatively well connected with regards to public transport, local services and employment. The level of growth involved is not enough to give rise to significant increases in emissions, and given the enhanced focus on climate change resilience and mitigation it is likely that new development should lead to an overall improvement with regards to climate change mitigation and enhancement (for example by supporting low carbon development and green infrastructure throughout the urban areas. These are potential major positive effects.

Option 5: Dispersal plus strategic focus

A mixed approach will bring benefits in terms of brownfield regeneration and well located urban sites, whilst also supporting new sustainable communities at a strategic location. Coupled with the enhanced focus on climate change mitigation and resilience in the revised policies, this is predicted to have potential major positive effects.

Appraisal summary table (Climatic factors)

Strategic option	Approximate Scale of growth	Effects summary
1) Proposed approach (dispersal)	646 dpa	Major +ve ?
2) Existing strategy rolled forward	660 dpa	Major +ve ?
3a) Strategic focus (Galley Common)	680 dpa	Major +ve ?
3b) Strategic focus (North of Nuneaton)	680 dpa	Major +ve ?
4) Increased dispersal in the urban areas	710 dpa	Major +ve ?
5a) Dispersal plus strategic focus (Galley Common)	710 dpa	Major +ve ?
5b) Dispersal plus strategic focus (North of Nuneaton)	710 dpa	Major +ve ?

SA Topic 9	Material Assets	Minor positive effects
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Option 1: Urban dispersal

The additional site allocations include a mix of brownfield and greenfield land. In terms of land resources, the focus on urban areas and PDL is positive as it serves to recycle brownfield / PDL sites. Though there are some greenfield land sites proposed for allocation, the total amount of land involved is not substantial. Furthermore, de-allocating the 'East of Bulkington' and 'The Woodlands' strategic sites means that these large greenfield sites would no longer be earmarked for development.

Several plan policies support the use of brownfield land, such as Policy DS3 (development principles) which prioritises the utilisation of previously developed land and the bringing back into use of underutilised buildings. This serves to recycle land and embedded carbon within existing buildings through re-use/ adaptation. The focus on brownfield land is greater compared to the existing adopted version of Policy DS3.

Policy H1 (Range and mix of housing) is also positive as seeks the provision of homes for older people which allows older residents to downsize to more manageable dwellings freeing up larger homes for families, which helps reduce underoccupancy and improve flexibility/ choice in the market.

Policies BE3 (Sustainable design and construction) and BE4 are also likely to have positive effects as they seek to conserve non-renewable resources, requiring development to minimise the use of non-renewable resources, harvest rain water and minimise air, noise, soil and light pollution. BE3 also promotes sustainable construction requiring that development utilise waste as resource to be re-used, recycled or recovered. The focus on climate change mitigation and the sustainable use of resources is also strengthened compared to the existing versions of these policies in the Adopted Local Plan.

SA1 has also been amended so that the strategic sites need to consider the sustainable use of resources.

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 reasonable alternatives

There are common elements to each of the strategic options, which are not the focus of the appraisal at this stage. However, each option is treated in the same way with regards to how existing and newly drafted Plan policies would apply.

Option 2: Continuation of existing strategy

Neutral effects are predicted as the situation would likely remain the same with regards to the amount of land and buildings being recycled. There are several plan policies that seek to encourage brownfield land use and use of natural resources. However, several of relevant policies have remained largely unchanged from the adopted Local Plan and therefore effects would be expected to be limited without an accompanying change in land use strategy.

Option 3: Strategic location focus

Under both approaches, there would be a use of strategic locations that comprise greenfield land. In this respect, negative effects are predicted. However, it would be possible to avoid greenfield land development at de-allocated sites, so the net effect is predicted to be neutral in this respect. There are several plan policies that promote the reuse of brownfield land and the efficient use of natural resources, but no direct effects are identified in terms of prioritising previously developed land. There will also be a requirement for significant infrastructure to support strategic growth, which would involve significant use of natural resources. Therefore, overall neutral effects are predicted.

Option 4: Increased dispersal in the urban areas

With increased dispersal and a higher scale of growth it is more likely that additional greenfield sites would be required within and on the periphery of the urban area (as well as the brownfield sites being promoted). This could lead to some negative effects with regards to the loss of greenfield land and use of natural resources in construction.

This would be offset by the fact that brownfield land sites would still be promoted in the urban areas and the plan policies would promote efficient use of natural resources in new developments. Therefore, overall neutral effects are predicted.

Option 5: Dispersal plus strategic focus

Dispersal on sites in the urban area would have some positive effects as discussed for Option 1. However, the addition of strategic locations for growth whether this be at Galley Common or North of Nuneaton would lead to an increase in the overall amount of greenfield land and natural resources required to support growth. As such, minor negative effects are predicted for both options.

Appraisal summary table (Material assets)

Strategic option	Approximate Scale of growth	Effects summary
1) Proposed approach (dispersal)	646 dpa	Minor +ve
2) Existing strategy rolled forward	660 dpa	Neutral
3a) Strategic focus (Galley Common)	680 dpa	Neutral
3b) Strategic focus (North of Nuneaton)	680 dpa	Neutral
4) Increased dispersal in the urban areas	710 dpa	Neutral
5a) Dispersal plus strategic focus (Galley Common)	710 dpa	Minor -ve
5b) Dispersal plus strategic focus (North of Nuneaton)	710 dpa	Minor -ve

SA Topic 10	Cultural Heritage	Minor positive effects	Minor negative effects
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Option 1: Urban dispersal

There are numerous heritage assets in Nuneaton, including listed buildings, Scheduled Monuments and Conservation Areas. With a few exceptions, the majority of new site allocations are not constrained by historic environment considerations.

Site ABB-3 is in close proximity to a Scheduled Monument; the Benedictine priory and precinct of St Mary and the Grade II listed St. Mary's Church (mainly Victorian parish church built on the grounds of the original ruins of the medieval priory). Historic England's listing states that '*little remains of the original 12th Century church except for massive piers which supported the central tower. These are incorporated within the mainly Victorian parish church now standing on the site*⁸. The proposed site is well enclosed and separated from the Scheduled monument by existing residential development and mature tree cover, which helps to reduce potential effects on the scheduled Monument. This location also contains the Abbey Conservation Area which includes the wider residential area around Manor Court Road, including Earls Road and Manor Park Road which constitute Nuneaton's first middle-class suburb of the late 19th and early 20th centuries⁹.

Site ABB-3 is also adjacent to the north western boundary of the conservation area and development here would overlook several properties described as being of significant to moderately significant historic value in the Abbey Conservation Area Appraisal. Therefore, moderate negative effects are possible due to proximity to the conservation area.

Sites ABB-7 (Mill St. & Bridge St.), ABB-8 (NUN-217 Vicarage St.) overlap the Nuneaton Town Centre Conservation Area (NTCA). ABB-7 is within mainly within Character Area 3 (Riversley Park and Coton Road) of the NTCA, described as an '*irregular linear area of land mostly lying along the west side of the river Anker, bounded to the west by Coton Road, to the east by Sainsbury's Supermarket and King Edward VI playing field, to the south by the railway line, and to the north by Mill Walk*¹⁰. It comprises Edwardian parkland and adjacent post-war gardens along the river Anker and includes housing development facing the park along the west side of Coton Road. This part of the NTCA is described as having several negative features such as some of the buildings on Coton Rd, Riversley House and the car dominated environment along the Ring Road /Coton Road and car parking areas. Therefore, new development on the site has the potential to enhance the character of the conservation area as the proposed site is on PDL and currently comprises several car parking areas, and the Nuneaton Job Centre building on Mill Walk. Redeveloping this site as part of a regeneration scheme can potentially have positive effects on enhancing this part of the NTCA but can also have adverse effects if inappropriate design or materials are used in the scheme.

The southernmost portion of Site ABB-8 overlaps character Area 2 (the Civic and Administrative Area) of the NTCA. This PDL site includes Nuneaton Library and car parking areas. The NTCA Appraisal and Management Proposals¹¹ describes the townscape character as comprising a loose aggregation of large discreet, mostly public buildings from the mid-late 20th century in a mixed setting of landscaped open space, car parks, streets, rear servicing areas to shops fronting the Market Place and riverside. The townscape east of this area (where the southern part of site ABB-8 is located) which includes the library is described as being *in transition and lacking coherent identity*. Here again, redevelopment has the potential to enhance the character of this part of the NTCA. However, given the presence of St

⁸ Source: [Historic England](#)

⁹ Source: [Abbey Conservation Area Appraisal and Management Proposals \(2008\)](#)

¹⁰ [Nuneaton Town Centre Conservation Area Appraisal and Management Proposals \(2009\)](#)

¹¹ Ibid. page 30

Nicolas Parish Church (Grade I listed) adjacent to this area (along with several other Grade 2 listed buildings), it will be important that development is of an appropriate scale, height, massing and design. The indicative capacity proposed suggests that development would need to be relatively dense, so there is potential for negative effects if this is overbearing. However, the poor condition of this part of the town should mean that positive effects are more likely than negative ones.

The proposed strategy proposes the de-allocation of the existing strategic sites at 'The Woodlands' and 'East of Bulkington'. These sites are not sensitive from a cultural heritage perspective, and so neutral effects are predicted (i.e. removing them will not have an effect on the historic environment).

Several existing plan policies ought to help mitigate potential effects of new development locations. For example, Policy BE4 (Valuing and conserving our historic environment) is highly relevant as it seeks to sustain and enhance the borough's heritage assets such as listed buildings and conservation areas and settings of townscapes. Development affecting designated and non-designated heritage assets will be *'expected to make a positive contribution to its character, appearance and significance'*.

Under this policy, applications affecting the significance of heritage assets will be required to include an assessment of the likely impacts on the heritage assets, their importance and settings, to a level of detail commensurate with the importance of the asset(s). These are to be informed by existing reports/ assessments including Conservation Area Character Appraisal and Management Plans.

Policies DS1 (Presumption in favour of sustainable development), DS3 (Development principles) require all new development to sustain and enhance the historic environment. New development will be prioritised on previously developed land (PDL). Policy DS5 (residential allocations) recognises that some of the non-strategic housing sites have heritage constraints stating that *'the opportunity should be taken to use, enhance and sustain these assets, or in exceptional circumstances, compensating, as part of any development proposal.'*

Policy BE3 (Sustainable design and construction) requires all development to contribute to local distinctiveness and character by reflecting the positive attributes of the neighbouring area, respecting sensitivity to change of character including street layout, residential amenity and built form. Overall, the policies above are likely to have positive effects on the historic environment as they seek to protect and enhance designated and non-designated assets.

Collectively, the Plan Policies discussed should help to mitigate some of the negative effects on cultural heritage that may arise as a result of new development locations. However, there are no further benefits likely to arise beyond the baseline position as there have been no major amendments to any of the policies in relation to heritage.

Overall, mixed effects are predicted (i.e. both positive and negative) whilst sites ABB-3 and ABB-4 could adversely impact the character of the Abbey Conservation Area, the policies discussed above 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 and the above discussed 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. Development at ABB8 needs to ensure that it is of an appropriate height and does not dominate the townscape.

Appraisal of reasonable alternatives

There are common elements to each of the strategic options, which are not the focus of the appraisal at this stage. However, each option is treated in the same way with regards to how existing and newly drafted Plan policies would apply.

Option 2: Continuation of existing strategy

Neutral effects are predicted as the situation would likely remain the same with regards to the sites allocated for development. The policies in the plan that promote the protection and enhancement of heritage would continue to have positive effects, but the baseline position would be unlikely to change significantly given that additional sites are not explicitly allocated for development.

Option 3: Strategic location focus

The strategic location at Galley Common is unlikely to have direct effects upon heritage assets as there are none overlapping or adjacent to areas that could be developed. The closest designated asset is the Church of St Peter (Grade II). Increased development in the surrounding countryside could affect views from the Church, but this is not vital to the setting of the Church and could be avoided / mitigated through site location, layout and design. Therefore, neutral effects are predicted in this respect.

The strategic location north of Nuneaton is not intersected or within close proximity to any nationally designated heritage assets, nor are any key views or the setting of heritage features likely to be affected by development in this location. As such, neutral effects would be predicted in relation to growth in this location.

For both of these options, whilst there are several plan policies that would continue to support the protection and enhancement of heritage, the baseline position is unlikely to change given that there are no additional sites allocated that would have negative or positive effects with regards to heritage. Therefore, neutral effects are predicted.

Option 4: Increased dispersal in the urban areas

With increased dispersal and a higher scale of growth it is more likely that additional greenfield sites would be required within and on the periphery of the urban area (as well as the brownfield sites being promoted). This could lead to some negative effects with regards to the loss of greenfield land and use of natural resources in construction.

This would be offset by the fact that brownfield land sites would still be promoted in the urban areas and the plan policies would promote efficient use of natural resources in new developments. Therefore, overall neutral effects are predicted.

Option 5: Dispersal plus strategic focus

Dispersal on sites in the urban area would have some positive effects as discussed for Option 1. However, the addition of strategic locations for growth whether this be at Galley Common or North of Nuneaton would lead to an increase in the overall amount of greenfield land and natural resources required to support growth. As such, **minor negative effects** are predicted for both options.

Appraisal summary table (Cultural heritage)

Strategic option	Approximate Scale of growth	Effects summary	
1) Proposed approach (dispersal)	646 dpa	Min +ve	Min -ve
2) Existing strategy rolled forward	660 dpa	Neutral	
3a) Strategic focus (Galley Common)	680 dpa	Neutral	
3b) Strategic focus (North of Nuneaton)	680 dpa	Neutral	
4) Increased dispersal in the urban areas	710 dpa	Min +ve	Min -ve
5a) Dispersal plus strategic focus (Galley Common)	710 dpa	Min +ve	Min -ve
5b) Dispersal plus strategic focus (North of Nuneaton)	710 dpa	Min +ve	Min -ve

SA Topic 11	Landscape	Minor positive effects
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Option 1: Urban dispersal

The majority of additional sites are not constrained with regards to landscape character as they are generally within existing built up areas and /or in close proximity to larger scale growth that would be expected to come forward through the adopted local plan.

Site, EMP2, a large 18 ha site allocated mainly for employment with some residential use is at the urban fringe of the settlement comprising open fields intercepted by the M6 and A444 and large warehouse developments visible to the south west of site. Whilst development here would alter the semi-rural/ open character of the site the landscape is rendered somewhat less sensitive due to the major highway infrastructure and the adjacent warehouse development. The landscape has been assessed as having few attractive features/ views and as having moderate-high capacity to accommodate employment and residential use¹². This site is already allocated in the adopted Plan for employment. Allowing some release for residential development is likely to have a less negative effect upon landscape character given that it would be less intrusive in terms of traffic and scale of buildings.

GAL 7 is somewhat sensitive to change, and therefore development could have some minor negative effects with regards to development.

Conversely, redeveloping sites such as ABB6,7,8 can potentially improve the urban landscape/ townscape as these locations includes some negative features such as unattractive buildings and land and a car dominated environment.

¹² Ibid: 5592.002

The de-allocation of strategic sites 'East of Bulkington' and the 'Woodlands' is also positive with regards to landscape as development here could lead to negative effects on the character of the urban fringes.

A range of existing plan policies that will be rolled forward from the adopted local plan will continue to have benefits with regards to landscape. This includes, NE1 and NE5 in particular. Further benefits are anticipated through amendments to policies such as SA1 (Development principles on strategic sites) which calls for development to incorporate landscape features into scheme design and retain/enhance existing features such hedgerows, trees and ridge and furrow sites. This policy also requires the provision of appropriate trees and orchards, which is an addition to the adopted plan policies.

Policy BE3 (Sustainable design and construction) calls for development to contribute to local distinctiveness and character reflecting the positive attributes of surrounding areas and respecting sensitivity to change within urban character areas.

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 (NBLCS). 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.

Appraisal of reasonable alternatives

There are common elements to each of the strategic options, which are not the focus of the appraisal at this stage. However, each option is treated in the same way with regards to how existing and newly drafted Plan policies would apply.

Option 2: Continuation of existing strategy

Under this approach, **neutral effects** would be expected. No additional site options would be necessary, and the sites that are currently adopted would continue to be supported.

Option 3: Strategic location focus

Further strategic growth to the north of Nuneaton is likely to have negative effects upon landscape. There are parcels of land in this location that are very sensitive in terms of landscape character, but some areas that may be more accommodating to change. The potential for avoidance and mitigation could therefore mean that residual effects are **minor negatives**.

Strategic growth at Galley Common would likely have negative effects upon areas of countryside that are highly sensitive with regards to landscape character. Several plan policies would help to mitigate effects through plan design, green infrastructure and so on, but there would still be residual negative effects due to the scale of change involved. Positive effects in terms of regeneration would also be limited under this approach as dispersal in the urban area would be reduced. Though landscape character in other parts of the Borough would be better protected (i.e. the Woodlands and East of Bulkington) these are less sensitive than comparative growth in Galley Common. Therefore, overall residual **moderate negative effects** are predicted.

Option 4: Increased dispersal in the urban areas

At an increased scale of growth, there is a range of additional sites within the existing urban areas that could be allocated (compared to option 1). Several of these are not particularly sensitive in terms of landscape and townscape and so their inclusion would not be anticipated to lead to significant effects despite an overall increase in development. However, there are some more sensitive locations that could give rise to minor negative effects. The effects are dependent on the sites involved, so a degree of uncertainty exists. However, potential **minor negative effects** are highlighted in this respect. Alongside these, there would still be regeneration on brownfield sites (as per the proposed approach), and thus **minor positive effects** are predicted as well.

Option 5: Dispersal plus strategic focus

The positive effects associated with regeneration and reuse of land and buildings would still occur under this approach as there would be a degree of dispersal, presumably on brownfield sites in the first instance. To achieve a higher scale of growth though, strategic growth would be involved. As discussed under options 3a and 3b, this would lead to negative effects at both locations, with those at Galley Common being of moderate significance and to the north of Nuneaton minor negative significance. Alongside these, there would still be regeneration on brownfield sites (as per the proposed approach), and thus **minor positive effects** are predicted as well for option 5a and 5b.

Appraisal summary table (Landscape)

Strategic option	Approximate Scale of growth	Effects summary	
1) Proposed approach (dispersal)	646 dpa	Minor +ve	
2) Existing strategy rolled forward	660 dpa	Neutral ?	
3a) Strategic focus (Galley Common)	680 dpa	Moderate -ve	
3b) Strategic focus (North of Nuneaton)	680 dpa	Minor -ve	
4) Increased dispersal in the urban areas	710 dpa	Neutral ?	Minor +ve
5a) Dispersal plus strategic focus (Galley Common)	710 dpa	Moderate-ve	Minor +ve
5b) Dispersal plus strategic focus (North of Nuneaton)	710 dpa	Minor -ve	Minor +ve

Appendix B: Site Appraisal Methods

LPA SA Topics	AECOM Site Assessment Topics
Air	Air quality
Biodiversity	Biodiversity
Climatic factors	Climate change resilience Climate change mitigation
Cultural heritage	Historic environment
Economic factors	Economy and Infrastructure
Landscape	Landscape
Material assets	Waste
Population and human health	Health and wellbeing
Social factors	Housing Transportation (topic is cross thematic)
Soil	Land and soil
Water	Water quality

Note- most sites over 30ha were assigned two 'access points' to determine road/path (driving/walking distances) to account for the potential for multiple site entrances. Where sites over 30a were not assigned two access points, it was due to access constraints. This also helps to ensure that larger sites are not unfairly given a poor score related to the location of access points. Some other sites were assigned two access points where it was deemed beneficial to the fair assessment of the site.

SA Criteria and Objectives	Assessment		Data (national/local data)	Methodology	Notes
1. Biodiversity	1.1	Direct loss or disturbance of biodiversity assets	SSSI, SAC, SPA, Ramsar, NNR (none in area), Ancient woodland LWS. LNR	Euclidean distance to nearest /overlap with biodiversity asset.	Sites adjacent to or overlapping with SSSI, SAC, SPA, Ramsar, NNR= red Sites overlapping with LNR, LWS or ancient woodland=red All other scores on a relative scale Scores over 600m Overall scoring Scores red in at least one measure as worst scoring Scores in the relative scale in at least one measure as worst scoring All scores green
	1.2	Disruption or loss of TPO	TPO	Intersect	Red= overlap Green= no overlap
2. Air Quality	2.1	Distance to nearest AQMA	AQMA	Euclidean distance from site to nearest AQMA	Under 100m Between 100m and 1200m Over 1200m
1-	2.2	Number of AQMAs within 1200m (road network distance)	AQMA	Number of AQMAs within 1200m (road network distance)	Relative scoring for all sites
3. Water Quality	No safeguarding/protection zones in Nuneaton and Bedworth				
4. Soil and Land	4.1	Loss of high quality agricultural land	Agricultural Land Classification (pre-1988)	Site overlap (ha) with agricultural land classification	Add together Grades 1, 2 and 3- red= loss of over 25ha, Green=0 and the rest as relative.
	4.2		Agricultural Land Classification (post-1988)	Site overlap (ha) with agricultural land classification	Add together Grades 1, 2 and 3a- red= loss of over 25ha, grey= 0 or not survey, value in between are relative
	4.3	Efficient use of land (greenfield/brownfield)	Site-by-site data relating to existing land use	Site-by-site assessment of	Greenfield Brownfield Mixed

				current site land use	
	4.4	Loss of land safeguarded for mineral extraction	Mineral safeguarding areas	Intersect	Oha Relative for the rest
5. Landscape	5.1	Landscape Sensitivity	Landscape sensitivity study	Overlap with areas identified as potentially sensitive	Strong Moderate Weak NA
6. Historic Environment	6.1	Impact of historic environment and nearby heritage assets	Listed buildings, world heritage site, historic parks and gardens, scheduled monuments, registered battlefields conservation areas	Euclidean distance to nearest heritage asset Site-by-site assessment looking at potential impact on nearby heritage asset	A degree of subjective and qualitative desktop assessment will be required on all sites which are within 200m of any heritage asset, or sites which are large in size or nearby to a more sensitive heritage asset. No nearby heritage asset Nearby heritage asset but likely no effects Nearby/adjacent heritage asset and potential, but avoidable effects Nearby/adjacent heritage assets and anticipated effects.
7. Waste					
8. Climate Change resilience	8.1	Potential for site to flood (fluvial)	Environment Agency Flood Risk Data	Site overlap (%) with flood zone	0% Relative for the rest
9. Climate Change Mitigation					
10. Housing					
11. Health and Wellbeing	11.1	Distance to nearest GP	GP surgeries	Euclidean distance	Relative scoring
		Number of GPs within 800m (road distance)	GP surgeries	Road distance	Relative scoring
	11.2	Distance to nearest formal green/open space	Green and open space	Euclidean distance	Relative scoring
		Number of green/open spaces within 800m (road distance)	Green and open space	Road distance	Relative scoring

	11.3	Potential for site to provide onsite green/open space	Site options	Site size could result in adequate onsite provision, alongside a qualitative assessment about loss and potential to mitigate	Relative scoring
	11.4	Distance to sports/ recreation/ gym facilities	Sports/ recreation facilities Leisure centres	Euclidean distance	Relative scoring
		Number of sports/ recreation facilities within 800m (road distance)	Sports/ recreation facilities Leisure centres	Road distance	Relative scoring
	11.5	Amenity issues nearby (sources of noise, odour, nuisance and related land use etc)	Satellite imagery, Google Street View	Check for potential nearby amenity issues on a site-by-site basis	No nearby amenity issues identified Potential minor nearby amenity issues (mitigation possible) Nearby amenity issues Amenity issues likely to be an issue for the intended use of development
12. Economy and Infrastructure	12.1	Distance to major employment centres, or, how many major employment centres/local shopping districts within 3km.	Major employment areas	Euclidean distance	Relative scoring
		Number of major employment centres within 800m (road distance)	Major employment areas	Road distance	Relative scoring
	12.2	Loss of employment land	Employment land	Intersect	Yes No
13. Transportation	13.1	Proximity to active travel network	Active travel network (cycle	Euclidean distance	Relative scoring

		<i>network, OS Paths and PROW)</i>		
	<i>Length of active travel network within 800m (road distance)</i>	<i>Active travel network (cycle network, OS Paths and PROW)</i>	<i>Road distance</i>	<i>Relative scoring</i>
13.2	<i>Proximity to bus stop</i>	<i>Bus stop data</i>	<i>Euclidean distance</i>	<i>Relative scoring</i>
	<i>Number of bus stops within 800m (road distance)</i>	<i>Bus stop data</i>	<i>Road distance</i>	<i>Relative scoring</i>
13.3	<i>Proximity to railway station</i>	<i>Railway stations</i>	<i>Euclidean distance</i>	<i>Relative scoring</i>
	<i>Number of railway stations within 800m (road distance)</i>	<i>Railway stations</i>	<i>Road distance</i>	<i>Relative scoring</i>
13.4	<i>Proximity to strategic road network</i>	<i>Strategic Road network</i>	<i>Road distance to A road or motorway</i>	<i>Relative scoring</i>
13.5	<i>Distance to nearest built-up centre</i>	<i>Built-up centres</i>	<i>Euclidean distance</i>	<i>Relative scoring</i>
	<i>Number of built-up centres within 800m (road distance)</i>	<i>Built-up centres</i>	<i>Road distance</i>	<i>Relative scoring</i>
13.6	<i>Distance to nearest primary school</i>	<i>Primary schools</i>	<i>Euclidean distance</i>	<i>Relative scoring</i>
	<i>Number of primary schools within 800m (road distance)</i>	<i>Primary schools</i>	<i>Road distance</i>	<i>Relative scoring</i>

Appendix C: Site Appraisal Matrix

See separate Microsoft Excel Spreadsheet

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