



Cabinet Member for Housing and Communities

Time and Date

1.00 pm on Wednesday, 29th June, 2022

Place

Diamond Room 2 - Council House

Public Business

1. **Apologies**
2. **Declarations of Interest**
3. **Minutes** (Pages 3 - 12)
 - a) To agree the minutes of the meetings held on 3 and 9 March 2022
 - b) Matters arising
4. **Consultation on the Draft Biodiversity Net Gain Supplementary Planning Document** (Pages 13 - 54)

Report of the Director of Streetscene and Regulatory Services
5. **New Residential Buildings Design Guide Supplementary Planning Document Public Consultation** (Pages 55 - 142)

Report of the Director of Streetscene and Regulatory Services
6. **Outstanding Issues**

There are no outstanding issues.
7. **Any other item of public business which the Cabinet Member decides to take as matters of urgency because of the special circumstances involved**

Private Business

Nil

Julie Newman, Director of Law and Governance, Council House, Coventry

Tuesday, 21 June 2022

Note: The person to contact about the agenda and documents for this meeting is

Usha Patel Governance Services Officer, Email: usha.patel@coventry.gov.uk

Membership: Councillor S Nazir (Deputy Cabinet Member) and
Councillor D Welsh (Cabinet Member)

By invitation: Councillors R Bailey and M Lapsa (Shadow Cabinet Members)
Councillor L Bigham (Chair of Communities and Neighbourhoods
Scrutiny Board (4)

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Usha Patel
Governance Services Officer
Email: usha.patel@coventry.gov.uk

Coventry City Council
Minutes of the Meeting of Cabinet Member for Housing and Communities held at
2.30 pm on Thursday, 3 March 2022

Present:

Members: Councillor D Welsh (Chair)

Other Members:

Councillor J Blundell
Councillor M Heaven (petition sponsor)
Councillor T Sawdon

Employees Present:

M Bajway, Law and Governance
S Chantler, Streetscene and Regulatory Services
G Curtis-Wheeler, Law and Governance
U Patel, Law and Governance

In Attendance:

H Butcher, BID Interpreting Service
A Kenny, BID Interpreting Service

Apologies:

Councillors R Bailey and M Lapsa (Shadow Cabinet Members)

Public Business

30. Declarations of Interest

There were no declarations of interest.

31. Minutes

The minutes of the meeting held on 18 November 2021 were agreed and signed as a true record. There were no matters arising.

32. Petition for Proposed Ban on Houses in Multiple Occupancy (HMOs) in Moreall Meadows Estates

The Cabinet Member considered a report of the Director of Streetscene and Regulatory Services which responded to a petition that requested a ban on Houses in Multiple Occupancy (HMOs) in Moreall Meadows estates.

The petition bearing 137 signatures was submitted on 7 September 2021 and was sponsored by Councillor M Heaven, a Wainbody Ward Councillor. Councillor Heaven and the petition organiser attended the meeting and spoke in respect of the petition. Councillors J Blundell and T Sawdon, also Wainbody Ward Councillors attended the meeting and spoke in respect of their concerns about HMOs in the area.

The petition was as follows:

“We the undersigned petition to ban the licensing of any HOMs in the Moreall Meadows estates which covers Moreall Meadows, The Arboretum, Russet Grove, Cassandra Close, Poppyfield Court and Heritage Court.

The area already has a restrictive covenant that has been placed on the development area by the land deed agreement which was dated 27 March 1997 between David Wilson, developer and the private owners and Coventry Council. The tile number of WM44722. The restrictive covenant means that all houses must be occupied by single households and is supposed to last for 80 years before they would then be expired. The Blanket Banned HMO proposal would cover Moreall Meadows, The Arboretum, Russet Grove, Cassandra Close, Poppyfield Court and Heritage Court”.

The petition organiser read a statement that focused on the restricted covenant that was the subject of the petition. She also spoke of the residents’ concerns over a particular HMO in the area. All three Ward Councillors spoke in support of the petition and their concerns in relation to the problems caused by HMOs in the area such as people, taxis and deliveries coming and going all hours of the day and night. In addition, they referenced case law in relation to HMOs and requested that the Cabinet Member consider expediting the introduction of Article 4 Direction at the earliest opportunity.

The licensing of HMOs is undertaken in accordance with the Housing Act 2004 legislation (the Act) which provides for the Council to administer Mandatory Licensing (a national scheme covering larger HMOs) and Additional Licensing (a discretionary scheme which requires other types of HMOs to be licensed where the Council has designated such a scheme). Additional Licensing came into force in Coventry on 4 May 2020.

Section 64 of the Act places a duty on the Council to either grant or refuse a HMO licence where an application for such a licence is made to the Council. Under Section 64 (2) and (3), the Council must grant a licence where it is satisfied that the house is reasonable suitable for occupation by not more than the maximum number of households being requested and the persons involved in the licence and the management of the HMO are fit and proper persons.

If these tests of suitability are met, the Council has a duty to grant a licence and failure to do so could result in the Council acting ‘*ultra vires*’ or beyond its powers.

Failure to licence a HMO is an offence under Section 72(1) of the Act, and the Council, if satisfied that the offence has been committed, could impose a financial penalty of up to £30,000 or pursue a prosecution in the Magistrates Court.

The restrictive covenant contained within the 27 March 1987 transfer deed between the Council and the developer of Moreall Meadows development states that the land cannot be used “for any purpose other than that of a private residence....”. Given the vague wording of the covenant, the Council would not be able to enforce it with regard to a HMO as the High Court ruled that a HMO falls within the definition of a “private residence” in *Roberts V Howlett [2002]*.

In any event, the transfers between the developer and the freeholders of the individual plots within Moreall Meadows development are between the developer

and the freeholder. The Council is not party to these individual agreements and therefore would be unable to enforce any restrictive covenant contained therein. The benefit of the restrictive covenant lies with the developer and therefore any enforcement would be the responsibility of the developer.

In law, it is the responsibility of the beneficiary of a restrictive covenant to enforce its particulars through the civil courts. Therefore, the existence of a restrictive covenant on the streets referred to in the petition could not be considered in either the issuing of HMO licences or planning permission where sought.

In considering the petition and the legal position outlined above, the Cabinet Member reiterated the Council's position in relation to HMOs and restrictive covenants. The Cabinet Member stated that work was currently underway on introducing an Article 4 Direction in Coventry and whilst once implemented, it would not be able to prevent new HMOs by itself, it would require small HMOs to apply for planning permission (currently planning permission is not required for small HMOs), thus allowing the Council to consider the application in light of local and national policies. And once licenced, the Council would be able to monitor and undertake enforcement action where necessary.

RESOLVED that the Cabinet Member having considered the report and the representations made at the meeting:

- 1. Considered the content of the petition and notes the concerns of the petitioners.**
- 2. Notes that the Council's Additional Licensing Scheme regulates the suitability of landlords and adds conditions to licences.**
- 3. Notes that officers carry out proactive and reactive visits to potential unlicensed and licensed HMOs in response to complaints made by residents and where necessary takes a robust approach to enforcement.**
- 4. Notes that officers are to bring forward options for implementing an Article 4 Direction and this work is currently underway.**
- 5. Notes that the existence of an HMO on Moreall Meadows estates is not a breach of the covenant and that because the Council is not a beneficiary of the covenant it cannot take any enforcement action against the freeholders with regard to the restrictive covenants' as detailed in Section 6 of the report.**
- 6. Notes the limitations of the Housing Act 2004 to refuse a HMO licence as detailed in para 1.2 of the report.**
- 7. Notes that as a result of recommendations 5 and 6 it is not possible to ban the licensing of all HMOs in Moreall Meadows estates**

33. **Outstanding Issues**

There were no outstanding issues.

34. **Any other item of public business which the Cabinet Member decides to take as matters of urgency because of the special circumstances involved**

There were no other items of business.

(Meeting closed at 3.35 pm)

Coventry City Council
Minutes of the Meeting of Cabinet Member for Housing and Communities held at
10.00 am on Wednesday, 9 March 2022

Present:

Members: Councillor D Welsh (Chair)

Other Members
(by invitation): Councillor L Bigham (Chair of Communities and
Neighbourhoods Scrutiny Board (4)
Councillor J Birdi (for item 36 below)
Councillor B Gittins (for item 37 below)
Councillor T Jandu (for item 36 below)
Councillor S Keough (for item 36 below)
Councillor A Tucker (for item 37 below)

Employees Present: D Butler, Planning and Regulation
M Bajway, Law and Governance
U Patel, Law and Governance
C Styles, Planning and Regulation

Apologies: Councillors R Bailey and M Lapsa (Shadow Cabinet
Members)
Councillor K Sandhu (for item 37 below)

Public Business

35. Declarations of Interest

There were no declarations of interest.

36. Proposed Brownhill Green Conservation Area - Public Consultation

The Cabinet Member considered a report of the Director of Streetscene and Regulatory Services which sought approval to undertake public consultation on the proposed Brownhill Green Conservation Area.

The proposed Brownhill Green Conservation Area was a commitment made in the Local Plan at Policy HE1 and draft documentation has now been produced to progress this.

A Conservation Area recognises the unique characteristics of an area and seeks to protect and enhance these. An Area Appraisal and Management Plan have been developed to this end and subject to approval from the Cabinet Member, public comment was now sought on both documents.

In order to ensure that specific matters would be considered in the context of the Appraisal and Management Plan, limited changes to Permitted Development rights were being proposed, via an Article 4 Direction, which would result in planning applications being submitted in these circumstances.

Following site walks and character analysis of Brownhill Green, the defining special characteristics have been identified in the Conservation Area Appraisal which, alongside the Management Plan serve as an evidence base against which to test any future development proposals within the area. The documents were attached to the report as Appendix 1 and 2 respectively.

It should be noted that the proposed designation is located beside an established housing allocation, and whilst not therefore in conflict with this allocation, the designating of the conservation area should serve to further inform best possible design outcomes in due course.

Alongside the draft Appraisal and Management Plan, a draft Article 4 Direction would be included within the consultation, resulting in a proposed removal of some elements Permitted Development rights to ensure applications are made to the planning authority for works which may affect the special character of the conservation area. These applications would then be determined in accordance with national and local policy, including the Conservation Area Appraisal and Management Plan.

It should be noted that as part of the public consultation of an article 4 Direction it is appropriate to establish the implementation date of said Direction. It was proposed that the Direction come into force on 1 July 2022, with the caveat that should the public consultation vary the nature of the Conservation Area or Article 4, that this date may be moved to a later date with Cabinet approval but may not be made sooner.

Brownhill Green falls within Bablake Ward of the city and Ward Councillors J Birdi, T Jandu and S Keough attended the meeting for the consideration of this item. All three ward councillors welcomed the Conservation Area proposals and sought clarifications on a number of issues including housing allocation/development within area, coverage of the proposed conservation area, classification and inclusion of land and properties and close border discussions.

The Cabinet Member welcomed the discussion and was pleased that this was being progressed and stressed that while it would not stop development, developers would have to consider their proposals with the conservation area in mind. He encouraged ward councillors and residents to respond to the consultation as the purpose of this was to identify and protect the land with the most characteristics.

A report on the outcome of the consultation seeking approval to the designation of the area would be submitted to Cabinet in due course.

RESOLVED that, the Cabinet Member having considered the report and the discussions at the meeting, approves a public consultation, for six weeks during March and April 2022, on the Brownhill Green Conservation Area proposal.

37. **Proposed Earlsdon Conservation Area - Public Consultation**

The Cabinet Member considered a report of the Director of Streetscene and Regulatory Services which sought approval to undertake a public consultation on the draft Earlsdon Conservation Area proposal.

The intention to consider the Earlsdon district of the city for conservation area status was included in the Coventry City Local Plan at Policy HE1 and draft documentation had now been produced to progress this and was ready for public consultation.

In order to ensure that specific matters would be considered in the context of the Appraisal and Management Plan, limited changes to Permitted Development rights were being proposed, via an Article 4 Direction, which would result in planning applications being submitted in these circumstances.

Community workshops were held in 2016 to seek the views of local people in identifying the special characteristics of the area, and to highlight issues which were seen to require control in order that the special character of the area was retained for future generations. In addition, site walks were also undertaken with the Ward Councillors.

Following this, a Conservation Area Appraisal and a Management Plan were produced based on the findings to develop a sound evidence base on which future development proposals may be assessed to ensure responsiveness to the local context. These draft documents were attached to the report as Appendix 1 and 2 respectively and were ready for public consultation.

Alongside the draft Appraisal and the draft Management Plan, a draft Article 4 was included at Appendix 3 to the report. The implementation of this Direction would result in a proposed removal of elements of Permitted Development Rights to ensure applications are made to the planning authority for works which may affect the special character of the conservation area. These applications would then be determined in accordance with national and local policy, including the Conservation Area Appraisal and Management Plan.

As with the previous report, it should be noted that as part of the public consultation of an Article 4 Direction, it is appropriate to establish the implementation date of the said Direction. It was proposed that the Article 4 Direction come into force on 1 July 2022, with the caveat that should the public consultation vary the nature of the Conservation Area or Article 4, that this date may be moved to a later date with Cabinet approval but may not be made sooner.

In seeking to progress the Earlsdon Conservation Area designation as per the commitment within the Local Plan, approval was sought to progress to public consultation prior to the anticipated adoption. Consultation was proposed for six weeks, in line with Council's Statement of Community involvement.

Councillors B Gittins and A Tucker, Earlsdon Ward councillors who attended the meeting for the consideration of this item, thanked and praised officers on the community engagement with the residents and the walk abouts in the area.

They raised the following points:

- The need to consider the broad ranging properties within the area, from exclusive properties, to first time buyer properties purchased with a view to refurbishment
- Regeneration and pedestrianisation of High Street would need to be sympathetically undertaken
- The need for the different service areas of the Council working in the area to liaise with each other to ensure everyone was working to the same end goal
- Consideration would need to be given to the weaving and watch making quarter which was just over the proposed conservation area border.
- Consideration needed to be given to the impact of empty shops and their refurbishment
- Consideration of traffic management/cycle lanes/light rail and how these would impact the built environment in the area

Other members present enquired about the size of a conservation area as there were individual properties in areas that have a more fluid community and residents who were less likely to come forward and engage in such proposals; unlike Earlsdon which has a more settled community. It was explained that in these circumstances, a local listing may be more appropriate.

The Cabinet Member thanked everyone for their useful comments and reiterated the need to encourage residents to engage with the consultation. He added that existing conservation areas would be revisited and areas where communities were less likely to engage would be included for consistency. The consultation would be available on the Council's website and displayed in libraries etc.

A report on the outcome of the consultation seeking approval to the designation of the area would be submitted to Cabinet in due course.

RESOLVED that, the Cabinet Member having considered the report and the discussions at the meeting, approves a public consultation for six weeks during March and April 2022, on the Earlsdon Conservation Area proposal.

38. Introduction of Council Blue Plaque Scheme

The Cabinet Member considered a report of the Director of Streetscene and Regulatory Services which sought approval to the introduction of a city-wide Blue Plaque Scheme.

The report outlined a proposal to introduce a heritage plaque nomination scheme (commonly known as a Blue Plaque Scheme), to be hosted via the Coventry City Council website, inclusive of associated administration and element of financial support for successful nominations.

In the past, commemoration plaques had been erected in the city on an individual basis, and/or alongside the support of local historical societies, as well as the City Council, and add greatly to the cultural and heritage offer of the city.

Although the City Council has not had a formal scheme in place for many years, such proposals were often brought to the Council's heritage team as enquiries regarding the due process of nomination and installation.

In this context, the Cabinet Member for Housing and Communities asked officers to draw up a best-practice scheme and liaise with stakeholders regarding the Council the re-introduction of a Council-led Blue Plaque scheme. The aim being to complement the existing, valued efforts of organisations, and to provide a route to plaque installation that varied from the pre-existing processes.

Following this process, officers drafted a route to nomination of commemorative plaques via the Local Authorities website, in order to establish this as the formal path for such proposals whilst introducing an assessment and recommendation process, supported by the Local Authorities heritage specialists. Final details were proposed to be delegated to the Head of Planning Policy and Environment, following consultation with the Cabinet Member for Communities and Housing, but would adhere to Historic England best practice whilst promoting and celebrating the diversity of heritage within the city.

However, it should be noted that a key component would be an element of public voting on Plaques to take forward, allowing a wide range of voices to be heard, reflecting the diversity of heritage within the city, and ensuring that was reflected in the Blue Plaques being installed.

Alongside the introduction of a nomination platform for commemorative plaque proposals, the council's heritage team would concurrently be engaging in an audit of existing plaques in the city, in order to inform future recommendations in regard to levels of existing representation.

Furthermore, it was proposed that the development of an appropriate scheme for the promotion and management of two annual Coventry City Council supported heritage plaques, thereby ensuring that the financial cost of production and installation would not be a barrier to any specific person or even being commemorated with a Blue Plaque.

It should be noted that the establishment of the scheme would not preclude the erection of commemorative plaques outside of the Council's nomination process, and the Council would continue to work positively with organisations seeking to install Plaques where appropriate.

RESOLVED that the Cabinet Member, having considered the report:

- 1. Approves the introduction of a city-wide Blue Plaque Scheme.**
- 2. Delegates to the Head of Planning Policy and Environment, following consultation with the Cabinet Member for Housing and Communities, to finalise the details of the process.**

39. **Outstanding Issues**

There were no outstanding issues.

40. **Any other item of public business which the Cabinet Member decides to take as matters of urgency because of the special circumstances involved**

There were no other items of business.

(Meeting closed at 11.35 am)



Cabinet Member for Housing and Communities

29 June 2022

Name of Cabinet Member:

Cabinet Member for Housing and Communities – Councillor D Welsh

Director Approving Submission of the report:

Director of Streetscene and Regulatory Services

Ward(s) affected:

All

Title:

Consultation on the Draft Biodiversity Net Gain Supplementary Planning Document

Is this a key decision?

No.

Although the matters within the report affect all wards in the city, it is not anticipated that the impact will be significant

Executive Summary:

This report seeks authority to consult for a six-week period on the draft Biodiversity Net Gain Supplementary Planning Document (SPD)

SPDs add further detail to the policies in the development plan but cannot introduce new policy. SPDs provide additional guidance for development and are capable of being a material consideration when making decisions on planning applications.

The purpose of the Biodiversity Net Gain SPD is to set out the Council's approach towards achieving Biodiversity Net Gain (BNG) from any new development. BNG is achieved when a development leads to an overall increase biodiversity relative to the site beforehand. The Biodiversity Net Gain SPD sets out how this can be achieved in Coventry using established methods.

The SPD is designed to assist prospective developers and applicants by providing guidance on how proposals can demonstrate they have met the requirements of planning policy related to biodiversity net gain in Coventry. By providing this information upfront Coventry City Council intends to provide additional clarity in the development process and ensure that negotiating obligations is based on a clear and consistent approach.

Responses to the consultation will be analysed and taken account of when considering amendments which may be required. The proposed final version will be submitted to Cabinet for adoption.

Recommendations:

The Cabinet Member is recommended to

1. Authorise a six week public consultation on the draft Biodiversity Net Gain Supplementary Planning Document.

List of Appendices included:

Appendix 1 - Draft Biodiversity Net Gain Supplementary Planning Document.

Appendix 2 - Strategic Environmental Assessment Screening Report

Appendix 3 - Equalities Impact Assessment

Background papers:

None.

Other useful documents:

Local Plan: adopted December 2017

National Planning Policy Framework July 2021

Has it been or will it be considered by Scrutiny?

No. However the Communities and Neighbourhoods Scrutiny Board (4) will consider the draft supplementary planning document as part of the consultation process at their meeting on the 7th July 2022

Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?

No.

Will this report go to Council?

No.

Report title: Draft Open Space Supplementary Planning Document

1. Context (or background)

- 1.1 The National Planning Policy Framework (NPPF) defines Supplementary Planning Documents (SPDs) as '*documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues.... Supplementary Planning Documents are capable of being a material consideration in planning decisions but are not part of the development plan*'.
- 1.2 Requiring developers to take account of biodiversity matters is a requirement of Policy GE1 (Green Infrastructure), Policy GE3 (Biodiversity, Geological, Landscape and Archaeological Conservation) and Policy DS4 (Part A: General Masterplan principles) of the adopted Coventry Local Plan.
- 1.3 The SPD is designed to assist prospective developers and applicants by providing guidance on how proposals can demonstrate they have met the requirements of planning policy related to Biodiversity Net Gain in Coventry. By providing this information upfront Coventry City Council intends to provide additional clarity in the development process and ensure that negotiating obligations is based on a clear and consistent approach. This is especially timely given the recent ascent granted the Environment Act 2021.
- 1.4 Regulations 11 to 16 of The Town and Country Planning (Local Planning) (England) Regulations 2012 set out the requirements for producing SPDs. This includes a minimum statutory public consultation period of four weeks: the Council's recently adopted Statement of Community Involvement however sets out a local standard that SPDs should be consulted on for six weeks, therefore this will be adhered to.
- 1.5 It is also a legal requirement, as set out in the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations), to consider whether or not Strategic Environmental Assessment (SEA) of the SPD should be undertaken. The process for determining whether or not an SEA is required is called screening. This is to determine whether a plan will have significant environmental effects. The screening opinion undertaken is attached at Appendix 2 of the report. This concludes that no SEA is needed as the SPD elaborates on existing policy. This screening report must be consulted on so that three statutory bodies (Historic England, Natural England and the Environment Agency) can respond. It makes sense to make the screening report publicly available for comment at the same time as the SPD is being consulted on.
- 1.6 Finally, an Equalities Impact Assessment (EIA) has been undertaken, this is attached at Appendix 3 to this report and this will also form part of the public consultation: see also paragraph 6.4 of this report.
- 1.7 Responses will be analysed and the SPD amended accordingly, before submitting to Cabinet for final adoption. In line with the legislation, the Cabinet report will include a statement setting out the details of the consultation, a summary of the main issues raised and how they have been addressed.

2. Options considered and recommended proposal

- 2.1 The Cabinet Member may wish for the Council to rely upon the current Local Plan policies along with the National Planning Policy Framework. However, this approach

does not provide the detail needed to give developers, officers and decision makers the clarity and consistency which is needed. This option is not recommended

- 2.2 The recommendation is to undertake a consultation on a new Biodiversity Net Gain SPD, as per Appendix 1 to the report, along with the Strategic Environmental Assessment Screening report at Appendix 2 to the report and the Equalities Impact Assessment at Appendix 3 to the report. This approach is recommended in order to give developers, officers and decision makers the clarity and consistency which is needed. This will accurately reflect the adopted Local Plan and national policy and ensure delivery in accordance with local need.

3 Results of consultation undertaken

- 3.1 No consultation has yet been undertaken as part of this report. However, the aim of the report is to ensure consultation takes place on the draft document.

4 Timetable for implementing this decision

- 4.1 Consultation will take place for six weeks during July and August. Amendments will be considered and analysed. It is intended that a report will then be taken to Cabinet seeking adoption of the SPD in accordance with the timescales set out in the adopted Local Development Scheme (the timetable for producing the Local Plan and SPDs which was adopted in February 2022).

5 Comments from the Chief Operating Officer (Section 151 Officer) and the Director of Law and Governance

- 5.1 Financial implications

There are no financial implications associated with this report.

- 5.2 Legal implications

- 5.1 There are no direct implications as a result of this report. Regulations 11 to 16 of The Town and Country Planning (Local Planning) (England) Regulations 2012 set out the requirements for producing SPDs. The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) also require the Council to consider whether or not a Strategic Environmental Assessment (SEA) of the SPD should be undertaken.

6 Other implications

- 6.1 How will this contribute to achievement of the Council's Plan?**

Planning policy documents and planning applications help deliver the aims and objectives of the One Coventry Corporate Plan by determining the type and quantum of development needed, where this should be located, areas which should be protected, enhanced or improved and the infrastructure which should be provided. In line with the Corporate Plan, this document focuses upon supporting local communities creating an attractive, cleaner and greener city which will also improve health and wellbeing.

- 6.2 How is risk being managed?**

There are no risks associated with this report.

6.3 What is the impact on the organisation?

No direct impact.

6.4 Equalities Impact Assessment EIA

A full Equality and Impact Assessment (EIA) was undertaken as part of developing the Local Plan. As part of that analysis, the Council had due regard to its public sector equality duty under section 149 of the Equality Act (2010). The Supplementary Planning Document elaborates on Local Plan policy and so a further EIA has been undertaken (Appendix 3)

6.5 Implications for (or impact on) climate change and the environment

This is an elaboration of Local Plan policy relating to the delivery of sustainable development through the delivery of biodiversity gain and, whilst it does not introduce new policy, it will assist in ensuring that developers make appropriate provision for biodiversity through their planning applications.

6.6 Implications for partner organisations?

The Supplementary Planning Document will provide further detail to the adopted Local Plan policy which will assist those organisations involved in the delivery of projects relating to biodiversity.

Report author:

Name and job title:

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Service

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This report is published on the council's website:

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Rob Back	Strategic Lead Planning	Streetscene and Regulatory Services	09/06/22	09/06/22
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Andrew Walster	Director of Street Scene and Regulatory Services	-	09/06/22	09/06/22
Councillor D Welsh	Cabinet Member for Housing and Communities	-	15/06/22	17/06/22



Coventry City Council
Biodiversity Net Gain
Supplementary Planning Document
Consultation draft June 2022

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1 Introduction

Purpose

- 1.1 Supplementary Planning Documents (“SPDs”) add further detail to policies contained within the development plan and are used to provide guidance on specific sites or particular issues. SPDs do not form part of the adopted development plan but they are a material planning consideration in decision taking.

Aims and objectives

- 1.2 This SPD provides guidance on achieving Biodiversity Net Gain (BNG) from any new development. BNG is achieved when a development leads to an overall increase biodiversity relative to the site beforehand. This Biodiversity Net Gain SPD sets out how this can be achieved in Coventry using established methods.
- 1.3 The purpose of this SPD is to provide information regarding how developers are able to deliver BNG and what contributions may be required. The circumstances and mechanisms for providing BNG are set out including how any financial contribution will be agreed and appropriate projects delivered.
- 1.4 This SPD is designed to assist prospective developers and applicants by providing guidance on how proposals can demonstrate they have met the requirements of planning policy related to biodiversity net gain in Coventry. By providing this information upfront Coventry City Council intends to provide additional clarity in the development process and ensure negotiating obligations is based on a clear and consistent approach

2 Context

Biodiversity

- 2.1 “Biodiversity is the variety of all life on Earth. It includes all species of animals and plants, and the natural systems that support them. Biodiversity matters because it supports the vital benefits we get from the natural environment. It contributes to our economy, our health and wellbeing, and it enriches our lives”¹
- 2.2 Across the country Biodiversity is being lost and it is accepted that this loss must be reversed before the impact becomes unsustainable².
- 2.3 Coventry is a largely urban area but does include a number of significant wildlife sites. Community surveys in Birmingham city have found over 2,300³ species of plants and animals (iNaturalist, June 2022) and the total number is likely to be significantly higher. Whilst Coventry has less volume of community biodiversity surveys than Birmingham currently, it is reasonable to assume that it will have similar biodiversity.

Biodiversity net gain

- 2.4 Biodiversity Net Gain delivers measurable improvements for biodiversity by creating or enhancing habitats in association with development. Biodiversity net gain can be achieved on-site, off-site or

¹ UK Biodiversity Indicators 2021 Revised, DEFRA, 2021

² Biodiversity 2020: A strategy for England’s wildlife and ecosystem services, DEFRA, 2011

³ https://uk.inaturalist.org/observations?place_id=53760

through a combination of on-site and off-site measures. The delivery of on-site measures, made accessible to existing and new residents, is the Council's preferred outcome.

- 2.5 Developments may deliver biodiversity gain by
 - a. Providing enhancements to habitats and wildlife on site
 - b. Providing enhancements to agreed sites elsewhere
 - c. Purchasing biodiversity credits
- 2.6 The required gain in the Environment Act is a minimum of 10%⁴ with sites managed for a period of not less than 30 years. Research has shown that in practice biodiversity will continue to decrease unless development provides significantly greater gain and that sites managed for longer periods⁵. Coventry is developing a network of different biodiversity offset sites where net gain can be achieved cost-effectively (Appendix 3). The network will be extended as further opportunities arise.

3 Relevant Policy and legislation

National Policy Context

- 3.1 Section 40 of the Natural Environment and Rural Communities Act 2006 includes a requirement for local authorities regarding biodiversity (the Biodiversity Duty). The Environment Act 2021 (Section 102) includes a revision such that there is a new requirement to enhance biodiversity in all activities.
- 3.2 The Government's National Planning Policy Framework⁶ has at its heart the core principle of sustainable development and set out a number of requirements related to the securing of biodiversity net gain through the planning system. The key sections of the NPPF that are relevant to biodiversity are:
 - a. Section 8: healthy and safe communities
 - b. Section 15: conserving and enhancing the natural environment.
- 3.3 These sections contain important policy requirements; the following paragraphs are notable:
- 3.4 Paragraph 8c sets out that sustainable development has an environmental objective –
“to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”
- 3.5 Paragraph 102 refers to Local Green Space, areas of land with particular importance including “richness of wildlife”. Related policies should be consistent with policies for the Green Belt

⁴ Environment Bill 2021

⁵ Implementation Gap between the Theory and Practice of Biodiversity Offset Multipliers, Bull, J.W. et al, Conservation Letters, 2017

⁶ Ministry of Housing, Communities and Local Government, July 2021

- 3.6 Paragraph 174 states that through planning policy and planning decisions, the natural environment should be enhanced by *'minimising impacts on and providing net gains for biodiversity including by establishing coherent ecological networks that are more resilient to current and future pressures'*
- 3.7 Paragraph 179 provides specific advice on habitats and biodiversity. In particular section b) states that development plans should *'identify and pursue opportunities for securing measurable net gains for biodiversity'*.
- 3.8 Paragraph 180 relates to determining planning applications. Section a) establishes the principle that Local Authorities should refuse permission if significant harm to biodiversity cannot be avoided or properly mitigated.

National Planning Practice Guidance

- 3.9 The Government's National Planning Policy Guidance⁷ explains the key issues in implementing the natural environment policies. The PPG provides advice on what ecological information should be included in an application and the use of planning conditions (Paragraph 018 Reference ID: 8-018-20190721). The guidance provides a definition of net gain (Paragraph: 020 Reference ID: 8-020-20190721) and how this can be achieved (023 Reference ID: 8-023-20190721)

Local Plan policy Coventry Local Plan (2017)

3.10 **Policy DS4 (Part A): General Masterplan principles:**

- Sympathetically integrate existing landscape, biodiversity and historic features of the site into the development taking opportunities to protect, enhance and manage important features along with mitigation and enhancement measures to provide satisfactory compensatory provisions where appropriate

3.11 **Policy GE1: Green Infrastructure:**

- New development proposals should make provision for green infrastructure to ensure that such development is integrated into the landscape and contributes to improvements in connectivity and public access, biodiversity, landscape conservation, design, archaeology and recreation
- Ensuring that a key aim of green infrastructure is the maintenance and improvement and expansion of biodiversity

3.12 **Policy GE3: Biodiversity, Geological, Landscape and Archaeological Conservation** (See Appendix 1)

- Sites of Special Scientific Interest (SSSIs), Local Nature Reserves (LNRs), Ancient Woodlands, Local Wildlife and Geological Sites will be protected and enhanced. Proposals for development on other sites, having biodiversity or geological conservation value, will be permitted provided that they protect, enhance and/or restore habitat biodiversity

⁷ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities & Local Government, July 2019

4 Achieving Biodiversity Net Gain

Background

- 4.1 The delivery of biodiversity net gain requires that any development delivers more and better-quality biodiversity than would exist without development taking place. Applicants are expected to demonstrate how their proposals meet the policy requirements of the Local Plan by providing clear information that sets out how biodiversity will be improved.
- 4.2 To demonstrate how proposals meet policy requirements applicants should:
- Undertake an ecological assessment of the habitat and key biodiversity features of the site;
 - Use a recognised metric (see paragraph 4.12) to assess the biodiversity value of the site and the impact of the proposed development; and
 - Agree appropriate mitigation for any impact of the development by ensuring that overall the number of biodiversity units is increased.
- 4.3 All planning applications will be required to submit a biodiversity gain plan⁸ which provides information on the site and details how biodiversity will be enhanced. The required amount of information submitted with the application will vary according to the application, see Table 1.

Table 1: Information required by applications

Type of application	Required information
Householder	No information required. Any mitigation is likely to be provided onsite through enhancements such as bat boxes, swift bricks and wildlife-friendly planting. An application which includes appropriate enhancements will be preferred.
Minor	Ecological survey with metric and details of proposed mitigation. An application that uses the Council's planning pre-application service may be advised that full information is not required, e.g. for sites with minimal biodiversity interest.
Major	Ecological survey with metric and details of proposed mitigation

Ecology information regarding net gain is independent of any information regarding legally protected species. All developments which may adversely impact on protected species (e.g. bats, badgers, great crested newts) are required to submit appropriate information with the application.

⁸ Environment Act 2021 Schedule 14, Part 2,14

Ecological surveys

- 4.4 To inform the net gain calculations ecological surveys should be undertaken at the appropriate time of year (see Appendix 2). The following survey information and assessment is required to complete the calculation:
- a. Area of each habitat and length of each linear feature present within the red line of the application;
 - b. Habitat type according to the UK Habitat Classification⁹ or other nationally recognised classification, including indicator species (with reference to the guidance provided by Warwickshire Habitat Biodiversity Audit);
 - c. Habitat condition;
 - d. Impact from development based upon current planning layout, both directly onsite, and indirectly offsite; and
 - e. Onsite biodiversity mitigation and compensation measures.
- 4.5 The survey should include the whole of the development boundary (red line) and adjacent land where direct or indirect impacts upon adjacent habitats are anticipated.
- 4.6 The evaluation of habitats recorded on site should be undertaken with reference to the Warwickshire and Coventry Local Wildlife Site selection criteria. Habitats that meet the selection criteria thresholds should normally be of 'County' value and of 'High or Very High distinctiveness'.
- 4.7 Habitat Condition should be assessed in accordance with the guidance provided with the relevant metric or subsequent guidelines. When assessing any habitats not covered by this guidance, developers and their advisors will be expected to apply evidence based professional judgement and submit any assessment in a written form.
- 4.8 If the biodiversity value of a site has been lowered by any activity after 30th January 2020¹⁰ (other than with planning permission) with the resulting loss of habitats in advance of a biodiversity metric calculation being undertaken the baseline for the metric is to be taken as the habitats present prior to site clearance. The biodiversity value of the habitats lost is to be estimated based upon a desk-based assessment and professional judgement. The precautionary principle¹¹ is to be applied where the distinctiveness or condition of the habitats lost is uncertain.

Biodiversity Impact Assessment

- 4.9 The Warwickshire Biodiversity Impact Calculator has been in established use in Coventry for a number of years. The metric has been used for a large number of developments and led to successful biodiversity mitigation projects. The DEFRA metric is more recent and will fully replace the Warwickshire BIA and a separate version is available for small-scale developments. All new applications will use the most recent DEFRA metric. Coventry CC will accept the Warwickshire metric where this is a revision of the BIA originally submitted for a development prior to the adoption of this SPD. See Appendix 4 for further details of the available metrics.

⁹ UK Habitat Classification <https://ukhab.org/>

¹⁰ Environment Act 2021 Schedule 14 Part 1, 6a

¹¹ "Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation" Rio Declaration on Environment and Development 1992

Irreplaceable habitat

- 4.10 Sites which include areas of irreplaceable habitat are exempted from the BNG policies and are unable to use any metric to assess the biodiversity value of these areas. If a site does include areas of such habitat and development were acceptable a bespoke agreement with the Council regarding appropriate mitigation would be required. Any site which includes both irreplaceable habitat and other wildlife habitats should use the metric on the other habitats. The DEFRA list of irreplaceable habitats will be used.

Sites with low biodiversity

- 4.11 Certain habitats (e.g. buildings and hardstanding) are considered to have zero biodiversity value. Such sites will be expected to demonstrate an overall improvement in biodiversity in order to meet relevant Council Local Plan policies (Policy GE3). The Council will advise on any requirement for ecological survey and agree appropriate biodiversity enhancement sufficient to provide an overall net gain. Features such as green walls, green roofs, containers and bird/bat boxes will provide appropriate benefits.

Agreeing mitigation

- 4.12 If an impact on an ecological asset is identified, applicants must propose how that impact will be avoided, mitigated, or compensated for in accordance with the mitigation hierarchy.
- 4.13 Where mitigation or compensation is proposed, habitat creation proposals, both on and offsite, should avoid 'down trading' of habitat value by proposing to create habitats of lower distinctiveness than those lost. Any proposed change in habitat must be agreed beforehand, applicants are encouraged to discuss provision of alternative habitats with the Council at the earliest opportunity. It is accepted that in within the urban area of Coventry habitats such as biodiverse roofs, green walls or wildlife-friendly landscaping may provide significant benefits particularly when these are associated with other existing or planned schemes.
- 4.14 Habitat creation proposals must be additional to any existing obligations and not deliver something that would occur anyway (for example through an existing planning permission, Forestry Commission grant or Environmental Stewardship scheme).
- 4.15 All proposals to deliver Biodiversity Net Gain through on-site and off-site habitat creation must be:
- a. In compliance with forthcoming British Standard BS 8683 (Process for designing and implementing Biodiversity Net Gain) (<https://shop.bsigroup.com/products/process-for-designing-and-implementing-biodiversity-net-gain-specification>);
 - b. Agreed in advance with the LPA;
 - c. Evaluated through the use of the Biodiversity Metric;
 - d. Secured by an appropriate agreement to ensure long term management;
 - e. Be supported by a monitoring and management plan (adaptive management plan);
 - f. Included on an offset register; and
 - g. Monitored and reviewed.

Provision of BNG

- 4.16 Coventry City Council has sufficient biodiversity offset sites to meet the expected demand in coming years. Sites have been identified in all parts of the city and provide for the long-term

creation and management of a range of different habitats. These sites will be added to the Biodiversity gain site register when this is available (anticipated Spring 2023). Developments will normally be expected to contribute any offsite mitigation required within this scheme by way of a Section 106 contribution. Alternative methods of providing adequate offset through third party schemes or the purchase of Biodiversity Credits will also be considered acceptable in principle. However, each case will be looked at and assessed on its individual merits as to the level of off-setting which will be required and accepted by the LPA.

- 4.17 In order to establish that it is feasible for on and/or off-site habitat creation/enhancement proposals to deliver a net gain for biodiversity developers will be expected to submit detailed, worked up proposals, with the expectation that sites provided within the boundary of the City.
- 4.18 Details of the design, location and extent of any habitat creation proposed will be required. Where offsite habitat creation is proposed it is particularly important that sufficient detail is submitted to reassure the Council that it is feasible that suitable provision can be delivered and maintained in the long term. Developers are encouraged to seek independent professional advice to ensure their proposals meet this requirement and are strongly recommended to make use of the planning Pre-application service. Any offsite mitigation would be secured by a Section 106 agreement, see Appendix 5.
- 4.19 Where compensation is targeted at a specific species, off site compensation must be delivered in an area where this species is known to occur. Desk and field-based assessments may be required to establish this
- 4.20 Where off-site habitat provision is necessary, this should be directed to the following areas:
- a. areas identified by the Ecological Network Map as delivering the most benefit for biodiversity (Core Areas, Corridors and Steppingstone, Restoration areas)
 - b. any designated Wildlife Corridors shown in neighbourhood plans
 - c. areas identified in Local Nature Recovery Strategies.
- 4.21 Habitat creation in these strategically important sites will deliver a greater benefit for biodiversity and so potentially less habitat creation will be required to achieve the same biodiversity benefits.
- 4.22 There is no requirement for compensatory habitats to be subject to public access. However public access is encouraged where this can occur without being detrimental to the value of the habitats created. All of the offset sites within the Coventry scheme include appropriate access and promote community involvement in the sites.

Habitat Banking

- 4.23 If a developer wishes to rely on habitat created by a Habitat Bank, this habitat would usually be in place in advance of a planning application being submitted. Habitat banking is an instrument that can be used to deliver compensation by implementing and pooling compensatory measures in advance of a development, enabling developers to purchase credits from established compensation schemes (habitat banks) to offset their impacts. Credits in the context may be earned through measures to conserve both habitats and species.
- 4.24 Any application which provides an excess of biodiversity units within a development may use these to offset any future projects within Coventry within a two-year period. Any such approach must be agreed beforehand with the LPA with information regarding future development projects provided. Future developments would need to provide an appropriate impact assessment and

offset any excess biodiversity loss. Developments are not able to use potential future projects to offset current proposals.

Biodiversity Net Gain and stacking/additionality

- 4.25 Where biodiversity enhancements are required for other purposes (e.g., protected species schemes) these projects will not contribute to BNG offset. For such projects to contribute to BNG they will have to demonstrate additional benefits which are above and beyond any required by other schemes.

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Appendix 1: Local Plan policy GE3

1.1 Policy GE3: Biodiversity, Geological, Landscape and Archaeological Conservation

1. Sites of Special Scientific Interest (SSSIs), Local Nature Reserves (LNRs), Ancient Woodlands, Local Wildlife and Geological Sites will be protected and enhanced. Proposals for development on other sites, having biodiversity or geological conservation value, will be permitted provided that they protect, enhance and/or restore habitat biodiversity. Development proposals will be expected to ensure that they:
 - a) lead to a net gain of biodiversity, where appropriate, by means of an approved ecological assessment of existing site features and development impacts;
 - b) protect or enhance biodiversity assets and secure their long-term management and maintenance;
 - c) avoid negative impacts on existing biodiversity; and
 - d) preserve species which are legally protected, in decline, are rare within Coventry or which are covered by national, regional or local Biodiversity Action Plans
2. Where this is not possible, adequate mitigation measures must be identified. If mitigation measures are not possible on site, then compensatory measures involving biodiversity offsetting will be considered, but only in exceptional circumstances.
3. Biodiversity will be encouraged particularly in areas of deficiency, in areas of development and sustainable urban extensions, and along wildlife corridors. Opportunities will be sought to restore or recreate habitats, or enhance the linkages between them, as part of the strategic framework for green infrastructure. Protected Species, and species and habitats identified in the Local Biodiversity Action Plan (LBAP), will be protected and conserved through a buffer or movement to alternative habitat. Identified important landscape features, including Historic Environment assets, trees protected by preservation orders, individual and groups of ancient trees, ancient and newly planted woodlands, ancient hedgerows and heritage assets of value to the locality, will be protected against loss or damage. In the case of archaeological remains, all practical measures must be taken for their assessment and recording in accordance with Policy HE2.

- 1.2 Planning legislation places a biodiversity duty of care on all local and public authorities, emphasising that development plan policies and planning decisions should be based upon up-to-date information about the environmental characteristics of their area. These characteristics include the relevant biodiversity and geological resources of the area. In reviewing environmental characteristics, the Council will continue to assess the potential to sustain and enhance these resources.
- 1.3 Connectivity between sites and buildings, and resilient and robust ecosystems, which are adaptable to change, are essential to ensure retention of existing levels of biodiversity and to enable these to be enhanced wherever possible. As part of new developments this could be achieved through well designed gardens, green roofs or landscape features. Resilient and functioning ecosystems support

a range of human population needs, including flood management, control of atmospheric pollution, and access to green space.

- 1.4 In order to restore good levels of biodiversity across the Warwickshire, Coventry and Solihull sub-region, it is important to have urban areas that are permeable for wildlife, with havens for wildlife through the city and connected corridors linking sites. Green infrastructure planning and implementation can contribute strongly to fulfilling this. Biodiversity will be promoted as a core component of sustainable development and landscapes for living, underpinning social, health, environmental and economic benefits, together with community well-being and local quality of life.
- 1.5 All development proposals will be expected to avoid negative impacts on existing biodiversity. Where this is not possible, mitigation measures should be identified, if these are not possible on site, then these should be offset elsewhere as a compensatory measure, but only in exceptional circumstances. Such circumstances may include the comprehensive delivery of a planned strategic allocation in accordance with a Council approved Masterplan. In all such cases though, compensatory provisions should be made as close to the original site as possible. In this instance development proposals should be guided by the Council's approach to biodiversity offsetting as set out in the Green Infrastructure Strategy, or any subsequent update to this document and national policy. In all instances, the long-term management and maintenance of ecological features must be demonstrated. In order to assist in ecological assessments, the Warwickshire Biological Records Centre should be consulted.

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Appendix 2: Survey Season

Key survey period	
Other survey period	

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Habitats/Vegetation												
Badgers												
Bats Hibernation Roosts												
Bats Summer Roosts												
Bats Foraging/Commuting												
Birds Breeding												
Birds Over Wintering												
Dormice												
Great-Crested Newts						Terrestrial						
			Aquatic									
Otters												
Reptiles												
Water Voles												
White-Clawed Crayfish												

Appendix 3: Coventry Offset sites

1.1 The table below shows sites that have already been identified as providing opportunity for biodiversity enhancement and where potential projects have been identified.

Additional sites will continue to be added where the location is appropriate and site management allows an increase in biodiversity value, these may include smaller areas within existing open spaces.

The DEFRA metric will be used to assess the value of any site prior to any biodiversity projects to ensure that there is an overall net gain.

Offset opportunity	Area (ha)	Notes
Habitat creation sites		
Elm Farm	9.45	Agricultural site, opportunity for woodland, meadow and other habitats
Habitat enhancement sites		
Leaf Lane	10.44	Meadow
Sherbourne	5.70	Woodland and meadow
Sowe	12.25	Wet woodland, scrub, marsh grassland, river corridor
Leaf Lane2	0.54	Meadow
Caludon	8.11	
Palmer Lane	0.07	Urban habitat
West Academy	3.59	Woodland and ponds (great crested newt)
Longford	4.94	Woodland, marsh, wetland
Bell Green	9.65	Meadow

Appendix 4 – Biodiversity metric

- 1.1 The change in biodiversity due to development is calculated using the most recent version of the DEFRA metric. The Warwickshire Metric will be accepted for older applications where this metric was submitted.

DEFRA metric

- 1.2 ‘Biodiversity Metric 3.0 can be used or specified by any development project, consenting body or landowner that needs to calculate biodiversity losses and gains for terrestrial and/or intertidal habitats. It will be this metric that underpins the Environment Bill’s provisions for mandatory biodiversity net gain in England, subject to any necessary adjustments for application to major infrastructure projects.’
- 1.3 The metric provides a value for the biodiversity value of a site before development and the result of habitats lost and created during development. The metric shows what areas of replacement habitat must be created to offset any loss and considers the location of any offset. The metric does not include any financial estimates
- 1.4 The metric can be freely downloaded (current version 3.1, April 2022):

<http://publications.naturalengland.org.uk/file/6242570327031808>

Appendix 5: Example Section 106 agreement

Biodiversity Contribution: means the sum of [£XXXX] payable to the Council towards the enhancement of biodiversity within the area ecologically connected to the Development;

Commencement of Development: means the carrying out in relation to the Development of any material operation as defined by section 56(4) of the Act (and the phrase “**Commence Development**” shall be construed accordingly) [but disregarding for the purposes of this deed and for no other purpose, the following operations: site clearance; ground investigations; site survey works; temporary access construction works; archaeological investigation; and erection of any fences and hoardings around the Land];

1. Biodiversity Contribution

- a. The Owner covenants to pay to the Council the Biodiversity Contribution on or before Commencement of Development.
- b. The Owner will not Commence Development until the Biodiversity Contribution has been paid to the Council.

Example biodiversity loss schedule

Biodiversity Impact Assessment: Means the use of the most current and locally adopted Defra Biodiversity Offsetting Metric to calculate the biodiversity impact of the scheme measured in Biodiversity Units;

Biodiversity Loss: Means a negative Biodiversity Unit score;

Biodiversity Offsetting Scheme: Means a scheme which will deliver biodiversity enhancements which shall not be less than the Biodiversity Impact Assessment score;

Biodiversity Unit: Means the product of the size of an area, and the distinctiveness and condition of the habitat it comprises to provide a measure of ecological value;

Defra Biodiversity Offsetting Metric: Means the Defra mechanism to quantify impacts on biodiversity that allows biodiversity losses and gains affecting different habitats to be compared and ensure offsets were sufficient to compensate for residual losses of biodiversity;

Ecology Contribution:

Means the sum payable in accordance with Schedule 1;

1 ECOLOGY CONTRIBUTION

The Owner covenants as follows;

- 1.1 The approved application shall not result in a Biodiversity Impact Assessment score greater than – (xx) Biodiversity Units or such other number as may be agreed with the Council
- 1.2 Prior to the Commencement of Development, the Owner shall submit a Biodiversity Offsetting Scheme to the Council for its approval in writing.
- 1.3 The Owner shall not Commence Development until a Biodiversity Offsetting Scheme has been submitted to and approved in writing by the Council.
- 1.4 The Biodiversity Offsetting Scheme shall be approved by the Council with the purpose of ensuring that the Development does not result in a Biodiversity Loss in accordance with the National Planning Policy Framework
- 1.5 The Scheme shall include a management plan for the provision and maintenance of offsetting features on the Land for not less than 30 years from the date of implementation. Where the offsetting features do not fully offset the (-xx) Biodiversity Units the residual loss shall be offset by a fixed sum contribution to the Council assessed using an agreed Biodiversity Impact Assessment metric;
- 1.6 The Biodiversity Offsetting Scheme shall provide for one of the following:
 - 1.6.1 Confirmation that an area of land has been made available to offset a maximum of -xx Biodiversity Units of Biodiversity Loss on the Land; or
 - 1.6.2 Where no land has been made available, provide for a fixed sum contribution to be paid to the Council. The sum shall not exceed £(xx.xx) and the Council will use the contribution to enhance and secure the long-term management of biodiversity of sites within the [DETAILS OF AREA WITHIN WHICH THE CONTRIBUTION IS TO BE USED]. or
 - 1.6.3 The required number of Biodiversity Credits have been purchased
- 1.7 Once the Biodiversity Offsetting Scheme has been implemented, the Owner shall not carry out any changes to the Biodiversity Offsetting Scheme without the written consent of the Council.

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**Strategic Environmental Assessment of the Biodiversity Net
Gain Supplementary Planning Document**

Coventry City Council

**Strategic Environmental Assessment Screening Opinion for
consultation**

March 2022

1. Introduction

- 1.1 This screening report has been produced to consider whether the Biodiversity Net Gain Supplementary Planning Document (SPD) prepared by Coventry City Council should be subject to a Strategic Environmental Assessment (SEA) in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004, as amended by The Environmental Assessments and Miscellaneous Planning (Amendment)(EU Exit) Regulations.
- 1.2 Paragraph: 008 of the Planning Guidance¹ states that supplementary planning documents may in exceptional circumstances require SEA if they are likely to have significant environmental effects that have not already been assessed during the preparation of the relevant strategic policies. This screening statement considers whether there are any impacts which have not already been assessed within the Coventry Local Plan which was adopted on 6th December 2017², and determines whether or not SEA is needed for this SPD.

2. The Biodiversity Net Gain SPD: Context

- 2.1 The Draft Biodiversity Net Gain SPD sets out further detail on existing policies contained within the adopted Coventry City Council Local Plan, in particular Policy GE1 (Green Infrastructure), Policy GE3 (Biodiversity, Geological, Landscape and Archaeological Conservation) and Policy DS4 (Part A: General Masterplan principles) The Local Plan is the City Council's statutory planning framework which sets out how and where new homes, jobs, services and infrastructure will be delivered and the type of places and environments that will be created, enhanced and protected.
- 2.2 Requiring developers to provide open space as part of their proposals is a key requirement of Policies GE1, GE3 and DS4 of the adopted Coventry Local Plan as set out above.
- 2.3 The SPD is designed to assist prospective developers and applicants by providing guidance on how proposals can demonstrate they have met the requirements of planning policy related to biodiversity net gain in Coventry. By providing this information upfront Coventry City Council intends to provide additional clarity in the development process and ensure that negotiating obligations is based on a clear and consistent approach.

3. The Screening Process

- 3.1 The screening assessment is undertaken in two parts: the first will assess whether the SPD requires screening for SEA and the second part of the assessment will consider

¹ Reference ID: 11-008-20140306

² <https://www.coventry.gov.uk/localplan>

whether the SPD is likely to have a significant effect on the environment, using criteria drawn from Schedule 1 of the SEA Regulations.

Table 1: Is SEA screening required?

Environmental Regulations Paragraph detail	Comments
<p>2.(1) In these Regulations- [...] "plans and programmes" means plans and programmes, including those co-financed by the European Community, as well as any modifications to them, which— (a) are subject to preparation and adoption by an authority at national, regional or local level; (b) are prepared by an authority for adoption, through a legislative procedure by Parliament or Government; and, in either case, (c) are required by legislative, regulatory or administrative provisions</p>	<p>Yes, this applies.</p> <p>The SPD is subject to preparation and adoption at local level. Whilst the SPD is not a requirement and is optional under the provisions of the Town and Country Planning Act it will, if adopted, supplement the development plan and be a material consideration in the assessment of planning applications.</p>
<p><u>Environmental assessment for plans and programmes; first formal preparatory act on or after 21st July 2004</u> 5.(2) The description is a plan or programme which— (a) is prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, and (b) sets the framework for future development consent of projects listed in Annex I or II Directive 2011/92/EU(4) of the European Parliament and of the Council on the assessment of the effects of certain public and private projects on the environment.</p>	<p>Yes, this applies.</p> <p>The SPD is prepared for town and country planning purposes. It supplements the planning policy framework of the Coventry City Local Plan, by providing detailed guidance as to how these policies are interpreted for future consent of projects listed in Schedule II of Directive 2011/92/EU(4).</p>
<p>3) The description is a plan or programme which, in view of the likely</p>	<p>No this does not apply.</p>

<p>effect on sites, has been determined to require an assessment pursuant to Article 6 or 7 of the Habitats Directive.</p>	<p>The SPD is not likely to affect sites and has been determined not to require an assessment pursuant to any law that implemented Article 6 or 7 of the Habitats Directive.</p> <p>Habitat Regulations Assessment is not required. The Habitat Regulation Assessment undertaken in 2016 for the Coventry City Local Plan concluded that the plan would not cause a negative effect alone or in combination with other plans. The SPD does not provide any guidance which alters the impact of the policy on designated sites.</p>
<p>6) An environmental assessment need not be carried out—</p> <p>(a)for a plan or programme of the description set out in paragraph (2) or (3) which determines the use of a small area at local level, or</p> <p>(b)for a minor modification to a plan or programme of the description set out in either of those paragraphs,</p>	<p>Yes, this applies.</p> <p>The SPD provides further detail on the implementation of biodiversity net gain within the adopted Local Plan. This applies to the whole administrative area of Coventry City Council.</p>
<p><u>Determinations of the responsible authority³</u></p> <p>9.—(1) The responsible authority shall determine whether or not a plan, programme or modification of a description referred to in—</p> <p>(a)paragraph (4)(a) and (b) of regulation 5;</p> <p>(b)paragraph (6)(a) of that regulation; or</p> <p>(c)paragraph (6)(b) of that regulation, is likely to have significant environmental effects.</p> <p>(2) Before making a determination under paragraph (1) the responsible authority shall—</p> <p>(a)take into account the criteria specified in Schedule 1 to these Regulations; and</p> <p>(b)consult the consultation bodies.</p>	<p>This screening opinion has been prepared using the criteria specified in Schedule 1 as presented in Table 2.</p> <p>The statutory bodies (Natural England, Historic England and the Environment Agency) are to be consulted as required.</p>

³ “Responsible authority”, in relation to a plan or programme, means the authority by which or on whose behalf it is prepared (Regulation 2(1)(a))

Table 2: will the SPD have a significant effect on the environment⁴

SEA requirement	Comments
1: The characteristics of plans and programmes, having regard, in particular, to	
(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;	The SPD has a minor role in setting the framework for projects. While the SPD forms a material consideration in decisions on planning applications, it has no influence on the location or volume of projects nor does it in itself allocate resources.
(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;	The SPD does not create new policies but will support the policies in the adopted Local Plan. Other plans and programmes may outlive the SPD and during their preparation will be steered by national legislation and policy.
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	The purpose of the SPD is to provide guidance to support the biodiversity policies of the adopted Local Plan. The Local Plan SA/SEA assessed this. The purpose of the SPD is to ensure these beneficial impacts of that policy are delivered and maintained which contributes to promoting sustainable development.
(d) environmental problems relevant to the plan or programme; and	There are no environmental problems relevant to this SPD: it elaborates adopted Local Plan policy.
(e) the relevance of the plan or programme for the implementation of retained EU law on the environment (for example, plans and programmes linked to waste management or water protection).	The SPD has no relevance to the implementation of retained EU law.
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to—	

⁴ As set out in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

<p>(a) the probability, duration, frequency and reversibility of the effects;</p>	<p>The SPD is not allocating sites for development. The SPD is to provide guidance for the application and implementation of the policies in the adopted Local Plan and is not expected to give rise to any significant environmental effects.</p>
<p>(b) the cumulative nature of the effects;</p>	<p>The SPD is not considered to have any significant cumulative effects. As the document provides further guidance to adopted local plan policies, but does not set policies itself, it cannot contribute to cumulative impacts in combination with the Local Plan.</p>
<p>(c) the transboundary nature of the effects;</p>	<p>There are no transboundary effects as this SPD relates to the Coventry City Council area only. Any potential significant transboundary environmental effects have already been assessed as part of the local plan's sustainability appraisal, the Habitat Regulations Assessment and the plan's examination process.</p>
<p>d) the risks to human health or the environment (for example, due to accidents);</p>	<p>The SPD poses no risk to human health.</p>
<p>(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);</p>	<p>The SPD relates to Coventry City Council's administrative area only.</p>
<p>(f) the value and vulnerability of the area likely to be affected due to— (i) special natural characteristics or cultural heritage; (ii) exceeded environmental quality standards or limit values; or (iii) intensive land-use;</p>	<p>The SPD relates to the Coventry City Council area only; as no development is proposed via the SPD, which elaborates on existing policy, none of these are likely to be affected by the SPD. Any site-specific matters would be addressed through a planning application specific to an individual proposal.</p>
<p>(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.</p>	<p>The SPD relates to the Coventry City Council area only; as no development is proposed via the SPD, which elaborates on existing policy, none of these matters are likely to be affected by the SPD. Any site-specific matters would be addressed through a planning application specific to an individual proposal.</p>

4. Conclusion and Screening Recommendation

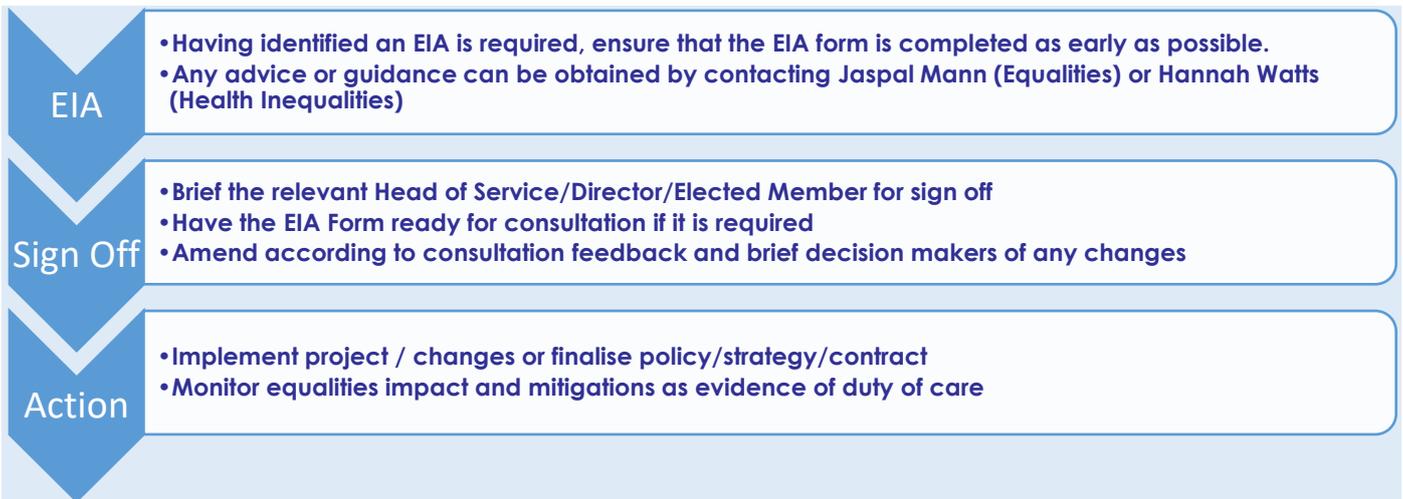
- 4.1 This screening opinion identifies that the SPD will provide guidance to support the biodiversity policies of the Coventry City Council adopted Local Plan. It is concluded that the SPD is unlikely to have significant environmental effects and therefore that Strategic Environmental Assessment is not required.

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EQUALITY IMPACT ASSESSMENT (EIA)



Title of EIA		EIA Open Space SPD
EIA Author	Name	Clare Eggington
	Position	Principal Town Planner (Planning Policy)
	Date of completion	09/02/2022
Head of Service	Name	David Butler
	Position	Head of Planning Policy and Environment
Cabinet Member	Name	Councillor David Welsh
	Portfolio	Housing and Communities



PLEASE REFER TO [EIA GUIDANCE](#) FOR ADVICE ON COMPLETING THIS FORM

SECTION 1 – Context & Background

1.1 Please tick one of the following options:

This EIA is being carried out on:

New policy / strategy

New service

Review of policy / strategy

Review of service

Commissioning

Other project *(please give details)* **Supplementary Planning Document for Open Space**



1.2 In summary, what is the background to this EIA?

The Biodiversity Net Gain Supplementary Planning Document (SPD) adds further details to the Local Plan which was adopted on 6th December 2017 and for which EIA was undertaken. SPDs do not introduce new policy, but provide further detail and guidance to enable the delivery of adopted policies.

The purpose of the Biodiversity Net Gain SPD is to set out the Council's approach towards achieving Biodiversity Net Gain (BNG) from any new development. BNG is achieved when a development leads to an overall increase biodiversity relative to the site beforehand. The Biodiversity Net Gain SPD sets out how this can be achieved in Coventry using established methods. It supplements Policy GE1 (Green Infrastructure), Policy GE3 (Biodiversity, Geological, Landscape and Archaeological Conservation) and Policy DS4 (Part A: General Masterplan principles) of the adopted Coventry Local Plan.

The additional guidance provided within the SPD aims to provide guidance for developers on how proposals can demonstrate they have met the requirements of planning policy related to biodiversity net gain in Coventry. By providing this information upfront Coventry City Council intends to provide additional clarity in the development process and ensure that negotiating obligations is based on a clear and consistent approach.

1.3 Who are the main stakeholders involved? Who will be affected?

Developers who are required to deliver biodiversity gain as part of their proposals, those who deliver and maintain the resultant projects, and those members of the community who will benefit from more biodiversity in their local area.

1.4 Who will be responsible for implementing the findings of this EIA?

Coventry City Council Planning Policy Service

SECTION 2 – Consideration of Impact

Refer to guidance note for more detailed advice on completing this section.

In order to ensure that we do not discriminate in the way our activities are designed, developed and delivered, we must look at our duty to:

- Eliminate discrimination, harassment, victimisation and any other conflict that is prohibited by the Equality Act 2010
- Advance equality of opportunity between two persons who share a relevant protected characteristic and those who do not

EQUALITY IMPACT ASSESSMENT (EIA)



- Foster good relations between persons who share a relevant protected characteristic and those who do not

2.1 Baseline data and information

Please include a summary of data analysis below, using both your own service level management information and also drawing comparisons with local data where necessary (go to <https://www.coventry.gov.uk/factsaboutcoventry>)

The Local Plan was formulated using detailed evidence including a range of ecological studies and mapping. The Local Plan was independently examined by a Planning Inspector to ensure that its policies were robust and formulated using appropriate evidence before it could be found sound and capable of adoption. Further detail on the Local Plan and the evidence base can be found here <https://www.coventry.gov.uk/localplan>

This SPD details how the policy will be delivered, providing clear information for developers about policy requirements: how developers should calculate how much biodiversity they need to deliver, and the appropriate mechanism for doing this.

2.2 On the basis of evidence, complete the table below to show what the potential impact is for each of the protected groups.

- Positive impact (P),
- Negative impact (N)
- Both positive and negative impacts (PN)
- No impact (NI)
- Insufficient data (ID)

Any impact on the Council workforce should be included under question 2.6 – **not below*

Protected Characteristic	Impact type P, N, PN, NI or ID	Nature of impact and any mitigations required
Age 0-18	P	Almost a fifth of Coventry City Council’s residents are aged 0-15. Access to open space and nature is a fundamental need for development, health and wellbeing. 22.5% of children live in low income families which is above the regional and national average (20.2% and 17% respectively) ¹ . Ensuring that developments provide appropriate levels of biodiversity as part of a wider network of open spaces is essential.

¹ <https://www.gov.uk/government/statistics/children-in-low-income-families-local-area-statistics-201415-to-201819>

EQUALITY IMPACT ASSESSMENT (EIA)



Age 19-64	P	Access to open space and nature is a fundamental need for health and wellbeing. Biodiversity is an essential part of any sustainable community. 67% of Coventry City Council's residents are aged between 16 and 64. Being of working age, these are the largest group likely to be accessing homes on new developments and will directly benefit from the provision of good design which incorporates biodiversity as part of a wider network of open spaces.
Age 65+	P	Access to open space and nature is a fundamental need for health and wellbeing. Biodiversity is an essential part of any sustainable community. 13.5% of Coventry City Council's residents are aged 65 and over and will benefit from the provision of good design which incorporates biodiversity as part of a wider network of open spaces.
Disability	P	Access to open space and nature is a fundamental need for health and wellbeing. Biodiversity is an essential part of any sustainable community. 17.7% of Coventry City Council's residents have a limiting long term health problem or disability and will benefit from the provision of good design which incorporates biodiversity as part of a wider network of open spaces.
Gender reassignment	P	Individuals will benefit from safe and well designed open space provision which incorporates biodiversity.
Marriage and Civil Partnership	P	Individuals will benefit from safe and well designed open space provision which incorporates biodiversity.
Pregnancy and maternity	P	Individuals will benefit from safe and well designed open space provision which incorporates biodiversity..
Race (Including: colour, nationality, citizenship ethnic or national origins)	P	Individuals will benefit from safe and well designed open space provision which incorporates biodiversity.
Religion and belief	P	Individuals will benefit from safe and well designed open space provision which incorporates biodiversity.
Sex	P	Individuals will benefit from safe and well designed open space provision which incorporates biodiversity.
Sexual orientation	P	Individuals will benefit from safe and well designed open space provision which incorporates biodiversity.



HEALTH INEQUALITIES

2.3 Health inequalities (HI) are unjust differences in health and wellbeing between different groups of people which arise because of the conditions in which we are born, grow, live, work and age. These conditions influence our opportunities for good health, and result in stark differences in how long we live and how many years we live in good health.

Many issues can have an impact: income, unemployment, work conditions, education and skills, our living situation, individual characteristics and experiences, such as age, gender, disability and ethnicity

A wide range of services can make a difference to reducing health inequalities. Whether you work with children and young people, design roads or infrastructure, support people into employment or deal with welfare benefits – policy decisions and strategies can help to reduce health inequalities

Please answer the questions below to help identify if the area of work will have any impact on health inequalities, positive or negative.

If you need assistance in completing this section please contact: Hannah Watts (hannah.watts@coventry.gov.uk) in Public Health for more information. More details and worked examples can be found at [https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-\(EIA\).aspx](https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx)

Question	Issues to consider
2.3a What HIs exist in relation to your work / plan / strategy	<ul style="list-style-type: none"> ● Explore existing data sources on the distribution of health across different population groups (<i>examples of where to find data to be included in support materials</i>) ● Consider protected characteristics and different dimensions of HI such as socio-economic status or geographical deprivation

Response:
 The Biodiversity Net Gain SPD supplements the policies of the adopted Local Plan which was subject to Health Impact Assessment. The Health and Wellbeing chapter of the plan, which includes Policy HW1, requires Health Impact Assessments for particular types and scale of development where there could be significant impacts. See <https://www.coventry.gov.uk/localplan> This was supplemented by a Health Impact Assessment SPD which provided further detail and guidance including that in relation to open space. See https://www.coventry.gov.uk/downloads/file/28900/health_impact_assessment_spd



<p>2.3b How might your work affect HI (positively or negatively).</p> <p>How might your work address the needs of different groups that share protected characteristics</p>	<p>Consider and answer below:</p> <ul style="list-style-type: none"> • Think about whether outcomes vary across groups and who benefits the most and least, for example, the outcome for a woman on a low income may be different to the outcome for a woman a high income • Consider what the unintended consequences of your work might be 																								
	<p>Response:</p> <p>a. Potential outcomes including impact based on socio-economic status or geographical deprivation</p> <p>The Health Impact Assessment SPD referred to above includes the following:</p> <p>Category 3: Access to open space and nature</p> <p>Providing secure, convenient and attractive open/green space can lead to more physical activity and reduce levels of heart disease, strokes and other ill-health problems that are associated with both sedentary occupations and stressful lifestyles. There is growing evidence that access to parks and open spaces and nature can help to maintain or improve mental health.</p> <p>The patterns of physical activity established in childhood are perceived to be a key determinant of adult behaviour; a growing number of children are missing out on regular exercise, and an increasing number of children are being diagnosed as overweight and obese. Access to play spaces, community or sport facilities such as sport pitches can encourage physical activity. There is a strong correlation between the quality of open space and the frequency of use for physical activity, social interaction or relaxation.</p> <table border="1" data-bbox="363 1440 1481 1760"> <thead> <tr> <th>Considerations</th> <th>Negative effects</th> <th>Positive Effects</th> <th>Relevant Local Plan Policies and Supplementary Planning Documents</th> </tr> </thead> <tbody> <tr> <td rowspan="3"> <ul style="list-style-type: none"> • Opportunities for physical activity • Access to open and natural space, including water fronts • Formal and informal outdoor play spaces • Maintenance of open space and sports facilities • Integration with other outdoor uses such as growing food </td> <td>Failing to protect local green spaces and playing fields near to communities can limit opportunities for physical activity.</td> <td>The provision of publicly accessible blue space, green spaces and play spaces can encourage physical activity and maintain or improve mental health</td> <td rowspan="3"> <ul style="list-style-type: none"> • DE1: Ensuring High Quality Design • DS3: Sustainable Development Policy • EM4: Flood Risk Management • EM5: Sustainable Drainage Systems (SuDS) • H3: Provision of New Housing • GE1: Green Infrastructure • GE2: Green Space • IM1: Developer Contributions for Infrastructure </td> </tr> <tr> <td>Green spaces that are of poor quality, feel unsafe, or are inaccessible will discourage physical activity and social interaction</td> <td>A growing population, particularly an increase in children will require a range of formal and informal play spaces and equipment</td> </tr> <tr> <td>Failing to provide a range of different types of open and play spaces may place pressure on</td> <td>Natural spaces and tree cover provide areas of shade and can improve air quality in urban areas</td> </tr> </tbody> </table> <table border="1" data-bbox="341 1800 1481 2033"> <tbody> <tr> <td rowspan="3"> <ul style="list-style-type: none"> • Maximising green infrastructure in urban environments (including green roof systems and gardens and green walls) </td> <td>existing spaces where formal and informal activities may conflict with each other</td> <td></td> <td rowspan="3"> <ul style="list-style-type: none"> • R2: Coventry City Centre – Development Strategy • Community Infrastructure Levy </td> </tr> <tr> <td></td> <td>There may be opportunities to integrate play spaces with other related health and environmental programmes such as food growing and increasing biodiversity</td> </tr> <tr> <td></td> <td>Green walls can also provide insulation or shading and cooling</td> </tr> <tr> <td></td> <td></td> <td>Green infrastructure can reduce flood risk</td> <td></td> </tr> </tbody> </table>	Considerations	Negative effects	Positive Effects	Relevant Local Plan Policies and Supplementary Planning Documents	<ul style="list-style-type: none"> • Opportunities for physical activity • Access to open and natural space, including water fronts • Formal and informal outdoor play spaces • Maintenance of open space and sports facilities • Integration with other outdoor uses such as growing food 	Failing to protect local green spaces and playing fields near to communities can limit opportunities for physical activity.	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EQUALITY IMPACT ASSESSMENT (EIA)



- b. Potential outcomes impact on specific socially excluded or vulnerable groups eg. people experiencing homelessness, prison leavers, young people leaving care, members of the armed forces community.

Ensuring access to a range of suitable open spaces which incorporate biodiversity in relation to new developments will meet a range of needs and circumstances: this is a key aim of the Local Plan housing and green infrastructure policies and the SPD provides the further detail to ensure that those policies can be delivered.

2.4 Next steps - What specific actions will you take to address the potential equality impacts and health inequalities identified above?

This was considered through the Local Plan (the 'parent document'), this document provides the detail to ensure the Local Plan policies can be delivered effectively

2.5 How will you monitor and evaluate the effect of this work?

The Local Plan includes monitoring indicators which includes monitoring the Green Environment for example 'designing new development to accommodate wildlife'.

2.6 Will there be any potential impacts on Council staff from protected groups?

No

You should only include the following data if this area of work will potentially have an impact on Council staff. This can be obtained from: lucille.buckley@coventry.gov.uk

Headcount:

Sex:

Age:

Female	
Male	

EQUALITY IMPACT ASSESSMENT (EIA)



16-24	
25-34	
35-44	
45-54	
55-64	
65+	

Disability:

Disabled	
Not Disabled	
Prefer not to state	
Unknown	

Ethnicity:

White	
Black, Asian, Minority Ethnic	
Prefer not to state	
Unknown	

Religion:

Any other	
Buddhist	
Christian	
Hindu	
Jewish	
Muslim	
No religion	
Sikh	
Prefer not to state	
Unknown	

Sexual Orientation:

Heterosexual	
LGBT+	
Prefer not to state	
Unknown	

3.0 Completion Statement

As the appropriate Head of Service for this area, I confirm that the potential equality impact is as follows:

- No impact has been identified for one or more protected groups
- Positive impact has been identified for one or more protected groups
- Negative impact has been identified for one or more protected groups
- Both positive and negative impact has been identified for one or more protected groups

4.0 Approval

Signed: Head of Service:	Date:
---------------------------------	--------------

EQUALITY IMPACT ASSESSMENT (EIA)



Name of Director:	Date sent to Director:
Name of Lead Elected Member:	Date sent to Councillor:

Email completed EIA to equality@coventry.gov.uk

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Public report Cabinet Member Report

Cabinet Member for Housing and Communities

29 June 2022

Name of Cabinet Member:

Cabinet Member for Housing and Communities – Councillor D Welsh

Director Approving Submission of the report:

Director of Streetscene and Regulatory Services

Ward(s) affected:

All Wards

Title:

New Residential Buildings Design Guide SPD Public Consultation

Is this a key decision?

No – Although the matters within the report affect all wards in the city, it is not anticipated that the impact will be significant.

Executive Summary:

This report seeks authority to consult for a six-week period of the draft New Residential Buildings Design Guide Supplementary Planning Document (SPD).

SPDs add further detail to the policies in the Local Plan but cannot introduce new policy. They provide additional information and are a material consideration when determining planning applications. This SPD gives developers design guidance when designing and developing new residential properties and will replace the existing Residential Design Guide.

Following consultation responses will be analysed and taken account of when considering amendments that might be required. The proposed final version will then be submitted to Cabinet for adoption, at which point it will replace the previous version.

Recommendation:

The Cabinet Member is requested to authorise a six-week public consultation on the draft New Residential Buildings Design Guide SPD.

List of Appendices included:

Appendix 1 – Draft New Residential Buildings Design Guide SPD
Appendix 2 – Strategic Environmental Assessment Screening Report
Appendix 3 – Equalities Impact Assessment

Background papers:

None

Other useful documents

2017 Local Plan

Has it been or will it be considered by Scrutiny?

No

Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?

No

Will this report go to Council?

No

Report title:

New Residential Buildings Design Guide SPD Public Consultation

1. Context (or background)

- 1.1. The current Residential Design Guide was adopted in 1991, and is therefore substantially aged. Developers and applicants would benefit from up-to-date guidance regarding what is expected in order to receive a successful planning determination.
- 1.2. The draft New Residential Buildings Design Guide is a comprehensive review and updating of the previous document and will provide clear guidance for developers and applicants as well as to officers when determining planning applications.
- 1.3. Regulations 11 to 16 of The Town and Country Planning (Local Planning) (England) Regulations 2012 set out the requirements for producing SPDs. This includes a minimum statutory public consultation period of four weeks: the Council's recently adopted Statement of Community Involvement however sets out a local standard that SPDs should be consulted on for six weeks, therefore this will be adhered to.
- 1.4. It is also a legal requirement, as set out in the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations), to consider whether or not Strategic Environmental Assessment (SEA) of the SPD should be undertaken. The process for determining whether or not an SEA is required is called screening. This is to determine whether a plan will have significant environmental effects. The screening opinion undertaken is attached at Appendix 2. This concludes that no SEA is needed as the SPD elaborates on existing policy. This screening report must be consulted on so that three statutory bodies (Historic England, Natural England and the Environment Agency) can respond. It makes sense to make the screening report publicly available for comment at the same time as the SPD is being consulted on
- 1.5. Finally, an Equalities Impact Assessment (EIA) has been undertaken, this is attached at Appendix 3 and this will also form part of the public consultation: see also paragraph 6.4 of this report.
- 1.6. Responses will be analysed and the SPD amended accordingly, before submitting to Cabinet for final adoption. In line with the legislation, the Cabinet report will include a statement setting out the details of the consultation, a summary of the main issues raised and how they have been addressed.

2. Options considered and recommended proposal

- 2.1. The Cabinet Member may wish for the Council and residents to rely on the existing Residential Design Guide. However, the current guidance was adopted in 2013 and it is considered appropriate to offer residents more up-to-date information and guidance. For this reason, this option is not recommended.
- 2.2. The recommendation is to approve the public consultation for the draft New Residential Buildings Design Guide SPD for six weeks.

3. Results of consultation undertaken

- 3.1. No formal consultation has taken place. Public involvement is a key element of the proposal.

4. Timetable for implementing this decision

- 4.1. The decision will be implemented immediately.

5. Comments from the Chief Operating Officer (Section 151 Officer) and the Director of Law and Governance

5.1. Financial implications

There are no financial implications associated with this report.

5.2. Legal implications

There are no direct implications as a result of this report. Regulations 11 to 16 of The Town and Country Planning (Local Planning) (England) Regulations 2012 set out the requirements for producing SPDs. The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) also require the Council to consider whether or not Strategic Environmental Assessment (SEA) of the SPD should be undertaken

6. Other implications

6.1. How will this contribute to the Council Plan (www.coventry.gov.uk/councilplan/)

Planning policy documents and planning applications help deliver the aims and objectives of the One Coventry Corporate Plan by determining the type and quantum of development needed, where this should be located, areas which should be protected, enhanced or improved and the infrastructure which should be provided. In line with the Corporate Plan, this document focuses upon supporting local communities creating more attractive and better designed residential development.

6.2. How is risk being managed?

There is no risk associated with the recommendations.

6.3. What is the impact on the organisation?

No direct impact

6.4. Equality/ EIA

A full Equality and Impact Assessment (EIA) was undertaken as part of developing the Local Plan. As part of that analysis, the Council had due regard to its public sector equality duty under section 149 of the Equality Act (2010). The Supplementary Planning Document elaborates on Local Plan policy and so a further EIA has been undertaken (Appendix 3).

6.5. Implications for (or impact on) climate change and the environment

There is no direct impact from the recommendations of the report.

6.6. Implications for partner organisations?

None

Report author:

Name and job title:

David Butler
Head of Planning Policy & Environment

Service

Planning Policy and Environment – Planning & Regulation

Tel and email contact:

Tel: 024 7697 2343
Email: David.butler@coventry.gov.uk

Enquiries should be directed to the above persons.

Contributor/approver name	Title	Service	Date doc sent out	Date response received or approved
Contributors:				
Usha Patel	Governance Services Officer	Law and Governance	09/06/22	09/06/22

Rob Back	Strategic Lead Planning	Streetscene and Regulatory Services	09/06/22	09/06/22
Names of approvers for submission: (officers and members)				
Mark Williams	Lead Accountant, Business Partnering, Place	Finance	09/06/22	14/06/22
Clara Thomson	Planning and Highways Lawyer, Legal Services	Law and Governance	09/06/22	14/06/22
Andrew Walster	Director of Streetscene and Regulatory Services	-	09/06/22	13/06/22
Councillor D Welsh	Cabinet Member for Housing and Communities	-	15/0	

This report is published on the council's website: www.coventry.gov.uk/councilmeetings



Coventry City Council

Design Guidance for New Residential Developments

Supplementary Planning Document (SPD)
(Draft)

Contents

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DRAFT

1 Glossary

Active frontages	Elevations that add interest, life and vitality to the public realm through the use of frequent doors and windows, narrow frontage buildings, articulation of facades with projections and lively internal uses visible from the outside or spilling onto the street.
Building line	The line formed by elevations of buildings along a street. Building lines can exist along the front and rear of a line of buildings.
Bulk	The combined effect of the arrangement, volume and shape of a building or group of buildings. Also called massing.
DAS	Design and Access Statement.
Daylight	Volume of natural light which enters a dwelling to provide satisfactory illumination of internal accommodation between dawn and dusk.
Density	The number of buildings or floorspace in relation to a given area of land. In this Guide, density is more than just the number of residential units/ha.
Design principle	An expression of one of the basic ideas guiding the design of a development.
Dual aspect dwelling	A dual aspect dwelling is one with opening windows on two external walls, which may be on opposite sides of the building or around a corner.
Habitable rooms and areas	Defined as any room where individuals will sit or lie down and require a reasonably quiet environment in which to concentrate or rest. Inclusive of living and dining room/spaces, conservatories, bedrooms Where kitchens are used exclusively for preparation, these would not be considered habitable space, however, would retain a requirement for an outlook and positive level of natural light.
Focal point	A building, structure, tree or other element that stands out from its background by virtue of height, size or some other aspect of design.
Grain	The pattern of the arrangement and size of buildings and their plots in a settlement and the size of street blocks and junctions.
Human scale	The use within development of elements that relate well in size to the biology of an individual human being and their assembly in a way that makes people feel comfortable rather than overwhelmed.
Layout	The way buildings, routes and open spaces are placed in relation to each other.
Publicly Accessible Land	Includes streets, cycle links, footpaths, open spaces, play areas, street furniture and public art.
Private realm	Those spaces that belong to or are controlled by the occupier of individual or groups of dwellings. These include front, side and rear garden areas, parking courts and separate pedestrian links where

	they have been designed to connect private space, such as the rear of terraces.
Scale	The impression of a building when seen in relation to its surroundings, or the size of parts of a building or its details, particularly as experienced in relation to the size of a person.
SuDS	Sustainable Drainage Systems (previously known as Sustainable Urban Drainage Systems) - drainage systems designed to reduce surface water flooding impacts from development through the use of natural systems e.g., by creating ponds and swales and using permeable materials for hard surfaces.
Vertical sky component	The Vertical Sky Component (VSC) is a measure of the amount of visible sky available from a point on a vertical plane. The reference point used for the calculation is usually the centre of the vertical face of the window.

DRAFT

2 Executive Summary

What is a SPD?

2.1 A Supplementary Planning Document (SPD) is a document which contains additional detail on how the Council will interpret and apply specific policies in its Local Plan. An SPD cannot include any new policies that do not currently form part of the Local Plan and a SPD also does not form part of the Local Plan. However, it is a key consideration in the determination of planning applications and applicants are advised to refer to the contents of an SPD, as this will provide guidance on how the Council will carry out its decision-making functions.

Aims and Objectives

2.2 This Design Guide SPD supports Local Plan design policies by setting out what the Council considers to be good residential design. Its purpose is to provide guidance to the development industry, the Council and the public on how to ensure that the city's future housing development has the required high quality and inclusive design to help deliver the great place, community and future desired for Coventry. The Guide sits alongside, and should be read in conjunction with, other design guidance documents the Council has published.

Applying the SPD

2.3 The Guide relates to all new residential development in the city. This includes:

- New housing units in the form allocated sites, windfalls and infill through to new neighbourhoods and sustainable urban extensions.

2.4 The Guide does not provide guidance on matters already addressed by national Building Regulation requirements (e.g., energy and water efficiency and disabled access). The city benefits from a number of specific and detailed conservation area character documents in the form of supplementary planning documents (SPD) and conservation area appraisals. This Design Guide sits alongside these documents and should be read in conjunction with them.

2.5 The Government and other bodies are expected to prepare or amend their policies, advice and guidance in a number of areas referred to or relevant to this SPD. Where this occurs, new or changed documents could also be material planning considerations which may need to be considered alongside this SPD.

3 Introduction

3.1 This Guide sets out design considerations for all scales and types of development that provides new residential buildings or conversions. Existing homeowners seeking design guidance for alterations to their property should refer to the Householder Design Guide. This Guide works from strategic issues down to detailed matters and reflects the sequence by which successful places are designed. The SPD is structured to ensure the following key elements are covered by:

- summarising relevant Local Plan policy that is relevant along with key aspects of national policy;
- setting out the information that should be included when submitting a planning application;
- providing a checklist/questionnaire that all applicable developments can use; and
- providing guidance on good practice in residential design.

3.2 This SPD is intended principally for applicants for planning permission and their agents, and for planning decision makers. It has been produced to ensure that applicants provide the right information so that planning decision makers can assess whether development proposals comply with Local Plan policy DE1 – Ensuring high quality design.

3.3 This SPD is a material consideration in planning decisions and decision makers will use it to help determine planning applications. This SPD replaces the existing 1991 Residential Design Guide SPG.

How to use this guide

3.4 This guide sets out design considerations for all scales and types of new residential development. It works from strategic issues down to detailed matters and reflects the sequence by which successful places are designed. Particular attention should be paid to the specific guidelines set out in the blue principle boxes in chapters 5 – 10.

3.5 All developments will need to be designed in light of the Council's overarching design principles set out in Chapter 5. Table 1 should also be used to determine which of the specific guidelines in Chapters 5-10 are likely to be applicable to a particular development.

4 Policy Context

National Planning Policy Framework

4.1 The NPPF, revised in July 2021, sets out the Government's planning policies for England and how these should be applied. Its main purpose is to protect the environment, promote healthy communities and sustainable growth.

4.2 Among the key changes to the NPPF are updated policies aiming to improve the design of new developments, in response to the findings of the government's Building Better, Building Beautiful Commission. Key elements of this approach include:

- changes to the overarching social objective of the planning system (paragraph 8b) to include the fostering of "well-designed, beautiful and safe places".
- introducing a new test that development should be well-designed (paragraph 133). This says that "development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes".
- the test clarifies that "significant weight" should be given to "development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes". Significant weight should also be given to "outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area", paragraph 133.
- paragraph 128 states that in order to "provide maximum clarity about design expectations at an early stage", all local planning authorities "should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences".

National Planning Practice Guidance

4.3 The national planning practice guidance document is relevant as detailed in the 2019 Design: process and tools¹. This useful document should be read alongside this guidance,

¹ www.gov.uk/guidance/design

the National Design Guide² sets out the characteristics of well-designed places and demonstrates what good design means in practice.

Local Policy Context

4.4 Local design policies can be found in the adopted Coventry Local Plan 2017. This Guide has been prepared to provide detailed guidance for residential development in relation to these design policies, particularly DE1 – Ensuring High Quality Design, see figure 1.

4.5 The Design Guide is intended to be read and used as a companion document to other Council design publications. At the current time this includes:

- Sustainable Urban Extensions Design Guidance SPD, 2019;
- Design Guidance on Shopfronts for Conservation Areas and Historic Buildings, 2014; and
- City Centre Area Action Plan, 2017.

4.6 This SPD replaces the following SPD/SPG:

- Residential design guide SPG, 1991

² www.gov.uk/government/publications/national-design-guide

Figure 1: Coventry Local Plan design policy

Policy DE1 Ensuring High Quality Design

1. All development proposals must respect and enhance their surroundings and positively contribute towards the local identity and character of an area.
2. The setting, integrity and character of heritage assets will be protected in accordance with Policy HE2.
3. All development will be expected to meet the following key principles:
 - a) respond to the physical context of the site;
 - b) consider the local distinctiveness and identity of the site but also have regard to opportunities to enhance the local built and natural environment through new development and enhanced design;
 - c) where appropriate, retain and incorporate into the layout the protection of important views, including key views of the three spires;
 - d) preserve or enhance the character and setting of the historic built, landscape and where appropriate archaeological environment;
 - e) preserve or enhance the character and setting of major road, rail and canal corridors;
 - f) clearly define the boundaries between public and private spaces and enclosure of space;
 - g) provide attractive, safe, uncluttered, active and easily identifiable, high quality public spaces;
 - h) make places that inter-connect and are easy to move through;
 - i) ensure places are easily understood by users, with clear routes and distinct physical features;
 - j) seek high quality design and attention to detail in the layout of developments, individual buildings and infrastructure in terms of function and impact, not just for the short term, but over the lifetime of the development;
 - k) be adaptable to changing social, technological, economic and market conditions and ensure that developments maximise the use of the site;
 - l) promote diversity through mixes of uses within a site or building, which work together to create vital and viable places;
 - m) be proactive in responding to climate change and adopt sustainable and low carbon construction principles in terms of their design, layout and density;
 - n) consider green infrastructure at the earliest stage in the design process, to ensure that it is well planned, designed, managed and maintained. It should also be well integrated and serve multiple purposes (as appropriate);
 - o) support the integration of through routes for public transport and incorporate suitable bus priority measures as appropriate;
 - p) minimise adverse impact on important natural resources;
 - q) conserve, restore or enhance biodiversity; and
 - r) respect and enhance landscape quality including trees, hedges and other landscape features of value.

5 Design Process Expectations in Coventry

5.1 The Council will expect development proposals seeking planning permission to have evolved through an iterative design process. Larger schemes (50+ net new units) will be expected to follow all steps identified in Table 2.

Table 2: Design process

STEP 1	Site analysis	Site & its context
		Opportunities and constraints
		Understanding of policy environment
STEP 2	Interpreting the brief	Vision setting
		Concept plan
STEP 3	Engagement	Community and neighbour engagement
		Council Pre-application discussions
		Statutory consultee engagement
STEP 4	Detailed design	Concept refinement
		Master planning
		Plot plans
		Design and Access Statements
		Detailed design
STEP 5	Submission	Planning application

Note: Steps 4 and 5 are not expected at Outline application stage

5.2 For larger schemes (50+ net new units) the Council requires the design of the project to have been subject to review at pre-application stage. Further information on this process can be found on the Council's website³.

³ [www.coventry.gov.uk/info/110/planning/3082/pre-application advice for planning highways and drainage](http://www.coventry.gov.uk/info/110/planning/3082/pre-application%20advice%20for%20planning%20highways%20and%20drainage)

Vision setting

5.3 Successful developments are underpinned by a guiding design vision. Once established and adopted by all parties, the vision anchors and guides the design team and enables it to communicate clearly and simply what the development is seeking to be and achieve

5.4 Applicants should develop their design vision early in the development process and then clearly articulate it to the Council in order to achieve a mutually agreed approach to any given development site and proposal.

5.5 Where, innovative, contemporary design solutions are proposed it is nevertheless critical that proposals are resultant of an understanding of context, to ensure proposals make a positive contribution toward wider character. Creating outstanding or innovative designs which promote high levels of sustainability will be welcomed, and help continue the cities rich history of architectural innovation, so long as they fit in with the overall form and layout of their surroundings.

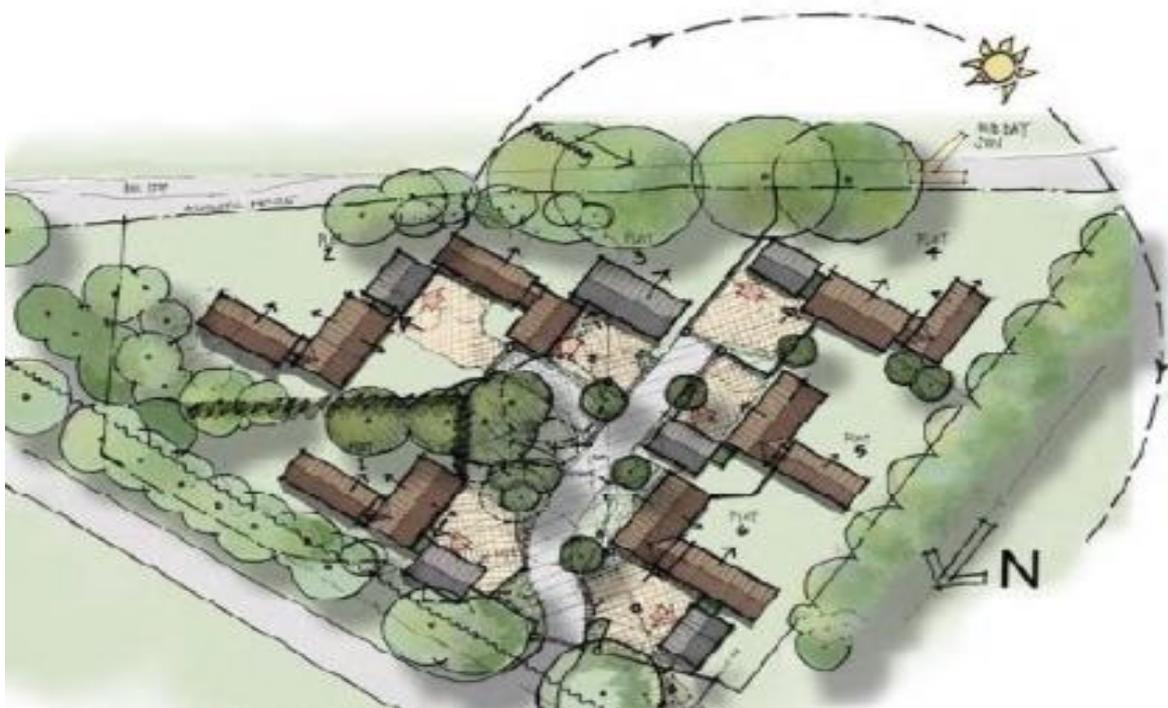
Where applicants seek to deliver innovative design outcomes, a design rationale will be required to be submitted alongside proposals in order to articulate the design development process, evidencing an appropriate grounding to local context which presents the scheme with the following points of assessment and rationale :

- Site constraints and opportunities analysis
- Key identifiers of character in local context, including;
 - Materiality
 - Architectural detailing
 - Scale, form & built environment hierarchy
 - Built form plan arrangement and urban grain
 - Landscape characteristics
- Design vision & architectural narrative
- Design development stages, showing design evolution steps
- Evidencing responsiveness through re-interpretation, testing the proposals back to key character identifiers
- Summary of rationale and design outcomes, outlining how the proposals have sought to deliver their own innovative design solution whilst being responsive to local context and a positive contributor to local character.

Concept Plan

5.6 For medium and larger schemes the vision should be supplemented by a high level concept plan. The aim of the concept plan is to show in a simple and clear way the key design principles that underpin the layout of the proposed development. It should include an indicative layout and illustrate key components such as access points, focal points, broad street and green space layouts and key site features to be retained. A concept plan is a higher-level document rather than a masterplan, see figure 2.

Figure 2: illustration of a concept plan



5.7 Together, the vision and concept plan can sum up what kind of place is being created. This allows the developer, Council and the local community to discuss how the basic structure of the proposals can be evolved and improved.

Principle 1: Concept Plan

- **All developments will be expected to set out the guiding vision for the development. Developments of 10 or more dwellings should also provide a concept plan in the Design & Access Statement.**

Providing masterplans and plot plans

5.8 More detail of the design will be provided in masterplans. For medium and large sized development, developers will also be expected to provide plot plans (sometimes referred to as conveyancing or platting plans) showing the extent of public and private ownership and all plot boundaries as part of their application.

Principle 2: Concept Plan

- **Developments of 10 or more dwellings will be required to provide plot plans to clearly identify ownership boundaries and public/private spaces.**

Community Involvement

5.9 It is recommended that developers and designers seek the views and opinions of the local community to inform preparation of proposals. The extent of community involvement in larger developments will depend on the project's scale and complexity of issues. Applicants should refer to the Council Statement of Community of Involvement.

5.10 Details of the community engagement process and results should form part of the Design and Access Statement (DAS).

6 Layouts

6.1 The large structural elements of a residential development are vital in terms of setting whether it functions effectively. These structural elements include landscape, street and open space networks, use mixes, plot and building layouts. Carefully designed layouts create the framework upon which great places can be created and maintained. Poor layouts create poor places which are difficult to correct.

6.2 Designers and architects should pay particular regard to the following layout matters to ensure that great places can be created:

Connectivity

6.3 Woven through the urban areas of Coventry is a network of public spaces made up of streets, parks, public open spaces and paths. This framework allows people to get to where they want to go and to spend time outdoors.

6.4 Some parts of Coventry have dense networks of connected spaces and routes for pedestrians, cyclists and vehicles that are easy to understand and navigate. Other areas could be better connected with streets and estates isolated by cul de sac layouts and lack of connections to surrounding areas (Figure 3). Developers may find local character guidance set out in other SPD's useful in identifying whether the development site lies in an area of good or poorly connected streets.

Figure 3: illustration of a poorly connected layout and well connected streets



6.5 New development will be expected to connect into and extend the surrounding route and space network in a high quality, safe and legible way. Although the Council does not wish to create vehicular rat runs through residential areas, cul de sac layouts will generally be resisted unless connectivity to surrounding areas can be introduced via open space or footpath/cycle links. New footpaths/cycleways should be high quality, acting as corridors for green infrastructure and generally lit by low level solar powered lighting. Designers should also look for opportunities to improving existing poorly connected places.

Principle 3: Connectivity

Residential developments should:

- **Connect into and complement the existing local network of routes and public open spaces.**
- **Ensure that the internal network of routes and public open spaces are well connected, legible, direct and safe.**
- **Ensure connections for pedestrians, cyclists and public transport are given the highest priority.**
- **Look for opportunities to create connections into/through neighbouring land so that a well connected network can be created in the event of future land release and development.**
- **Should enable the connectivity of the natural environment in both public and private space.**

Street Design and Enclosure

6.6 Streets are the bedrock of places and make up the greater part of the public spaces within Coventry. They allow people access in, out, and through places, are spaces of social interaction and are vital in creating the character of an area. Street quality has a significant impact on how those living, working and visiting Coventry experience the city and it is important that they are legible, safe and attractive places to be in.

6.7 Many of Coventry's existing streets have a strong green character reflecting the heavily treed nature of the city and its links to the parkland. The council wishes to perpetuate and enhance this soft green character in its streets to reinforce the special characteristics and identity of the city. Designers will be encouraged to make use of green infrastructure

in the form of street trees, planted verges, green walls and gardens in new residential development to help maintain the ever expanding green character of the city.

Figure 4: Coventry street image illustrating soft landscaping character



6.8 Residential streets should have building height to street width ratios that provide for a good sense of enclosure without overwhelming people who are using the streets. Street design should consider the context and fall within appropriate height to width ratios.⁴

Figure 5: an example of buildings, boundary treatments and trees being used to enclose a street successfully



⁴ Street widths should be measured from the front of the building on one side of the street to the front of the building on the other side of the street. This will mean front gardens, pavements, cycle lanes, verges and road carriageways are included in the street width.

Principle 4: Street Design

Residential developments should:

- **Be based on streets designed as places primarily for people. Particular attention will need to be given to streets needing to carry high levels of vehicle movement.**
- **Create a legible hierarchy of streets based on street character and form. Street layouts dominated by cul-de-sac type layouts will be resisted.**
- **Use street layouts that make walking and cycling more attractive and convenient for short trips than using the private motor car. Distances by foot and cycle should be shorter and more direct than by car.**
- **Create animated and active streets by using fine grain development and designing strongly active frontages on the network of streets and other routes. Blank or poorly active frontages (including buildings that turn their side or backs onto the street) will be resisted.**
- **Not contain overly engineered streets led by highway requirements.**
- **Use focal points, enclosure, setbacks, pressure vacuums, deflections and other townscape features to create visually interesting streets. Streets will be expected to be visually rich and aesthetically pleasing for people using them.**
- **Use appropriate trees, vegetation, gardens and open spaces to create a strong soft, green character to streets.**
- **Design spaces within the street to facilitate social interaction. This could include pause points, small amenity spaces, seating and squares.**
- **Ensure streets are safe places by considering the needs of vulnerable users and providing active frontages, good lighting, clear, obstacle free routes for pedestrians and designing in traffic calming measures to restrict vehicle speeds.**

Shared spaces

6.9 Shared spaces are streets and areas of public realm in which all uses have equal status. They involve the introduction of features which influence driver behaviour to reduce vehicle speeds and create places that encourage a high level of social interaction between residents. They work best in short residential streets such as mews, cul de sacs and rural lanes.

6.10 Shared streets are increasingly being promoted in Coventry. Although the Council welcomes this approach, it is important the design is carefully considered to ensure that the

needs of all road users (including vulnerable groups such as children, elderly and disabled) are catered for.

Figure 6: an example of a good, shared surface pedestrian friendly street



Principle 5: Street Design

Principles governing the design of shared spaces in Coventry:

- **Motorists should be treated as ‘guests’, who will be expecting to find other people walking, playing, and cycling in the street space.**
- **Shared spaces should generally be restricted to short lengths of streets. Developments of over 80 dwellings should contain a mixture of shared space and zones where the movement of vehicles takes a higher priority.**
- **Long stretches of surface with no refuge areas for vulnerable road users should be avoided.**
- **Materials and form should encourage safe play and social interaction between residents.**
- **Provision for car parking needs to be effectively integrated into the street in a safe and attractive manner.**

Density

6.11 Coventry has a finite supply of land allocated for housing and given it is a relatively compact built up city with tightly defined boundaries, it is important that land resource is used efficiently to deliver the new residential development that the city needs. This may involve intensifying the urban fabric both in terms of numbers of houses or bedrooms(density) and in the amount of built mass.

6.12 Building at higher density, where appropriate and in accordance with the Coventry Local Plan density policy, can create a more intense environment which can be visually and socially exciting. It can also allow for additional populations to help maintain and support vital local facilities such as public transport systems, local shops and community centres. High quality, denser development at locations which are sustainably located will be encouraged, provided they are supported by adequate green infrastructure. This could include pocket parks, roof gardens, green walls, community gardens and communal amenity space. Such locations are likely to include windfall developments in the designated centres and the string of neighbourhood areas across many Wards of the city.

Principle 6: Density

- **Housing development should seek to achieve the highest density possible without adversely impacting on the amenity of neighbours and residents or compromising local character, the environment or the appearance of an area.**
- **Residential developments in higher intensity locations will be expected to be supported by generous green infrastructure provision which will provide the appropriate level of amenity space.**

Uses and mix

6.13 Mixed and balanced communities are seen as being important in delivering the sustainable, high quality great places for Coventry's residents. Mixes of densities and dwelling types, sizes and tenures are seen as being vital in the creation of attractive neighbourhoods and the city will actively pursue this in all applications. Where appropriate, mixed use developments also play a significant role in providing homes, jobs and opportunities for community, leisure and retailing needs.

6.14 Details of the Council's housing mix need in terms of housing size, tenure and specialist accommodation types are outlined in the latest SHMA⁵. Designers are encouraged to discuss with the city planning team at an early stage the specific nature of the mixes that a residential development site should seek to deliver.

Principle 7: Density

- **All residential development should contribute to the provision of balanced communities through the provision of a mix of residential densities, housing forms, sizes and tenures. Larger residential development sites will also be expected to deliver a mix of uses.**

Plots

6.15 Plots are important elements in the character of an area. Their sizes, especially the widths along a street frontage are key determinants of the rhythm of buildings and spaces along a street, how active it will be and the grain of development in an area.

6.16 Streets with regular, clearly defined plot rhythms that are fine grain create the most interesting and attractive street scenes. Development that disrupts the rhythm of existing plots can create unattractive, inactive street scenes (Fig 7).

Figure 7: sketch diagram illustrating perception of plot rhythm



⁵ www.coventry.gov.uk/downloads/file/19652/lp42_coventry_shma_2012_-_gl_hearn

Principle 8: Plots

- **New residential development will be expected to respond to the size, shape and rhythm of surrounding plot layouts.**
- **Plot boundaries to the front, side and rear will be expected to be clearly and strongly defined. Proposals with weak or absent plot definition and plot layouts that are out of context with the surrounding character will be resisted.**

Parking

6.17 Space to park cars can place a significant burden on the design of residential layouts. Balancing the expectations of residents and visitors for adequate parking spaces near to properties with the need to ensure parking does not unduly impact on the street scene and safety and amenity of people is a key consideration.

6.18 In order to create attractive and well-functioning layouts it is important that the space to park vehicles is carefully considered at the early stages of the design process.

6.19 This Council expects the parking standards to be adhere to***

General standards

6.20 Coventry is a city dominated by its urban fabric and tree assets coupled with the ancient Arden landscape and it will be expected that parking solutions will reflect this nature with significant use of soft green landscaping. Parking solutions involving large areas of hard surfacing will be resisted.

6.21 It is also expected that the quality of parking solutions will be high. Use of high quality hard and soft landscaping to provide appealing and functional parking spaces will be required. Developers will be expected to use porous surfacing for parking areas and will be encouraged to use different materials and colours to delineate parking bays and road carriageways.

6.22 Parking can be provided in a number of ways:

- On plot;
- In communal mews/parking courts; and
- On street.

6.23 The Council accepts that different parking layouts are likely to be required in different locations and developments may need a mix of solutions. Low density schemes, for instance will find it easier to predominantly accommodate parking on-plot whilst higher intensity schemes in more urban locations may need to use solutions involving undercrofts or on street provision. Whatever solution is used, it is important that it is high quality and that the residential layout is not visually and functionally dominated by parked cars.

Figure 8: example pic showing use of materials to delineate parking bays



Principle 9: Parking

Parking layouts should be high quality and designed to:

- **Reflect the strong urban fabric and Ancient Arden identity of the city. All parking arrangements should be softened with generous soft landscaping and no design should group more than 3 parking spaces together without intervening landscaping;**
- **Ensure developments are not functionally and visually dominated by cars;**
- **Maintain activity in the street without adversely affecting the attractiveness of the streetscene;**
- **Minimise impact on the amenity of residents;**
- **Unobstructed and inclusive access to front and rear of a property by 1.2m to provide futureproofing for all users**
- **Be safe, overlooked and convenient for users; and**
- **Be spaces that are visually and functionally attractive in the street scene.**



Figure 9: Ancient Arden: An interesting grouping of buildings that have grown and evolved over time with parking arrangements integrated well within the existing landscape.

Parking space standards

6.24 For details on the number and sizes of parking spaces in residential schemes developers should contact the Councils Highways team and the Coventry Connected SPD⁶ to ascertain the adopted standards.

On-plot parking

6.25 On-plot parking can occur to the front, side or rear of dwellings. It may include integral or stand-alone garages and carports.

6.26 The Council's preference is for parking to be to the side or rear where adverse impacts on the street scene and amenities can be more effectively managed. Where parking has to be provided to the front it is important that the visual impacts are mitigated as far as possible. Potential solutions include landscaping, staggered buildings, separation and use of boundary treatments. It is also important that buildings are set back far enough from the road to enable cars to be comfortably parked in front. Enclosure of front on plot parking areas with vegetation will be strongly encouraged.

6.27 On-plot parking generally requires many crossovers onto the highway. In heavily treed landscapes the landscape screen along plot boundaries is a key element of local character. In such locations a single shared drive may be required from the street to serve dwellings with on plot parking.

6

www.coventry.gov.uk/downloads/download/5195/coventry_connected_supplementary_planning_document_spd

Principle 10: Parking on-plot

On-plot parking should generally be provided to the side or rear. Where front of plot parking is proposed this should be enclosed with soft landscaping and not:

- **Dominate the appearance of the plot or the street scene with extensive hard surfacing or multiple or over wide vehicle cross overs.**
- **Result in vehicles overhanging the pavement or lying hard up against habitable rooms.**

Parking Courts

6.28 Communal parking courts are private car parking areas, typically positioned either to the front or rear of dwellings. Parking courts are used for flats and intense terraced housing.

6.29 Parking courts should be designed as attractive, busy, safe spaces in their own right.

Figure 10: Images showing front parking with a variety of surface treatments and enclosed with soft landscaping



Principle 11: Parking courts

- Car parking courts should be designed with active frontages and to be multi-purpose.
- Parking courts should be attractive places with high quality hard and soft landscaping.
- Dwellings with frontages onto streets should not have their main frontage to rear parking courts.
- Where parking courts are provided to the front of development, they should be enclosed with strong soft landscape screens and not be dominant elements in the street scene

On-street parking

6.30 If well designed on-street parking can add to the vibrancy and variety of a street scene. The Council's preference is for visitor and non-allocated parking to be provided on-street where possible and appropriate to local character.

6.31 Where on-street parking is proposed, then the street must be purposefully designed to accommodate it. Parking bays may accommodate parallel, perpendicular or angled spaces.

Principle 12: Parking on-street

- Where provided, on-street parking will be expected to be high quality in terms of layout and materials. On-street parking should not dominate the street scene and must be integrated with other street features. Positioning of on-street parking should not dominate adjoining plots and residential uses.
- Street car parking will be expected to be placed in a landscaped street setting utilising hard and soft features of a high quality.
- Where bays are provided, they should accommodate no more than a cluster of 3 cars.
- Where the width of the road has been increased to accommodate on-street parking designers will be expected to employ features such as increasing building height, street trees or other planting to ensure that the street is well enclosed.

Figure 11: 2 images showing i) a lack of space for on-street parking, no marking of parking bays and lack of softening landscaping creates an unattractive, poor street environment that is unsafe for pedestrians ii) attractive on-street parking solutions in a landscaped setting



Defining Public/private space

6.32 It is important that the boundaries between public and private space are clearly defined. Poorly defined spaces create confusion as to ownership and use. This can lead to spaces becoming neglected, avoided and unattractive.

Principle 13: Boundary Treatments

- Where appropriate boundary treatments of at least 1m in height will need to be provided in residential environments to clearly define the boundaries of public and private space.
- Developments that leave space with unclear ownership will be resisted.

Figure 12: 2 images showing i) Poor definition makes it unclear what space is in private ownership and what is public ii) good definition of public/private spaces.



Informed by Environment

6.33 Where new development can call upon informative environmental opportunities in layout designs these should be integrated into the proposals. Positive response to features such as waterways (e.g., canals and rivers) field patterns and woodlands should be positively considered in order to ensure that proposals are positively responsive to the surrounding environment.

DRAFT

7 Built Form

Building positioning

Building lines

7.1 Front building lines help to define the street and the degree of street enclosure. Rear building lines are important in protecting neighbour amenity, especially at 2 storey levels. Where dwellings are detached or semidetached, building lines along the side walls can help maintain visual gaps and protect the amenities of neighbours.

7.2 The Council will expect new developments to give careful consideration to all forms of setbacks.

7.3 Occasional variation from a common front building line may provide opportunities to add visual interest to street scenes. Developers may consider using this as a design feature where positive opportunities arise and no adverse impact on neighbour amenity would be likely to arise.

Figure 13: image showing a front building line





Principle 14: Building Lines

- **Setbacks in new developments should complement the street scene, avoid impacting on neighbour amenity and allow for suitable landscaping and open space.**
- **Setbacks that erode character, street enclosure and amenity of neighbours will be resisted.**

Solar & sustainable design

7.4 The Council strongly encourages designers to design buildings to minimise energy consumption by taking advantage of the sun's energy. This opportunity should be considered at the early stages of the design process.

7.5 Passive solar design involves orientating buildings to maximise the entry of low winter sun for passive solar heating. Facades with generous fenestration with no overshadowing need to be orientated buildings within 30 degrees of due south to gain from solar heating (Fig 14). When employing passive solar design designers will also need to

consider how to maximise solar collection during winter and minimise overheating during summer months.

7.6 Active Solar Gain uses building facades and roofs to collect solar energy for conversion into electricity or hot water. Any aspect within 30 degrees due south is ideal (Fig 15). The Council is supportive of active solar micro renewable technologies where they do not have a detrimental impact on the appearance of the building and street scene.

Figures 14: Principles of passive solar design

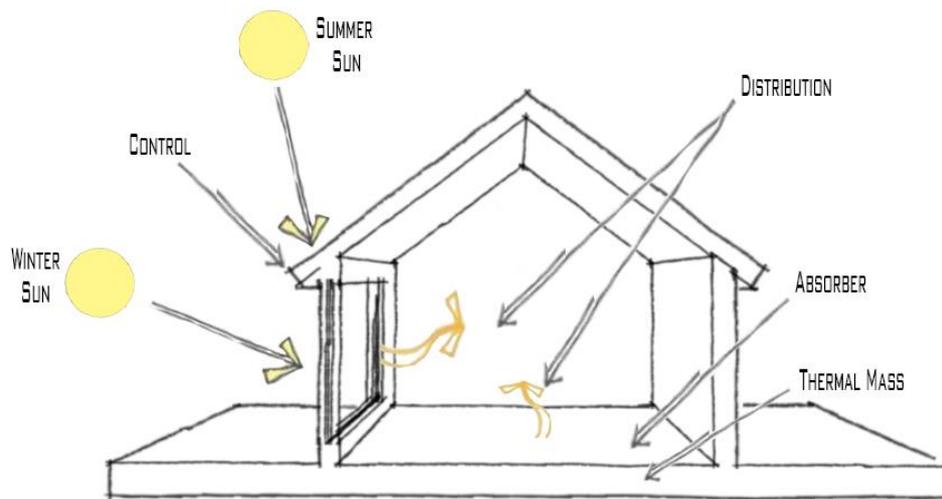
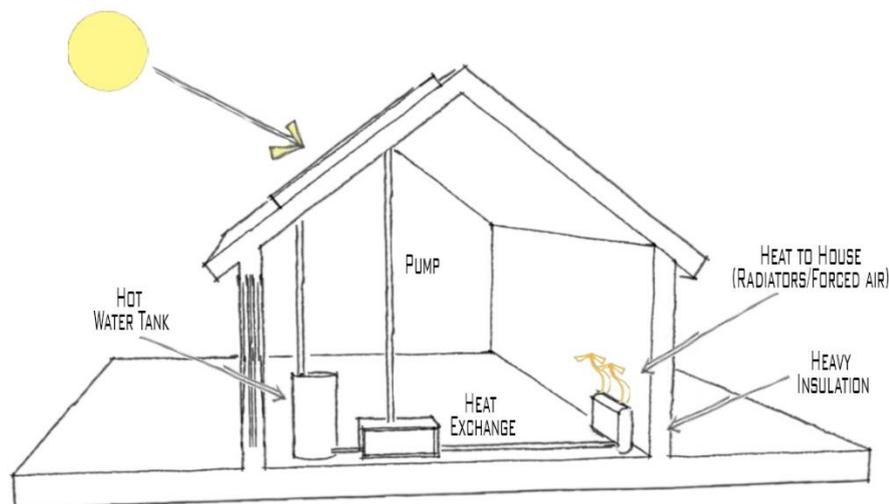


Figure 15: principles of active solar design principles



Principle 15: Sustainable Design

- **The Council will expect new residential developments to make optimal use of natural light and warmth so as to minimise the use of energy for lighting and heating.**
- **Proposals that fail to incorporate passive solar design will be resisted unless there is strong justification for not integrating it into a building or site.**
- **Developments that overshadow existing light dependant micro renewable technologies (e.g. photovoltaics, and solar hot water panels) on neighbouring properties will be resisted.**

Building scale, massing & form height

7.7 The height of a building has an important impact on the character and enclosure of a street scene. Buildings that are too low in relation to the width of a street provide low levels of enclosure and unsatisfying street scenes, whilst buildings that are too high in relation to the width of a street create dark, overwhelmed spaces that do not feel human scale.

7.8 Buildings that are out of context with their neighbours in terms of height may also create unsatisfactory visual and physical relationships. There is also a greater likelihood of an overly tall building having adverse impacts on residential amenity. Varied building heights can add interest to a streetscene and are encouraged as long as they are contextually appropriate in the Streetscene judged on their individual merits.

7.9 In general, the more rural and suburban areas of the borough tend to have building heights of 1 to 2 storeys with ridge heights of around 7.5 – 8m with occasional 3 storey status or focal point buildings. This low height is a strong defining element in the character of these lower density areas and the Council will seek to maintain this.

Figure 16: Images showing i) two story suburban residential accommodation and ii) taller residential development in the city center (flats ideal)

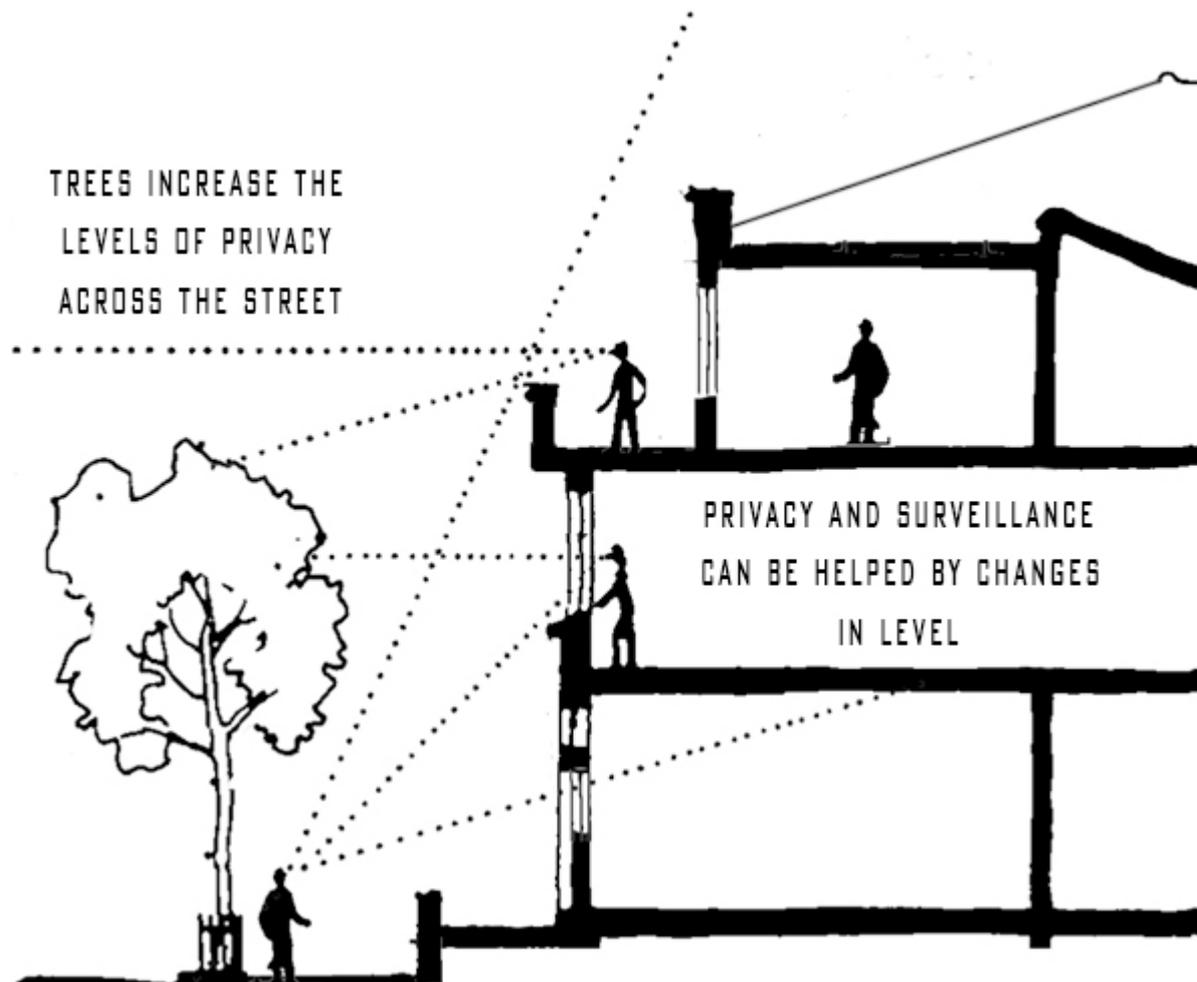




7.10 Building heights are more varied in tighter urban environments and can often be in excess of 3 storeys. In the city centre, residential buildings of 3 storeys or more will be encouraged, subject to impacts on street and residential amenities being satisfactorily resolved.

7.11 Where there is concern that a building height could adversely impact on the street or neighbour amenities designers should consider setting the upper floor/s back from lower storeys (Fig 17)

Figure 17: sketch diagram showing use of upper floor setback to maintain light to public and private realm



7.12 Developers may need to supply details of the street widths to building height ratios along with information on topography and the scale of neighbouring properties to enable the Council to assess how a proposal's height may fit into the street scene and impact on neighbour amenities.

Principle 16: Building heights

- **The Council will expect buildings heights to help enclose the street without overwhelming it. In suburban and semi-rural fringe areas, building heights will generally be expected to be lower with occasional increases acting as visual focal points. Taller buildings will be more acceptable in city centre locations.**
- **Building heights should not result in adverse impacts on residential amenities and will be expected to enable a building to integrate well into its surrounding context.**

Scale & massing

7.13 The footprint that a building makes on the ground, along with its height, and the amount of space around it determines the mass of a dwelling and the impact it has on the street scene.

7.14 Most existing residential areas have discernible patterns of massing and it would be expected that new development would reflect this pattern.

Principle 17: Scale and Massing

- **New residential development should be responsive to the spacing, heights and building footprints of existing buildings, especially when these are local historic patterns such as the Ancient Arden landscapes.**

Roofscapes

7.15 Rooflines, roof shapes and chimneys can have an important influence on the character of a street scene. Designers should consider this aspect of their proposals carefully and look to use the roofscapes they create to enhance buildings and townscapes. In higher intensity developments, developers will be expected to consider using roof spaces to provide green infrastructure.

7.16 In Coventry residential roof forms are based on pitches with hips and gables with various forms of dormers. More contemporary styles have explored flat and curved roof forms.

7.17 Buildings that are overly deep were historically bridged with a double pitched roof. More contemporary approaches have been to propose a large element of flat roof behind short pitched to span the depth, often leaving unattractive and contrived roof forms, whilst utilising

roof areas for additional spaces may be welcome, impact of this from all aspects must be taken into consideration.

Figure 18: Image showing a corner plot which are particularly good locations to consider opportunities to introduce variations in roofscapes for visual interest and the creation of focal points



Principle 18: Roofscapes

- **Proposals to introduce roof forms on residential development that diverge from the prevailing character of residential development will be resisted unless it can be demonstrated that the proposals would make a positive contribution to the streetscape.**
- **Where a building has been designed to reflect traditional forms and styles, roofscape should be similarly responsive to contextual precedents.**
- **Opportunities for roof terraces and balconies are welcomed, provided they are in keeping and context to their setting.**

Active frontages

7.18 There should be a strong relationship between the street and the buildings and places that frame it. Buildings should front onto the street and animate it with 'active' frontages to provide interest, life and vitality to public realm.

7.19 Active frontages mean:

- Frequent doors & windows, with few blank walls;
- Articulation of facades, with projections such as bays and porches; and
- Key habitable rooms fronting onto the street so that lively internal uses are visible from the public realm.
- Where schemes provide communal functions the use of highly transparent façade treatments can positively contribute to the delivery of active frontage.
- Where communal areas offer opportunity for public interaction/use would be welcomed

Figure 18.1 and 18.2 images showing i) a place with frequent doors and windows facing a street and ii) an inactive frontage with a blind façade at street level





Minimum internal space standards

7.20 In 2015, the Government produced national internal space standards covering dwelling sizes and storage requirements⁷. Developers will need to take these into account when designing new residential developments.

Principle 19: Space Standards

- **As a minimum, the Council will expect new housing development to comply with the national internal space standards.⁸**

Adaptable Homes

7.21 The Council considers it important that homes are flexible enough to adapt to the changing needs of occupants over time. Lessons may be learnt from historic housing forms such as Victorian and Edwardian terraces, which have proved very adaptable to modern living. National Design Guide standards look to create dwelling spaces that are accessible, adaptable and flexible.

⁷ www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard

⁸ <https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard/technical-housing-standards-nationally-described-space-standard>

Principle 20: Adaptable Homes

- **Buildings should be designed so that they have the ability to be adaptable to future needs.**

Architectural detailing

7.22 Architectural detailing has an important role to play in setting the quality of a development. It is also important in setting or reinforcing the character of an area.

7.23 Examples of Architectural details may include windows proportions and style, doors, chimneys, eaves lines, cills, window to wall ratios, string courses, corners, fenestration, roof overhangs, colour, materials, gables & hips, pediments and brickwork styles (Fig 19).

Figure 19: Image showing architectural features that may be considered when designing built form.



7.24 The Council will expect developments to exhibit high quality architecture which reinforces the design vision for the scheme. The design should be carefully considered to

create a rational, coherent whole with a visually pleasing balance of proportions. The use of high quality materials will be an added important element in creating an architecturally satisfying development.

7.25 Developments can take a contemporary or traditional approach and can be designed with formal or informal styles. Attention to detail is vital to ensure that a development is successful. Buildings where the elements have been well put together will be pleasing to the eye, will last well and will complement the spaces they face, whatever the style of architecture.

7.26 This Council values architectural honesty. Pastiche designs that incorporate a mix of historic styles and detailing will generally be resisted as this typically creates a confused, poor quality visual appearance that does not specifically relate to any specific building style or age. If a traditional/vernacular language is being applied, it is important that details (such as windows and doors) are convincing. Where designers seek to mix architectural styles to create a contemporary approach, the Council will look for attention to detail and high quality with strong architectural justification for the proposals.

7.27 Coventry has a strong legacy of public art, particularly from the post war period where public art formed an integral part of the redevelopment of the city, it is an important element in defining the character and identity of a city, locality or community. To build on this legacy, public art will be encouraged to be incorporated into new developments particularly where they have significance to local communities and reflect the character and history of an area.

Figure 20: Local precedents of good building form and architectural detailing



Principle 21: Architectural Detailing

- **Designers should use architectural detailing to create attractive buildings that positively contribute to the character and quality of an area. Buildings that employ architectural detailing that is unattractive, low quality or is not honest or legible will be resisted.**

Windows

7.28 Windows are particularly important detailed features on a building. Designers will be expected to pay particular attention to window proportions, positioning, symmetry, frame thicknesses, recessing/projection and surrounding decoration (e.g brickwork arches). If a traditional vernacular design language is being applied it is important that details are as convincing, rather than paying lip service to precedent.

7.29 Window to wall ratios will also need to be considered. Public facing elevations that have large area of blank wall with limited amounts of glazing will be unacceptable.

7.30 Ground level windows that are distinctly taller than fenestration on upper floors help to maintain balance and harmony and create pleasing compositions (Fig 7.6). Either recessing windows or enabling them to project beyond a façade provides an elevation with articulation and visual richness.

Figure 21: Taller ground floor windows, symmetrical glazing that is well proportioned and taller on the ground floor than at upper levels.



Principle 22: Architectural Design

- **Window design visible in the public realm should be high quality and create visually balanced and harmonious compositions.**
- **Poor quality window design will be resisted, especially where it will be visible in the street scene.**
- **Large areas of blank wall with limited glazing should be avoided on elevations visible from the public realm.**

8 Amenity

8.1 Residential amenity, in the form of light, privacy, outlook and provision of outdoor amenity space, is a detailed but important design matter that has a very strong influence on the quality of resident's living environment.

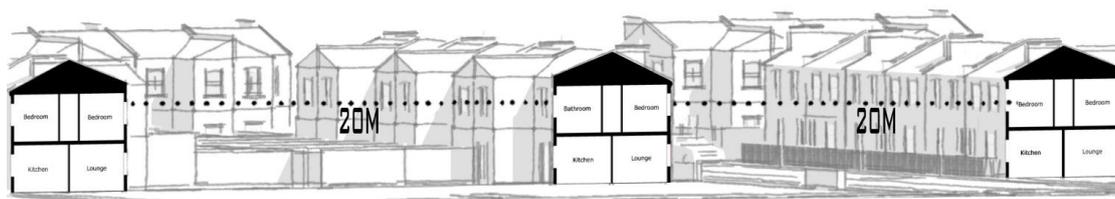
8.2 New residential developments should provide future occupiers with high quality amenities and do not undermine the residential amenities of occupiers of neighbouring properties.

Privacy

8.3 It is important that people are able to enjoy a degree of privacy which makes them feel comfortable inside their dwellings and also able to enjoy their private outdoor spaces without feeling overlooked or overheard. Areas of particular sensitivity are habitable rooms, such as the first 3m of private space behind a rear elevation and balconies or terraces which are the sole source of private outside space for a home.

8.4 A number of design solutions for maintaining privacy in new development and with neighbouring properties are available:

Figure 22: image showing 20m separation distance



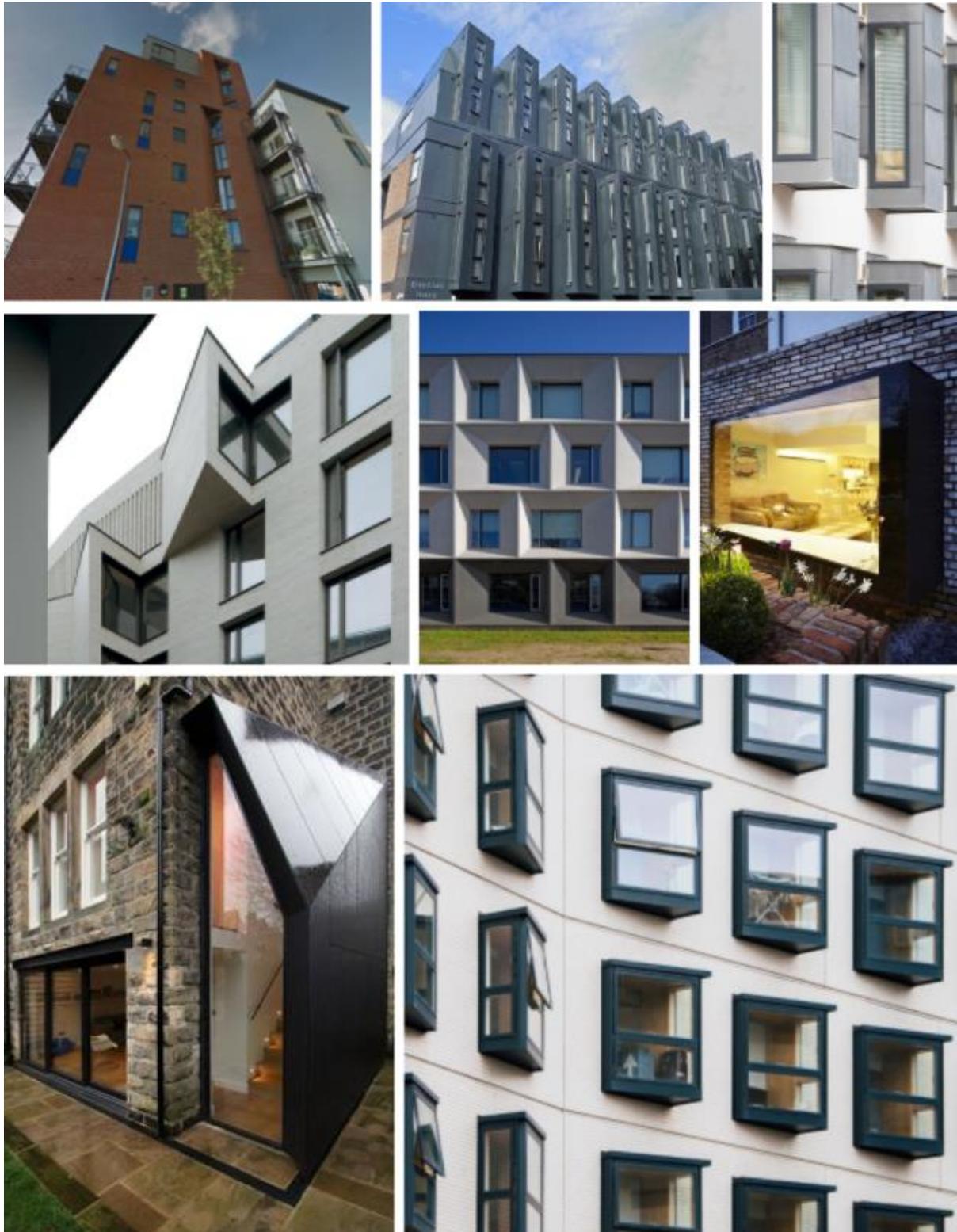
Distance:

- A minimum distance of 20m is this Council's generally accepted guideline for there to be no material loss of privacy between the rear of two storey buildings directly facing each other (i.e., a back-to-back relationship).
- Where residential development exceeds 2 storeys it would be expected that separation distances should increase this will be assessed on a case by case basis, taking account for local context
- For two storey rear to side relationships it may be possible to reduce the separation distance.
- However, there are instances where this minimum separation distance to maintain privacy may not be appropriate.
- Extra separation distance may be needed where there are significant changes in level between buildings.
- Equally, in more compact contexts (in centre of towns and villages and infill plots), or where the development is single storey, it may not be appropriate to provide the conventional separation distances.
- Alternative design solutions to maintain privacy will be needed in such instances.

Oblique angles:

- Positioning of buildings and angled windows to create oblique views are useful tools to reduce overlooking (Fig 22).
- Where buildings are angled at more than 30 degrees from each other separation distances can often be reduced
- Angled windows need to be designed to maintain adequate light levels to the rooms they serve.

Figure 23: images showing oblique window solutions



Window design:

- Roof lights, slit windows, high level windows and smaller vertically proportioned windows can be used to maintain privacy as well as provide adequate internal light levels.

Obscure glazing:

- Obscure glazing will be appropriate for bathrooms and exceptionally can be considered for other rooms provided that there is clear glazing to another window in the room which does not overlook another property. Primary Habitable spaces must always be primarily served by unobscured glazing.

Screening:

- Provided it does not create significant overshadowing small ground floor extensions, walls, fencing, hedges, trees and general landscaping can be used to provide screening to private spaces.

Figure 24: Image showing screening for both front and rear gardens



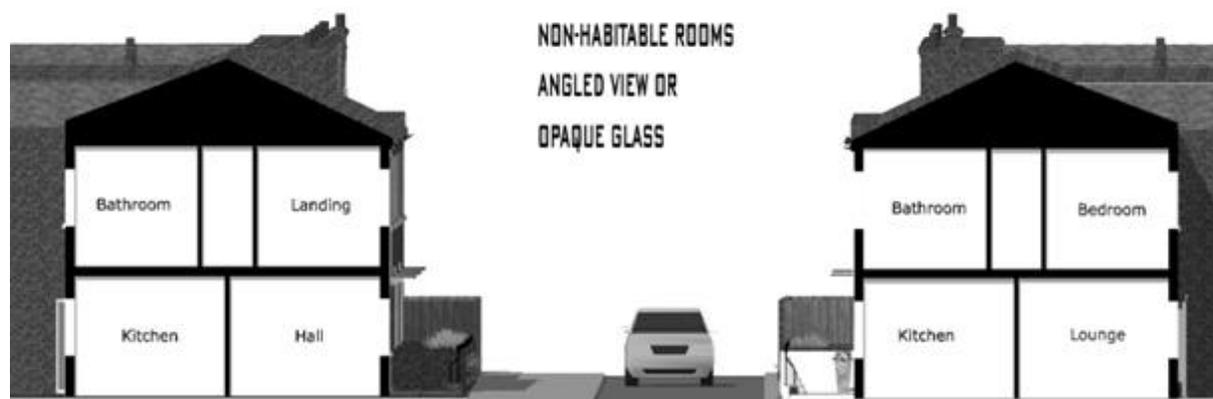
Gardens:

- Use of small front gardens can help maintain privacy for habitable rooms facing the street.
- Front gardens are also key contributors to character in many areas of the city and should be sought to be retained and respected in proposals.

Room layout:

- Intelligent layout design may be employed to offset direct relationships of habitable rooms, to contribute to maintaining privacy, and mitigate perception of visual intrusion into private spaces.

Figure 25: internal habitable room layout relationships



Principle 23: Habitable Rooms

- New residential development should be provided with a reasonable degree of privacy to habitable rooms and sensitive outdoor amenity spaces.
- Developments which have a significant adverse effect on the privacy of neighbouring properties will be resisted.

Figure 25: image showing small, enclosed gardens providing privacy to habitable rooms



Outlook

8.5 Although there is no right to a view, residents should be able to enjoy good quality outlook to the external environment from habitable rooms, without adjacent buildings, walls, parked vehicles or storage materials being overbearing or visually intrusive. Outlook from the home to exterior spaces keep people in touch with their wider surroundings, the prevailing weather and the rhythm of the day and seasons. Contact with nature and the social life of the community people live in has been shown to be important in maintaining human health and mental wellbeing.

8.6 A poor outlook relationship is caused when the height and bulk of a development, or the proximity of parked vehicles, dense high vegetation or storage materials, significantly dominate the outlook of a habitable room or area. Level changes can also create overbearing relationships and poor outlooks.

8.7 Poor outlook is also created when rooms are only served by:

- obscurely glazed windows;
- roof lights that only provide a small sky vista; and
- small oblique windows.

Such proposals that provide poor outlook are considered unacceptable.

Daylight and Sunlight

8.8 Daylight and sunlight animate and enhance resident's enjoyment of interior spaces. Good natural light reduces the energy needed to provide light for everyday activities, while controlled sun penetration can also help to meet part of the winter heating requirement.

Daylight access

8.9 It is important for the maintenance of people's health and well-being to ensure that habitable rooms in people's homes are well lit by natural daylight to facilitate a range of daily activities. It is possible for people to manage light levels in dwellings if there is too much daylight but impossible to do anything about it if there is too little. Building Regulation requirements will set the standards for internal illuminations in new dwellings but it is also important that designers consider lighting of outdoor spaces and the impact of the development on the amount of daylight reaching habitable rooms and external spaces of neighbouring dwellings.

Principle 24: Daylight and Sunlight

- **All habitable rooms should maintain at least one main window with an adequate outlook to external spaces where nearby man-made and natural features do not appear overbearing or visually intrusive.**

8.10 Design solutions to achieve good quality internal lighting of new homes include:

- providing glazing areas in habitable rooms that is not less than 20% of internal floor area of room;
- dual aspect dwellings (Fig 24); and

- Ensuring habitable rooms are served by glazing that has a vertical sky component of no less than 27%.

Figure 24: sketch diagram to show floorplan and elevation for a dual aspect dwelling



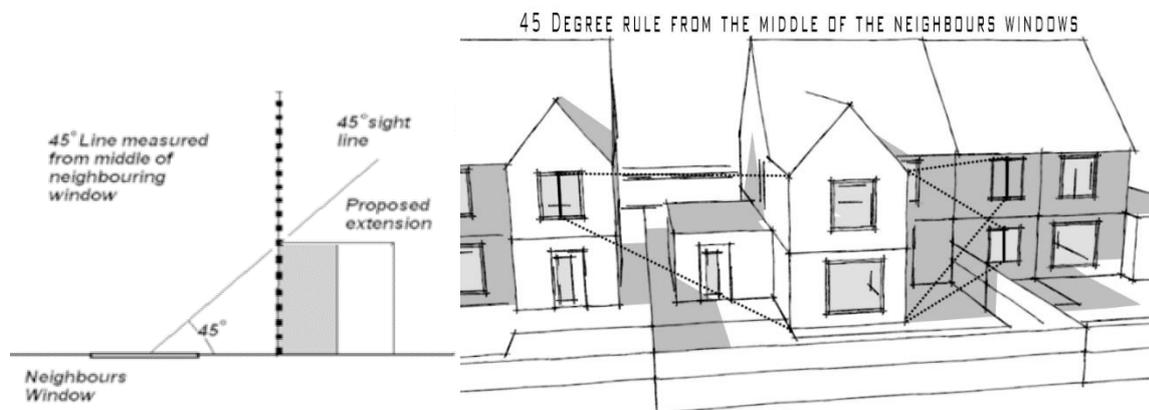
8.11 One or all of these solutions may be required to ensure people will have comfortable light levels in their habitable rooms.

8.12 Potential design solutions to prevent material loss of daylight to neighbouring windows and overshadowing of habitable external spaces include:

- Applying a 25 degree vertical angle from a point 2 m above the floor at the façade is not obstructed. This typically results in separation distances of 10m; and
- Avoiding obstruction to light by ensuring that the centre of an existing window serving a habitable room does not fall within 45 degrees of a line drawn from the edge of an extension or a new development (Fig 26).

The 45 degree rule is applicable to extensions exceeding 2.5m in height. Designers should note that the 45 degree rule is only an indicator and the acceptability of a development proposal will also be dependent on ground levels on site and the orientation of buildings.

Figure 26: diagram to illustrate the 45 degree rule



Sunlight access

8.13 Provided it can be controlled, people enjoy sunlight and likewise, its absence can have a detrimental effect to health and wellbeing. Not only does sunlight have beneficial health effects for people, it also has the potential to reduce energy consumption in homes. Neighbours will often be particularly distressed if new development threatens their existing private sunny spaces.

8.14 Accordingly, when drawing up their plans, developers should consider the needs of both new and existing neighbouring development to retain sunlight in habitable spaces. This includes both indoor and outdoor spaces. The needs for people who spend a large proportion of their day indoors, demand particular consideration.

8.15 Potential design solutions to provide good quality solar access include:

- Providing for direct sunlight to enter at least one habitable room for part of the day through-out the year. Dual aspect dwellings will assist with this.
- Providing private external spaces (patios, gardens, balconies, roof terraces) that receive direct sunlight for part of the day in the period between 1st April and 30th September.

8.16 Sunlight has a significant impact on thermal comfort and energy consumption. In winter it can make an important contribution to heating, but excessive solar gain can cause

discomfort in summer. Careful design can control sunlight to maximise the benefits of solar access whilst minimising overheating.

8.17 Where there is doubt about the quality of daylight or sunlight access to new dwellings, or the maintenance of light access to existing neighbouring development, developers may be required to produce plans illustrating sky components and shadow paths at the winter solstice and spring/autumn equinox.

Principle 25: Daylight and Sunlight

- **The occupants of new dwellings should be provided with good quality daylight and sun access levels to habitable internal rooms and external spaces.**
- **Dual aspect dwellings are strongly encouraged. Where single aspect dwellings are proposed, developers should demonstrate how good levels of ventilation, daylight and sun access will be provided to habitable spaces.**
- **Single aspect residential units that are north facing should be avoided.**
- **Developments should not result in occupants of neighbouring dwellings suffering from a material loss of daylight and sun access.**

Private outdoor amenity space

8.18 This Council considers the provision of high quality, private open space to serve homes to be a necessity. This form of space serves a number of important household functions including allowing people enjoying contact with nature as part of their home life, clothes drying, growing food and pursuing domestic leisure activities.

8.19 In the context of increasing intensification of residential development and the specification of minimum internal space standards, it is important to ensure that this private outdoor amenity space is provided in adequate amounts and is of a high quality.

Accordingly, the Council has established minimum space standards for the provision of external private amenity space in all forms of property. Developers will be encouraged to exceed these standards where the site allows for this. Where developments are not able to meet the minimal outdoor amenity space standards the Council may consider accepting lower standards provided this is robustly justified and it can satisfy itself that the outdoor amenity space provided will be of high quality.

Private outdoor amenity space standards for houses

8.20 The amount of garden space (including front, side and rear spaces) may vary widely but new developments must provide for a minimum amount of private amenity space in the form of gardens. The minimum amount may vary depending on the context of the house. Homes with private amenity spaces facing predominantly north may need to provide larger private gardens than those facing the sun with a predominantly southern orientation (Figure 27 & Table 3). For conversion schemes, private outdoor amenity space will be considered on case by case basis depending on the type of use being sought.

Table 3: Minimum outdoor private amenity space size standards for houses (sq m)

House size	Minimum standard/unit for outdoor amenity spaces facing predominantly south (sqm)	Minimum standard/unit for outdoor amenity spaces facing predominantly north (sqm)
1 bed	40	50
2/3 beds	55	65
4+ beds	70	85

Outdoor amenity space standards for flats & maisonettes

8.21 Given the benefits of people having access to good quality private outdoor amenity space, especially in more intense living environments, the Council will expect developers of flatted proposals to provide high quality outdoor amenity space which is an important visual and functional focal point of the design.

Principle 26: Outdoor Amenity

Private outdoor garden spaces should, wherever possible and feasible:

- **Screened by fences or walls to provide privacy;**
- **Receive direct sunlight;**
- **Able to accommodate bin and cycle storage;**
- **Not be heavily overshadowed by trees and tall hedges;**
- **Be inclusive of access not dependent upon routes through internal spaces**
- **Directly accessible from habitable rooms; and**
- **Have level access from the home.**
- **Garden spaces that are separated from the dwellings they serve will generally be resisted.**

Communal amenity space

8.22 Designers should provide attractive communal amenity space which serves all residents. All too often, communal amenity spaces in flatted developments become neglected, unused low-quality spaces which serve flat occupants poorly and make little positive contribution to townscapes.

8.23 Where space at ground floor level is limited, innovative solutions such as the provision of communal garden space at first floor levels or above will be encouraged.

Principle 27: Outdoor Amenity

External Communal amenity space should be:

- **connected to the building;**
- **easily accessible to all residents;**
- **screened from public view;**
- **free of vehicles;**
- **located to receive sunlight for a substantial part of the day; and**
- **Actively overlooked to provide surveillance and security.**

The Councils Open Spaces SPD provides more information on the provision of public open spaces as part of new development

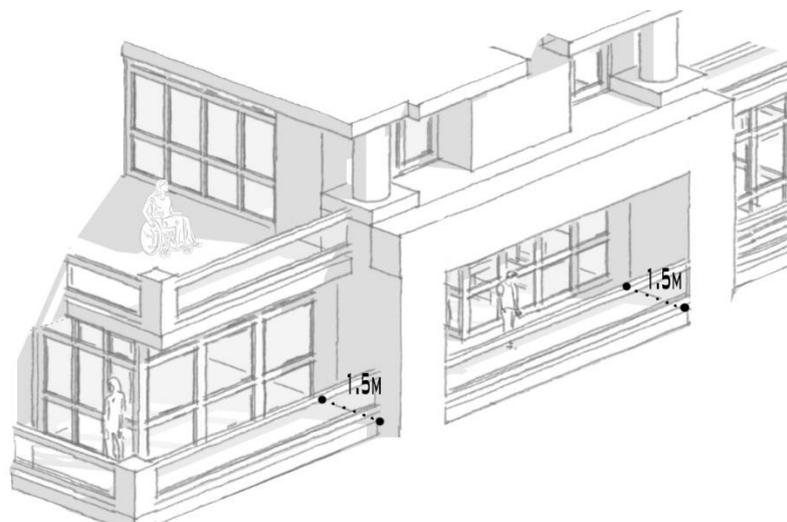
Private amenity space for flats

8.24 Private outdoor amenity space on flatted developments is also considered important, especially in tight urban environments and the Council will expect this space to be provided, particularly in new build developments. Private communal space can take the form of small gardens for ground floor flats and private balconies for flats above ground (Figure 28).

8.25 The provision of private amenity for all residents will be expected, however conversions will be considered on a case-by-case basis and will be expected to provide alternative outdoor amenity provisions where private amenity is unable to be delivered subject to sufficient justification.

8.26 In many respects, this private outdoor space is considered more important for people than communal space and thus it is important that it is high quality. Equally it is important that this private outdoor space does not compromise the privacy of adjoining dwellings

Figure 28: Illustration of private amenity space in apartment design.



Principle 28: Outdoor Amenity

Flatted developments will be expected to provide private outdoor amenity space for each unit. All ground floor flats should have access to a well-defined private area of amenity space which:

- Directly adjoins and is accessible from the flat;
- Has a minimum depth of 3m;
- Is the same width of the dwelling it serves;
- Is clearly identified by boundary treatments, including railings, low wall or a hedge; and
- Has a privacy screen between dwellings.

Unless conservation, privacy or heritage issues negate against the use of balconies, all flats above ground floor should be provided with balconies which:

- Are a minimum of 1.5m deep;
- Are wider than their depth; and
- Provide for privacy. Screens, recesses and orientation are potential design solutions to provide for this.

Predominantly north facing balconies with no access to sunlight during the year, or balconies in close proximity to adjoining main roads which will be materially affected by noise and air pollution will not be considered to have fulfilled the obligation to provide outdoor amenity space for flat occupants.

Private outdoor amenity space standards for Residential Care Homes

8.27 Residential Care Homes will be expected to provide private amenity space at the same level as flatted developments. Usable, high quality private outdoor amenity space will be required for all new Residential Care Home developments.

Principle 29: Outdoor Amenity

- **Usable, high quality private outdoor amenity space will be required for all new Residential Care Home developments.**

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9 Curtilage Development

Boundary treatments

9.1 Boundary treatments are important in helping to define defensible space, establishing the boundaries between public and private space and setting the character of a street.

9.2 Strongly defined boundaries help to convey ownership and maintenance responsibility, privacy and home security. The absence of clearly defined boundaries, between public and private space can lead to confusion over ownership and responsibility leading to neglect and poor quality spaces between buildings and public realm.

9.3 The cumulative effect of boundary treatments in a street is a very significant component of street character and quality. Good quality boundary treatments define the pattern of plots and frontages along a street and create visual interest through the provision of rhythm and variety of materials and form.

Figure 29: boundary treatments helping to define the plots and create strong unified character



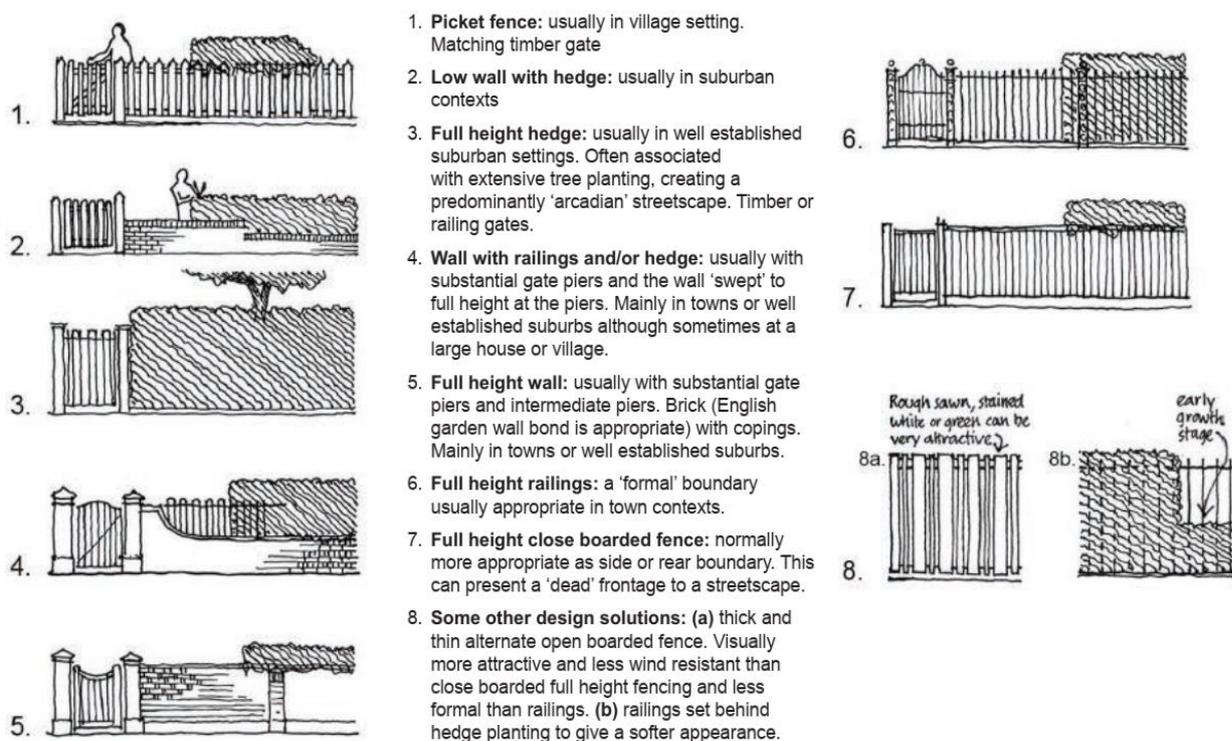
9.4 Poor quality boundary treatments erode street character and quality and can create environments that feel unsafe. This can result from:

- A lack of strong front and side boundary treatments;
- Absence, or very weakly present boundary treatments;
- Partial removal of boundary treatment to accommodate parking;
- Erosion of existing boundary treatments by the insertion of ill-considered new styles of treatments that are out of keeping;
- Long unbroken stretches of high, blank walls or fences;
- Use of poor quality boundary treatments materials (e.g. close boarded fencing) fronting public realm areas.

9.5 Given the importance of boundary treatments in setting the quality of a development and streetscene, the Council will expect developers to consider this aspect of their designs very carefully and provide a high quality design response. Particular consideration will need to be given to boundaries which are visible in the public realm. Figure 30 illustrates the typology of boundary treatments to public realm areas that the designers should draw upon when developing their schemes.

9.6 Where existing boundary treatments make a consistent and positive contribution to the character of the street, this design should be adhered to.

Figure 30: Examples of acceptable forms of boundary treatments to public realm areas



Principle 30: Boundary Treatments

- All boundary treatments will be expected to be high quality and reflect the character of the development and the surrounding context.
- Treatments to the public realm will be expected to be visually interesting and very high quality. Long lengths of unrelieved hard boundary treatments will be resisted.
- To a front garden, boundary treatments predominantly in excess of 1.2m will be discouraged.
- Wooden shiplap or panel fencing is considered an unacceptable boundary treatment when visible from the public realm.

Provision for Cycles, Bins & meter cabinets

Waste and recycling storage

9.7 It is important that the design of bin storage is considered at an early stage in the design process.

9.8 The Council currently has a fortnightly domestic waste collection service. Normal householder bins are as follows:

	Refuse Collection (fortnightly)	Recycling Collection (fortnightly)	Food and Garden Waste Collection (fortnightly)
Single Household (Individual property)	240 litre green lidded wheeled bin	240 litre blue lidded wheeled bin	240 litre brown lidded wheeled bin, 5 litre food waste caddy
HMO (As defined in the Waste Policy)	240 litre green lidded wheeled bin	240 litre blue lidded wheeled bin	240 litre brown lidded wheeled bin, 5 litre food waste caddy
Flats or Apartments (Properties containing several individual properties within one building)	Share Euro style containers (See Annex 2)	Share Euro style containers (See Annex 2)	240 litre brown lidded wheeled bin (shared use of residents – not for commercial use i.e. by paid gardener)

9.9 Shared bins may need to be provided in flats or care homes.

9.10 It is important that the waste storage requirements are handled in purpose built spaces that are sufficient in size, easily accessible and which do not generate offensive smells or negatively impact on a street scene's character and quality.

9.11 The Council's strong preference is for refuse storage areas to be located to the rear or side of dwellings where they are invisible in the public realm. Where rear and side storage opportunities are not available, well considered frontage storage may be acceptable should it be evident that the solution delivers a high-quality outcome.

9.12 Early discussion with the LPA during pre-application discussions is recommended so that waste management is considered as an integral part of the design process. Distances beyond 25m between collection point and storage points will be resisted

Figure 31: example of discrete sustainable bin storage design

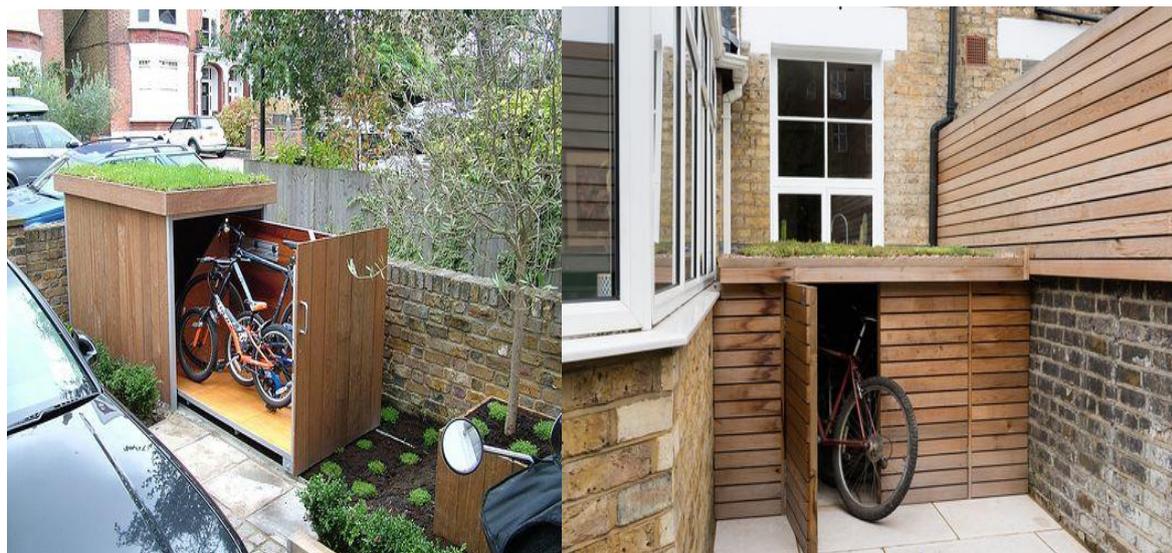


Cycle storage

9.13 The Council actively supports the development of cycling as a sustainable transport mode. Good quality space to accommodate the storage of bikes is expected to be specifically designed in at an early stage for each dwelling. This can be external or internal space but it is important that cycle parking is additional to space used for other uses, e.g. balconies, lobbies and hallways. Cycle storage facilities on balconies or in hallways will not be acceptable.

9.14 Cycle storage facilities should be easily accessible to occupiers and wherever possible, be integral to the design of the residential development. Where external cycle facilities are provided, they should be constructed of durable materials, relate to the design of the main residential building, be easily accessible and not have a detrimental impact on the street scene.

Figure 32: cycle storage solution that reflect and blend with the house design



Meter cabinets

9.15 It is recognised that utility companies prefer meter cabinets to be located on external elevations that are easily accessible from the street. However, it is also important that the meter cabinets do not undermine the attractiveness of buildings and the street scenes by virtue of their design and positioning.

9.16 Meter boxes need not be standard white units and the council would encourage a bespoke approach that fits in with the character of the building they are positioned on and the wider area. However, they should be designed to and positioned to ensure a balance between accessibility and unobtrusiveness.

Principle 31: Meter Cabinets

- **All new residential development will be provided with meter cabinets and space for storage of cycles & bins in a manner that functions well and does not compromise the visual amenities of the building and street scene.**

Hardstanding and vehicle cross-overs

9.17 If not carefully designed, driveways and hardstanding areas can create hard, unattractive environments that break down the rhythm of plot definitions and landscaping, increase flooding and reduce biodiversity.

9.18 Provision of new vehicle crossings can result in a loss of front boundary definitions and if inadequate space is available in front of a dwelling for parking, result in vehicles:

- hanging over pavement areas, potentially causing problems for pedestrians; or
- lying hard up against habitable rooms, affecting outlook.

9.19 It is important for this Council that new vehicle crossings and areas of hardstanding on residential properties do not contribute to a deterioration of the streetscene, a loss of biodiversity, reduced pedestrian safety or increased flooding.

9.20 Potential solutions for minimising adverse impacts of hardstanding include:

- using porous materials such as gravel or blocks;
- keeping driveways and parking areas only as large as necessary;
- Integrating areas into the overall landscaping schemes;
- Ensuring the spaces is enclosed as much as possible by soft planting, walls or other boundary treatments which are in keeping with the character of the area.

Principle 32: Vehicle crossings and hardstanding

- **New hardstanding areas will be expected to be constructed in porous materials and cover only the minimum space necessary. Hardstanding that is not designed as part of a soft landscaping scheme, or which results in a deterioration of the streetscene, will be resisted.**
- **Hardstanding should be considered to meet the needs of both vehicle and pedestrian use, providing definition of routes, and maintaining unobstructed access to dwellings.**

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**Strategic Environmental Assessment of the Residential Design
Guide Supplementary Planning Document**

Coventry City Council

Strategic Environmental Assessment Screening Assessment

June 2022

1. Introduction

1.1 This screening report has been produced to consider whether the Residential Design Guide Supplementary Planning Document (SPD) prepared by Coventry City Council should be subject to a Strategic Environmental Assessment (SEA) in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004, as amended by The Environmental Assessments and Miscellaneous Planning (Amendment)(EU Exit) Regulations.

1.2 Paragraph: 008 of the Planning Guidance¹ states that supplementary planning documents may in exceptional circumstances require SEA if they are likely to have significant environmental effects that have not already been assessed during the preparation of the relevant strategic policies. This screening statement considers whether there are any impacts which have not already been assessed within the Coventry Local Plan which was adopted on 6th December 2017², and determines whether or not SEA is needed for this SPD.

2. The Residential Design Guide SPD: Context

2.1 The Draft Residential Design Guide SPD sets out further detail on existing policies contained within the Coventry City Council Local Plan, in particular Policy DE1: Ensuring High Quality Design. The Local Plan is the City Council's statutory planning framework which sets out how and where new homes, jobs, services and infrastructure will be delivered and the type of places and environments that will be created, enhanced and protected.

2.2 Delivering high quality design over the Plan period to 2031 is a key objective of the adopted Coventry Local Plan. The aim of this SPD is to facilitate the delivery of good design as set out in the plan and in compliance with the most up to date national policy as set out in the National Planning Policy Framework

2.3 The additional guidance provided within the SPD sets out a series of principles for ensuring high quality design for residential design including concept plans, connectivity, street design, density, plots, parking, boundary treatments, building lines, sustainable design, building heights, scale and massing, roofscapes, space standards, adaptable homes, architectural detailing, architectural design, habitable rooms, daylight and sunlight, outdoor amenity, boundary treatments, meter cabinets, vehicle crossings and hardstandings

3. The Screening Process

3.1 The screening assessment is undertaken in two parts: the first will assess whether the SPD requires screening for SEA and the second part of the assessment will consider

¹ Reference ID: 11-008-20140306

² <https://www.coventry.gov.uk/localplan>

whether the SPD is likely to have a significant effect on the environment, using criteria drawn from Schedule 1 of the SEA Regulations.

Table 1: Is SEA screening required?

Environmental Regulations Paragraph detail	Comments
<p>2.(1) In these Regulations- [...] "plans and programmes" means plans and programmes, including those co-financed by the European Community, as well as any modifications to them, which— (a) are subject to preparation and adoption by an authority at national, regional or local level; (b) are prepared by an authority for adoption, through a legislative procedure by Parliament or Government; and, in either case, (c) are required by legislative, regulatory or administrative provisions</p>	<p>Yes, this applies.</p> <p>The SPD is subject to preparation and adoption at local level. Whilst the SPD is not a requirement and is optional under the provisions of the Town and Country Planning Act it will, if adopted, supplement the development plan and be a material consideration in the assessment of planning applications.</p>
<p><u>Environmental assessment for plans and programmes; first formal preparatory act on or after 21st July 2004</u> 5.(2) The description is a plan or programme which— (a) is prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, and (b) sets the framework for future development consent of projects listed in Annex I or II Directive 2011/92/EU(4) of the European Parliament and of the Council on the assessment of the effects of certain public and private projects on the environment.</p>	<p>Yes, this applies.</p> <p>The SPD is prepared for town and country planning purposes. It supplements the planning policy framework of the Coventry City Local Plan, by providing detailed guidance as to how these policies are interpreted for future consent of projects listed in Schedule II of Directive 2011/92/EU(4).</p>
<p>3) The description is a plan or programme which, in view of the likely effect on sites, has been determined to</p>	<p>No this does not apply.</p>

<p>require an assessment pursuant to Article 6 or 7 of the Habitats Directive.</p>	<p>The SPD is not likely to affect sites and has been determined not to require an assessment pursuant to any law that implemented Article 6 or 7 of the Habitats Directive.</p> <p>Habitat Regulations Assessment is not required. The Habitat Regulation Assessment undertaken in 2016 for the Coventry City Local Plan concluded that the plan would not cause a negative effect alone or in combination with other plans. The SPD does not provide any guidance which alters the impact of the policy on designated sites.</p>
<p>6) An environmental assessment need not be carried out— (a)for a plan or programme of the description set out in paragraph (2) or (3) which determines the use of a small area at local level, or (b)for a minor modification to a plan or programme of the description set out in either of those paragraphs,</p>	<p>Yes, this applies.</p> <p>The SPD provides further detail on the implementation of design policy within the adopted Local Plan. This applies to the whole administrative area of Coventry City Council.</p>
<p><u>Determinations of the responsible authority³</u> 9.—(1) The responsible authority shall determine whether or not a plan, programme or modification of a description referred to in— (a)paragraph (4)(a) and (b) of regulation 5; (b)paragraph (6)(a) of that regulation; or (c)paragraph (6)(b) of that regulation, is likely to have significant environmental effects. (2) Before making a determination under paragraph (1) the responsible authority shall— (a)take into account the criteria specified in Schedule 1 to these Regulations; and (b)consult the consultation bodies.</p>	<p>This screening opinion has been prepared using the criteria specified in Schedule 1 as presented in Table 2.</p> <p>The statutory bodies (Natural England, Historic England and the Environment Agency) are to be consulted as required.</p>

³ “Responsible authority”, in relation to a plan or programme, means the authority by which or on whose behalf it is prepared (Regulation 2(1)(a))

Table 2: will the SPD have a significant effect on the environment⁴

SEA requirement	Comments
1: The characteristics of plans and programmes, having regard, in particular, to	
(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;	The SPD has a minor role in setting the framework for projects. While the SPD forms a material consideration in decisions on planning applications, it has no influence on the location or volume of projects nor does it allocate resources.
(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;	The SPD does not create new policies but will support the policies in the adopted Local Plan. Other plans and programmes may outlive the SPD and during their preparation will be steered by national legislation and policy.
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	The purpose of the SPD is to provide guidance to support the design policy of the adopted Local Plan. The Local Plan SA/SEA assessed this. The purpose of the SPD is to ensure these beneficial impacts of that policy are delivered and maintained which contributes to promoting sustainable development.
(d) environmental problems relevant to the plan or programme; and	There are no environmental problems relevant to this SPD: it elaborates adopted Local Plan policy.
(e) the relevance of the plan or programme for the implementation of retained EU law on the environment (for example, plans and programmes linked to waste management or water protection).	The SPD has no relevance to the implementation of retained EU law.
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to—	
(a) the probability, duration, frequency and reversibility of the effects;	The SPD is not allocating sites for development. The SPD is to provide

⁴ As set out in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

	guidance for the application and implementation of the policies in the adopted Local Plan and is not expected to give rise to any significant environmental effects.
(b) the cumulative nature of the effects;	The SPD is not considered to have any significant cumulative effects. As the document provides further guidance to adopted local plan policies, but does not set policies itself, it cannot contribute to cumulative impacts in combination with the Local Plan.
(c) the transboundary nature of the effects;	There are no transboundary effects as this SPD relates to the Coventry City Council area only. Any potential significant transboundary environmental effects have already been assessed as part of the local plan's sustainability appraisal, the Habitat Regulations Assessment and the plan's examination process.
d) the risks to human health or the environment (for example, due to accidents);	The SPD poses no risk to human health.
(e)the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	The SPD relates to Coventry City Council's administrative area only.
(f)the value and vulnerability of the area likely to be affected due to— (i)special natural characteristics or cultural heritage; (ii)exceeded environmental quality standards or limit values; or (iii)intensive land-use;	The SPD relates to the Coventry City Council area only; as no development is proposed via the SPD, which elaborates on existing policy, none of these are likely to be affected by the SPD. Any site-specific matters would be addressed through a planning application specific to an individual proposal.
(g)the effects on areas or landscapes which have a recognised national, Community or international protection status.	The SPD relates to the Coventry City Council area only; as no development is proposed via the SPD, which elaborates on existing policy, none of these matters are likely to be affected by the SPD. Any site-specific matters would be addressed through a planning application specific to an individual proposal.

4. Conclusion and Screening Recommendation

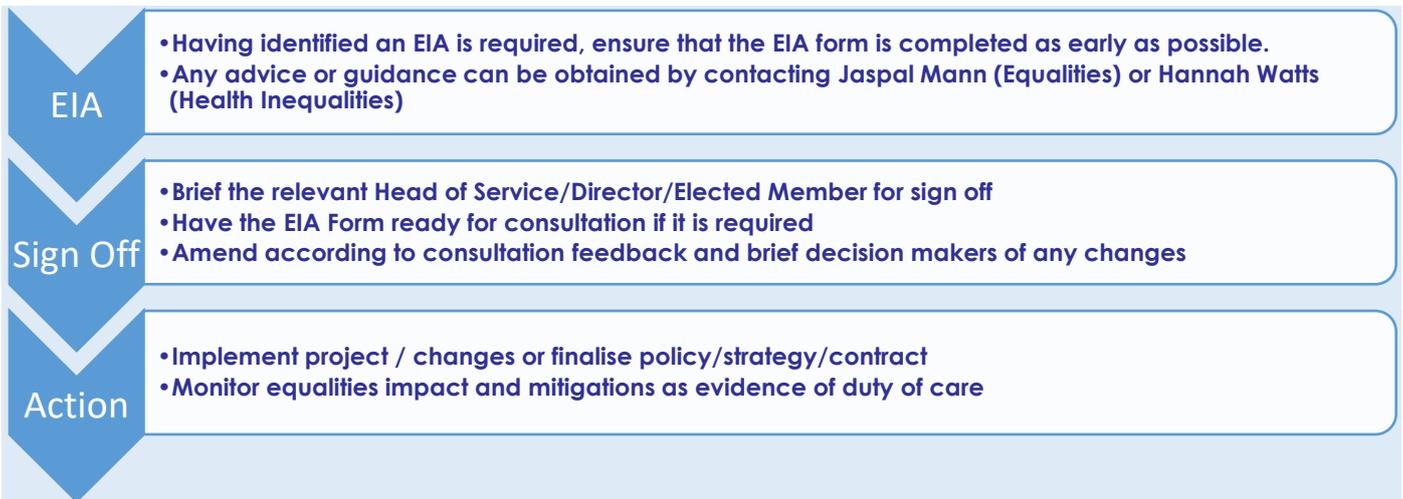
4.1 This screening assessment identifies that the SPD will provide guidance to support the design policy of the Coventry City Council adopted Local Plan. It is concluded that the SPD is unlikely to have significant environmental effects and therefore that Strategic Environmental Assessment is not required.

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EQUALITY IMPACT ASSESSMENT (EIA)



Title of EIA		EIA Residential Design Guide SPD
EIA Author	Name	Clare Eggington
	Position	Planning Policy Manager
	Date of completion	08/06/2022
Head of Service	Name	David Butler
	Position	Head of Planning Policy and Environment
Cabinet Member	Name	Councillor David Welsh
	Portfolio	Housing and Communities



PLEASE REFER TO [EIA GUIDANCE](#) FOR ADVICE ON COMPLETING THIS FORM

SECTION 1 – Context & Background

1.1 Please tick one of the following options:

This EIA is being carried out on:

New policy / strategy

New service

Review of policy / strategy

Review of service

Commissioning

Other project *(please give details)* *Supplementary Planning Document for Householder Design*



1.2 In summary, what is the background to this EIA?

The Residential Design Supplementary Planning Document (SPD) adds further detail to the Local Plan which was adopted on 6th December 2017 and for which EIA was undertaken. SPDs do not introduce new policy, but provide further detail and guidance to enable the delivery of adopted policies.

Delivering high quality residential design over the Plan period to 2031 is a key objective of the adopted Coventry Local Plan. The aim of this SPD is to facilitate the delivery of high quality design as set out in the plan and in compliance with the most up to date national policy as set out in the National Planning Policy Framework.

The additional guidance provided within the SPD sets out detail for developers who are designing residential schemes.

1.3 Who are the main stakeholders involved? Who will be affected?

Developers, those who will live in the properties, the communities where the properties will be located, those who have an interest in the way in which plans are prepared (eg the various statutory consultees)

1.4 Who will be responsible for implementing the findings of this EIA?

Coventry City Council Planning Service

SECTION 2 – Consideration of Impact

Refer to guidance note for more detailed advice on completing this section.

In order to ensure that we do not discriminate in the way our activities are designed, developed and delivered, we must look at our duty to:

- Eliminate discrimination, harassment, victimisation and any other conflict that is prohibited by the Equality Act 2010
- Advance equality of opportunity between two persons who share a relevant protected characteristic and those who do not
- Foster good relations between persons who share a relevant protected characteristic and those who do not

2.1 Baseline data and information

EQUALITY IMPACT ASSESSMENT (EIA)



Please include a summary of data analysis below, using both your own service level management information and also drawing comparisons with local data where necessary (go to <https://www.coventry.gov.uk/factsaboutcoventry>)

The Local Plan was independently examined by a Planning Inspector to ensure that its policies were robust and formulated using appropriate evidence before it could be sound and capable of adoption. Further detail on the Local Plan and the evidence base can be found here

<https://www.coventry.gov.uk/localplan>

This SPD expands upon adopted Local Plan Policy DE1, Ensuring High Quality Design. It provides additional for guidance developers who are designing residential schemes to ensure they produce high quality design.

2.2 On the basis of evidence, complete the table below to show what the potential impact is for each of the protected groups.

- Positive impact (P),
- Negative impact (N)
- Both positive and negative impacts (PN)
- No impact (NI)
- Insufficient data (ID)

Any impact on the Council workforce should be included under question 2.6 – **not below*

Protected Characteristic	Impact type P, N, PN, NI or ID	Nature of impact and any mitigations required
Age 0-18	P	Whilst those aged 0-18 would generally not be directly involved in the design process, many will live in new build properties on new residential developments and the SPD will ensure that such developments are of a high standard. 19.5% of the population are aged 0-15 so well over a fifth of the population (when the 16-18 year olds are factored in) could potentially benefit.
Age 19-64	P	67% of the population of Coventry are of working age (16-64). Many will live in new build properties on new residential developments and the SPD will ensure that such developments are of a high standard.
Age 65+	P	13.5% of Coventry's population aged above 65. As above, many will live in new build properties on new residential developments and the SPD will ensure that such developments are of a high standard. The guide provides advice on ensuring that developments are

EQUALITY IMPACT ASSESSMENT (EIA)



		accessible and adaptable, which could assist ageing residents in being able to remain in their own homes and communities.
Disability	P	17.7% of Coventry's residents have a limiting long term health problem or disability. The SPD encourages good design in new build developments to ensure that people can adapt their homes and communities in a way which meets their changing needs.
Gender reassignment	P	Good residential design has a positive impact on everyone in the community.
Marriage and Civil Partnership	P	Good residential design has a positive impact on everyone in the community.
Pregnancy and maternity	P	Good residential design has a positive impact on everyone in the community.
Race (Including: colour, nationality, citizenship ethnic or national origins)	P	Good residential design has a positive impact on everyone in the community.
Religion and belief	P	Good residential design has a positive impact on everyone in the community.
Sex	P	Good residential design has a positive impact on everyone in the community.
Sexual orientation	P	Good residential design has a positive impact on everyone in the community.

HEALTH INEQUALITIES

2.3	<p>Health inequalities (HI) are unjust differences in health and wellbeing between different groups of people which arise because of the conditions in which we are born, grow, live, work and age. These conditions influence our opportunities for good health, and result in stark differences in how long we live and how many years we live in good health.</p> <p>Many issues can have an impact: income, unemployment, work conditions, education and skills, our living situation, individual characteristics and experiences, such as age, gender, disability and ethnicity</p> <p>A wide range of services can make a difference to reducing health inequalities. Whether you work with children and young people, design roads or infrastructure, support people into employment or deal with welfare benefits – policy decisions and strategies can help to reduce health inequalities</p>
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EQUALITY IMPACT ASSESSMENT (EIA)



<p>Please answer the questions below to help identify if the area of work will have any impact on health inequalities, positive or negative.</p> <p>If you need assistance in completing this section please contact: Hannah Watts (hannah.watts@coventry.gov.uk) in Public Health for more information. More details and worked examples can be found at https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx</p>	
Question	Issues to consider
<p>2.3a What HIs exist in relation to your work / plan / strategy</p>	<ul style="list-style-type: none"> ● Explore existing data sources on the distribution of health across different population groups (<i>examples of where to find data to be included in support materials</i>) ● Consider protected characteristics and different dimensions of HI such as socio-economic status or geographical deprivation
	<p>Response:</p> <p>The Residential Design Guide SPD supplements the policies of the adopted Local Plan which was subject to Health Impact Assessment. The Health and Wellbeing chapter of the plan, which includes Policy HW1, requires Health Impact Assessments for particular types and scale of development where there could be significant impacts. See https://www.coventry.gov.uk/localplan This was supplemented by a Health Impact Assessment SPD which provided further detail and guidance including that in relation to affordable housing. See https://www.coventry.gov.uk/downloads/file/28900/health_impact_assessment_spd</p> <p>Whilst only major residential applications are subject to HIA, the explanatory text still encourages the use of the toolkit for smaller developments than those covered by the policy (which relates to developments of 150 homes or more, or a site area of 5 hectares or more). This Residential Design SPD will help provide further guidance on good design and this will help to ensure decent living standards in terms of amenity, accessibility and adaptability, avoiding negative impacts and supporting people to carry on living in their community.</p>
<p>2.3b How might your work affect HI (positively or negatively).</p> <p>How might your work address the needs of different groups that share</p>	<p>Consider and answer below:</p> <ul style="list-style-type: none"> ● Think about whether outcomes vary across groups and who benefits the most and least, for example, the outcome for a woman on a low income may be different to the outcome for a woman a high income ● Consider what the unintended consequences of your work might be



protected characteristics																	
	<p>Response:</p> <p>a. Potential outcomes including impact based on socio-economic status or geographical deprivation</p> <p>The Health Impact Assessment SPD referred to above includes the following:</p> <p>Category 1: Housing Quality and Design</p> <p>Access to decent and adequate housing is critically important for health and wellbeing, especially for the very young and very old. Environmental factors, overcrowding and sanitation in buildings as well as unhealthy urban spaces have been widely recognised as causing illness since urban planning was formally introduced. Post-construction management also has an impact on community welfare, cohesion and mental wellbeing.</p> <table border="1" data-bbox="400 824 1390 1283"> <thead> <tr> <th>Considerations</th> <th>Negative effects</th> <th>Positive Effects</th> <th>Relevant Local Plan Policies and Supplementary Planning Documents</th> </tr> </thead> <tbody> <tr> <td rowspan="3"> <ul style="list-style-type: none"> • Accessible and adaptable dwellings • Internal space standards, orientation and layout • Affordable housing and dwelling mix • Energy efficiency • High Quality Design </td> <td>A lack of affordable housing within communities may compromise the health of low-income residents as they are likely to spend more on housing costs and less on other daily living needs.</td> <td>Making provision for affordable housing has the potential to improve wellbeing, while housing quality can be improved by use of appropriate construction methods. This includes use of good materials for noise insulation and energy-efficiency, and detailed design considerations to make sure that homes are accessible, adaptable and well oriented.</td> <td rowspan="3"> <ul style="list-style-type: none"> • AC2: Road Network • DE1: Ensuring High Quality Design • DS3: Sustainable Development Policy • EM2: Building Standards • EM5: Sustainable Drainage Systems SuDS • H3: Provision of New Housing • H4: Securing a Mix of Housing • H5: Managing Existing Housing Stock • H6: Affordable Housing • H8: Care Homes, Supported Housing, Nursing Homes and Older Persons accommodation </td> </tr> <tr> <td>Poor choice of location, design and orientation of housing developments can be detrimental to physical and mental health.</td> <td>Providing a sufficient range of housing tenures with good basic services is also essential. Adaptable buildings for community uses such as health, education and leisure can contribute towards a sustainable community.</td> </tr> <tr> <td>The quality of design, including internal sound insulation, daylighting and provision of private space can influence the health and wellbeing of occupiers.</td> <td>Providing adaptable homes allows residents to remain in their home despite changing accommodation requirements. In this context, adaptable housing allows care to be</td> </tr> </tbody> </table> <table border="1" data-bbox="365 1317 1390 1379"> <tr> <td></td> <td></td> <td>provided in the community more easily.</td> <td> <ul style="list-style-type: none"> • Sustainable Urban Extension Design Guide SPD </td> </tr> </table>	Considerations	Negative effects	Positive Effects	Relevant Local Plan Policies and Supplementary Planning Documents	<ul style="list-style-type: none"> • Accessible and adaptable dwellings • Internal space standards, orientation and layout • Affordable housing and dwelling mix • Energy efficiency • High Quality Design 	A lack of affordable housing within communities may compromise the health of low-income residents as they are likely to spend more on housing costs and less on other daily living needs.	Making provision for affordable housing has the potential to improve wellbeing, while housing quality can be improved by use of appropriate construction methods. 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	<p>b. Potential outcomes impact on specific socially excluded or vulnerable groups eg. people experiencing homelessness, prison leavers, young people leaving care, members of the armed forces community.</p> <p>Ensuring well designed developments to meet a range of needs and circumstances is a key aim of the Local Plan design policy and the SPD provides the further detail to ensure that policy can be delivered.</p> <p>Policy DE1 of the Local Plan sets out the context, and the SPD provides the detail for ensuring that residential developments are well designed and appropriate to meet the changing needs of the communities impacted.</p>																

2.4 Next steps - What specific actions will you take to address the potential equality impacts and health inequalities identified above?

EQUALITY IMPACT ASSESSMENT (EIA)



This was considered through the Local Plan (the 'parent document'), this document provides the detail to ensure the Local Plan policies can be delivered effectively.

The SPD elaborates on adopted Policy DE1 to ensure that high standards of design are implemented.

2.5 How will you monitor and evaluate the effect of this work?

Planning applications and their outcomes are monitored. However there is scope to improve the monitoring process and this is an action which will be undertaken by the planning policy team to consider moving forwards in terms of the effectiveness of design policy. In terms of the outcomes of further monitoring, if there are issues which are emerging, this can then be fed into a review of the wider local Plan policies.

2.6 Will there be any potential impacts on Council staff from protected groups?

No

You should only include the following data if this area of work will potentially have an impact on Council staff. This can be obtained from: lucille.buckley@coventry.gov.uk

Headcount:

Sex:

Female	
Male	

Age:

16-24	
25-34	
35-44	
45-54	
55-64	
65+	

Disability:

Disabled	
Not Disabled	
Prefer not to state	
Unknown	

Ethnicity:

Religion:

Any other	
Buddhist	
Christian	
Hindu	
Jewish	

EQUALITY IMPACT ASSESSMENT (EIA)



White	
Black, Asian, Minority Ethnic	
Prefer not to state	
Unknown	

Muslim	
No religion	
Sikh	
Prefer not to state	
Unknown	

Sexual Orientation:

Heterosexual	
LGBT+	
Prefer not to state	
Unknown	

3.0 Completion Statement

As the appropriate Head of Service for this area, I confirm that the potential equality impact is as follows:

- No impact has been identified for one or more protected groups
- Positive impact has been identified for one or more protected groups
- Negative impact has been identified for one or more protected groups
- Both positive and negative impact has been identified for one or more protected groups

4.0 Approval

Signed: Head of Service: David Butler	Date:
Name of Director: Andrew Walster	Date sent to Director:

EQUALITY IMPACT ASSESSMENT (EIA)



Name of Lead Elected Member: Councillor D Welsh	Date sent to Councillor:
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Email completed EIA to equality@coventry.gov.uk

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