



### Scrutiny Co-ordination Committee

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**Time and Date**

11.00 am on Wednesday, 18th December 2024

**Place**

Diamond Rooms 1 and 2 - Council House, Coventry, CV1 5RR

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**Public Business****1. Apologies and Substitutions****2. Declarations of Interest****3. Minutes** (Pages 3 - 20)

(a) To agree the minutes of the previous meeting held on 31 October, and 14 and 20 November 2024

(b) Matters Arising

**4. West Midlands Combined Authority Update** (Pages 21 - 116)

a) Corporate Update – To receive a presentation

b) Scrutiny Annual Report

**5. Regulation 19 Local Plan** (Pages 117 - 1034)

Report of the Director of City Services and Commercial

**6. Community Safety Plan 2024-27** (Pages 1035 - 1052)

Briefing Note of the Director of Law and Governance

**7. Scrutiny Co-ordination Committee Work Programme and Outstanding Issues 2024/25** (Pages 1053 - 1060)

Report of the Director of Law and Governance

**8. Any Other Items of Public Business**

Any other items of public business which the Chair decides to take as a matter of urgency because of the special circumstances involved.

**Private Business**

Nil

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

Tuesday, 10 December 2024

Note: The person to contact about the agenda and documents for this meeting is Suzanne Bennett, Governance Services - Telephone: 024 7697 2299 E-mail: [suzanne.bennett@coventry.gov.uk](mailto:suzanne.bennett@coventry.gov.uk)

Membership: Councillors M Ali, A Jobbar, L Kelly (Deputy Chair), J Lepoidevin, G Lloyd (Chair), C Miks, G Ridley, R Singh and CE Thomas

By Invitation: Councillors P Akhtar, G Duggins, AS Khan, E M Reeves

**Public Access**

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**Suzanne Bennett, Governance Services - Telephone: 024 7697 2299  
E-mail: [suzanne.bennett@coventry.gov.uk](mailto:suzanne.bennett@coventry.gov.uk)**

**Coventry City Council**  
**Minutes of the Meeting of Scrutiny Co-ordination Committee held at 2.00 pm on**  
**Thursday, 31 October 2024**

Present:

Members: Councillor L Kelly (Chair)  
Councillor B Christopher (Substitute for Councillor C Thomas)  
Councillor A Hopkins (Substitute for Councillor A Jobber)  
Councillor R Lakha (Substitute for Councillor C Miks)  
Councillor J Lepoidevin  
Councillor E M Reeves  
Councillor R Singh

By Invitation: Councillor N Akhtar  
Councillor P Akhtar  
Councillor G Duggins  
Councillor S Gray  
Councillor J O'Boyle

Other Members: Councillors E Reeves

Employees (by  
Directorate):

Adults and Housing J Crawshaw, M Donovan  
Law and Governance G Holmes, L Knight, A Veness  
Property Services and  
Regeneration L Lowell  
Regeneration and  
Economy R Palmer, B Willers  
Apologies: Councillors M Ali, R Bailey, G Hayre, G Lloyd and G Ridley

## **Public Business**

### **35. Declarations of Interest**

There were no disclosable pecuniary interests.

### **36. Minutes**

The minutes of the meeting held on 25 September, 2024 were agreed and signed as a true record.

There were no matters arising.

### **37. Exclusion of Press and Public**

RESOLVED that the Scrutiny Co-ordination Committee agrees to exclude the press and public under Sections 100(A)(4) of the Local Government Act 1972

relating to the private report in Minute 42 below headed 'Temporary Accommodation – Lease Renewal of Caradoc Hall, Coventry' on the grounds that the report involves the likely disclosure of information as defined in Paragraph 3 of Schedule 12A of the Act, as it contains information relating to the financial affairs of a particular person (including the authority holding that information) and in all circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

### 38. **Climate Change Strategy**

The Scrutiny Co-ordination Committee considered a report and received a presentation on the Climate Change Strategy.

The report is also to be considered by the Cabinet at its meeting on 5<sup>th</sup> November 2024 and by Council at its meeting on 3<sup>rd</sup> December 2024.

The Coventry Climate Change Strategy 2024-2030 sets out how the Council plans to tackle the causes and consequences of climate change, which is central to the delivery of the One Coventry Plan. The Strategy sets out the challenges and opportunities to creating a more sustainable city through the following five key pathways or themes:

- Adaptation and Resilience
- Route to net zero
- A circular economy
- Fairer green future
- Nature

The report provided a summary of the five pathways, which included the existing challenges and key recommendations.

Tackling the causes and consequences of climate change is a key priority for the Council as set out in the One Coventry Plan. The Strategy gives a comprehensive insight into the challenges and opportunities the Council faces collectively in tackling the causes and consequences of climate change. Whilst the challenges ahead are significant, taking positive action to address them brings about real opportunity to create a better future for the city and its residents. The Climate Change Strategy is an important step for Coventry in being clear on the Council's level of ambition, to be a leading city on the global stage, which is innovative, forward-thinking and capable of delivering meaningful change and leading the green industrial revolution. The Council needs to be bold and rise to these challenges. However, the Council can't do this alone and the success of how it responds to this will rely on city-wide support.

Climate change has many complex challenges which must be looked at holistically to deliver meaningful and lasting change.

The Council recognised the importance of this issue well before many authorities were declaring emergencies, the Council were a founding signatory of the Global Covenant of Mayors in 2008, which set a target of achieving net zero by 2050 and the Council published its first Climate Change Strategy in the same year. In 2021 the Council signed up to the Covenant of Mayors revised interim target of 55-65%

reduction in emissions from 1990 levels by 2030. The Council are committed to working towards the UK government's more recent interim target for a 68% reduction in emissions by 2030. More recently the Council has been working towards how it can support government targets to tackle the ecological emergency, whereby 30% of land in the UK should be conserved and managed for nature by 2030. Whilst Coventry recognises the importance of targets to give focus, the Council's focus is taking action and being innovative to tackle climate change.

It is important that the Council is seen to lead from the front; and is committed to reducing the direct impact the Council has on the environment and climate change, and have a role to lead and encourage city-wide action. It is for that reason that the Council helped to develop an independent Climate Change Board in 2021, where the Council in its leadership role, representing the interests of its citizens, brings together the leading stakeholders in the private, public and voluntary sectors to take action on climate change and promote sustainability.

The Board is made up of more than 25 partner agencies from the public, private and third sectors. The Board is supported by five pathway groups, focusing on each of the key areas of the Strategy, expertly chaired by professionals in those areas. The Board and pathway groups share ideas and resources to develop solutions to these difficult and complex issues affecting the city and its people and have had an important role in developing this Strategy. The Council will also continue to engage with residents and help empower community organisations to develop projects on the ground and encourage behavioural change.

The Committee noted that the Council's emissions only account for 1% of the city as a total, but the organisation is taking significant steps to decarbonise its estate and fleet and to ensure that climate change and sustainability is embedded in all policy areas, from planning to procurement. The Council has an important role in terms of co-ordinating the city's approach to tackling climate change, which includes partnership working, building support and empowering citizens to take action. Key actions in the next 12 months will include training and reviewing resources to build knowledge, capacity and awareness to help deliver against the Action Plan.

The Climate Change Action Plan sets out all of the planned activities and projects, many already in development or underway, or plans the Council aspires to deliver in response to the Climate Change Strategy, to make a real difference city wide. Whilst a large number of the actions sit with the Council, there are also initiatives that require support from partners, businesses and communities to reflect the citywide action required. The Action Plan will remain a live document and be used to monitor progress and performance to make sure that the actions being taken are delivering against goals.

It was acknowledged that there is a huge amount to do, and whilst it is important to be aspirational there is also a requirement to be practical about what can be achieved. The Council will work hard to raise finance, engage partners and work with communities and organisations across the city to help remove barriers, identify opportunities and make this happen. It must also ensure it considers the risks and impacts of activities and take collective action to deliver a just transition as part this.

The Committee sought clarification about the membership of the Climate Change Board as it was understood that a number of residents had tried to engage with the Board without success. It was confirmed that the members of the Board are all professionals in various capacity who volunteer their time and expertise in respect of climate change, with the relevant abilities, skillsets, knowledge and organisations behind them to enable ideas to become projects. There is however work ongoing outside of the Climate Change Board to engage with the community in respect of project development on the ground.

Concerns were raised regarding the number of properties within the city reported to be at risk of flooding. The Committee requested that information be circulated to the Committee Members and Members of the Communities and Neighbourhoods Scrutiny Board (4) who were invited to attend the meeting, identifying the flood risks within the city by electoral wards.

Whilst considering decarbonisation, reference was made to the installation of cycle routes around the city and the public misconception that the Council have funded these projects. The Committee requested that information in respect of cycle routes and how they have been funded be publicised through the Communications Team, following consultation with the Cabinet Member for City Services and the Cabinet Member for Jobs, Regeneration and Climate Change.

The Committee discussed the route to net zero and made particular reference to the electric vehicle charging facilities and the impact of charging points being damaged or vandalised. During the course of this discussion, the Committee requested that investigations be made into the level of vandalism that has occurred and that information be circulated to all Councillors on the process for reporting where charging facilities have been damaged or vandalised.

**RESOLVED that, the Scrutiny Co-ordination Committee note the report and confirm there are no comments or recommendations to be forwarded to Cabinet for consideration at their meeting on 5th November 2024.**

### 39. **Temporary Accommodation - Lease Renewal of Caradoc Hall, Coventry**

The Scrutiny Co-ordination Committee considered a report of the Director of Adults and Housing, which set out options to enter into a new lease for Caradoc Hall for 10 years.

The report would also be considered by the Cabinet at its meeting scheduled for 5<sup>th</sup> November 2024 and the Council at its meeting scheduled for 3<sup>rd</sup> December 2024.

The Housing Act 1996 (as amended) places a statutory duty on Local Authorities to provide Temporary Accommodation to homeless households who are eligible and have a priority need.

Nationally the number of households living in temporary accommodation has increased significantly over the last 3 years and as of the 31<sup>st</sup> March 2024 the Government's quarterly publications show this is the highest recorded figure ever.

Coventry has also seen an increase in demand with 1,329 households living in temporary accommodation as at the 23<sup>rd</sup> September 2024.

The Housing and Homeless Service have implemented several different accommodation options leading to a diverse temporary accommodation portfolio including lease agreements with private providers, provision through Registered Providers and the purchasing of properties. The results being that despite increases in temporary accommodation the Council has very few families in bed and breakfast (B&B) accommodation in comparison to similar sized Councils. As of the 30<sup>th</sup> September 2024 there were 1,326 households in temporary accommodation with 938 being families with dependent children. Even with these significant numbers there were no families in B&B and only 19 single people. B&B does not typically have cooking facilities and is often the most expensive temporary accommodation option alongside being the most inappropriate form of temporary accommodation, particularly for families with dependent children.

The lease of Caradoc Hall would allow the Council to secure the use of the building for 10 years. The length of the lease term reflects the current demand and includes a break clause for the Council to terminate the lease arrangement after five years.

As part of the proposed lease agreement, the managing agent will commit to a refurbishment of the 103 flats in line with a condition survey agreed with the Council, as well as continued improvements to the building such as replacement of the lifts.

Caradoc Hall is a residential building and as of 23<sup>rd</sup> January 2023, the Fire Safety (England) Regulations 2022 made it a requirement in law to provide information to fire and rescue services to assist them in planning for and responding to a fire in the building. Caradoc Hall has complied with these regulations. A high-rise residential building is defined as a building containing two or more sets of domestic premises that is at least 18 metres tall or has at least seven storeys. The Housing & Homeless service has commissioned independent fire safety inspections quarterly with high levels of compliance by the provider. The building has a sprinkler system installed as part of the initial lease, smoke detectors and linked fire panel.

A corresponding private report detailing confidential financial matters was also submitted for consideration (minute 42 below refers).

Following questions from the Committee, it was clarified that Caradoc Hall is owned by a private landlord. Residents in the accommodation are required to pay Council Tax and their own utility bills. The length of stay at the accommodation varies according to the requirements of the resident. Where residents require a 2 bedroom property, the wait for suitable accommodation is approximately 12 months. For 3+ bedroom properties, the wait is longer. Caradoc Hall is primarily used to accommodate small families. The increase in the number of families requiring temporary accommodation is due to a number of factors such as friends and families no longer being able to offer support and families fleeing from domestic violence. Caradoc Hall had undergone extensive refurbishment 5 years ago, which included some of the extractors being replaced, and whilst a further refurbishment will be undertaken to return the properties to the same standard as

5 years ago, there had been limited incidents of damp or mould identified during the structural assessment. The proposed refurbishment will take place as individual flats become vacant.

**RESOLVED that, the Scrutiny Co-ordination Committee note the report and confirm there are no comments or recommendations to be forwarded to Cabinet for consideration at their meeting on 5<sup>th</sup> November 2024.**

40. **Work Programme and Outstanding Issues 2024/2025**

The Committee considered and noted their Work Programme and Outstanding Issues for 2024/25.

41. **Any other Items of of public business which the Chair decides to take as a matter of urgency because of the special circumstances involved.**

There were no other items of public business.

42. **Temporary Accommodation - Lease Renewal of Caradoc Hall, Coventry**

Further to Minute 39 above, the Scrutiny Co-ordination Committee considered a private report of the Director of Adults and Housing, which set out options to enter into a new lease for Caradoc Hall for 10 years.

During consideration of the report, the Committee requested that information be circulated to the Committee Members and the Members of the Communities and Neighbourhoods Scrutiny Board (4) who were invited to attend the meeting, on the total costs of the existing lease for temporary accommodation at Caradoc Hall.

**RESOLVED that, the Scrutiny Co-ordination Committee note the report and confirm there are no comments or recommendations to be forwarded to Cabinet for consideration at their meeting on 5<sup>th</sup> November 2024.**

43. **Any other items of private business which the Chair decides to take as a matter of urgency because of the special circumstances involved.**

There were no other items of private business.

(Meeting closed at 4.10 pm)



**Coventry City Council**  
**Minutes of the Meeting of Scrutiny Co-ordination Committee held at 2.00 pm on**  
**Thursday, 14 November 2024**

Present:

Members:                   Councillor G Lloyd (Chair)  
                                  Councillor M Ali  
                                  Councillor B Christopher (Substitute for Councillor C Miks)  
                                  Councillor A Jobbar  
                                  Councillor L Kelly (Deputy Chair)  
                                  Councillor J Lepoidevin  
                                  Councillor G Ridley  
                                  Councillor R Singh  
                                  Councillor CE Thomas

Other Members:           Councillor R Brown, Cabinet Member for Strategic Finance  
                                  and Resources  
                                  Councillor G Duggins, Cabinet Member for Policy and  
                                  Leadership  
                                  Councillor S Gray (by invitation)  
                                  Councillor E Reeves (by invitation)

Employees (by Service Area):

Children's Services           M Clayton  
Digital Services:             P Ward (Director)  
Finance:                     E Dewar  
Law and Governance:        S Bennett, G Homes  
Transformation and Change:  D Horton-Rayner, M McGinty

Apologies:                 Councillor C Miks (Substitute Councillor B Christopher)

**Public Business**

**44.     Declarations of Interest**

There were no disclosable pecuniary interests.

**45.     Transformation Programme**

The Scrutiny Co-ordination Committee considered a Briefing Note which provided an overview of the One Coventry Transformation Plan 2024/25. A copy of the Plan was appended to the Briefing Note.

The Briefing Note indicated that the Council is embarking on a journey, building on current strengths, but also being imaginative in relation to changes and improvements to the delivery of services, support to residents and communities, and effectively targeting and prioritising resources. The One Coventry Transformation Plan 2024/25 sets out the approach being taken to successfully deliver the Council's transformation ambitions, aligned to the Council's One Coventry Plan (2022-2030) priorities, and provides a mechanism for delivery of the Council's medium term financial strategy.

In order to successfully deliver these transformation priorities and provide the foundations for wider change, the following 7 key operational change programmes were identified, with delivery progress being reported to the One Coventry Transformation Board:-

- Coventry Connects
- Coventry Advice Services
- One Coventry Services
- Increasing Early Intervention to reduce demand on services
- Thinking smarter about service delivery
- One Coventry Partnership delivery
- Helping our people to grow

Case studies on high-level delivery activity across key programmes were provided at the meeting, including a specific update on the One Coventry Services consultation which ended on 4 November, 2024.

The One Coventry Transformation Board was established in March 2024 and has been meeting monthly to oversee and enable the delivery of the Transformation Plan. Membership includes representatives from a variety of different service areas within the Council, with highlight reporting for all programmes and a focus on cross-organisational ownership.

As the Board has now been in operation for several months, a review has been undertaken in the form of a workshop with the Board Members and Leadership Board to ensure the approach of the Board provides the optimum focus in enabling delivery and providing assurance on progress. This has included the alignment of reporting on delivery of the Medium-Term Financial Strategy savings schedule, and the highlight reporting of programme progress.

The potential impacts of delivery of the transformation priorities (for residents, workforce, partners and the Council more widely) are robustly scoped and kept under review. Diversity and Inclusion is a Council priority and is a key focus throughout all transformation engagement, design and delivery. An Equality Impact Assessment (EIA) is completed for change projects at the appropriate time to understand any diversity and inclusion impacts, with consideration to appropriate management and mitigation of these, where possible.

The Committee noted that the Corporate Peer Challenge Progress Review has been arranged and will take place on 22<sup>nd</sup> November 2024. The purpose of this is to help the Council assess the impact of the Peer Challenge recommendations and demonstrate the progress it has made against the areas of improvement and

development identified by the Peer Team. A final feedback report will be shared by the Local Government Association early next year.

The Transformation Plan will naturally evolve and change as it progresses. The current Transformation Plan mainly focuses on 2024/25 and will be reviewed for future years to ensure delivery alignment with the medium term financial strategy position. In addition, the role and function of Transformation Board will be reviewed, to ensure clear oversight and grip of change and improvement programme delivery as work continues to realise financial efficiencies.

The Briefing Note indicated that the Council will continue to build on learning to date, with the intention to work even more collaboratively through the One Coventry approach, where all teams and partners will work seamlessly to deliver services differently for residents.

The Committee asked questions, sought assurances and made comments on a number of issues including:-

- Information relating to the Corporate Peer Challenge Progress Review taking place on 22 November, 2024.
- Work being undertaken in relation to “land” the “Transformation” comms and get the message out, both internally and externally. It was noted that the use of the terminology in relation to the Transformation Programme was being reviewed.
- How AI may be used by the Council in the future and work being undertaken in relation to AI. It was noted that consideration was being given to the impact AI has on climate change with regards to energy usage.
- It was noted that the Transformation Programme would be the subject of a report to Cabinet in February, 2025.
- Work being undertaken in relation to EIAs and consulting with the Disability and Equality Advisory Panel (DEAP).
- Early intervention and how this has changed. In relation to concerns raised, it was noted that the Children’s and Education Scrutiny Board (2) would be considering Early Intervention at their meeting in February, 2025
- In relation to Adult Services, officers were asked to circulate examples “what people need rather than what they want”.
- The implications for the Council of not making the savings identified.
- The process that was undertaken to inform staff of the Holbrooks Library proposals.
- Concerns were expressed about the Transformation Programme, the consultation undertaken in relation to services, timescales for implementation and the provision of objectives. The Committee were informed of the importance placed on consulting with residents in relation to the services they want to receive.
- Information in relation to the proposed changes to Advice Services.
- Officers were requested to provide information in relation to the breakdown of staff who were part of the One Cov Squad.
- Benchmarking with other Local Authorities and looking for examples of good practices.

- The importance of ensuring value for money and delivering services the best way possible.
- Work undertaken in relation to void commercial properties.

**RESOLVED that the Scrutiny Co-ordination Committee:-**

- 1) **Notes the overview of the Transformation Programme Plan 2024/25, progress made to date and delivery challenges.**
- 2) **Requests that consideration be given to streamlining the Transformation Programme where possible, highlighting objectives and including timescales for projects.**

46. **Scrutiny Co-ordination Committee Work Programme and Outstanding Issues 2024-25**

**RESOLVED that the Scrutiny Co-ordination Committee notes and approves the Work Programme and Outstanding Issues for the remainder of the Municipal Year 2024/25.**

47. **Any Other Items of Urgent Public Business**

There were no other items of urgent public business.

(Meeting closed at 3.50pm)

**Coventry City Council**  
**Minutes of the Meeting of Scrutiny Co-ordination Committee held at 11.00 am on**  
**Wednesday, 20 November 2024**

Present:

Members: Councillor G Lloyd (Chair)  
Councillor L Kelly (Deputy Chair)  
Councillor M Ali  
Councillor A Jobbar  
Councillor L Kelly  
Councillor J Lepoidevin  
Councillor C Miks  
Councillor G Ridley  
Councillor R Singh  
Councillor CE Thomas

Other Members: Councillor G Duggins  
Councillor S Gray  
Councillor J O'Boyle

Others Present: P Wallace, E.ON

Employees  
(by Service Area):

Chief Executive J Nugent (Chief Executive)

City Services and  
Commercial A Walster (Director of City Services and Commercial),  
G McKelvie

Finance and Resources B Hastie (Director of Finance and Resources) P Mudhar,  
M Phillips

Innovation C Knight (Director of Innovation)

Law and Governance G Holmes, M Salmon, A Veness

Regeneration and Climate  
Change A Williams (Director of Regeneration and Climate Change),  
A Livesey, R Palmer, P Singh, S Weir

Property Services and  
Development R Moon (Director of Property Services and Development)

Apologies: There were no apologies

## Public Business

### 48. **Declarations of Interest**

There were no disclosable pecuniary interests.

### 49. **Minutes**

The minutes of the meeting held on 19th September 2024 were agreed and signed as a true record. There were no matters arising.

### 50. **Exclusion of Press and Public**

**RESOLVED** that the press and public be excluded under Sections 100(A)(4) of the Local Government Act 1972 for the consideration of the following private reports on the grounds that the reports involve the likely disclosure of information defined in Paragraphs of Schedule 12A of the Act as indicated, and that in all circumstances of the cases, the public interest in maintaining the exemption outweighs the public interest in disclosing the information:

<b>Minute Number</b>	<b>Report Title</b>	<b>Paragraph(s) of Section 12A of the Act</b>
<b>57</b>	<b>UKBIC 6-Month Performance Report 2024/25</b>	<b>3</b>
<b>58</b>	<b>Coventry Municipal Holdings Limited Annual Performance Report Year Ended 31<sup>st</sup> March 2024</b>	<b>3</b>

(Note: The Committee resolved to consider the above items in private however, Councillor J Lepoidevin and Councillor G Ridley opposed this resolution and requested that this be recorded.)

### 51. **Strategic Energy Partnership Performance Update - November 2024**

The Scrutiny Co-ordination Committee considered a report of the Director of Regeneration and Economy and the Director of Innovation, that would also be considered at the meeting of the Coventry Shareholder Committee on 21<sup>st</sup> November 2024, which provided a performance update on the Strategic Energy Partnership. A report on the Strategic Energy Partnership Activity to date for 2024/25 was attached as an Appendix to the report.

The information was being submitted to the Coventry Shareholder Committee to enable the Council's interest in the Strategic Energy Partnership to be monitored comply the agreed governance process. The report provided an update on Strategic Energy Partnership activity since the approval of the Strategic Business Plan and Annual Business Plan at the meeting of the Shareholders Committee on 23rd April 2024.

The fifteen-year Strategic Energy Partnership between the Council and E.ON was the first of its kind in the UK and had the potential to put Coventry at the forefront of the net zero transition. The Council's relationship with E.ON would help support the development of ground-breaking projects, with potential funding from E.ON as well as other sources.

There had been a significant amount of activity over the last six months. Projects underway include a five-year energy supply contract, development of solar/heat pump projects in schools and four council-owned or run buildings, installation of EV charging points and a home energy efficiency programme. A key milestone that had been achieved was the production of the Coventry energy plan, which provided a detailed baseline of energy infrastructure challenges and opportunities to help prioritisation of future projects the partnership develops going forwards to maximise impact. In addition, there were currently nine social value projects that generated benefits to local communities either delivered or underway which include school education programmes, work placements, a community growing programme and tree planting.

In considering the report, the Board asked questions and received responses on the matters in the following areas:

- The importance of decarbonisation, but also the need to ensure that there is sufficient supply of energy to be affordable.
- That this model was unique within Europe and other local authorities were enquiring to see how Coventry's model works.
- That the benefits of the way the partnership was set up in Coventry was that it meant projects could be procured more quickly than if there was separate procurement processes for each individual project. Other benefits include legitimacy schemes supported by the Council have with residents.
- Steps being taken to ensure a range of alternative energy is considered including hydrogen, ground solar, thermal energy from mine water, district heating for new developments,
- That there will be 2200 jobs created annually through the Energy Plan. The SEP was working with schools and colleges to promote apprenticeships within the sector, with a target of at least 25 in the first 5 years.
- The work being done with social landlords in the city to decarbonise properties, including ways to make use of economies of scale where privately owned properties are interspersed within social housing.

Members requested that officers consider how to increase the Electric Vehicle Charging points that were accessible to disabled drivers and also that they be provided with details of the contribution that the 2.5 Council funded posts made towards the Strategy Energy Partnership.

**RESOLVED that the Scrutiny Co-ordination Committee recommends that the Coventry Shareholder Committee approves the recommendations in the report.**

52. **Coventry and Warwickshire Growth Hub Half-Year Report (Financial Year 2024/25)**

The Scrutiny Co-ordination Committee considered a report of the Director of Finance and Resources, that would also be considered at the meeting of the Coventry Shareholder Committee on 21<sup>st</sup> November 2024, which provided the half-year performance of the Coventry and Warwickshire Growth Hub.

Further to Minute 50 above, the Committee were satisfied that the information contained in both the public and private reports could be considered as public business.

The Committee were requested to consider the performance report, subject to the consideration of the additional confidential information contained in the corresponding private report and the Appendix to that report, and to forward any comments or recommendations to the Coventry Shareholder Committee.

The Coventry and Warwickshire Growth Hub (CWGH) had been established since 2014 and was firmly integrated as part of a successful Coventry and Warwickshire economic area – providing a ‘one stop’ centre for local businesses, with advice and guidance on the most appropriate support for their needs.

The CWGH Business Plan was approved by the Shareholder Committee on 23<sup>rd</sup> April 2024. The CWGH half-year report outlined the performance based on the Business Plan during the Financial Year 2024/25, detailing income and operating costs for the ‘core’ Growth Hub. There were limited risks with the company balance sheet and CWGH had sufficient resources to meet liabilities as they fell due. The Council was not responsible for meeting liabilities in its role as shareholder, as CWGH was a private limited company.

Primary objectives and priorities for the period of the Business Plan remained unchanged with the CWGH focussing on accessing and supporting sub-regional small and medium-sized enterprises (SMEs), plugging them in to relevant and available support partners and their programmes - such as those funded through the UK Shared Prosperity Fund.

In considering the report, the Board asked questions and received responses on the matters in the following areas:

- Although there were no plans to close the Growth Hub, there would be no impact on Council resources as a consequence of any liabilities resulting from closure.
- The Board was made up of 4 public sector Directors, including the Director of Regeneration and Economy, and four private sector Directors. The Board was responsible for the development of the Growth Hub Plan and the submission of reports to the Shareholders Committee on a 6-monthly basis.
- Further information could be provided on the income analysis for 2023/24, as well as more detail on the outcomes from initial contacts.

Members requested that details of the outcome rates for referrals to the Growth Hub be sent to them.



**RESOLVED that the Scrutiny Co-ordination Committee recommends that the Coventry Shareholder Committee agrees the recommendations in the reports, and that future reports be considered as public items of business.**

**53. UKBIC 6-Month Performance Report 2024/25**

The Scrutiny Co-ordination Committee considered a report of the Director of Finance and Resources, that would also be considered at the meeting of the Coventry Shareholder Committee on 21st November 2024, which provided the 6-month performance of the UKBIC.

A corresponding private report detailing confidential financial matters was also submitted for consideration (Minute 57 below referred).

The Committee were requested to consider the performance report, subject to the consideration of the additional confidential information contained in the corresponding private report and the Appendix to that report, and to forward any comments or recommendations to the Coventry Shareholder Committee.

UKBIC was a state-of-the-art battery manufacturing research and development facility, funded by £114m from the UK Government (through Innovate UK, part of UK Research & Innovation) and £18m from the West Midlands Combined Authority (WMCA). The facility was operated by UKBIC Ltd which was owned by Coventry City Council (CCC). The Council was also accountable body for the grant funding used to establish the facility.

In considering the report, the Board asked questions and received a response on the matter in the following area:

- Details on the registered name with Companies House and the closure of a dormant company

Members requested that clarification on different company names registered with Companies House be provided to them.

**RESOLVED that the Scrutiny Co-ordination Committee, subject to the consideration of the additional confidential information contained in the corresponding private report and the Appendix to that report (Minute 57 below refers), recommends that the Coventry Shareholder Committee approves the recommendations in the report.**

**54. Coventry Municipal Holdings Limited Annual Performance Report Year Ended 31st March 2024**

The Scrutiny Co-ordination Committee considered a report of the Director of Finance and Resources, that would also be considered at the meeting of the Coventry Shareholder Committee on 21st November 2024, which provided the annual performance for the year ended 31<sup>st</sup> March 2024 of Coventry Municipal Holdings Ltd.

A corresponding private report detailing confidential financial matters was also submitted for consideration (Minute 58 below referred).

The Committee were requested to consider the performance report, subject to the consideration of the additional confidential information contained in the corresponding private report and the Appendix to that report, and to forward any comments or recommendations to the Coventry Shareholder Committee.

The Annual Performance Report was focused on a backward look over the 12 months of operation from April 2023 to March 2024 for Coventry Municipal Holdings (CMH) and its subsidiaries which included the following entities.

- Coombe Abbey Park Ltd (CAP), including two subsidiaries:
  - No Ordinary Hospitality Management Ltd (NOHM)
  - Coombe Abbey Park (LACo) Ltd (CAP LACo)
  
- Tom White Waste Ltd (TWW), including two subsidiaries:
  - A&M Metals & Waste Ltd (A&M)
  - Tom White Waste (LACo) Ltd (TWW LACo)
  
- Coventry Regeneration Ltd (CR)
- Coventry Technical Resources Ltd (CTR)
- No Ordinary Hotels Ltd (NOH)

The Group Governance Agreement (GGA) required CMH to produce an Annual Performance Report looking back at the operation of the Group to the year-end 31st March 2024.

In considering the report, the Board asked questions and received responses on the matters in the following areas:

- The availability of the public accounts in January and that Scrutiny Co-ordination Committee could consider that information in public at that point.
- That the purchase of both Coombe Abbey and Tom Whites was completed based on an independent valuation at the time and there was no reason to believe that the assets were over-valued.

**RESOLVED that the Scrutiny Co-ordination Committee, subject to the consideration of the additional confidential information contained in the corresponding private report and the Appendix to that report (Minute 58 below refers),:**

- 1) Notes the annual performance report for the Coventry Municipal Holdings Group for the year ended 31st March 2024.**
- 2) Recommends that the Coventry Shareholder Committee approves the recommendations in the report.**
- 3) Requests that a further report be considered by Scrutiny Co-ordination Committee when the accounts for 2023/24 have been published in early 2025.**

**4) Recommends that Coventry Shareholder Committee requests that future reports provide cash flow details for the businesses.**

**55. Scrutiny Co-ordination Committee Work Programme and Outstanding Issues 2024/25**

The Scrutiny Co-ordination Committee received a report of the Scrutiny Co-ordinator that detailed issues on the Board's Work Programme for meetings of the Committee for 2024/25.

**RESOLVED that the Scrutiny Co-ordination Committee notes the issues on the Committee's Work Programme for 2024/25.**

**56. Any Other Items of Public Business**

There were no other items of public business.

**57. UKBIC 6-Month Performance Report 2024/25**

Further to Minute 53 above, Scrutiny Co-ordination Committee considered a private report of the Director of Finance and Resources, that would also be considered by Coventry Shareholder Panel at their meeting on 21<sup>st</sup> November 2024, which set out the commercially confidential matters relating to UKBIC 6-Month Performance Report 2024/25.

In considering the report, the Committee asked questions and received responses on the matters raised.

**RESOLVED that further to Minute 53 above relating to the public aspects of this report, Scrutiny Co-ordination Committee recommends that the Coventry Shareholder Committee agrees the recommendations in the report.**

**58. Coventry Municipal Holdings Limited Annual Performance Report Year Ended 31st March 2024**

Further to Minute 54 above, Scrutiny Co-ordination Committee considered a private report of the Director of Finance and Resources, that would also be considered by Coventry Shareholder Panel at their meeting on 21<sup>st</sup> November 2024, which set out the commercially confidential matters relating to Coventry Municipal Holdings Ltd Annual Performance Report year ended 31st March 2024.

In considering the report, the Committee asked questions and received responses on the matters raised.

**RESOLVED that further to Minute 54 above relating to the public aspects of this report, Scrutiny Co-ordination Committee:**

- 1) Notes the annual performance report for the Coventry Municipal Holdings Group for the year ended 31st March 2024.**
- 2) Recommends that the Coventry Shareholder Committee approves the recommendations in the report.**

59. **Any Other Items of Private Business**

There were no other items of private business.

(Meeting closed at 1.40 pm)

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**To: Scrutiny Coordination Committee**

**Date: 18<sup>th</sup> December 2024**

**Subject: WMCA Corporate Update**

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### **1 Purpose of the Note**

- 1.1 The report sets out a high-level summary of the structure and corporate performance of the West Midlands Combined Authority for the Financial Year 2023/2024 and 2024/25.

### **2 Recommendations**

- 2.1 Scrutiny Co-ordination Committee are recommended to note the contents of the report and makes any suggestions to representatives.

### **3 Information and Background**

- 3.1 As a Constituent Member of the West Midlands Combined Authority, Coventry City Council is a key partner in ensuring we deliver for the region.
- 3.2 This report is one of three that is scheduled for the Board to receive this year. We are due to bring a detailed summary of our delivery within the Coventry City Council areas on the 9 April 2025.

### **4 Health Inequalities Impact**

- 4.1 The West Midlands Combined Authority considers the impact of health inequalities in all reports presented to Committees.

James Hughes  
Member Relationship Manager  
West Midlands Combined Authority  
[member.enquiry@wmca.org.uk](mailto:member.enquiry@wmca.org.uk)

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West Midlands  
Combined Authority



# Corporate Update

Coventry City Council, Scrutiny Coordination  
Committee

# What is the WMCA?

**VIDEO TO BE SHOWN DURING THE MEETING**





# Mayor & Mayoral Office



**Richard  
Parker**  
Mayor of  
the West  
Midlands

**Cllr  
Sharon  
Thompson**  
Deputy  
Mayor of  
the West  
Midlands

**Joe  
Dundas**  
Director –  
Mayoral  
Strategy

**Roisin  
Lyons**  
Mayoral  
Delivery  
Manager

**Priya  
Thakur**  
Mayoral  
Support  
Manager

**Rhianna  
Patel**  
Senior  
Policy  
Officer

**George  
Fraser**  
Policy &  
Casework  
Officer

**Jas Gill**  
Executive  
Assistant to  
the Mayor

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# Jobs for Everyone

We're investing in jobs, skills, training and apprenticeships. Reducing youth unemployment and ensuring everyone has a job that pays well.

# Homes for Everyone

We're building social and affordable homes and creating vibrant communities so that everyone will have a place to call home.

# Growth for Everyone

We're helping businesses grow, supporting innovation and creativity, and making sure everyone benefits.

# Journeys for Everyone

We're connecting communities and making travel easier, safer and more affordable for everyone.

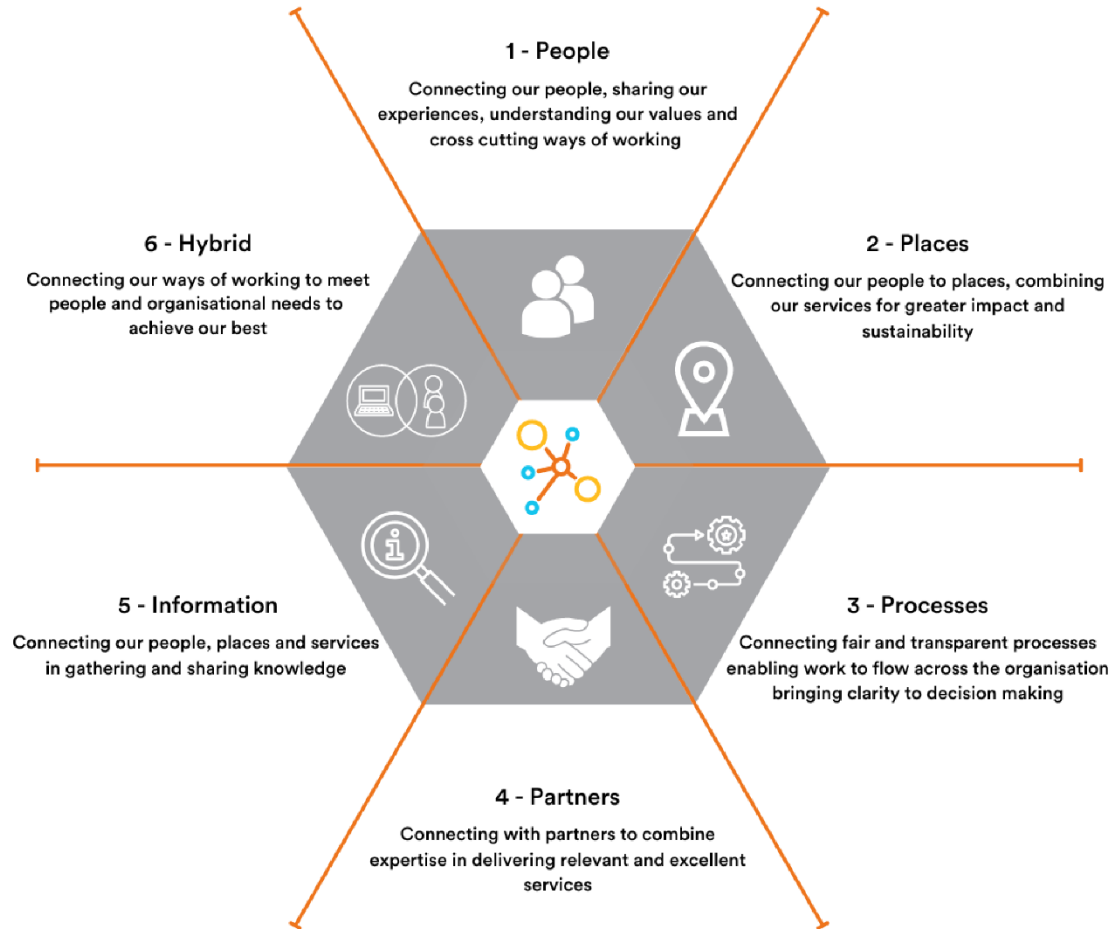


# Executive Leadership Team



# #BetterConnected

We all achieve more when we work in a more integrated way. That's why we launched #BetterConnected in the summer of 2022.



## PEOPLE & CULTURE STRATEGY

- 1** Create an agile, curious and learning organisation.
- 2** Provide the environment to help everyone bring their best energy and thrive.
- 3** Think and act as 'One team WMCA' aligned to our overall purpose, values and strategy.

Creating better  
experiences together.  
[wmca.org.uk/designteam](https://www.wmca.org.uk/designteam)

# Financial Year

2023-2024

# Annual Business Plan – 2023/2024 FY

## Corporate Aims and Objectives

1. To promote inclusive economic growth in every corner of the Region and stimulate the creation of good jobs.
2. To ensure everyone has the opportunity to benefit as the Region recovers from COVID-19, improves resilience and tackles long-standing challenges.
3. Connect our communities by delivering transport and unlocking housing and regeneration schemes.
4. To reduce carbon emissions to net zero, enhance the environment and boost climate resilience.
5. To secure new powers and resources from Central Government, and demonstrate the strength of our regional partnership.
6. To develop our organisation and our role as a good regional partner.

*West Midlands Combined Authority 2023 to 2024 Annual Business Plan*

In this Financial Year, there were 127 HLDs/KPIs, beneath these were SMART milestones that provide granular detail and were profiled over the course of the year with measures and targets.

## Performance over the year:

- 115 indicators remained on track by the end of Q1 and only 3 were amber.
- This positive trend continues into Q2, although there are now 11 red and amber indicators.
- By Q3, 106 indicators remained on track and 14 had a red and amber RAG status. This increase was to be expected because performance is calculated cumulatively through the year and compared to the same period last year it showed an improvement, where 23 red and amber indicators were reported to the Executive Board.

*(Performance monitoring against the Annual Business Plan Deliverables, OSC, Jan 24)*

**Performance against the plan is reviewed by our Overview and Scrutiny Committee bi-annually.**

# Financial Budget 2023-2024

The below sets out how the £346m revenue income was sourced and where it was allocated for expenditure.

- The 2023/24 Transport expenditure is to be funded by £119.4m of Transport Levy, which WMCA receive from its Constituent Members, £4.7m of Business Rates and £9.2m of WMCA's existing Reserves. The Transport Levy has been increased by 2% (£2.3m) from 2022/23.
- The 2023/24 Portfolio expenditure includes WMCA's devolved funding of £141.4m in order to deliver Adult Education throughout the Region, as part of our Employment and Skills portfolio. The remaining expenditure in the area includes WMCA's Economy & Innovation, Culture & Digital, Health & Wellbeing, Levelling Up, Environment & Energy and Inclusive Communities portfolios, as well as revenue costs of delivering our Housing & Regeneration Capital Programme.
- The Investment Programme and Mayor's Office Budgets are in line with prior years and include the receipt of Devolution Deal grants. A gainshare grant of £36.5m will be used to deliver the Capital projects within the Investment Programme, whilst a £0.9m Mayoral Capacity Funding grant supports the operation of the Mayoral Office.

The West Midlands Combined Authority Capital Programme is summarised below:

- Revenue Backed Debt – IP - £871 million
- DfT Transport Grants - £1,753 million
- Income Backed Debt – £226 million
- Land Fund Grants – £208 million
- Other Grants – £169 million
- Administered Grants - £32 million

*West Midlands Combined Authority 2023 to 2024 Annual Business Plan*

## Performance against Budget

- The provisional position at the end of March 2024 shows an underspend of £2.0m - £3.5m deriving from Transport for West Midlands. This is offset by a £1.5m adverse variance derived from overspend within the Portfolios. In the whole financial year a total of £3m savings were delivered in full.
- Within Portfolios, savings on staffing and reduced external advice have been offset by an increase in provision for legal claims. Within Transport, additional advertising income, the release of a provision relating to a lease contract and net savings within Metro due lower subsidy than budgeted have contributed to the favourable variance.
- The underspend of £2.0m will be transferred to the WMCA General Reserves to bolster financial resilience, leaving a balance of £6.4m (less than 1% of 2024/25 planned expenditure.)
- Capital spend totalled £374.1m, resulting in a favourable variance of £242.2m against budget – a 60.7% delivery against budgets.

# Key Achievements 2023/2024

**VIDEO TO BE SHOWN DURING THE MEETING**

Video taken from the Cllr Open Day held in June.



Creating better  
experiences together.  
[wmca.org.uk/designteam](https://www.wmca.org.uk/designteam)

# Financial Year

2024-2025

# Annual Business Plan – 2024/2025 FY

2024 is set to be a pivotal year in the history of the WMCA. Our corporate aims and objectives, however, have remained unchanged for this Financial Year. The backdrop to how we deliver these will and has already somewhat changed.

- ❖ We have successfully delivered a Mayoral election and welcomed Mayor Parker as a new Mayor. The transition has gone extremely well, and we are working with the Mayor on how we achieve our aims and objectives together over the next Mayoral Term.
- ❖ We are getting ready to undergo the biggest change to the way that we work since we were formed in 2016. The Single Settlement has challenged us to think differently and boldly about how we deliver the change we need here in the West Midlands.

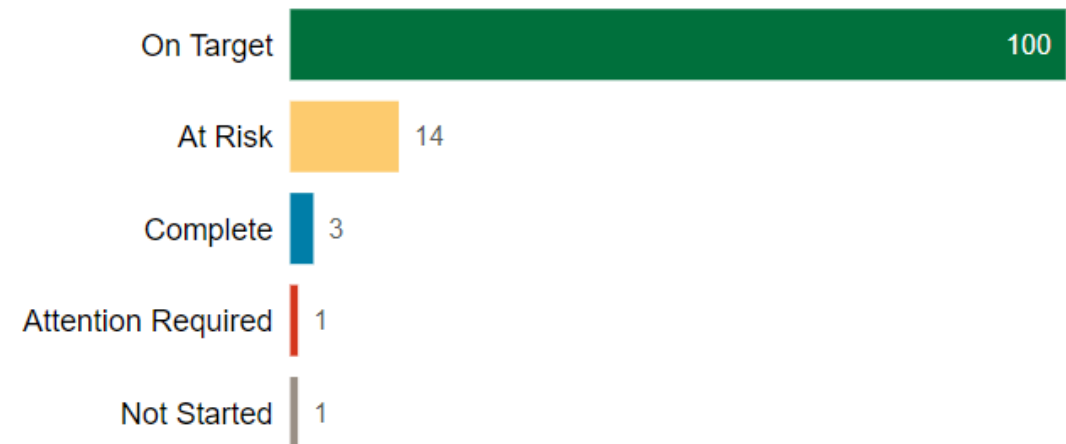
We have already, and will continue, to deliver on this years Business Plan through living our values:

- ✓ Collaborative
- ✓ Inclusive
- ✓ Driven
- ✓ Innovative

There remains 127 HLDs/KPIs in this year's plan. And we will continue to monitor our progress against them through the Executive Board meetings and our Overview and Scrutiny Board. As part of our commitment to remaining accountable and on target, we've made the Annual Business Plan (ABP) performance report available on all of our Employees' desktops.

## Performance so far :

### No. of PIs in Variance Categories for September 2024



# Financial Budget 2024-2025

The below sets out how the £506.9m revenue income is sourced and where it has been allocated for expenditure.

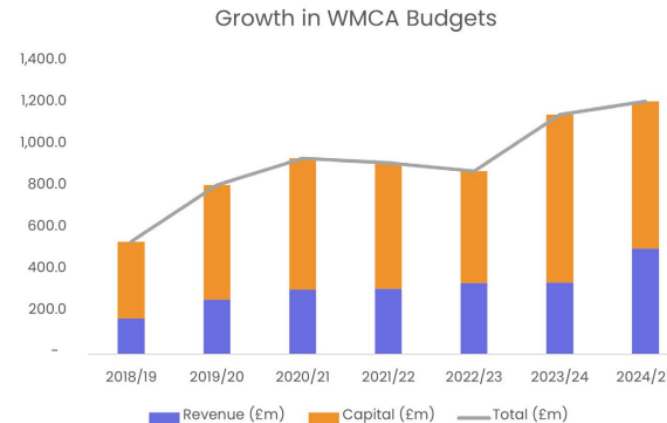
- The 2024/25 Transport expenditure is largely funded by £119.4m of Transport Levy which is received from Constituent members along with £73.9m of Transport specific revenue grants
- The 2024/25 Portfolio includes WMCA’s devolved funding of £142.0m in order to deliver Adult Education throughout the Region, as part of our Employment & Skills directorate. The remaining expenditure is largely funded by Revenue grants of £104.6m and includes WMCA’s Economy & Innovation, Culture & Digital, Health & Communities, Levelling Up, Environment & Energy and Inclusive Communities Directorates, as well as revenue costs of delivering our Housing & Regeneration Capital Programme.
- The Investment Programme and Mayor’s Office budgets are in line with prior years. A gainshare grant of £36.5m will be used to deliver the capital projects within the Investment Programme, whilst a £0.9m Mayoral Capacity Funding grant supports the operation of the Mayoral Office.

The West Midlands Combined Authority Capital Programme is summarised below:

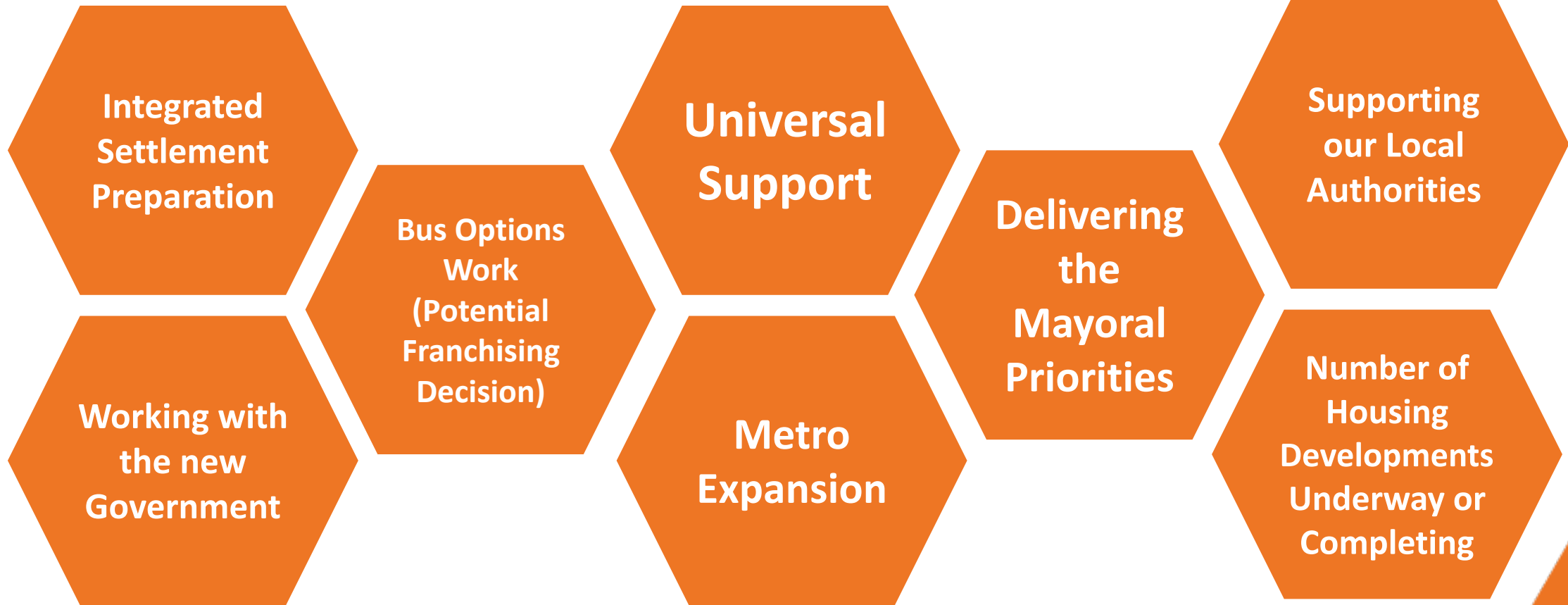
- Revenue Backed Debt – IP - £871 million
- DfT Transport Grants - £1,787 million
- Income Backed Debt – £226 million
- Land Fund Grants – £253 million
- Other Grants – £179 million
- Administered Grants - £32 million

*West Midlands Combined Authority 2024 to 2025 Annual Business Plan*

## Growth in WMCA Budgets



# Lookahead 2024-2025



# How we work with you...

## Formal

- Each Constituent Authority is represented by two members at the WMCA Board, these are appointed at your Full Council Meetings.
- Your Council is also represented on our Investment Board, Investment Zone Board, OSC, TDOSC and ARAC Committees.
- The Mayor meets on a regular basis with Leaders (MML) to talk about the issues we face and how we can work together to tackle them.
- The Chief Executives meet as part of the WM Executive Board to also talk about key themes, projects and issues.
- Scrutiny Visits by the WMCA.

## Informal

- There are several Officer-Officer meetings that take place, for example FD's, Directors of Economic Dev, PDIP, Place Based Strategy Working Group, Investment Zone Working Group.
- This year our Member Relationship Team are providing you with All Councillor Webinars on the work we do.
- The Mayor is planning on engaging with Councils and Councillors over his coming Mayoral Term.
- Work together on ad hoc basis on projects.

We are keen to improve the 2-way relationship so if you have ideas of other ways to engage.



# West Midlands Combined Authority

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**To: Scrutiny Coordination Committee**

**Date: 18<sup>th</sup> December 2024**

**Subject: WMCA Corporate Update**

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## **1 Purpose of the Note**

- 1.1 The report sets out the work of the West Midlands Combined Authority Scrutiny function for the Municipal Year 2023-2024.

## **2 Recommendations**

- 2.1 Scrutiny Co-ordination Committee is recommended to note the contents of the report and makes any suggestions to representatives.

## **3 Information and Background**

- 3.1 As a Constituent Member of the West Midlands Combined Authority, Coventry City Council is represented on Overview and Scrutiny Committee, Transport Delivery, Overview and Scrutiny Committee and Audit, Risk and Assurance Committee.

- 3.2 For the Municipal Year 2023-2024 Coventry's representatives were:

Overview and Scrutiny Committee

Councillor Naeem Akhtar (Vice-Chair)

Transport Delivery, Overview and Scrutiny Committee

Councillor John McNicholas (Chair)

Councillor Pervez Akhtar

Councillor Antony Tucker

Audit, Risk and Assurance Committee

Councillor Ram Lakha OBE

## **4 Health Inequalities Impact**

- 4.1 The West Midlands Combined Authority considers the impact of health inequalities in all reports presented to Committees.

James Hughes  
Member Relationship Manager  
West Midlands Combined Authority  
[member.enquiry@wmca.org.uk](mailto:member.enquiry@wmca.org.uk)

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# West Midlands Combined Authority Scrutiny and Audit Annual Report

2023/24



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# Forewords



## Councillor Cathy Bayton

Chair of Overview & Scrutiny Committee

I write this foreword as the outgoing Chair of the Overview and Scrutiny Committee, a position I have proudly held for the last three years and have guided the scrutiny committee through the many challenges of the Deeper Devolution Deal and the Government’s new Scrutiny Protocol. The committee has risen to the challenge this year, and I want to pay tribute to every member of the committee for their dedication and contributions, particularly my Vice-Chair Councillor Naeem Akhtar for his ongoing support and leading the Brownfield Land Remediation Deep Dive Review.

As always, the committee would not function without the support of Governance Service Officers, Dan Essex and Julia Cleary, but particularly Lyndsey Roberts who ensures that the committee has the information it needs and supports me as Chair to keep the meeting running smoothly. Lyndsey Roberts has helped the committee develop over the years and will continue to be an invaluable source of support to the new committee. It has also been very helpful to always have a member of the senior leadership team present at meetings and this has increased accountability.

In the annual report the work schedule has been outlined, the outcomes and future focus points demonstrate the forward thinking of the committee and the impact of the WMCA's policies on its strategic aims and objectives. During this year, scrutiny has been given a higher profile at the WMCA Board in the presentation of its reports where all scrutiny recommendations are now included and considered by the board.

In March we received a confirmation letter from Rt Hon Michael Gove MP that the WMCA would be eligible for the Level 4 Devolution Deal, achieved in part due to the level of work scrutiny had undertaken and the improvements made.

As scrutiny chairs, Councillor John McNicholas and I have attended five of the constituent authorities' Overview & Scrutiny Committees during the year, to increase elected members knowledge and involvement in the WMCA, which has been well received. We still have some thinking to do around public participation in scrutiny sessions and how we can increase this.

I have continued to chair the national Combined Authorities Scrutiny Chairs' Forum where much discussion has taken place around the new scrutiny protocol and the strengthened accountability and responsibility. The West Midlands is in a good place to continue to grow in the new Mayoral term. I wish the committee well for the coming year and the new challenges it will face.



## Councillor John McNicholas

**Chair of Transport Delivery Overview & Scrutiny Committee**

I have had the privilege of being appointed as Chair of the newly formed Transport Delivery Overview & Scrutiny Committee for 2023/24, and I would like to take this opportunity to thank my Vice-Chair, Councillor Mary Locke and all members of the committee for their constructive contributions throughout the year. I would also like to thank the chairs of the Member Engagement Groups for the in-depth scrutiny work they have done throughout the year.

I would like to acknowledge non-constituent members appointed to the committee for their participation and valued contributions as members of rural communities and thank Dan Essex and Lyndsey Roberts for their tireless help, advice and patience. The committee has welcomed James Hughes as the newly appointed Member Relationships Manager and look forward to working with him next year.

As you will read in this Annual Report, it has been a very busy year setting up and delivering our extensive work programme, which justifies the WMCA Board's decision to create a new scrutiny committee solely focused on the WMCA public transport responsibilities.

As you would expect, much happens behind the scenes and we have continued to hold meetings of the scrutiny chairs and vice-chairs of all the combined authorities across England. This has helped share good practice and ideas for how we can all strengthen and improve our scrutiny functions.

Transport Delivery Overview & Scrutiny Committee has experienced issues with quoracy this year, so we are continuing to engage with council leaders on the importance of member attendance to ensure that individual districts are not disenfranchised in the development of transport in the West Midlands. It is vitally important when local authorities nominate members to sit on our committees that those individuals have the capacity to commit to the varied and interesting work programme for the year.

I would like to congratulate the newly elected Mayor of the West Midlands, Richard Parker and we look forward to the Mayor's proposals regarding bus franchising, which will be a focus of the committee's work programme in the forthcoming year.

Finally, as a result of me being in the same political party as the Mayor, the WMCA's constitution now requires me to stand down as chair of the Transport Delivery Overview & Scrutiny Committee, and a new Chair will be appointed at our AGM. I have enjoyed my time as Chair immensely, having been appointed by the region's political leaders, and I look forward to continuing to be involved in transport matters this year.



## Mark Smith

**Chair of Audit, Risk & Assurance Committee**

It has been my pleasure to be the Independent Chair of the Audit, Risk and Assurance Committee since October 2021. During that time I have been fortunate to be supported in my role by the Vice Chair Councillor Ram Lakha who has continued to provide wise counsel.

The Committee has formally met on five occasions during the course of the year and continued to provide oversight of the WMCA's Risk Management process and the Single Assurance Framework which I am pleased to note has now been rolled out to all the Directorates. Further Assurance has been provided through a range of specific audits undertaken by the Internal Audit function. In previous years this service was outsourced to the

City of Wolverhampton Council, but in 2023 -24, it was concluded that it would be more efficient and effective to bring in house, and I am pleased to note that we have ended the year with a new Head of Internal Audit and Information Governance and have built a team to support this work going forward.

The Committee also oversees the relationship with the External Auditors. There are a number of well publicised challenges in the provision of external audit services to public sector bodies and in particular the timely completion of the work, and WMCA has not been immune to this. We will continue to work with the auditors to do whatever we can to try and ensure that the annual accounts are approved on a more timely basis in the future.

The Committee continues to get excellent support from a wide range of officers, but I would particularly like to thank Wendy Slater for all of her hard work in supporting the committee and me personally, to ensure we can undertake our responsibilities effectively.

As Independent Chair, I am looking forward to continuing to lead the important work that is undertaken by Audit, Risk & Assurance Committee and also to building relationships with the new Chairs of the Overview and Scrutiny Committees, but I would also like to thank Councillor Bayton and Councillor McNicholas for the collaborative manner in which we have all worked together over the past year.





# Introduction

This is the first joint scrutiny and audit annual report which outlines the key work activities and the outcomes of the West Midlands Combined Authority's statutory scrutiny and audit functions during 2023/24.

## Overview & Scrutiny and Audit Functions

Overview, scrutiny and audit are statutory functions of the WMCA.

Two scrutiny committees discharge the responsibilities of overview and scrutiny through oversight of the work of the Mayor, portfolio lead members and the wider WMCA decision-making process in order to hold the region's political leaders to account and improve the quality and impact of the decisions that the WMCA makes.

Audit, Risk & Assurance Committee discharges the responsibility of audit by providing independent oversight of the audit, risk management, assurance and reporting arrangements that underpin good governance and financial standards and is chaired by an independent member of the public.

## What We Do, and How We Do It

**Pre-Policy Development** - Considering and influencing policy areas and proposals before they are more formally developed.

**Pre-Decision** - Looking at topics and reports immediately before decisions are made by the WMCA Board.

**Deep Dives and Topic Based Reviews** – Establishing task & finish groups to undertake ‘deep dives’ and making reports and recommendations to be considered by the WMCA Board and/or other committees.

## What is WMCA Overview & Scrutiny?

The WMCA’s two scrutiny committees provide important challenge and oversight of the WMCA’s plans priorities, governance arrangements and financial affairs.

The committees perform two distinct functions under the remit of ‘overview’ and ‘scrutiny’:

**Overview** - Focusing on the development of policy. This form of scrutiny is carried out in the earlier stages of policy development.

**Scrutiny** - Looking at decisions that have been made, or are about to be made. This form of scrutiny is often carried out in the immediate weeks leading up to a decision being made.

### **Advocating for Residents of the West Midlands**

- Investigating issues that are important to local people's lives and by looking further into matters brought to its attention by the public.

### **Exercising the Power of Call-In of Decisions**

- Call-in decisions for further scrutiny and challenge prior to policy implementation.

### **Performance Monitoring**

- Monitoring the implementation, performance and impact of policies and decisions of the WMCA.

## **Our Transparency & Accountability**

- Engagement with the 'business voice' – This brings a private sector voice to discussions at Overview & Scrutiny Committee and Audit, Risk & Assurance Committee, and ensures that the views of the region's commercial sector are heard at the highest levels of decision making.
- Agendas, reports and minutes posted online
- Meetings are held in public
- Livestream posted on YouTube
- Scrutiny and Audit Annual Report
- X / Twitter account @WMCA\_Scrutiny
- Independent Chair, WMCA's Audit, Risk & Assurance Committee

## Peer Learning/Sector Lead Improvement

- Combined Authorities Scrutiny Chairs' Forum
- Combined Authorities Governance Network
- Centre for Governance & Scrutiny
- Regional Scrutiny Network
- West Midlands Audit Committee Chairs Forum
- Partaking in other Combined Authorities Scrutiny Reviews

### “Building a Culture of Scrutiny and Audit”

Scrutiny and audit are fundamental parts of any efficient and equitable governance structure and decision-making process. Both functions are at the heart of good decision-making, which the WMCA has welcomed, encouraged and continues to support throughout the organisation.

**“The scrutiny and audit functions are a fundamental part of the WMCA’s governance and decision-making processes. The WMCA and its scrutiny/audit members have built and continue to build a strong culture of non-partisan, constructive, collaborative, productive and evidence-based scrutiny.”**



# Scrutiny - what's new for 2023/24

## 1. Transport Governance - New Arrangements

**“With greater powers comes greater accountability”**

This year, to help strengthen the lines of accountability for transport decision making in the WMCA, reduce duplication of meetings and provide a more effective platform for elected members to hold transport decision makers to account, the WMCA Board agreed to establish a new Transport Delivery Overview & Scrutiny Committee to provide oversight and scrutiny to Transport for West Midlands and transport decision makers.

## 2. Government's Scrutiny Protocol

**“The Government's expectations as to how scrutiny should be carried out”**

In announcing the Deeper Devolution Deal, the Government highlighted the importance of governance and accountability underpinning these new powers and responsibilities. These enhanced accountabilities have been framed within the English Devolution Accountability Framework, which was published in March 2023, and formed a key part of the Government's thinking in respect of local accountability. Within the West Midlands Deeper Devolution Deal, the Government had highlighted the importance of governance, accountability and effective scrutiny.

The Department for Housing, Levelling Up & Communities, together with combined authorities, have developed a Scrutiny Protocol which sets out the relationship between the Mayor, the WMCA and its scrutiny and audit functions.

### **3. Regular Performance & Outcomes Monitoring**

#### **“Taking a more active role in the review of performance against key indicators”**

An area of focus for the committee for 2023/24 has been a focus on the WMCA’s key strategies and measuring the performance of the WMCA against its annual business plan. This has enabled members to better understand priorities and recommend action or inform future work activity.

Together with the WMCA, members have assisted in the development of performance information to be delivered in a format that has enabled them to undertake its scrutiny role in an effective way. This information is now being considered by members on a regular basis.

### **4. Scrutiny of the WMCA’s Statutory Officers**

#### **“The importance of senior officer engagement”**

As part of its role in engaging with senior officers, this year members wanted to also focus on the decisions undertaken by the WMCA’s Statutory Officers.

## 5. The Use of External Experts

### “Technical experts to enhance scrutiny of decisions”

During 2023/24, members have invited Homes England and the University of Birmingham to help inform and enhance their knowledge on particular subject matters that were to come forward for their consideration, particularly in respect of air quality, transport and housing.

## 6. Stronger Relationships with Stakeholders

### “Greater engagement with local authorities”

We have started to have more engagement with scrutiny within local authorities and have taken our scrutiny ‘on the road’.





# Audit - what's new for 2023/24

## 1. Review of the Internal Audit function

Following a review of the outsourced service provision having been provided by the City of Wolverhampton Council's internal audit in recent years, the WMCA decided to bring internal audit services in-house.

## 2. Organisational Audit Structures

A clear structure for the WMCA's internal audit team has been developed and designed together with audit members, with additional resourcing sourced to support delivery of the Internal Audit Plan during this transitional year. Recruitment for the In-House team was completed with a Head of Internal Audit & Information Governance joining the organisation in March 2024.

## 3. CIPFA

During 2023/24, audit members have utilised CIPFA guidelines on relevant matters to ensure the committee was reflective of statutory requirements. The consideration on the appointment of additional independent members continues.

## 4. Training

Audit members have received treasury management training this year, to support their role of oversight of financial matters including the approval of the Authority's annual statement of accounts.

## 5. External Auditor

The committee were introduced to the new External Auditor Engagement Leader who will have responsibility for overseeing the external audit of the WMCA Annual Report and Accounts for the year ended 31 March 2024.

# Overview & Scrutiny's Focus for the Year

During the year, the work of the Overview & Scrutiny Committee has had a strong focus on the performance of the WMCA and the outcomes delivered against its strategic aims and objectives.

The committee has also focused on the implementation of the WMCA's Deeper Devolution Deal and its implications for enhanced scrutiny, the Government's Scrutiny Protocol and WMCA activity in relation to housing, skills and air quality.



# Holding the Mayor of the West Midlands to Account

The committee has undertaken a number of public mayoral Q&A sessions, structured around two core themes ‘**accountability**’ and ‘**investment**’ with questions focusing on the key challenges, outcomes and benefits for the people of the West Midlands.

In October, the committee questioned the Mayor on the delivery and impact of the WMCA’s policies. Questions focused on:

- Governance and accountability
- Economy
- Skills and the labour market
- The green policy agenda
- Housing
- Transparency of the WMCA’s policies and business activity
- Community engagement

In December, the committee held its second Q&A and questioned the Mayor and the Lead Member for Finance on financial matters relating to the developing budget for 2024/25, with a particular focus on:

- Income generation opportunities, including a mayoral precept
- Autumn Statement
- Business and the economy
- The use of reserves
- Local authorities' financial position and the impact on the WMCA
- Transport, including bus franchising
- Combined authority funding

**“These public Q&A sessions were an important part of providing public accountability and transparency of decision-making for the WMCA’s only directly elected politician.”**



# Mayoral Q&A Sessions - Key Findings and Outcomes

## Delivery and Impact of the WMCA's Policies

The following matters were reported to the WMCA Board in November:

### **Economic Impact of HS2 (Cancellation of Birmingham - Manchester leg)**

The Overview & Scrutiny Committee enquired as to when an analysis of the economic impact of the cancellation of the Birmingham - Manchester leg of HS2 would be undertaken and wished to review the report when completed. Overview & Scrutiny members also wanted to be kept abreast of the transportation transformations to be delivered with the funding to be provided within the Network North strategy, the implementation of the Midland

Rail Hub and on the timeline for delivery.

### **The Outcome: Response from the Mayor**

The economic impact of the cancellation of the northern leg of HS2 was currently being considered as part of private sector work, which I commissioned alongside Andy Burnham (Mayor of Greater Manchester), with contributions from both the West Midlands and Greater Manchester combined authorities ahead of planned publication in the spring/summer of 2024. This work was primarily looking at how rail links between Birmingham and Manchester could be improved in light of the HS2 decision, but is also considering economic factors. As this was a large, complex piece of work it was difficult to be able to give an

exact date of when the findings will be available, due to the need to collate information from a variety of sources and to map this against impacts that might or might not be experienced, but as soon as more information was available, we would be happy to share with members.

To truly understand the economic impact, this private sector work would be supplemented by a WMCA commissioned piece of work to look at the specific impacts that would be felt within our region and how these will affect our regional economy. This would hopefully be available in March/April of 2024, and again we would be happy to share with members once complete.

## **Energy Creation**

Although it was recognised that the current focus on the WMCA was to reduce energy consumption, Overview & Scrutiny Committee considered that the WMCA should also explore options for energy creation to help keep energy affordable for residents.

## **The Outcome: Response from the Mayor**

The WMCA recognised the need to explore options to unlock barriers to local energy generation. With this in mind, we were working with partners on a number of initiatives, including Midlands Net Zero Hub who were completing a non-domestic solar mapping project. We were also talking with solar developers who were looking at grid-scale solar farms to service increasing industrial electricity demand as our industrial sector looked to decarbonise.

## **Community Engagement**

The considerable work undertaken by the WMCA was recognised, but the importance of ensuring that this was communicated to local authorities and the public to ensure that maximum benefit from its activities was being achieved was stressed.

## **The Outcome: Response from the Mayor**

The WMCA recognised the key importance of communicating and engaging with members, stakeholders, Government and the residents of the region on our work and its impact. In terms of engagement with councillors, this responsibility sits within the WMCA's Law & Governance directorate. Recently they introduced a new role of Member Relationship Manager to improve engagement with elected members across the region.

The WMCA communications team was responsible for engagement with residents. They did this through events, media, social media, marketing opportunities and community engagements events. Key project milestones and successes were highlighted with press releases, and associated social media was produced alongside it. Events were held to engage or collaborate with stakeholders, or where projects were being delivered or proposed that could have an impact on residents or businesses.

## **Labour Market Overview Information**

Scrutiny members would welcome sight of the local labour market information referred to by the Mayor within the Q&A session on a regular basis.

## **The Outcome: Response from the Mayor**

WMCA produced a monthly labour market and research briefing called 'WISE' (West Midlands Insights on Society and Economy). This would be shared with the committee in addition to the latest economic intelligence briefings going forward to provide ongoing updates.

# WMCA's Budget 2024/25

The following matters were reported to the WMCA Board in January, as part of the proposed draft budget 2024/25.

The first joint Q&A session was held with members of Overview & Scrutiny Committee and Transport Delivery Overview & Scrutiny Committee in which members asked questions to the Mayor and Portfolio Lead Member for Finance on the medium-term financial pressures and the mitigation measures that will be a focus of the committee during the current and future years.

In addition, questions were also raised in relation to:

- The potential for a mayoral precept
- Network North funding
- The need for subsidy for public transport in urban areas
- An increase in the transport levy and support for this across the local authorities to sustain the current offer to residents
- Financial risk
- SMEs and access to funding pots
- The WMCA's funding approach
- Business rates retention
- West Midlands Cycle Hire Scheme and its financial viability and sustainability



# The Outcome

The matters identified by Overview & Scrutiny Committee and Transport Delivery Overview & Scrutiny Committee that arose out of the Mayoral Q&A in December were considered as part of the draft budget 2024/25, which was submitted to the WMCA Board in January. A strong focus for scrutiny in the forthcoming year will be on the medium-term financial pressures in relation to transport.



# Effectiveness and Outcome

## Housing

### Affordable Homes Programme

Representatives from Homes England and the WMCA's Housing and Regeneration team were invited to answer questions on the Affordable Homes Programme within the West Midlands, as set out in the Deeper Devolution Deal agreed by the WMCA and the Government in March.



#### Future Focus Point

- Estate regeneration and examples of where local authorities were seeking to work with the WMCA to regenerate estates
- The delivery of social housing
- Resource and funding post 2026

## Affordable Housing Supply Strategy

Scrutiny members considered the Affordable Housing Supply Strategy that was informed by the recommendations of the Overview & Scrutiny Committee's 2021/22 'Helping to Deliver Affordable and Social Housing' scrutiny review, in particular the recommendation of the panel:

**“That the WMCA, housing associations, Homes England and local authorities continue to work together to address the contradictions and challenges of the current system for delivery of affordable and social housing – recognising that the challenge cannot be addressed in isolation, and it is a multi-faceted systemic issue where all agencies need to work together with a clear strategy for change.”**



### Future Focus Point

- Creation of Green Spaces
- Key Performance Indicators and the provision of information to undertake benchmarking
- Brownfield land redevelopment

## Pre-Decision Scrutiny: Homes for the Future: Draft Strategy

The Overview & Scrutiny Committee considered and contributed to the development of the Homes for the Future draft strategy prior to its submission to the WMCA Board for approval.



### The Outcome

The Overview & Scrutiny Committee endorsed the official release of the WMCA's Homes for the Future proposals, subject to assurances sought in relation to retrofit and non-domestic dwellings, the pace of delivery of homes on decontaminated sites and support provided for SMEs and smaller developers within the region on adopting the standards.

# Skills

## Pre-Decision Scrutiny: Employment and Skills Strategy for Deeper Devolution

Scrutiny members were engaged on the development of an Employment and Skills Strategy for the WMCA area, and development and implementation of a new approach to Employment, Skills, Health and Communities benefits, including the establishment of a new outcomes framework.



### The Outcome

The Overview & Scrutiny Committee endorsed the Employment and Skills Strategy and Outcomes Framework.



### Future Focus Point

As part of its lines of enquiry for 2024/25, Overview & Scrutiny Committee will focus on:

- Skills and qualifications
- The increase in youth unemployment
- Benchmarking against other combined authority areas
- The provision of training linked to the current and future labour market opportunities

# Air Quality

## Pre-Decision Scrutiny: WMCA Air Quality Framework and Implementation Plan

In November, members scrutinised the WMCA's Air Quality Framework and Implementation Plan prior to its submission and approval by WMCA Board. Questions focused on health risks associated to wood burners and the need for stricter regulations, the success of Walsall in requiring a full assessment of the impact of wood burners within permitted regulations and environmental mitigations within the air quality framework.



### The Outcome

The Overview & Scrutiny Committee endorsed the WMCA's Air Quality Framework and Implementation Plan, subject to the inclusion of the Overview & Scrutiny Committee within its governance structure.

# The Economy

## West Midlands State of the Region

The West Midlands State of the Region was a high-level report that brought to attention the most important trends in the West Midlands. It was an annual review that considered data relevant for comparison at yearly or longer-term basis.



### The Outcome

The Overview & Scrutiny Committee welcomed the report, as it provided a good summary with data information as to the current condition of the West Midlands.

As requested by the committee, future reports would include information on in-work claimants' figures, 'ghost children' and home schooling, and should also be brought to the attention of the WMCA Board.



### Future Focus Point

The areas identified by the Overview & Scrutiny Committee that it wished to review as part of its 2024/25 work programme including:

- 'Ghost children' post-Covid
- Connectivity
- Air quality
- Retrofit skills

# Scrutiny in the Spotlight

## Good Scrutiny? Good Question!

### Government's Scrutiny Protocol

The publication of the Government's new Scrutiny Protocol as part of its Autumn Statement was welcomed, providing further guidance to authorities with devolved powers like the WMCA on its overview & scrutiny arrangements.

Scrutiny members agreed a four-stage approach to the implementation of the Government's Scrutiny Protocol:

- **Phase 1** - Review
- **Phase 2** - Self-Assessment
- **Phase 3** - Implementation
- **Phase 4** - Evaluation



## **Review (September 2023 – January 2024)**

Prior to the publication of the Government's Scrutiny Protocol, scrutiny members were engaged in the development of the protocol and the general direction of travel in respect of the Government's view of scrutiny within authorities with Level 4 devolution through regular update reports and briefings.

Following its publication in November, member knowledge briefing sessions were attended on the 18 key principles identified within the protocol, with opportunities to provide emerging thoughts and comments.

## **Self-Assessment (March – April 2024)**

A Scrutiny Working Group consisting of the Chairs and Vice-Chairs of Overview & Scrutiny Committee, Transport Delivery Overview & Scrutiny Committee and Audit, Risk & Assurance Committee was established to undertake an open and honest

assessment of the current scrutiny and audit arrangements and activities against each of the 18 key principles.

An action plan of improvements had been developed to demonstrate how improvements would be made to the current scrutiny and audit functions together with timescales that would be monitored to ensure delivery.

## **Implementation (May - December 2024)**

Work will be undertaken in 2024/25 to implement further improvements to the scrutiny arrangements of the WMCA arising out of the self-assessment exercise, to fully comply with the ambitions, set out within the Scrutiny Protocol.

## **Evaluation (January 2025)**

Work will then be taken later in the year to evaluate the impact of the changes introduced, and whether these should be further reformed.

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# Deep Dive Review: Brownfield Land Remediation

**“To examine and assess how the WMCA exercises its powers and funding in respect of brownfield land redevelopment and to assess how the region’s communities have benefited”**

Following a series of questions raised by the Overview & Scrutiny Committee in relation to the WMCA’s Brownfield Land Remediation Fund, scrutiny members undertook a review to understand and assess how the WMCA exercises its powers and funding in respect of brownfield land redevelopment and to assess how the region’s communities had benefited.

## The Evidence

The review group sought a range of written and verbal evidence to help inform its conclusions and recommendations. In addition to the written evidence, the review group conducted face-to-face interviews with a range of key witnesses to help build a better understanding on the current situation, decision-making process, relationships, challenges, failures, benefits and to highlight any areas of potential improvements. Key participants included:

- John Godfrey, Executive Director of Housing, Property & Regeneration

- Professor Chaminda Pathirage, Director of the National Brownfield Institute
- Andrew Stott, Centre Manager of the National Brownfield Institute;
- Stuart Penn, Regional Managing Director, Lovell Homes

Emerging themes and consideration:

- The ability and capacity of SMEs to identify and appraise brownfield land opportunities across the region
- The introduction of innovative pilot planning policies which are designed to support and facilitate the delivery of brownfield regeneration zones.
- Ensuring greater transparency and accessibility to available incentives which assist in unlocking and expediting the delivery of brownfield sites.
- Developing a more integral bio-diversity policy which provides developers with a framework for on-site eco offsetting.

- Examining the potential to enhance brownfield land registers so that they include wider and more comprehensive information.
- Responding to developer feedback which indicates that the WMCA's existing grant approval processes are inefficient and can, as a result, introduce barriers and avoidable delays to progressing applications in a timely manner.
- To help support developer cashflow and exposure to significant upfront costs, consideration be given to a revised grant draw-down profile (and associated security package) which enables a first tranche funding allocation during site enabling works.
- The importance of promoting the house building industry to the community

A full report on the findings of the review together with recommendations will be considered by the Overview & Scrutiny Committee in July 2024, prior to its submission to the WMCA Board for approval.

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# Transport Delivery Overview & Scrutiny Committee

The first meeting of the newly formed Transport Delivery Overview & Scrutiny Committee was held in July.

## Focus for the Year

### Deeper Devolution Deal Implementation (Transport)

The committee continued to be engaged in, and have oversight of, the Deeper Devolution Deal between the WMCA and Government, its transport commitments and the Transport Implementation Plan. Questions focused on the passenger, transport corridors and the best mode of transport for each corridor.

**“a one size fits all approach would not be appropriate as different sized cities, towns and villages would all have different requirements”**



### The Outcome

Six-monthly progress reports on the Transport Implementation Plan be submitted to future meetings of the committee.

## HS2 Announcements & Network North Funding

A focus of the Transport Delivery Overview & Scrutiny Committee has been on the HS2 programme following the Government's announcement in December in respect of the cancellation of the HS2 line north of Birmingham.



### The Outcome

A future report to come forward to scrutiny on funding allocated to Network North projects, any funding gap for these projects based on previous funding assumptions. The funding allocated to the Midlands Rail Hub and whether any additional projects were to be included in this in the absence of the HS2 northern leg.



## Future Bus Policy Delivery (Franchising and Enhanced Bus Partnerships)

Members continue to receive briefings and opportunities to share their views on the ongoing bus options development work and Enhanced Partnership Scheme. Lines of enquiry have mainly focused on funding sources for subsidised bus services over the next five years (long term and short-term funding)



### The Outcome

Transport for West Midlands agreed to develop a detailed timetable for completing the full franchising assessment in preparation for a decision to progress further to audit and consultation by the WMCA Board in July 2024, to include scrutiny engagement to provide transparency and assurance that emerging thoughts and proposals would be subject to public scrutiny.

**“The nature of bus operators within the region, needed to give greater priority to passenger needs”**

## Draft Safer Travel Plan 2024 - 27

Members have raised their concerns about the reduction of Police Community Support Officers and have continued to be engaged on how the gap would be covered.

**“Collaboration with local police, both on the network and within the local community, is crucial to reducing issues on the travel network”**



### The Outcome

Scrutiny members to receive a further report in July 2024, prior to the publication of the new Safer Travel Plan in Autumn 2024.

## What is the Role of Green Infrastructure in Urban Design for Air Quality and Climate Resilience?

To help members answer this question, the committee had invited the University of Birmingham to discuss how green infrastructure in urban design could reduce exposure to poor air quality and support climate resilience.



### The Outcome

The Local Transport Plan would now include the ‘reduce, extend, protect’ principle, to support the role of green infrastructure in urban transport design for air quality.

A review of the draft Green Transport Revolution Big Move Chapter would be undertaken to ensure it effectively encompasses the role of green infrastructure in supporting climate resilience in the West Midlands.



## Ring & Ride Target Operating Model

Transport for West Midlands has continued to engage with scrutiny members in the emerging future target operating model for the region's Ring & Ride Service.



### The Outcome

The comments, concerns and thoughts of the committee would be reflected in a Mayoral report, including:

- The review to consider providing fair access and address transport barriers
- Capacity constraints of the service
- Funding possibilities from Network North
- Allocation of funding
- The need for additional data
- Criteria to be reviewed and possibilities for subsidising service use for community diagnostic

## Capital Delivery Programme

Monitoring the delivery of the WMCA's Capital Programme was significant and the Transport Delivery Overview & Scrutiny Committee continue to work with officers to develop a report with the appropriate information to enable members to monitor the progress in respect of the capital programme and to identify future focus areas.



# Member Engagement Groups

The Transport Delivery Overview & Scrutiny Committee has also introduced six Member Engagement Groups (MEGs) that provide members with an opportunity to meet and discuss in more detail transport-related issues that are grouped around broad thematic areas. These MEGs are supported by officers from Transport for West Midlands and, whilst not decision making, provide a forum for members to develop a deeper understanding of those matters that would not otherwise be able to be discussed in such detail at formal committee meetings.



## Air Quality, Congestion and Environmental Impact MEG

The MEG had reviewed and contributed to the:

- West Midlands Air Quality Policy, Strategy and Measures
- West Midlands Local Transport Plan Development
- West Midlands Bus Network and Current Issues
- Approaches and priorities of West Midlands local authorities to reduce NO<sub>2</sub> and PM<sub>2.5</sub> emissions
- The draft WMCA regional air quality framework implementation plan
- Updates on the Defra review of Euro VI Bus Retrofitting scheme
- The role of hydrogen for buses and updates on ZEBRA funding bid

In addition, members have also worked closely with the University of Birmingham on:

- Air quality and public health
- The role of green infrastructure in urban design
- The impact on air quality of lowering motorway speed limits in the West Midlands
- The impact on air quality of bus fleet electrification

Midlands Hydrogen and Fuel Cell Network:

- The future role of hydrogen (and fuel cells) for the transport sector



## Outcome 1

### Air Quality Framework & Implementation Plan

Recommendation accepted by the Transport Delivery Overview & Scrutiny Committee:

- as part of development of the Regional Air Quality Framework, stretch targets which were more ambitious in terms of timescales and pollutant concentration targets than the Government's air quality targets, and which were closer to World Health Organisation targets for NO<sub>2</sub> and PM<sup>2.5</sup>, be agreed.

This recommendation was also accepted by the WMCA Board on 17 November 2023.



## Outcome 2

### The Use of Experts

The work of the Member Engagement Group in respect of Air Quality and the Environment has led to:

- a presentation by the University of Birmingham on the role of green infrastructure to Transport Delivery Overview & Scrutiny Committee in January 2024



### Outcome 3

#### West Midlands Local Transport Plan

Recommendations accepted by the Transport Delivery Overview & Scrutiny Committee:

Transport for West Midlands to:

- Incorporate in the Local Transport Plan the ‘reduce, extend, protect’ principle, to support the role of green infrastructure in urban transport design for air quality; and
- Review the draft ‘Green Transport Revolution’ Big Move Chapter to ensure it effectively encompasses the role of green infrastructure in supporting climate resilience in the West Midlands.



### Outcome 4

#### Bus Operators and the transition to a Zero Emission Bus Fleet

Recommendation accepted by the Transport Delivery Overview & Scrutiny Committee:

- The committee to urge Transport for West Midlands and bus operators to accelerate the transition to a zero-emission bus fleet in the West Midlands.
- The MEG will also seek to engage National Highways to consider the issues related to reducing 70mph motorway speed limits in the West Midlands. This is in relation to the 2023 WMCA regional air quality framework action ‘TRN15 Speed limit reduction (or dynamic speed limits) on high-speed roads’

## Rail, Metro & Sprint MEG

The focus of the MEG has been on:

- Midlands Rail Hub and the wider network connectivity benefits
- Midland Metro Ltd and performance
- Sprint – key statistics for phase 1 to Walsall
- HS2 and Midlands Rail Hub
- Eastside Metro extension
- Dudley Port Integrated Transport Hub
- Buy-Before-You-Board concept for West Midlands Metro
- Pay-as-You-Go on rail West Midlands pilot
- Birmingham to Longbridge, and Hagley Road (Edgbaston) to Halesowen Corridors – Mass Transit Options Appraisal Studies
- Open access rail proposals from Wrexham, Shropshire & Midlands Railway
- The work of the West Midlands Rail Executive
- Cross City Bus consultations for Package 4 (Longbridge to Castle Vale) and Package 6W (Soho Road)

## Passenger & Road Safety MEG

The focus of the MEG has been on:

- Long-term funding for Transport Safety Officers, post-2025
- Passenger safety statistics
- Road safety statistics
- The refreshed regional road safety strategy 2023 – 2030

## Finance & Performance MEG

The focus of the MEG has been on:

- The transport revenue and the risk around the Medium-Term Financial Plan, and mitigation measures
- Bus delivery options
- Performance reporting



## Passenger First MEG

The focus of the MEG has been on:

- The Bus Service Improvement Plan
- West Midlands Bus Passenger Charter
- Operator funding and services and the impact on the passenger
- A review of the Ring & Ride Service
- The Closure of Dudley bus station for redevelopment
- Bus Network Performance System
- Fares and ticketing
- Realtime information Issues
- Community engagement



### Outcome 1

#### Service Information

Recommendation accepted by the Transport Delivery Overview & Scrutiny Committee:

Councillors and the resources of individual councils to be made full use of when information needs to reach as many passengers as possible.



## Outcome 2

### Ring & Ride Target Operating Model

Recommendation accepted by the Transport Delivery Overview & Scrutiny Committee:

Transport for West Midlands to look at specific targets and how feedback can best be obtained from a broad range of users including Ring & Ride drivers.



## Outcome 3

### Service Information

Recommendation accepted by the Transport Delivery Overview & Scrutiny Committee:

The use of all local radio stations to share important information for free, via their channels should be explored.

## Sustainability & Active Travel

The focus of the MEG has been on:

- Transport for West Midlands Zero Emission Bus Delivery Plan and its alignment with fleet modernisation
- Sustainable travel to school
- Mobility Hubs and supporting net-zero targets by reducing car travel
- Local Travel Point Pilot Project – Cross Street, Halesowen



### Outcome 1

#### Living Streets Walk to School Programme

Recommendation accepted by the Transport Delivery Overview & Scrutiny Committee:

- Members identified similarities with Mobility Hubs in the Netherlands. Transport for West Midlands to use real photography of similar schemes to reinforce that Mobility Hubs can be a reality in the future.



## Outcome 2

### Local Travel Points

Recommendation accepted by the Transport Delivery Overview & Scrutiny Committee:

- Local Travel Point planning applications should reflect biodiversity net gain requirements.



## **Holding Those Responsible for Transport To Account**

### **Councillor Mike Bird, Portfolio Lead for Transport**

In October 2023, a Q&A was held with Councilor Mike Bird, Portfolio Lead for Transport, on transport policy and delivery related matters. Members questioned him on:

- New Local Transport Plan
  - The green agenda
  - Transport funding pressures
  - HS2 (Cancellation of Birmingham to Manchester Leg)
  - Reliability of the bus service
  - Reliability of rail services
  - Delivery of Wednesbury to Brierley Hill Metro extension
- Hydrogen buses
  - Bus franchising
  - Community engagement and buy-in



## Outcome 1

### In-depth Review of Real-Time Information

WMCA to consider encouraging to bus operators to improve the technology on buses to encourage accurate and reliable real-time information.

Scrutiny members undertook a more in-depth review of the real time information system that had a focus on:

- responsibilities
- technological interdependencies
- processes required to deliver accurate and trustworthy real time information for passengers



## Outcome 2

### Demand Responsive Transport

The WMCA to consider using a demand responsive transport system to improve reliability.

An analysis report on the future of demand responsive transport and Ring & Ride had been requested and considered by scrutiny members.



## Outcome 3

### Communications and Engagement

Scrutiny members together with WMCA officers had identified communication and member engagement as an area that needed further review.

A deep dive review into the effectiveness of the WMCA's communication and engagement had been initiated.

# Deep Dive: Member Engagement and Development

## “The Effectiveness of Member Engagement and Development”

Following a Q&A session with the Portfolio Lead Member for Transport on transport policy and delivery related matters, and feedback received from visits to local authority scrutiny committee meetings, at its meeting in December, this committee agreed to establish a task & finish group to review the effectiveness of member engagement and development within the WMCA and to make recommendations as to how this could be further developed and improved.

## Evidence Gathering

Evidence was heard from a wide range of stakeholders as to the current engagement and development that was undertaken with councillors currently sitting on a WMCA committee, as well as with those councillors who were not currently participating in WMCA decision making, but still wished to be informed and engaged in the WMCA’s activities.



Key participants included:

- Councillor Matthew Dormer, Leader, Redditch Borough Council
- James Hughes, Member Relationship Manager, WMCA
- Laura Shoaf, Chief Executive, WMCA
- Councillor Stephen Simkins, Leader, City of Wolverhampton Council
- Councillor Bob Sleigh, Deputy Mayor, WMCA



# Themes and Recommendations

The recommendations were agreed by the Transport Delivery Overview & Scrutiny Committee that will be presented to the WMCA Board in June 2024 for consideration. The recommendations were grouped around four key areas of activity:

## Member Induction/Training

Develop a comprehensive induction programme / onboarding arrangements for new and returning members.

## Member/Council Engagement

Look to create further opportunities to engage with all constituent and non constituent authority members.

## Governance

- Consider establishing portfolio-specific political structures involving cabinet members from constituent authorities and the corresponding WMCA portfolio lead to discuss strategy and delivery matters
- Consider establishing political structures involving non-constituent leaders and the political leadership of the WMCA
- Local authorities be encouraged to consider making multi-year appointments to WMCA committees aligned to the mayoral term of office
- A role profile be developed for members appointed to all WMCA committees setting out the expectations and commitment requirements of the role
- Engagement mechanisms and governance processes be codified within the constitution

## Resource

Further consideration be given to strengthening the WMCA's financial and nonfinancial resources to support scrutiny and member engagement improvements.



# Looking Forward: “What Next for Scrutiny”?

## Evolving the Role of Overview & Scrutiny

**“For scrutiny to remain effective it’s important to undertake regular open and honest conversations and self-assessments to improve current practices and arrangements.”**

## Monitoring of Scrutiny Recommendations

To undertake regular monitoring of recommendations made by the committee and their implementation and effectiveness.

## Review of Call-In Process

To engage with the WMCA to ensure that there is greater clarity on the operation of the call-in process particularly in respect of Delegated Sign-off decisions.

## **Holding Portfolio Lead Members to Account**

Greater scrutiny of the WMCA's Portfolio Lead Members. Members will strengthen this area of scrutiny during 2024/25 by inviting Portfolio Lead Members on a regular basis to meetings of scrutiny when considering reports within their portfolio area.

## **Greater Focus on the delivery of the Capital Programme**

A greater focus on the delivery of the capital programme and underspend.

## **Public Engagement within the scrutiny process**

Greater use of social media and the comms team to engage with members of the public to help inform written questions, deep dives and potential future activity of the scrutiny function.

## **Comprehensive Training Programme**

A greater focus will be on member training and development during 2024/25 to enable members to undertake their role effectively.

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# Overview & Scrutiny Committee Members - 2023/24



**Councillor Cathy Bayton**  
Dudley (Association of Black  
Country Authorities)  
Committee Chair



**Councillor Philip Bateman**  
Wolverhampton



**Councillor Naeem Akhtar**  
Coventry  
Committee Vice-Chair



**Councillor Ian Kettle**  
Dudley



**Councillor Andrew Burrow**  
Solihull



**Councillor Nigel Lumby**  
Shropshire



**Councillor Ewan Mackey**  
Birmingham



**Councillor Jamie Tennant**  
Birmingham



**Councillor Emma Marshall**  
Redditch



**Amanda Tomlinson**  
Business Voice - Black Country  
Housing Group



**Councillor Paul Moore**  
Sandwell



**Councillor Adrian Warwick**  
Warwickshire



**Councillor Lauren Rainbow**  
Birmingham



**Councillor Vera Waters**  
Walsall

# Transport Delivery Overview & Scrutiny Committee Members - 2023/24



**Councillor John McNicholas**  
Coventry  
Committee Chair



**Councillor Mary Locke**  
Birmingham  
Committee Vice-Chair



**Councillor Robert Alden**  
Birmingham



**Councillor Pervez Akhtar**  
Coventry



**Councillor Aqeela Choudhry**  
Sandwell



**Councillor Zaker Choudhry**  
Birmingham





**Councillor Carol Hyatt**  
Wolverhampton



**Councillor Amo Hussain**  
Walsall



**Councillor Timothy Huxtable**  
Birmingham



**Councillor Narinder Kaur Kooner**  
Birmingham



**Councillor Emma Marshall**  
Redditch



**Councillor Martin McCarthy**  
Solihull



**Councillor Barbara McGarrity**  
Wolverhampton



**Councillor Steve Melia**  
Sandwell



**Councillor Saddak Miah**  
Birmingham



**Councillor Ian Nellins**  
Shropshire



**Councillor Josh O'Nyons**  
Solihull



**Councillor David Stanley**  
Dudley



**Councillor Gurmeet Singh Sohal**  
Walsall



**Councillor Alan Taylor**  
Dudley



**Councillor Robert Tromans**  
Warwickshire



**Councillor Antony Tucker**  
Coventry



**Councillor Ian Ward**  
Birmingham

# Audit, Risk & Assurance Committee

## Focus in 2023/24

In addition to its work programme, a focus of the Audit, Risk & Assurance Committee this year has been to develop a relationship with the two scrutiny committees to share issues of common interest, particularly in respect of the recently published scrutiny protocol. Regular attendance at the West Midlands Audit Committee Chairs forum had also be beneficial to share best practice and issues.

## Internal Audit

Audit, Risk and Assurance Committee has a key role in the approval and monitoring of the delivery of the risk based Annual Internal Audit plan. This has been particularly relevant throughout the past year with the 2023/24 being a transitional year following management's decision to develop an in-house provision following this previously being delivered via an outsourcing model for a number of years.

Key items for consideration during the year have included:

- Review of the 22/23 Annual audit report including the Head of Internal Audit's annual audit opinion providing a 'Reasonable' assurance on the overall adequacy and effectiveness of the organisation's framework of governance, risk management and internal control
- Approval of the 23/24 Internal Audit plan in April 2023
- Oversight of the structure and establishment of the new in-house audit team
- The monitoring of resource availability and capability to deliver the 23/24 plan
- Assessment of audit outcomes and the delivery of audit recommendations
- The monitoring of whistleblowing claims received by the WMCA and outcome of issues raised with, and investigated by Internal Audit

## Risk Management

The Strategic Risk Register was presented to committee periodically through the year in order for members to discharge their role in assessing the WMCA's ability to adequately identify and address key risks of the authority.

Audit members are satisfied there is demonstrable evidence that strategic risks are actively being managed with members focussing on individual risks where greater detail is required, including:

- The management of the risk pertaining to WMCA's external factors and financial due diligence
- Negotiations for the Single Settlement and ratification of the Trailblazer Devolution Deal
- To seek assurance that the authority has satisfactory due diligence arrangements in place when awarding contracts in response to a key supplier of the rail programme going into administration

## Financial Management

Audit, Risk & Assurance Committee continues to have oversight of the financial management arrangements in place for WMCA throughout the year, including the approval of the 2022/23 accounts in January 2024.

Key areas of financial management having been requested by audit members during this year has included:

- Oversight of the Treasury management arrangements in place including the borrowing and investments held by WMCA
- A presentation of WMCA's revenue and capital budgets to support members in their remit of financial monitoring
- The endorsement of the draft 2024/25 treasury Management Policy Statement and Treasury Management Strategy for onward approval by WMCA Board

- Receipt and consideration of the External Auditor's Annual Accounts report for the year ending 31st March 2022

## What is Assurance?

As a Combined Authority, the WMCA is obligated to have an Assurance Framework in place, approved by WMCA Board and the Department for Levelling Up, Housing and Communities. The WMCA has a Single Assurance Framework in place for this purpose, with the development and delivery of all projects and programmes being funded through an external source being required to follow this framework.

## Assurance activities

### Single Assurance Framework

Audit, Risk & Assurance Committee members continue to review on a quarterly basis the progress of all WMCA projects and programmes progressing through the Single Assurance Framework.

## Health & Safety

Members considered an annual report of the Health and Safety arrangements in place for WMCA in March by the Health and Safety manager.

## Information Security

Committee continue to have oversight of delivery of the audit actions arising from the 2022/23 internal audit of Information Security and Cyber Security with regular updates.

## Information Governance

During this year, members have focussed on the arrangements for Information Governance within the WMCA in meeting its obligations under the UK General Data Protection Regulation, the Data Protection Act 2018 and the Freedom of Information Act 2000.



## The Outcome

### Health & Safety

Members were content that satisfactory arrangements are in place and welcomed the organisation having maintained the ISO 45001 accreditation for Health & Safety.

## Arm's Length Companies

Audit members had requested a report from the Director of Law & Governance, to provide assurance that appropriate governance arrangements are in place for companies where WMCA has an interest.



## The Outcome

### Arm's Length Companies

Regular reports on the status of the WMCA's interest in all arm's length companies would now be submitted to the committee.

The WMCA to submit a detailed report on the monitoring arrangements for all of its arm's length companies at a future meeting for approval.

## Annual Governance Statement

The Annual Governance Statement for 2022/23 was approved by members in January 2024 alongside the presentation of the annual accounts for that year, with the draft Annual Governance Statement for 2023/24 being presented for consideration in March 2024.

### Terms of Reference

Audit members have undertaken a review of its Terms of Reference this year. It has been noted CIPFA guidelines recommends a minimum of two independent members are included within the membership of audit committees, with ARAC members supporting the recruitment of an additional member by WMCA.



## The Outcome

### Terms of Reference

CIPFA guidelines recommends a minimum of two independent members are included within the membership of audit committees. The recruitment of an additional independent member was supported by Audit, Risk & Assurance Committee members.



# What next - Looking forward 2024/25

## ARAC self-assessment

Internal Audit to support the introduction of annual self-assessment by members to determine the committee's training requirements

## Membership

A drive for committee members to be retained as members of ARAC for a period of 4 years

## Internal Audit service

The development of an in-house internal audit framework and service will improve the visibility of the risk and control environments within the WMCA.

## Single Settlement preparedness

Attention will be given to the monitoring of WMCA's preparedness for the commencement of the Single Settlement, due in April 2025.

## CIPFA Audit Committee guidelines

A review, and implementation where required, of the Audit Committee guidelines as set out by CIPFA, including private access to the Head of Internal Audit and External Audit.

# Audit, Risk & Assurance Committee Members - 2023/24



**Mark Smith**  
Independent Chair



**Councillor Ram Lakha, OBE**  
Coventry  
Vice-Chair



**Councillor Karen Ashley**  
Redditch



**Councillor Nick Bardsley**  
Shropshire



**Councillor Richard Baxter-Payne**  
Nuneaton & Bedworth Borough  
Council



**Councillor Dave Borley**  
Dudley



**Councillor Jaspreet Jaspal**  
Wolverhampton



**Councillor Brigid Jones**  
Birmingham



**Councillor Leslie Kaye**  
Solihull



**Councillor Rose Martin**  
Walsall



**Councillor Liam Preece**  
Sandwell



**Lisa Ritchie**  
Business Voice

### **Connect with Scrutiny**

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**West Midlands  
Combined Authority**



## Public report Cabinet

Cabinet  
Scrutiny Co-ordination Committee  
Council

10<sup>th</sup> December 2024  
18<sup>th</sup> December 2024  
14<sup>th</sup> January 2025

### **Name of Cabinet Member:**

Cabinet Member for Housing and Communities – Councillor N Akhtar

### **Director approving submission of the report:**

Director of City Services and Commercial

### **Ward(s) affected:**

All Wards

**Title:** Local Plan Review - Regulation 19 Stage

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### **Is this a key decision?**

Yes - the proposals are likely to have a significant impact on residents or businesses in all wards of the City

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### **Executive summary:**

On 6<sup>th</sup> December 2022 Council resolved to adopt a new Local Development Scheme (LDS) and to undertake a review of the Local Plan. In July 2023, Council approved the Regulation 18 'Issues and Options' consultation which ran until September 2023. Approval is now sought to undertake Regulation 19 stage for a 6-week publication period.

Approval to publish for Regulation 19 is in line with the Council's adopted timetables, and is the most effective route to adopting an up-to-date Local Plan for the city and for meeting the development needs of our communities in a balanced and sustainable way.

The Council received 930 separate responses from the Regulation 18 consultation which have been used to inform the development of the Regulation 19 plan, alongside a range of engagements and a specialist evidence base. This report seeks authority to undertake this next required phase of plan preparation, prior to returning to Cabinet and Council for authority to submit to the Secretary of State for examination, this later request will be accompanied with a summary of responses from the Regulation 19 stage.

## **Recommendations:**

Cabinet is requested to recommend that Council:

- (1) Approves the Proposed Submission version of the Local Plan (Regulation 19) document and associated Strategic Environmental Assessment / Sustainability Appraisal and Equalities / Health Impact Assessment for a 6-week consultation period to begin at the earliest opportunity.
- (2) Delegates authority to the Director of City Services and Commercial, following consultation with the Cabinet Member for Housing and Communities, to authorise any non-substantive changes to the documents prior to consultation.

Scrutiny Co-Ordination Committee are requested to:

- 1) To consider the information provided in the report and identify any comments for the Cabinet Member for Housing and Communities.

Council is requested to:

- 1) Approve the Proposed Submission version of the Local Plan (Regulation 19) document and associated Strategic Environmental Assessment / Sustainability Appraisal and Equalities / Health Impact Assessment for a 6-week consultation period to begin at the earliest opportunity.
- 2) Delegate authority to the Director of City Services and Commercial, following consultation with the Cabinet Member for Housing and Communities, to authorise any non-substantive changes to the documents prior to consultation.

## **List of Appendices included:**

The following appendices are attached to the report:

- Appendix 1 – Regulation 19 Proposed Submission Version CCC Local Plan
- Appendix 1A – Regulation 19 Proposed Submission Appendices
- Appendix 2 - Sustainability Appraisal
- Appendix 2A – Sustainability Appraisal Appendices
- Appendix 3 – Equalities and Health Impact Assessment
- Appendix 4 – Consultation Statement
- Appendix 5 – Policy matrix – 2017 Local Plan Policy Proposed Policy updates and changes guidance note
- Appendix 6 – Policy guidance – 2017 City Centre Area Action Plan Proposed Policy updates and changes guidance note

## **Background papers:**

None

**Other useful documents:**

- Adopted Local Plan 2017
- Adopted Coventry City Area Action Plan 2017
- Reports to Cabinet and Council (15<sup>th</sup> November 2022, 6<sup>th</sup> December 2022, July 2023).
- Local Development Scheme December 2024
- Statement of Community Involvement July 2021

**Has it or will it be considered by Scrutiny?**

The Local Plan review was presented to the Community and Neighbourhoods Scrutiny Board (4) on 21st September 2023 (their minute 9/23 refers) during the Regulation 18 stage to inform the ongoing development of the plan. Ongoing member engagement has also been undertaken through meetings of the Local Plan Advisory Group in the formulation of the draft plan for regulation 19 publication. This regulation 19 stage report will also be considered at Scrutiny Co-ordination Committee prior to Council, on 18<sup>th</sup> December 2024.

**Has it or will it be considered by any other council committee, advisory panel or other body?**

The Local Plan Cabinet Advisory Group has been engaged throughout the formulation of the Local Plan Review.

**Will this report go to Council?**

Yes – 14<sup>th</sup> January 2025

## **Report title: Local Plan Review (Regulation 19 stage)**

### **1. Context (or background)**

- 1.1 Local Plans should be considered for review at least once every five years, as laid out in Paragraph 33 of the National Planning Policy Framework and (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012).
- 1.2 As the Local Plan was adopted in December 2017, Council approved the commencement of a full review of the Local Plan on 6<sup>th</sup> December 2022 with the objective of ensuring policies are up to date, in line with changes to national policy and guidance, and that they continue to reflect local priorities. Members should note that the Coventry City Area Action Plan, was adopted alongside the Local Plan, and this will be incorporated in this review. Therefore, all references to 'The Local Plan', 'The Plan' and 'Plan Review' incorporate both documents.
- 1.3 Members should also be aware that the Government has also recently consulted on proposed changes to the National Planning Policy Framework the outcome of which is anticipated around the end of this year. These changes have implications for the Local Plan Review process which are outlined later in this report.
- 1.4 Each policy in the 2017 Local Plan has been considered in turn in the context of current legislation and guidance and, where appropriate, updated evidence. The Proposed Submission Version of the Local Plan includes some polices that are unchanged from 2017, some with varying degrees of change and, where necessary, some new policies.
- 1.5 Consultation will be undertaken in line with the relevant regulations and the adopted Statement of Community Involvement to ensure that individuals, communities, stakeholders, and other organisations have ample opportunity to engage through a variety of means. The established planning policy database will directly notify those registered at the launch of the consultation.
- 1.6 The Regulation 19 stage is the final plan-making stage before submission of the Local Plan for examination. If approved by Council, this document will be published for the purpose of consultation so that the Council can seek representations on the "soundness" of the proposals contained within this Draft under sections 19 and 20 of the Town and Country Planning Regulations 2012.
- 1.7 Following the Regulation 19 stage, the Council can then choose whether to proceed to submit the Proposed Submission Version to the Planning Inspectorate for Examination in Public on behalf of the Secretary of State.

### **2. Proposed Submission Draft Local Plan – Key Matters**

- 2.1. The Proposed Submission Version is a draft of the full Local Plan. It is a version of the Plan that further to earlier stages of consultation and engagement, officers consider should be submitted to the Secretary of State for public examination. It



therefore contains the information and detail that would be found in an adopted Local Plan.

- 2.2. The Proposed Submission Version is informed by an up-to-date evidence base, which will be published in full alongside the Regulation 19 consultation. In the formulation of the reviewed plan, officers and the Local Plan Advisory Panel have considered feedback from the Regulation 18 consultation and relevant expert evidence. The following paragraphs are a summary of the key matters contained in the reviewed plan.
- 2.3 The Proposed Submission Draft contains the following development targets for the 2021-2041 plan period:
  - 29,100 dwellings;
  - 60ha employment land;
- 2.4 The proposed development targets are informed by the 2022 Coventry and Warwickshire HEDNA (Housing and Economic Development Needs Assessment) and additional updated evidence, this is consistent with that proposed within the Issues and Options consultation.
- 2.5 Development that has already been completed in the 2021-2041 period counts towards these targets and therefore new allocations proposed within the proposed submission draft are for the quantities of additional development required to achieve these overall targets.
- 2.6 The Proposed Submission Draft Local Plan does not propose any changes in respect of Greenbelt boundaries or designations. All newly proposed development allocations are on previously developed land and therefore in line with the Local Authorities 'brownfield first' approach to identifying development land. In pursuing an approach of 'brownfield first' and protection of the City's remaining areas of Greenbelt, the Proposed Submission Version also reviews the policy areas of development density and design. This approach is in alignment with National Governments priority for higher density development within urban areas, alongside locally embedding high quality standards upon design and internal living spaces.
- 2.7 The City of Coventry has a tightly-drawn administrative boundary and therefore development land is always in short supply. Through the allocation of brownfield development sites, the Council is able to identify land to meet the overall target of 29,100 dwellings. However, at this stage and notwithstanding a dedicated 'call for sites' being undertaken for employment land, identification of land to meet the overall employment land need has not been possible. The Council recognises the need to support the local economy and enable job creation and continues to work with our Duty to Cooperate partners to consider strategic options for meeting this need in the absence of suitable available sites within the city.
- 2.8 The Local Plan Advisory Panel has made clear the priority for the delivery of Social Rented housing and a suitable mix of house types to meet the needs of communities within the city. To this end, the policies proposed within the Proposed Submission Draft Local Plan include the following changes:

- Reduced threshold for the provision of Affordable Housing on new development sites – any site over 10 dwellings should now provide Affordable Housing
  - An increased proportion of Social Rented housing on all qualifying sites
  - Adoption of Nationally Described Space Standards for all new housing developments
- 2.9 In respect of Climate Change, the Proposed Submission Version includes new and revised policies seeking to reduce the negative environmental impacts of new development. These policies are proposed to surpass Building Regulations requirements for both residential and non-residential new build requirements, and policies are included for the setting of new standards for developers to meet for on-site renewable energy generation, restrictions in the use of fossil fuels and improved thermal efficiency.
- 2.10 The plan review has undertaken to develop policy to guide the highest possible quality of development throughout the city, this includes both the development of new policy standards, and also a review of the engagement of current policy in the past plan period. Where additional clarity has been identified as being required, or modifications to be responsive to market delivery this has also been incorporated into policy development.
- 2.12 There are several policy areas where the Council would have wished to set higher and more ambitious standards for new development to meet our wider aspirations for the city and its communities, however national planning guidance requires that the viability of development is considered when formulating local planning policy. To that end, the viability implications of the policy proposals within the Proposed Submission Version have been fully assessed and have iteratively informed the policy detail. The plan therefore seeks to deliver a balanced set of changes to policy that will enable development to sustainably meet the needs of the city.

### **3 Proposed Changes to the National Planning Policy Framework**

- 3.1 The Government has recently undertaken consultation on proposed changes to the National Planning Policy Framework (NPPF). The Council has submitted a response to that consultation following consideration by the Cabinet Member and Scrutiny Coordination Committee. Government intends to publish an updated NPPF by the end of 2024.
- 3.2 The proposed changes to the NPPF include provisions for the preparation of Local Plans. If implemented, the changes would mean that councils at the Regulation 18 stage of their Local Plan Review will have to prepare their plans against the new NPPF. This would result in delay and increased cost for the Council.
- 3.3 Councils who have reached an advanced stage of plan preparation (Regulation 19) can continue to prepare their Local Plan in accordance with the current NPPF. This report recommends that the Council continues to progress our

ongoing Local Plan Review in accordance with the agreed timetables set out in our adopted Local Development Scheme. It is considered this approach has a number of benefits:

- Most efficient route to adopting an up-to-date Local Plan,
- Most effective in enabling development to meet the needs of the city and our communities
- Most cost-effective route, given the expenditure on the Local Plan Review process to date
- Progression to Regulation 19 stage allows the Council to consider the final outcomes of changes to the National Planning Policy Framework, and any implications for Coventry before committing to the submission of the Local Plan for Examination

3.4 In order to progress to the Regulation 19 stage of plan making, the proposed changes to the NPPF indicate a one-month transitional window post National Government's NPPF's publication to reach the regulation 19 stage. However, to date, the authority has been unable to obtain clarity upon the publication date of the revised NPPF from National Government.

#### **4 Technical Requirements**

4.1 There is a wide range of statutory requirements that must be followed in the formulation of a Local Plan in order for it to be found legally compliant and sound by the Planning Inspectorate. Key amongst these is the process of Sustainability Appraisal and Strategic Environmental Assessment. This involves the assessment of all objectives and options considered in the formulation of the Local Plan against a range of sustainability objectives.

4.2. The Sustainability Appraisal will be published alongside the Proposed Submission Version as part of the publication process and is contained at Appendix two of this report.

4.3. Regulation 19 of the Town and Country Planning Regulations 2012 requires that all documents that are to be submitted to the Secretary of State must be made available for public inspection. The full evidence base that has informed the Proposed Submission Draft plan will be published as part of the public consultation alongside background papers which have been prepared to articulate the policy proposals made.

4.4 Work with all statutory consultees and Duty to Cooperate Partners has been ongoing throughout the process of the Local Plan Review and the formulation of the Proposed Submission Version. Details are available within the evidence base and supporting documents.

## **5. Public Consultation on the Proposed Submission**

- 5.1. Public consultation must be undertaken in line with the Town and Country Planning Regulations 2012, The Town and Country Planning (Assessment of Environmental Effects) Regulations 1988 and the Council's Statement of Community Involvement (SCI).
- 5.2. A six-week publication period is proposed to take place between 15<sup>th</sup> January 2025 and 3<sup>rd</sup> March 2025. Should national government publish a revised NPPF ahead of the consultation, and it be inclusive of a necessity to undertake regulation 19 prior to these dates to meet transitional arrangements, a 6-week consultation is proposed to be undertaken at an earlier date through use of emergency powers, in order to retain the authority's ability to progress the reg 19 plan to submission for examination under the current NPPF.

## **6. Options considered and recommended proposal**

- 6.1 The Cabinet could choose to not progress with the consultation, however, this would not address the need to review the Local Plan or be in accordance with the Local Development Scheme and as such this option is not recommended.
- 6.2 The Cabinet could choose to instruct officers to amend the consultation documents and supporting information. However, these have been prepared to respond appropriately to council priorities and up to date evidence, and this would cause delays which may mean not achieving the plan programme in line with the published Local Development Scheme.
- 6.3 The Council could choose to approve the Proposed Submission Draft Local Plan and associated Strategic Environmental Assessment / Sustainability Appraisal and Equalities / Health Impact Assessment for a 6-week consultation to begin at the earliest opportunity ahead of returning to Cabinet and Council to report the findings of the consultation. This option is recommended.

## **7. Results of consultation undertaken**

- 7.1 The consultation outcomes of the Regulation 19 stage will be reported to a future meeting of Cabinet, with accompanying recommendations for the next stage of the plan review process.
- 7.2 A summary of consultation from the previous Regulation 18 stage is supplied at Appendix 4

## **8. Timetable for implementing this decision**

- 8.1 At the earliest opportunity further to decision.

## **9. Comments from the Director of Finance and Resources and the Director of Law and Governance.**

### **9.1 Financial Implications**

The Local Plan Review must be supported by robust evidence, the costs of which are being managed within existing departmental budgets but have resulted in managed overspends at reported through regular budget reports.

There is no direct financial implication of approving the Regulation 19 stage. The costs of the consultation process are limited and can be met from existing budgets. After this consultation, Council will be asked whether to submit the Local Plan for Examination, this Examination process will have direct financial costs that are the responsibility of the Council, and these are estimated to be in the region of £150k. These will be provided in detail in a separate report at the time of that decision alongside summary of evidence base costs.

### **9.2 Legal Implications**

The Local Plan is a statutory development plan. The process for preparing a Local Plan is contained within the Planning and Compulsory Purchase Act 2004, Localism Act 2011, The Town and Country Planning (Assessment of Environmental Effects) Regulations 1988 and the Town and Country Planning (Local Planning) (England) Regulations 2012.

## **10. Other implications**

### **10.1 How will this contribute to the One Coventry Plan?**

(<https://www.coventry.gov.uk/strategies-plans-policies/one-coventry-plan>)

A reviewed Local Plan will enable the corporate priorities to be reflected as they are set out in the One Coventry Plan 2022 - 2030

### **10.2 How is risk being managed?**

There is a risk that the reviewed policies could be found unsound by a Planning Inspector, however this is minimised by producing a thorough evidence base and having undertaken extensive consultation prior to submission of the plan.

### **10.3 What is the impact on the organisation?**

No direct impact from having additional planning policies.

### **10.4 Equalities / EIA?**

A full Equality and Impact Assessment (EqIA) has been undertaken as part of developing the Proposed Submission Local Plan and this has shaped policy preparation. As part of that analysis, the Council had due regard to its public sector equality duty under section 149 of the Equality Act (2010).

#### **10.5 Implications for (or impact on) climate change and the environment?**

The Proposed Submission Version contains new planning policies which seek to address the councils' priorities for climate change. These policy areas have been informed by specialist evidence which has been jointly considered by CCC planning policy and climate change teams.

#### **10.6 Implications for partner organisations?**

None

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Coventry City Council

Coventry Local Plan Review

# Regulation 19

# Proposed Submission

December 2024

# Regulation 19 Proposed Submission

December 2024

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3. Housing Trajectory
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5. Heritage Park and Route
6. Cycle and Parking Standards for New Development
7. Infrastructure Delivery Plan
8. Monitoring Framework
9. Designation & Allocation Maps
  - a. Key Employment Sites
  - b. New / Amended Housing & Mixed Use Allocations

- c. Affordable Housing Policy H6
- d. City Centre Boundary & Transition Zone
- e. Centres & Primary Shopping Areas
- f. City Centre Character Areas

## Abbreviations

Abbreviation	Full Term
<b>AAP</b>	Area Action Plan
<b>AEP</b>	Annual Exceedance Probability
<b>AMR</b>	Annual Monitoring Report
<b>ANGST</b>	Accessible Natural Greenspace Standards
<b>BGS</b>	British Geological Society
<b>BNG</b>	Biodiversity Net Gain
<b>BREEAM</b>	Building Research Establishment Environmental Assessment Method
<b>BREDEM</b>	Building Research Establishment Domestic Energy Model
<b>CIBSE</b>	Chartered Institution of Building Service Engineers
<b>CQC</b>	Care Quality Commission
<b>DEFRA</b>	Department for Environment, Food and Rural Affairs
<b>DtC</b>	Duty to Cooperate
<b>ELR</b>	Employment Land Review
<b>FEMA</b>	Functional Economic Market Area
<b>FRA</b>	Flood Risk Assessment
<b>FWMA</b>	Flood and Water Management Act
<b>GTAA</b>	Gypsy and Traveller Accommodation Assessment
<b>HEDNA</b>	Housing and Economic Development Needs Assessment
<b>HELAA</b>	Housing and Employment Land Availability Assessment
<b>HEM</b>	Home Energy Model
<b>HER</b>	Historic Environment Record
<b>HIA</b>	Health Impact Assessment
<b>HMA</b>	Housing Market Area
<b>HMOs</b>	Homes in Multiple Occupation

<b>IDP</b>	Infrastructure Delivery Plan
<b>ITS</b>	Intelligent Transport Systems
<b>JLR</b>	Jaguar Land Rover
<b>kWh</b>	Kilowatt Hour
<b>kWp</b>	Kilowatt Peak
<b>LAA</b>	Local Aggregate Assessment
<b>LCRM</b>	Land Contamination Risk Management
<b>LCWIP</b>	Local Cycling and Walking Infrastructure Plan
<b>LETCP</b>	Low Emissions Towns and Cities programme
<b>LLFA</b>	Lead Local Flood Authority
<b>LNR</b>	Local Nature Reserve
<b>LNRS</b>	Local Nature Recovery Strategies
<b>LPA</b>	Local Planning Authority
<b>LTP</b>	Local Transport Plan
<b>MCS</b>	Microgeneration Certification Scheme
<b>MVHR</b>	Mechanical Ventilation with Heat Recovery
<b>MSAs</b>	Mineral Safeguarding Areas
<b>NaCTSO</b>	National Counter Terrorism Security Office
<b>NDSS</b>	Nationally Described Space Standards
<b>NPPF</b>	National Planning Policy Framework
<b>ONS</b>	Office for National Statistics
<b>PBSA</b>	Purpose Built Student Accommodation
<b>PHPP</b>	Passive House Planning Package
<b>PSA</b>	Primary Shopping Area
<b>R&amp;D</b>	Research & Development
<b>SABs</b>	Sustainable Drainage Systems Approval Bodies
<b>SAP</b>	Standard Assessment Procedure
<b>SBEM</b>	Simplified Building Energy Model

<b>SFRA</b>	Strategic Flood Risk Assessment
<b>SPD</b>	Supplementary Planning Document
<b>SSSIs</b>	Sites of Special Scientific Interest
<b>SuDS</b>	Sustainable Drainage Systems
<b>SUE</b>	Sustainable Urban Extension
<b>SWLP</b>	South Warwickshire Local Plan
<b>TER</b>	Target Emissions Rate
<b>TfWM</b>	Transport for West Midlands
<b>UTMC</b>	Urban Traffic Management Control
<b>WMCA</b>	West Midlands Combined Authority
<b>WMSESS</b>	West Midlands Strategic Employment Sites Study

# 1. Introduction

- 1.1 The Local Plan covers the administrative area of Coventry City Council. It sets out where development will go, how much is needed and what kind of development we should provide for, as well as setting out what areas should be protected and improved. It must provide a balance between economic, social and environmental needs.
- 1.2 The policies which the Local Plan contains are used to help decide whether planning applications are acceptable or not. Some policies relate to specific areas and these are shown on the [Policies Map](#). Other policies are criteria based and provide information to help with assessing planning applications.
- 1.3 The Local Plan needs to help deliver the vision, aims and objectives of Coventry City Council and these are set out in the [One Coventry Plan](#). The One Coventry Plan focuses on the economy, skills and education, addressing the needs of an ageing population, addressing health inequalities, and dealing with environmental matters. Planning policies need to help deliver the aims and objectives of the One Coventry Plan.
- 1.4 The Local Plan is a statutory document and has to be prepared in accordance with legislation. It has been prepared under the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
- 1.5 The [Local Plan and the accompanying Coventry City Area Action Plan](#) were adopted by Coventry City Council on 6<sup>th</sup> December 2017. Councils are required to review their policies every five years to ensure that they remain up to date.
- 1.6 This is the process which has led to the production of this reviewed document. An initial consultation ([Issues and Options](#)) was undertaken from 18<sup>th</sup> July to 29<sup>th</sup> September 2023 to explore areas where it was felt the plan needed to be updated. A number of 'call for sites' consultations were also run, where the Council explored opportunities for accommodating its growth needs especially for housing and employment. The background to the Plan Review can be found [here](#).
- 1.7 Taking into account consultation feedback alongside an updated [evidence base](#), the Council has reviewed the policies of the Local Plan and Area Action Plan (AAP) to bring them up to date.
- 1.8 As this is a review and not a new Local Plan it is important that matters are kept proportionate. To ensure clarity and to avoid unnecessary duplication the Council is proposing to merge the Local Plan and the Area Action Plan into a

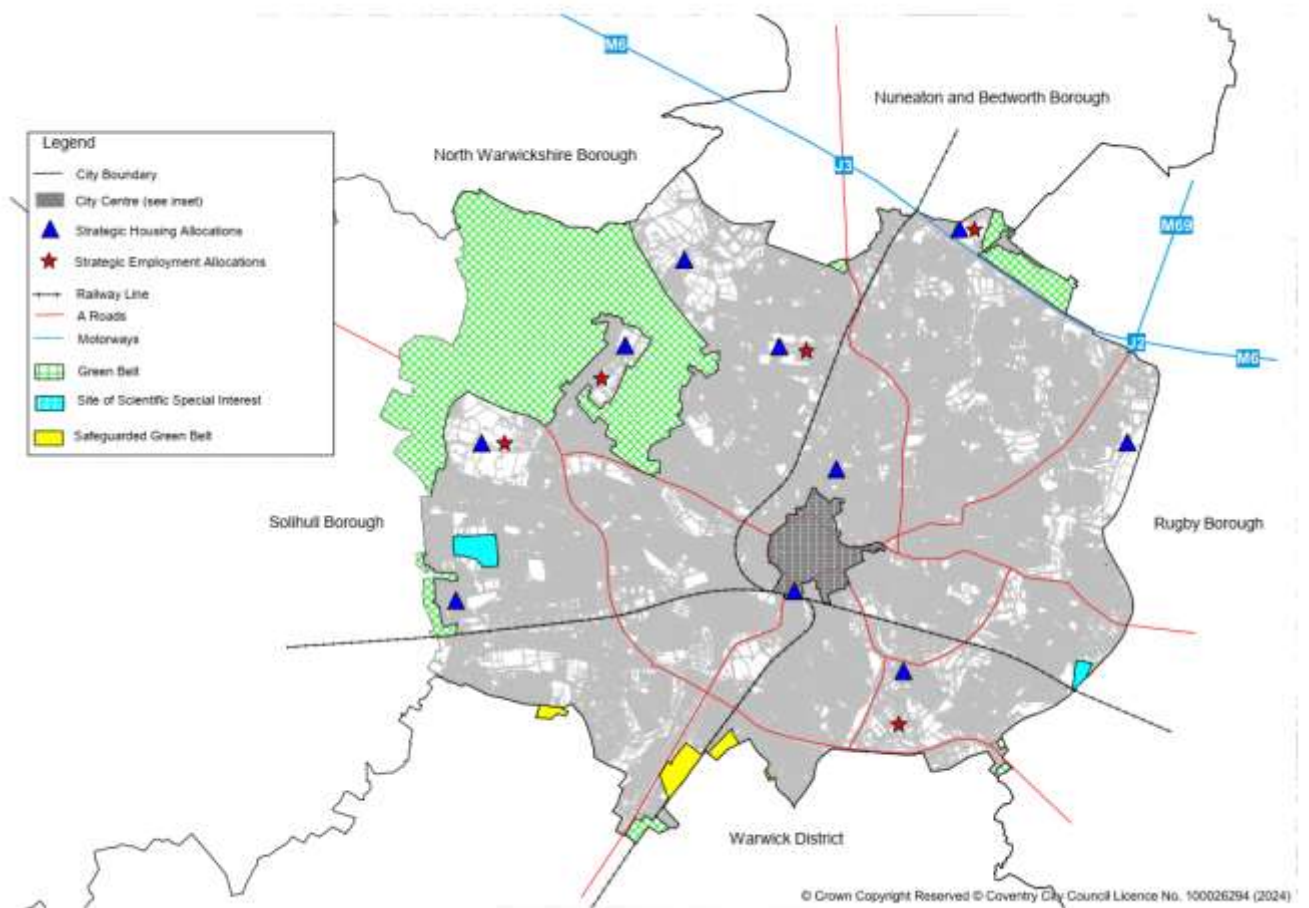
single document. In line with national legislation, some policies have now been identified as Strategic Policies: as set out in Planning Practice Guidance (March 2019) these are the ones that address the priorities for an area. Non-strategic policies deal with more detailed matters.

- 1.9 To help understand which policies have changed and why, the Council has produced a summary matrix to sit alongside this document. This shows the current adopted policy, proposed changes to the policy, any deleted or new policies and a short explanation. More detail is contained in a series of topic-based background papers. A Proposals Map has also been produced which shows how the current adopted Policies Map will change. A log of all reviewed policies from the Local Plan and Area Action Plan can be found in Appendix 1.
- 1.10 Local Plans must be prepared in line with **national legislation**. The new government which came into power in July 2024 is making a number of changes to the planning system. **However this plan is being progressed under the current transitional arrangements and is therefore being progressed in line with the [National Planning Policy Framework \(NPPF\) December 2023](#)** so as not to slow progress on work which was already very advanced.
- 1.11 Current legislation, The **Duty to Co-operate (DtC)**, which was introduced through the Localism Act 2011 also requires the council to work closely and constructively with neighbouring authorities and a range of other organisations in addressing strategic issues.
- 1.12 The development of the plan is also informed by a Sustainability Appraisal, Habitats Regulations Assessment and Equalities and Health Impact Assessment.
- 1.13 Once this draft plan (the Regulation 19 Plan), along with its accompanying documents set out in paragraph 1.12, has been consulted on, it will be submitted for Examination in Public by an independent Planning Inspector who will take account of the comments received ('representations') as well as the evidence provided. More detail can be found [here](#) in terms of the process which must be followed.
- 1.14 The current Local Plan runs up until 2031. The reviewed Local Plan will run up until 2041 as Local Plans need to cover at least a 15 year time period.
- 1.15 The geographical area which the Local Plan covers is shown in the diagram below, this relates to the area covered by Coventry City Council and for context also includes the detail of the neighbouring areas.
- 1.16 The Key Diagram below shows the administrative area of Coventry City Council (to which this Local Plan applies), the City Centre boundary, key geographical policies and infrastructure, and the context with the wider sub-region.



## Map 1.1 Key diagram

The Key Diagram is a map showing how Coventry relates to the surrounding area, and the main policy designations.



## 2. The Vision

2.1 The [One Coventry Plan](#) (2022 – 2030) sets out the following Vision:

One Coventry - working together to improve our city and the lives of those who live, work and study here.

We will create:

- a city with a strong and resilient economy, where inclusive growth is promoted and delivered, businesses are enabled to innovate and grow and new local jobs are created.
- a city where our residents get the best possible start in life, experience good health and age well, in a city that embraces diversity, protects the most vulnerable and values its residents and communities.
- a city, that leads the way and invests in the green industrial revolution. Ensuring the future well-being of our residents by embedding environmentally friendly behaviours and exploring opportunities to lessen the pressures caused by climate change.

2.2 The Vision includes three interconnected priorities:

- Increasing the economic prosperity of the city and region.
- Improving outcomes and tackling inequalities within our communities.
- Tackling the causes and consequences of climate change.

2.3 The table below sets out how the Local Plan can help deliver the vision and priorities of the One Coventry Plan, with the key objectives column extracted from the detail of the One Coventry Plan list of commitments for each priority, where applicable to the planning system.

**Table 2.1 Delivering the One Coventry Plan**

Priority	Key objectives	Key Local Plan policy references
Increasing the economic prosperity of the city and region	Working with the existing businesses in the city to grow and expand, creating new jobs and becoming more resilient to fluctuations in the economy.	Strategic growth policies DS1-4
Developing and building on the strength of our city's economy to deliver inclusive growth, supporting businesses to	Working to secure new inward investment in the city, businesses looking to grow and expand in the UK. Marketing Coventry as an attractive place to invest and create new jobs. When delivering projects across the city we will, where possible, prioritise jobs and skills for local people, use local small businesses and source	Economic policies JE1-7 Housing policies H1-13

<p>innovate, grow and scale up. Capitalising on the green technological revolution to create more local jobs.</p>	<p>materials as locally as possible to try to ensure inward investment into the local area.</p> <p>We will create a sustainable, inclusive transport infrastructure, attracting businesses to invest. This will focus on a substantially improved public transport network, an environment that is much more suited to walking and cycling and harnessing transport links at the forefront of innovation.</p> <p>Continuing to improve the city and develop projects that enable local neighbourhoods to play their part in our economic success.</p> <p>Working with registered providers, charities, and community organisations to deliver more social housing for those who need it most. We will explore options around community-led housing projects, putting meaningful community involvement at the heart of new housing development.</p> <p>We will continue to ensure our city centre remains clean and tidy and offers a diverse range of experiences for residents and visitors to enjoy. By ensuring a high standard of city centre we will continue to attract investment and development making the city a liveable, green and safe place to thrive.</p>	<p>Retail policies R1-6</p> <p>Green and Blue Infrastructure policies GE1 – 4</p> <p>Design polices DE1-2</p> <p>Heritage and Conservation Policies HE1-3</p> <p>Transport policies AC1-7</p> <p>Infrastructure policy IM1</p>
<p>Improving outcomes and tackling inequalities within our communities</p> <p>Focusing on improving outcomes for local people and tackling inequalities in order to build prosperity across the city, protecting the most vulnerable and supporting and valuing the</p>	<p>Effectively delivering the essential services that matter most to our communities.</p> <p>Strengthening our Marmot City approach to ensure it remains at the heart of what we do.</p> <p>Working with NHS partners to encourage healthy lifestyles and provide quality healthcare to all communities across the city.</p> <p>Working with business, residents, partners, and education providers to ensure that all our communities' benefit from job opportunities created by investment in the city.</p> <p>Tackling inequalities through a collaborative approach, with our residents, communities,</p>	<p>Strategic growth policies DS1-4</p> <p>Health Policy HW1</p> <p>Economic policies JE1 &amp; JE7</p> <p>Housing policies H1 – H13</p>

<p>contribution of our residents.</p>	<p>and partner organisations and through alignment with our Health and Wellbeing Strategy.</p> <p>Addressing the needs of those on low incomes with affordable access to quality housing, heating, and insulation.</p> <p>Protecting children and supporting families to give children the best start in life.</p> <p>Improving social, emotional, and mental health and well-being of our residents by enabling people to live independently where possible.</p> <p>Supporting our most vulnerable – including people who are street homeless, experiencing mental ill health and the integration of our refugee and migrant communities.</p>	<p>Community policies CO1-3</p> <p>Green &amp; Blue Infrastructure Policies GE1 – GE4</p> <p>Design Policies DE1-2</p> <p>Transport Policies AC1, AC4, AC5, AC6</p> <p>Environmental Management policies EM1, EM4, EM7, EM11, EM13, EM15</p> <p>Infrastructure policy IM1</p>
<p>Tackling the causes and consequences of climate change</p> <p>Having a relentless focus on tackling the causes of climate change and mitigating the inevitable consequences of this, to ensure the well-being of our residents and position Coventry as a leader and pioneer of the green industrial revolution.</p>	<p><u>Low Emission Development</u></p> <p>Investing in the development of technology solutions with businesses, universities, and partners to increase the adoption of new efficient, zero carbon renewable energy generation technologies. Promoting and supporting inward investment of zero carbon technologies in making the city a global market leader in a clean and green transport e.g., Very Light Rail and encouraging residents, communities, and businesses to take up active and green forms of travel.</p> <p>Encouraging green behaviours from everyone that lives, works or visits the city, and working with schools to implement sustainability into the curriculum in a holistic way.</p>	<p>Sustainable development policy DS3</p> <p>Health policy HW1</p> <p>Employment policies JE1 - JE7</p> <p>Housing policies H1 – H13</p> <p>Community policies CO1-3</p>

<p>A Climate Change strategy is being prepared by the Council and its partners to address these issues in more detail.</p>	<p><u>Nature-based Development</u></p> <p>Promote biodiversity and the natural heritage and greenspace across the city. Protecting and developing existing and new biodiversity and habitats for current and future generations.</p> <p>Ensuring that we protect wildlife, communicate awareness and engage communities and developers on the conservation of natural habitats.</p> <p><u>Equitable and People-centered Development</u></p> <p>Address inequalities exacerbated by the effects of climate change such as unemployment, fuel and food poverty, air quality and access to open space with associated impacts on health and wellbeing.</p> <p><u>Resilient Development</u></p> <p>Address the impacts and consequences of Climate Change by ensuring we have the right infrastructure in place to cope with the effects of extreme weather events such as flooding and extreme heat.</p> <p><u>Circular Economic Development</u></p> <p>Actively support businesses, schools, and partners in the minimisation of waste and the development of a circular economy which moves away from the traditional business model of consumption production and disposal to extending the life of products, re-use, and recycling.</p>	<p>Green Belt policies GB1-2 and Local Green Space Policy LGS1</p> <p>Green and Blue Infrastructure Policies GE1-4</p> <p>Design policies DE1 – 2</p> <p>Transport Policies AC1, AC4, AC5, AC6, AC7</p> <p>Environmental Management Policies EM1 and EM4 – EM15</p> <p>Infrastructure Policy IM1</p>
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2.4 It is essential that the Local Plan is prepared in a way which delivers sustainable development and supports the Council’s journey to net zero. The National Planning Policy Framework (NPPF), within Local Plans must be prepared, sets out that there are three overarching objectives:

- an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and
- by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- 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.

2.5 The plan review takes into account the above context, alongside the need to consider changes to national planning policy and guidance and other relevant policy and guidance. These are detailed in the separate chapters of the plan which address different themes.

### 3. Overall Levels of Growth and the Duty to Co-operate

#### Key evidence:

Housing and Economic Development Needs Assessment (2022)

Review of Coventry's Local Housing Need (2024)

Employment Land Review and Office Market Addendum (2024)

West Midlands Strategic Employment Sites Study (2024) and Coventry and Warwickshire Alignment Paper (2024)

Growth and Duty to Co-operate Background papers (2024)

#### Overall profile: summary

- 3.1 Coventry City Council's website provides a detailed [profile](#) about the city (which also includes mapped data) and this is a summary of the key issues. The city has a relatively young, and growing, population which is increasingly ethnically diverse. Deprivation is an issue in some neighbourhoods and whilst the situation is improving there are particular issues and challenges relating to social inequalities. More children in Coventry live in low income families than the national average.
- 3.2 Economically, the city has particular strengths in advanced manufacturing and engineering; energy and low carbon; connected autonomous vehicles; business, professional and financial services; and digital, creative, and gaming. However, despite resilience in terms of spending and other economic activity, Brexit, the Covid-19 Pandemic and the recent cost of living crisis, have all had significant impacts on households and businesses.
- 3.3 In terms of housing and the environment, the 2021 Coventry Household survey showed a general satisfaction of the area as a place to live. As a result of the compact nature of the city, most people live within walking distance of a range of services and facilities including open and green spaces. However there are significant areas of deprivation where access to services, facilities and open space are poor, pollution levels are higher and this reflects in higher levels of dissatisfaction. In addition, housing stock is typically small and old, with just under two thirds having being built before the early 1950s. Many homes are damp and poorly insulated, and expensive to heat. Poor overall health and wellbeing is a particular challenge in the deprived areas of Coventry where life expectancy is shorter and of poorer quality.

## **Growth needs**

- 3.4 The Local Plan needs to ensure that housing and employment growth is managed in a sustainable way to ensure that it is also addressing environmental and social priorities including the delivery of infrastructure.
- 3.5 Planning for housing and economic needs is informed by the Housing and Economic Development Needs Assessment (HEDNA). This key piece of evidence has been produced jointly by Coventry and the Warwickshire Local Authorities of Nuneaton and Bedworth, North Warwickshire, Stratford on Avon, Warwick and Rugby because geographically they share a common Housing Market Area (HMA) and a Functional Economic Market Area (FEMA) i.e. their housing and economic circumstances are closely related.

## **Housing Need**

- 3.6 In terms of housing, the NPPF (December 2023) sets out in Paragraph 61 that strategic policies should be informed by a local housing need assessment, conducted using the standard method which is an 'advisory starting point'. However, it goes on to explain that there may be exceptional circumstances, including those relating to particular demographic characteristics.
- 3.7 In Coventry's case, the Coventry and Warwickshire HEDNA found that there had been notable issues with the Office for National Statistics (ONS) population estimates for Coventry with the 2021 Census indicating that population had been significantly over-estimated. It was concluded that exceptional circumstances existed to deviate from the Standard Method for assessing local housing need because the basis upon which the Standard Method was based utilised erroneous data (the 2014-based Household Projections).
- 3.8 Given that new data had emerged since the production of the HEDNA in 2022, Coventry City Council commissioned an update in relation to its own housing need (Review of Coventry's Local Housing Need June 2024). This concluded that the HEDNA remained a reliable basis for plan-making.
- 3.9 The Local Housing Need for Coventry for the period 2021-2041 is therefore 29,100 (1,455 per annum) and this will be delivered fully within Coventry's administrative area through an urban and brownfield-focused strategy of allocations and densification as set out in the Housing chapter of this reviewed plan.

## **Employment Land Needs**

- 3.10 In terms of employment, the HEDNA provides the starting point for the overall amount of employment which is needed over the plan period and this covers the Coventry and Warwickshire area.



- 3.11 However alongside this, work has been undertaken across the wider West Midlands region to understand the needs of large scale warehousing and logistics industries, the 'big box' units which are an increasing part of the economy both locally and nationally and which need sites of 25 hectares and above to function effectively (subject also to locational requirements). The West Midlands Strategic Employment Sites Study (WMSESS) 2024 has therefore been jointly produced by several Local Authorities across this area to guide this work.
- 3.12 Because the HEDNA was produced before the WMSESS, the Coventry and Warwickshire authorities jointly commissioned an 'Alignment Paper' (September 2024) to ensure all evidence was consistent, and up to date in terms of need, supply and any residual need (ie any remaining need which each of the Coventry and Warwickshire authorities would need to plan for).
- 3.13 Further detailed evidence has been prepared in terms of the Employment Land Review (ELR) and Office Market Addendum in terms of how employment need should be planned for, and this includes allocations and the identification of key sites as set out in the Employment chapter. Office needs have been assessed to understand further detail about the quantum needed and changing demand for space and flexibility, given altered patterns of working especially post-pandemic where hybrid working and use of technology is now commonplace.
- 3.14 In terms of office need, Coventry City Council is able to accommodate this, primarily but not exclusively within a revised Friargate allocation. In regard to local employment need (use classes E(g) (iii), B2 and B8), the City Council is able to accommodate 60 hectares of employment need, with a remaining shortfall of 45 ha which it is not able to accommodate within its own boundaries.
- 3.15 The above is for local need. In terms of a contribution to the wider strategic need, one allocation meets this, Baginton Fields, which is 25 hectares in size. Ongoing work is continuing with partners under the Duty to Co-operate to work collaboratively and constructively to address strategic need as, being a constrained area, no further opportunities are available in Coventry.

## **STRATEGIC POLICY**

### **Policy DS1: Overall Development Needs**

1. Over the Plan period 2021-2041 significant levels of housing and employment will be planned for and provided along with supporting infrastructure and environmental enhancements:-
  - a. A minimum of 29,100 additional homes.

- b.** A minimum of 60 ha of employment land to meet local needs within the city's administrative boundary, including:
                - i.** the continued expansion of Whitley Business Park; and
                - ii.** 15ha strategic allocation adjoining the A45 as part of the Eastern Green sustainable urban extension (SUE).
              - c.** 25 ha, to be provided at Baginton Fields, to contribute to sub regional need in Coventry and Warwickshire
- 2.** A minimum of 41,200 sqm overall office provision to include 39,549 sqm of office floor space at Friargate in compliance with Friargate Allocation JE2:1 with the remainder delivered in compliance with the criteria set out in Policy JE4
- 3.** Notwithstanding the above, Coventry's employment need for the period 2021 to 2041 is for 105 ha of employment land (including qualitative replacements). It is not possible to deliver all of this additional development land within the city boundary. As such, the Council will continue to work proactively with neighbouring Councils through the Duty to Cooperate to ensure that appropriate provision is made elsewhere within the Functional Economic Market Area.
- 4.** The Council will undertake a comprehensive review of national policy, the regional context, updates to the evidence base and monitoring data within 5 years of the date of adoption of the plan to assess whether a full or partial review of the Plan is required. In the event that a review is required, work on that review will commence immediately.

Furthermore, the Plan will be reviewed (either wholly or partially) prior to the end of the Plan Period in the event of one or more of the following circumstances arising: -

- a.** Through the Duty to Co-operate, the unmet employment needs of the city are proven to be undeliverable within the Local Plans of Warwickshire authorities;
            - b.** Updated evidence or changes to national policy suggest that the overall development strategy should be significantly changed;
            - c.** The monitoring of the Local Plan (in line with the Plan's Monitoring Framework having particular regard to the monitoring of housing delivery) demonstrates that the overall development strategy or the policies are not delivering the Local Plan's objectives and requirements;
            - d.** Any other reasons that render the Plan, or part of it, significantly out of date.

## The Duty to Co-operate

- 3.16 The Duty to Co-operate (DtC) is a legal test that requires co-operation between local planning authorities and other public bodies to maximise effectiveness of policies for strategic matters in Local Plans. It was created by the Localism Act 2011. Further details are set out in the Duty to Co-operate Paper

### STRATEGIC POLICY

#### Policy DS2: The Duty to Co-operate and partnership working

1. Coventry City Council will work with neighbouring authorities within its Housing Market Area to support the delivery of the development needs identified in Policy DS1 that originate from the city.
2. In order to ensure the affordable housing needs of the city are met, the Council will work with its neighbouring authorities to secure opportunities for Coventry citizens to access affordable homes within Warwickshire where they are delivered as part of the city's wider housing needs being met.
3. The Council will support the preparation of joint strategic evidence which will enable the successful delivery of regeneration and economic growth across the sub-region. The Council will continue to be proactive in this regard and will seek to cooperate with all partners on an ongoing basis across all topic areas including housing, infrastructure, economy and jobs, transport, health and the environment.
4. Should the need arise and should it be considered appropriate the Council is committed to working with partners on preparing joint development plan documents, Supplementary Planning Documents (SPD) and design guides to help deliver new sustainable development that may straddle or adjoin the city's administrative boundary.
5. Where sites cross or are adjacent to administrative boundaries and are not subject to joint development plan documents, the Council will continue to work proactively and on an on-going basis with all relevant partners to enable the delivery of new development on these sites.
6. Of particular relevance to parts 4 and 5 of this policy is the continued support for and recognition of the contribution which the following sites make to the sub-regional economy:
  - a. Jaguar Land Rover at Whitley;
  - b. The University of Warwick;
  - c. The wider Coventry Gateway proposals;
  - d. Ansty Park;

- e. Pro-Logis Park at Keresley; and
  - f. Proposed residential developments to the south of the city's administrative boundary.
7. The Council is committed to supporting the economic growth objectives of the sub-region and, in partnership will continue to work pro-actively with all partners to deliver economic growth and prosperity across Coventry and Warwickshire.

## Delivering Sustainable Development

- 3.17 The Government expects the planning system to actively encourage growth, giving local people the opportunity to shape communities, whilst providing sufficient housing to meet local need and support economic activity. This approach is entirely consistent with the Council's vision and aspirations for Coventry. In this context, it is important that the planning system does everything possible to support economic growth and sustainable development.
- 3.18 The NPPF sets out the presumption in favour of sustainable development and the need for sustainable economic growth. Local Plans should reflect this presumption within their own policy base to promote sustainable development at the local level.

## STRATEGIC POLICY

### Policy DS3: Sustainable Development Policy

1. When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). It will work proactively with applicants to find solutions to enable proposals to be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area, taking into account the ambitions of the One Coventry Plan and the Climate Change Strategy and including:
  - a. access to a variety of high quality green and blue infrastructure;
  - b. access to job opportunities;
  - c. use of low carbon, renewable and energy efficient technologies;
  - d. the creation of mixed sustainable communities through a variety of dwelling types, sizes, tenures and range of community facilities
  - e. increased health, wellbeing and quality of life;
  - f. measures to adapt to the impacts of climate change;
  - g. access to sustainable modes of transport;

- h. preservation and enhancement of the historic environment; and
  - i. sustainable waste management.
2. Planning applications that accord with the policies in the Coventry Local Plan (and, where relevant, with policies in supporting plans) will be approved without delay, unless material considerations indicate otherwise.
  3. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise.
  4. This will take into account:
    - a. Any adverse impacts of granting permission that would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or
    - b. Specific policies in that Framework that indicate that development should be restricted

## Masterplan Principles

- 3.19 To support the delivery of sustainable development the importance of embedding a strong master planning framework within the Local Plan cannot be underestimated.
- 3.20 This policy, together with other relevant policies provides the master planning principles to guide and support landowners and developers in preparing appropriate master plans and site plans to help inform the Development Management process. It will provide an over-arching framework for the master planning of new development proposals.
- 3.21 Part A of this Policy provides a general context. Parts B-D relate specifically to the 3 specific allocations (Whitley, Keresley and Eastern Green) which the Council considers of significant strategic importance to the successful implementation of this Plan and its objectives. The Council considers these sites to be of sufficient scale to warrant comprehensive consideration through a master planning process.
- 3.22 To support this, planning conditions and Planning Obligations will be used in accordance with Policy IM1 to deliver necessary supporting infrastructure with trigger mechanisms and thresholds used to ensure timely provision. This will have regard to the requirements of this Local Plan as well as supporting evidence and modelling work provided as part of the planning application.
- 3.23 The infrastructure provisions contained within parts B-D of Policy DS4 and the supporting policies reflect the known requirements at this time. Future updates to the Infrastructure Delivery Plan (IDP) will allow such information to be

regularly updated to reflect prevailing circumstances and show more detail when it is known.

## **STRATEGIC POLICY**

### **Policy DS4 (Part A) – General Masterplan principles**

The following General Principles should be adhered to when master planning any major development proposal:

- i.** Where appropriate the Masterplan should clearly identify any phasing of development along with the timely provision of supporting infrastructure;
- ii.** Where the site is identified as an allocation within the Local Plan it should plan positively to meet in full the requirements identified within the relevant policies associated with the allocation. Where the proposal represents a phase or phases of a wider scheme however, the quantum of development should reflect the relative size and characteristics of the phase, including its position within the wider site;
- iii.** Where possible, all proposals should be planned in a comprehensive and integrated manner reflecting partnership working with relevant stakeholders. Where proposals represent a phase of a larger development the Masterplan should have full regard to any adjoining land parcels and development proposals to ensure it delivers appropriate parts of the strategic or site-wide infrastructure and other relevant features. This should support the wider delivery of the comprehensive scheme;
- iv.** Opportunities to deliver higher density residential and mixed-use development should be maximised along public transport corridors and in designated centres with lower densities provided elsewhere (in accordance with policies H9 and R3);
- v.** Employment and commercial proposals should respond positively to market demands and requirements, maximising opportunities to locate within or close to designated centres (as appropriate) and provide a range and choice of opportunities to meet business and customer needs;
- vi.** Identify appropriate highway infrastructure along with sustainable transport corridors that include the provision for integrated public transport, cycling and walking which provides excellent connectivity and linkages to within the site itself, the city centre and with the surrounding area and existing networks;
- vii.** Appropriate levels of car and cycle parking should be made in accordance with the Local Plan's parking requirements. Spaces should be well integrated

within the development and laid out to ensure they do not result in the obstruction of the highway as a result of excessive on-street parking;

- viii.** Where appropriate social and community facilities should be concentrated within mixed use hubs and designated centres and easily accessed by public transport, walking and cycling (having regard to Policy CO1);
- ix.** Proposals should respond to the local context and local design characteristics (in accordance with Policies GE3, HE2 and DE1), to create new well designed developments with a distinctive character which residents will be proud of;
- x.** Features of the historic environment should be respected as part of new developments with existing heritage assets conserved and enhanced as part of development proposals (in accordance with Policy HE2). Where appropriate, this should include the setting of buildings and spaces and the restoration of assets at risk of loss;
- xi.** 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 (having regard to Policies GE1-4);
- xii.** Provide fully integrated, accessible and connected multi-functional green and blue infrastructure which forms strategically important links to the surrounding area to provide routes for people and wildlife and open spaces for sports, recreation and play;
- xiii.** Where appropriate incorporate innovative and creative approaches to energy generation, the provision of utilities and information technology, mitigation of pollutants, management of surface water and flood risk and waste management solutions. These should be adopted to make new developments more sustainable and resistant to the impacts of climate change; and
- xiv.** All new Masterplans should be informed by consultation with existing communities in adjoining areas. This should take place prior to the submission of a planning application to ensure feedback can influence the final proposals.

3.24 As outlined above, Parts B-D of this policy relate to the following sites:

- The Whitley employment hub (including the future expansion of JLR);
- The Keresley SUE; and
- The Eastern Green SUE

These are considered to offer significant strategic importance to the successful delivery of the Local Plan and due to their size and nature will require a degree of comprehensive master planning.

## **Policy DS4 (Part B) - Whitley Specific Masterplan Principles**

In addition to the general principles outlined in Policy DS4 (Part A) of this policy, development proposals which relate to this area should also have regard to the relevant requirements below:

- i.** Any development should support and complement the existing JLR global headquarters;
- ii.** New provision should be primarily focused within 'B class' uses unless they are shown to be ancillary and supportive to the overall provisions of the business park and in accordance with the other policies of this Plan;
- iii.** Support and integrate the planned highway infrastructure (as listed in the IDP) across the A45, A444 and other appropriate surrounding roads to ensure efficient and appropriate vehicle access into the site(s);
- iv.** Continue to maximise links and connectivity with surrounding business parks within both Coventry City and Warwick District to enhance the employment hub;
- v.** Expand and enhance on existing travel plans and continue to encourage excellent connectivity to public transport as well as the provision of high quality routes to support both walking and cycling;
- vi.** Enhance the connectivity of ecology and biodiversity at the Stonebridge meadows Local Nature Reserve (LNR) and Baginton Fields nature reserve. This should include a 'green' connection into the River Sowe along the northern edge of the site and south of the A46;
- vii.** An appropriate buffer should be retained between the new commercial activity and the existing homes in and around Sedgemoor Road;
- viii.** Development should not compromise the presence and ecological value of the River Sowe and River Sherbourne; and
- ix.** Make positive provisions to relocate the existing sports fields (as appropriate) in accordance with Policy GE2;

3.25 Further to Part B of Policy DS4, further considerations may be of relevance to the wider Whitley Business Park in so far as it relates to land within Warwick District. Notwithstanding the extensive cooperation between Coventry City Council and Warwick District Council in relation to this area, it is not within the remit of this Local Plan to apply policy proposals to land outside of Coventry's administrative boundary



## **Policy DS4 (Part D) – Eastern Green SUE Specific Masterplan Principles**

In addition to the general principles outlined in Policy DS4 (Part A) of this policy, development proposals which relate to this area should also have regard to the relevant requirements below:

- i.** Incorporate the recommendations of the Council’s SUE Design Guidance SPD;
- ii.** Respond to the transport and economic opportunities associated with the site’s proximity to the planned HS2 interchange to the west.
- iii.** Ensure that the employment provisions and Major District Centre are located towards the north of the site and are accessed directly from the new A45 Junction. Neither the employment provision or new Major District Centre should be occupied until the new A45 junction is fully operational;
- iv.** Furthermore, the residential element of the scheme should be limited to the occupation of no more than 250 homes until such time as the new A45 junction is fully operational, unless otherwise agreed in writing by the Council in response to a robust TA.
- v.** Ensure the new defensible boundaries to the Green Belt are clearly supported to Pickford Green Lane in the west and the A45 to the north;
- vi.** Provide appropriate green infrastructure along the western edge of the SUE around Pickford Green Lane to help blend and integrate the development into the wider Countryside;
- vii.** Establish a comprehensive green and blue infrastructure corridor focused along the Pickford Brook and its tributary. This should run from Pickford Green Lane in the west and link to existing corridors off-site, for example, across Westridge Avenue and Parkhill Drive towards Allesley Park;
- viii.** Identify clear access points to the site and make appropriate provisions for new transport infrastructure and highway improvements to support the comprehensive delivery of the site;
- ix.** In accordance with Policy AC2, manage the existing highway junctions at Pickford Green Lane and Brick Hill Lane with the A45 to ensure they are either integrated into the new A45 Junction or safely retained within the existing highway network; and
- x.** Make appropriate provision to aid future integration of the new rapid transit route within the site once the final route is known.

## 4. Health and Wellbeing

### Key Evidence

Coventry Joint Strategic Needs Assessment 2019

Coventry Health and Wellbeing Strategy 2023 -26

Indices of Multiple Deprivation

Health Background Paper 2024

### Context

- 4.1 This chapter sets out the policy and guidance to support the health and wellbeing of Coventry's population over the plan period. It builds upon the NPPF's principle of achieving sustainable development and ensuring the health status and needs of the population are fully understood and taken into account as part of the development process. A key role of the Local Plan is to provide for development in a way that supports healthy and active lifestyles.
- 4.2 A healthy place is one which supports and promotes healthy behaviours and environments and a reduction in health inequalities for people of all ages. It will provide the community with opportunities to improve their physical and mental health, and support community engagement and wellbeing.
- 4.3 Poor health and wellbeing cannot be explained as arising by chance or genetics alone, increasingly the impact that the built environment has on health and health inequalities is being recognised. The places that people live in can have a direct and significant impact on peoples' health and wellbeing as the way that places are designed and constructed can have substantial effects on people's lifestyles.
- 4.4 Health and wellbeing are not consistent throughout the population, with health inequalities present across the population of Coventry. These inequalities can often be observed across small areas, with the differences in health and wellbeing throughout the population strongly correlated with levels of socio-economic deprivation. Economic, social and environmental conditions all influence health and wellbeing outcomes. Typically, those living in the most deprived areas experience worse health inequalities compared to those living in less deprived areas.
- 4.5 These were the findings of a review by Sir Michael Marmot (The Marmot Review, 2010) and as a result Coventry City Council was one of seven cities in the UK invited to participate in the UK Marmot Network, and it became a Marmot City in 2013. Addressing health inequality and health equity is therefore a key priority of the Council.

- 4.6 Using the [Marmot Monitoring Tool](#), the Council actively seeks to address and improve the health and wellbeing of its population. It is therefore vital that health matters are an integral part of any development process.
- 4.7 Health Impact Assessments (HIAs) are useful tools in determining planning applications where there are expected to be significant impacts on health and wellbeing. They should be used to reduce adverse impacts and maximise positive impacts on health and wellbeing of the population as well as assessing the indirect implications for the wider community. HIAs are usually forward looking and can be carried out at any stage of the development process but are best undertaken as early as possible in the design process to ensure health matters are integrated at the outset.
- 4.8 Even for smaller applications health matters should be a consideration, and should be incorporated into the Design and Access Statement.
- 4.9 An updated Health SPD will be produced which provides guidance on producing Health Impact Assessments for major applications and a checklist to assist in factoring in health considerations for smaller applications, ensuring that matters addressed are proportionate to the nature and scale of the proposal.
- 4.10 Major development proposals in particular are more likely to have a significant impact in terms of health and wellbeing, which is recognised by national guidance. As such a HIA will be required to support developments defined as follows:
- a. the use of land for mineral-working deposits;
  - b. waste development;
  - c. all forms of residential development where:
    - i. the number of homes to be provided is 150 or more; or
    - ii. the site area is 5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i)
  - d. all forms of urban development (not involving housing) where:
    - i. the area of development exceeds 1ha; or
    - ii. in the case of industrial development exceeds 5ha

## **STRATEGIC POLICY**

### **Policy HW1: Health and Health Impact Assessments (HIA)**

- 1.** All major development proposals will be required to demonstrate that they would have an acceptable impact on health and wellbeing. This should be demonstrated through a:
  - a.** HIA where significant impacts on health and wellbeing would arise from that proposal; or
  - b.** HIA Screening Report which demonstrates that the proposed development would not overall give rise to negative impacts in respect of health and wellbeing.
- 2.** All HIAs shall be undertaken in accordance with the Council's HIA Supplementary Planning Document or any future equivalent.
- 3.** Where a development has significant negative or positive impacts on health and wellbeing the Council may require applicants to provide for the mitigation or provision of such impacts through planning conditions and/or financial/other developer contributions
- 4.** Where the threshold has not been met for requiring a full HIA, for major applications of 10 dwellings or more, applicants will be required to demonstrate through their Design and Access Statements how they have taken health matters into account in line with principles contained in an updated Health SPD.

## 5. Jobs and Economy

### Key evidence

Housing and Economic Development Needs Assessment (HEDNA) (2022)

Employment Land Review (ELR) (2024) and ELR Office Market Addendum (2024)

Housing and Employment Land Availability Assessment (HELAA) (2024)

West Midlands Strategic Employment Sites Study (WMSESS) and Coventry and Warwickshire Alignment Report (2024)

Coventry City Council Economic Development Strategy 2022-2027

Local Plan Review Employment Background Paper (2024)

### Economic Opportunities and Challenges

- 5.1 Coventry City Council's administrative area sits within the wider economic sub region of Coventry and Warwickshire which forms the defined Functional Economic Market Area (FEMA).
- 5.2 The Council's [Economic Development Strategy](#) sets out the local context. In the 10 years after the 2008/09 recession, Coventry & Warwickshire was the fastest-growing local economy in England, driven significantly by major investments in Research & Development and production in the automotive sector and its supply chain, as well as continued expansion of the professional services sector and creative economy.
- 5.3 However, the local economy has encountered significant challenges in recent years. Growth slowed in 2018/19, and the COVID-19 pandemic had a severe impact on the local labour force. Longstanding inequalities across Coventry were exacerbated as a result.
- 5.4 Further challenges emerged in 2021 and 2022, with inflation (driven heavily by energy and component cost increases), labour shortages, and new regulations and document requirements for UK-EU trade post-Brexit all of which have slowed economic recovery. It is therefore crucial that Coventry can deliver a strong and sustainable recovery from this challenging economic climate, and that foundations are put in place for longer-term prosperity.
- 5.5 The Local Plan aims to help to deliver the key priorities of the Council's Economic Development Strategy which are:
  - Focus on Advanced Manufacturing & Engineering: Emphasis on B2 floorspace and modern facilities to accommodate these sectors' requirements. Demand for skilled labour force within this sector.

- Promoting a Green City: Prioritising industrial innovation for sustainability through investment in sustainable transport to foster environmental consciousness.
- Cultural City with Expanded Creative & Tourism Sectors: Creative industries likely to require E(g) floorspace.
- Commitment to expanding creative and tourism sectors for cultural growth.
- High Employment Levels & Quality Jobs: Strong focus on creating employment opportunities with quality jobs.
- Opportunities for All through Education & Skills Ecosystems: Strengthening universities and education institutions to create opportunities for everyone.
- Addressing Inequalities: Aim to reduce health, economic, and social inequalities across the city.

5.6 The Coventry and Warwickshire HEDNA (2022) shows a strengthening local economy for Coventry with the key sectors being Education (13.1%), Health and Care (12.1%), Manufacturing (10.6%), Business Support Services (9.7%), Professional Services (7.6%) and Retail (7%). Coventry contains 39% of the study area's office stock, totalling 477,000 square metres, reflecting its position as a key commercial centre in the FEMA. Between 2011 and 2019 there was an increase of 26,700 jobs in Coventry.

5.7 However, as set out in the Employment Land Review (2024), exploration into Coventry's commercial markets reveals variances in vacancy rates and rental prices and data indicates a complex and changing landscape within the commercial market.

5.8 Furthermore, the HEDNA considered, at a high level, the impacts of the changed patterns of working especially relating to increases in hybrid and flexible working since the pandemic on office floorspace requirements. This was explored further through the ELR Office Market addendum, concluding that floorspace requirements in this sector could be reduced to respond to changes in the way the sector is now operating.

5.9 There are also particular challenges within the storage and distribution / logistics sectors as their demands and locational requirements have altered over time, including access to the strategic road and rail network and access to local markets and labour. This issue relates to 'Strategic B8', the 'big box' units of over 9,300 sq.m in size and strategic sites of 25 hectares and above. Because of the strategic nature of the challenges involved evidence (the WMSESS) was produced jointly by a number of authorities across the West Midlands area, and a more local 'alignment paper' was produced by the Coventry and Warwickshire local authorities to explain how this aligned with the HEDNA assessment of strategic B8 needs, which had been produced at an earlier date.

- 5.10 It is important that the location and provision of employment land is considered against future growth sectors and is able to adapt to changing needs of the various economic sectors over the plan period not just within Coventry but within the wider FEMA. This includes continuing to support the key sectors mentioned in paragraph 5.6 as well as supporting new and emerging sectors such as the growth in green industry, and working with our partners to ensure more strategic needs are met.

## Definition of Employment

- 5.11 Defining 'employment' for the purposes of plan making and decision-taking is complex. The [Use Classes Order](#) was updated in 2020, therefore it is important to clarify that for the application of Local Plan Policy (and associated monitoring) this will relate to Class B2, B8 and E (g).
- 5.12 However, for the purposes of decision-making when considering planning applications it is recognised that outside of these use classes there are many other sectors which generate jobs, and therefore other uses serving an employment purpose will be taken into account in the planning balance.

## STRATEGIC POLICY

### Policy JE1: Overall Economy and Employment Strategy

1. In accordance with the One Coventry Plan, the Economic Development Strategy and the Climate Change Strategy the Council will work positively and proactively with the business community in the city, inward investors, the city's two Universities, key public sector employers, partners, and neighbouring local authorities to support sustainable economic growth and job creation. In this regard the Council will:
  - a. Promote continued diversification of the city's economic base, particularly through supporting the expansion of companies operating in growth sectors particularly those relating to sustainable and green technologies, and through fostering partnership working with the city's Universities to promote innovation;
  - b. Ensure that job opportunities arising from employment development are accessible to all of the city's working age residents, particularly priority groups and those in the most deprived areas of the city;
  - c. Provide for a readily available range and choice of employment sites and premises to meet projected need over the Plan period related to growth of the city's population and the pivotal role of the city in the ambitious growth agenda for the sub-region;

- d. There will be a presumption against the loss of employment uses, and change to non-employment uses will be assessed against the criteria set out in Policy JE3
- e. Support companies, including Jaguar Land Rover, in retaining, expanding and/or relocating their headquarters operations within the city and support the provision of new infrastructure that encourages these companies to grow.
- f. Seek to direct office development to locations in the city centre and other defined centres with new large scale office development focused on the city centre
- g. Ensure that new research and development, light industrial, general industrial and storage/ distribution developments are appropriately sited and designed to maximise their accessibility by a choice of means of transport, have an acceptable impact on the highway network and to minimise the potential for environmental conflict with nearby sensitive land uses;
- h. Support tourism/visitor related development including Coventry city centre, the CBS Arena and the Coventry and Warwick University Campuses.
- i. Support the continued growth of the city's two universities and in doing so maximise the economic development and other community benefits associated with them.
- j. Support the provision of new green infrastructure as part of new and improved developments

## Provision of Employment Land and Premises

- 5.13 Employment land should be provided to meet the needs of all employment uses – offices, research and development, light/general industrial and storage/distribution. These uses have varying land requirements. Office occupiers tend to seek city centre locations, research and development occupiers often require sites with close links to the universities whilst industrial and storage/distribution occupiers prefer sites which have good access to the strategic highway network and are not constrained by their proximity to neighbouring sensitive land uses such as housing. Sites of varying size are also required to meet the needs of both large and small businesses.
- 5.14 The HEDNA (2022) along with the subsequent Alignment Paper (2024) sets out that for Coventry between 2021 and 2041 105 hectares of employment land (use Classes B2 and B8) is required. This does not include the strategic 'big box' need which is set out in the alignment paper as between 136 – 311 ha across the Coventry and Warwickshire sub region.



5.15 In addition the ELR Office Market Addendum (2024) establishes an indicative minimum need of 41,200 sq.m. office floorspace provision with a recommendation for flexibility to allow for the ability to respond to changing markets.

5.16 Table 5.1 below provides a summary of the employment land supply components for Class B2 and B8

**Table 5.1 – Class B2 and B8 local employment land supply components for Coventry**

Supply components	Site size (Ha)
Completions 2021 – 2024*	25.4
Committed supply	6.2
Remaining Allocations from adopted 2017 Local Plan carried forward (where not included above)**	28.6
<b>Total</b>	<b>60.2</b>

\*Data up to 31 March 2024

\*\*Includes 1.2ha at Austin Drive HELAA site. Excludes 25ha at Baginton Fields which is for strategic B8

5.17 Table 5.2 below provides a summary of the employment land supply components for office uses

**Table 5.2 – office supply components for Coventry**

Supply components	Site size (sqm)
Completions 2021 - 2024	22,299
Committed supply	24,940
Remaining Allocations from adopted 2017 Local Plan carried forward (where not included above)*	27,100
<b>Total</b>	<b>74,339</b>

\* Friargate remaining as part of reconfigured mixed use calculations (see Friargate allocation)

5.18 In terms of office allocations Coventry is able to meet its own need, through a majority of provision through a reviewed Friargate allocation. Since 2021, Friargate has delivered 12,449 sq.m floor space at Friargate 2 (Friargate One was delivered prior to the start of the plan review period), and a further 27,100 sq m will be provided as part of the Friargate allocation. This totals 39,549 sq.m delivery at Friargate over the plan period, leaving a residual amount of around 1,650 sqm to be delivered in line with the approach set out in Policy JE4

5.19 In terms of remaining local employment needs excluding office provision 60 hectares for local need can be accommodated taking into account supply,

completions and allocations, leaving a residual need of 45 hectares. The city is unable to meet its need in full which has already been highlighted through Policy DS1 and reflects the importance of the Duty to Co-operate in ensuring the employment land needs of the sub region are met.

- 5.20 In terms of strategic employment the Baginton Fields (Policy JE2:4) allocation meets the 25 hectares and above criterion and is to be retained as an allocation to contribute to the wider strategic needs of the sub-region, and again the Council will work with partners to ensure strategic needs are met.
- 5.21 The Employment Land Review assessed Coventry's employment sites and concluded that a number of these were particularly important in maintaining a resilient and varied employment stock: these are designated as Key Employment Sites.

## **STRATEGIC POLICY**

### **Policy JE2: Provision of Employment Land and Premises**

1. A total of 52 ha of land is allocated for employment development within the city's administrative area, plus 27,100 sq m remaining floorspace at Friargate as part of a wider mixed use allocation. The allocations are as specified below together with details of the type of employment development that will be promoted on each of these sites.

Site ref	Site	Ward	Site area (as allocated (ha) in 2017 adopted plan)	Allocation (local Plan review) – area remaining (ha unless specified otherwise)	Comments
JE2:1	Friargate (part of mixed use scheme)	St Michaels	7	27,100 sq m office floorspace (part of mixed use development)	6.52ha remaining overall site area. Friargate 1 and 2 delivered.
JE2:2	Lyons Park	Bablake	19	0	Delivered
JE2:3	Whitley Business Park	Cheylesmore	30	6.46	Part delivered
JE2:4	Land at Baginton Fields and South East of Whitley Business Park	Cheylesmore	25	25	Application awaited
JE2:5	A45 Eastern Green (part of mixed use site)	Bablake	15	15	Outline application received
JE2:6	Whitmore Park (part of mixed use site)	Holbrook	8	2.89	Part delivered
JE2:7	Durbar Avenue (part of mixed use site)	Foleshill	1.5	1.5	Application awaited
JE2:8	Land at Aldermans Green Road and Sutton Stop (part of mixed use site)	Longford	1.5	1.5	Application awaited
	<b>Total</b>		<b>107ha</b>	<b>52.35 (excludes Friargate office floorspace figure)</b>	

2. The Friargate, A45 Eastern Green, Whitmore Park, Durbar Avenue and Alderman's Green Road and Sutton Stop employment allocations are to be progressed as part of wider mixed-use re-development schemes and should be supported by comprehensive Masterplans.
3. A balanced portfolio of employment land supply offering a choice of sites will be maintained, with details of need and supply set out in the Annual Monitoring

Report (AMR) and informed by the Employment Land Review which will be updated on a five yearly basis.

4. The following sites, shown at Appendix 9a and listed in bullet point 5, are designated as Key Employment Sites which will be protected for employment use. Alternative uses will not be considered acceptable unless exceptional circumstances demonstrate otherwise. In such cases it must be demonstrated that delivery of mixed use including retention of employment has been considered on the site. Only where this has been evidenced not to be viable or appropriate will policy JE3 and associated Appendix 2 be applicable.
5. Key Employment Sites are shown at Appendix 9a and are:
  - Binley Business Park
  - Coventry Business Park
  - Cyan Park
  - Lyons Park
  - Swallowgate Business Park
  - University of Warwick Science Park
  - Whitley Business Park

## **Non-Employment Uses on Employment Land**

- 5.22 It is essential that a sufficient amount and range of employment land is maintained throughout the city to ensure that the city's economy continues to grow and residents have access to job opportunities. This objective is achieved in part through the allocation of land in this Plan for employment purposes along with the designation of Key Employment Sites. This policy seeks to protect these allocated and designated sites from undesirable redevelopment or conversion for non-employment uses. It is also important to ensure that existing non-allocated employment sites are also retained for employment use wherever possible.
- 5.23 On those employment sites where this Policy applies the loss of such sites to non-employment use will not be permitted unless the exceptions criteria outlined in the Policy are satisfied.
- 5.24 Where it is considered that a site is no longer suitable for employment use the evidence of unsuccessful active and substantial marketing of the site using a variety of media will normally need to show that such marketing has taken place for a continuous period of at least 6 months, immediately prior to the submission of any planning application for non-employment use of the site. This marketing activity should be undertaken in accordance with Appendix 2 of the Local Plan.

### **Policy JE3: Non-Employment Uses on Employment Land**

1. Sites designated as Key Employment Sites will firstly be assessed in accordance with Policy JE2
2. Proposals for the redevelopment in whole or in part of employment land for non-employment purposes will not be permitted unless it can be demonstrated that the part(s) of the site where non employment development is proposed are:
  - a. No longer suitable for employment use bearing in mind their physical characteristics,
  - b. access arrangements and/or relationship to neighbouring land-uses and there is evidence of unsuccessful active and substantial marketing of the site for employment use using a variety of media which supports this; or
  - c. It would not be financially viable to re-use or re-develop the land or buildings on the land in whole or in part for employment purposes; or
  - d. The non-employment development proposed would be used for purposes which are clearly ancillary to and will support the operations of a primary employment use on the land; or
  - e. The non-employment development would generate significant employment gains which are of sufficient weight to justify the loss of employment land.
4. In addition to at least one of the above criteria being satisfied it will also need to be demonstrated that:
  - a. The potential of the site to contribute to the employment land requirements of the city over the plan period is not significant; and
  - b. The proposal would not significantly compromise the viability or deliverability of other adjacent employment land or land allocated in this Plan for employment development; and
  - c. The proposal will not have an unacceptable adverse impact on the continuing operation of any nearby existing businesses.
5. Planning applications to which this Policy applies should be accompanied by written evidence to demonstrate that the proposed development satisfies the exceptions criteria highlighted above.
6. This Policy applies to land which is currently in use or was last used for employment purposes unless such land has been allocated in this Plan wholly for non-employment use.

### **Location and type of new office development**

- 5.25 The NPPF defines office development as a main town centre use. Therefore the 'Sequential Test' applies and such development should normally be

accommodated within defined centres unless it can be demonstrated that there are no sites within such centres which are suitable and available to accommodate the proposed development. The NPPF and associated Planning Practice Guidance sets out how the sequential test should be applied.

- 5.26 The ELR Office Market Addendum recommends a continued focus of office development within the city centre. This includes the Friargate site but with some further flexibility to enable windfall office floorspace development to come forward in other sustainable locations outside the Friargate allocation site in line with the sequential approach set out in the NPPF. This is to encourage and support the provision of office stock, both new and refurbished, to respond to changing market needs in this sector. Similarly, office developments are encouraged to ensure their layouts are flexibly designed (eg to allow for reconfigured internal layouts) so that they can adapt to a range of potential users such as start ups, grow-on or small to medium enterprises.

#### **Policy JE4: Location and type of Office Development**

1. New office development (including change of use of buildings to provide office accommodation and the expansion of existing office uses) should normally be sited within Coventry city centre or other defined centres (as defined on the Policies Map).
2. The Friargate site within Coventry city centre is the Council's preferred location for new large scale office development.
3. Proposals for new office development in other locations will only be permitted if the following criteria are satisfied:
  - a. Having regard to locational factors, there are no suitable sequentially preferable sites available within the city centre, another defined centre or in an edge-of-centre location (if no Defined Centre sites are suitable and available); or
  - b. The proposal is for small scale rural offices;
4. In addition to at least one of the above criteria being satisfied it will also need to be demonstrated that:
  - a. The proposal would not have a significant adverse impact on the vitality and viability of defined centres and on existing, committed and planned public and private investment in office development within a defined centre; and
  - b. The site is accessible by a choice of means of transport or will be made accessible by a choice of means of transport as a consequence of planning permission being granted for the development; and
  - c. There is good access from the development to a primary route on the highway network and and acceptable impact on the capacity of that network; and

d. The proposals are compatible with other Plan Policies.

5. Proposals for new office development outside of Defined Centres shall be accompanied by a Sequential Assessment.

6. New build offices, and conversions of premises to offices should be designed to allow for flexibility of internal layouts so that these can be altered to adapt to changing market conditions and the needs of users.

## Location of Industrial and Storage / Distribution Development

- 5.27 The Council's preferred location for new industrial and storage/ distribution development are the various sites allocated for such purposes under Policy JE2.
- 5.28 Notwithstanding this, it is acknowledged that proposals may come forward on other non-allocated sites within the city for these uses. All industrial and storage/distribution developments on such sites should be accessible by a choice of means of transport, have an acceptable impact on the highway network and be compliant with other Plan Policies.
- 5.29 However, in addition it is acknowledged that significant environmental impacts can arise from general industrial and storage/distribution operations and therefore proposals for such development will also need to demonstrate that they would not result in significant harm to the amenities of persons occupying nearby residential property or other land occupied by uses sensitive to environmental pollution such as schools and hospitals.
- 5.30 The Council will also need to be satisfied that proposals on windfall sites would not compromise the viability or deliverability of land allocated in this Plan for employment development.
- 5.31 Given the nature and scale of the storage and distribution sector and its dependence upon road freight movements, in order to reduce impact on the road network and in line with the [transport strategy](#), B8 uses will need to include HGV parking and overnight facilities. In addition, electric vehicle charging and consolidation facilities will need to be delivered. Freight consolidation is where many suppliers have goods delivered directly to a place (consolidation centre or delivery hub), where it is stored and then delivered to its final destination by means which have a reduced impact upon the local road network such as smaller more sustainable vehicles, or alternative delivery technologies, for example.
- 5.32 Overall the objective of Policy JE5 is to ensure that businesses can locate in the optimal location in terms of accessibility and minimising environmental conflicts whilst also providing residents with good access to a range of job

opportunities across the city and minimising impacts upon the environment, health and climate change.

### **Policy JE5: Industrial and Storage / Distribution Development**

1. The Council's preferred location for new industrial and storage/distribution development are the sites allocated for such purposes under Policy JE2.
2. Proposals for new industrial and storage/distribution development (including changes of use and the expansion of existing operations) on sites not allocated under Policy JE2, will be permitted provided that they are:
  - a. Accessible by a choice of means of transport or will be made accessible by a choice of means of transport as a consequence of planning permission being granted for the development;
  - b. Have good access to a primary route on the highway network and an acceptable impact on the capacity of that network;
  - c. Would not significantly compromise the viability or deliverability of I and allocated in this Plan for employment development;
  - d. Would be compatible with other Plan Policies.
3. In addition to the above, proposals for new general industrial and storage/distribution development (including changes of use and the expansion of existing operations) on all sites (including those allocated under Policy JE2) will also be required to demonstrate that the proposed development would not result in significant harm to the amenities of persons occupying nearby residential property or other land occupied by uses sensitive to environmental pollution.
4. In addition to the above, where B8 uses will include HGV parking and overnight facilities, electric vehicle charging and consolidation facilities.

### **Tourism / Visitor related development**

- 5.33 According to [Destination Coventry](#) (2024) the tourism, leisure and hospitality sector, generates<sup>1</sup> over £750 million, supports circa 7,357 jobs, and attracts over 11 million visitors annually. The Council's [Economic Development Strategy](#) highlights the importance of tourism in delivering sustainable economic growth. This includes delivering physical enhancements to Coventry's culture and tourism assets to increase footfall, dwell times and spend and further build the city's reputation for hosting major national events and as a destination for leisure and tourism. The strategy states that central to achieving this objective will be the completion of the development of the Collections Centre as a focal point for arts and creative sectors, as well as realising the Arena Quarter



Masterplan which will be crucial to maximising the economic potential of the North East of the city.

- 5.34 Destination Coventry is a newly formed (2024) Destination Management Organisation and will take forward and develop the Coventry Tourism Strategy 2019-2023
- 5.35 Policy JE6 therefore seeks to support proposals for tourism/visitor related development in accordance with the Economic Development Strategy and the aims and objectives of Destination Coventry subject to compatibility with other Plan Policies. Tourism/visitor related development such as hotels, conference facilities and leisure/recreation schemes which are classified by the NPPF as Main Town Centre Uses will also need to satisfy the Sequential and, where appropriate, Impact Tests laid down in national guidance.

**Policy JE6: Tourism/Visitor Related Development** Proposals which would contribute towards the city's role as a tourist destination will be supported subject to compatibility with other Local Plan Policies.

## Accessibility to Employment Opportunities

- 5.36 One of the key pillars of the Council's [Economic Development Strategy](#) is to support all Coventry residents to access jobs and develop skills. This will help support education and skills issues that restrict the labour market progression of both people in work and the unemployed (7.1% of Coventry's working-age population have no qualifications compared to 6.4% nationally). Any failure to match the local workforce's skills to employer's needs risks harming the economic recovery of key sectors. The Council has stated that it will continue to support local businesses to tackle challenges with recruitment and labour supply.
- 5.37 Moreover, those without work or who are low paid are vulnerable to poorer health and life expectancy, and the Council has committed to working with businesses to tackle longstanding health inequalities. The Council is therefore prioritising the upskilling and reskilling of the local workforce and ensuring local people access new jobs emerging. This strategy is fully integrated with the new [Coventry Skills Strategy](#) . Working with stakeholders the Council will encourage social responsibility in the development sector, and ensure the benefits of this are being realised well into the future within the city.
- 5.38 Furthermore the Economic Development Strategy seeks to encourage the development and growth of social enterprises across a range of sectors, and boost their capacity to tackle social and environmental needs and provide training and job opportunities.

## **Policy JE7: Accessibility to Employment Opportunities**

1. Planning applications for new employment development (including changes of use and the expansion of existing operations) will be required to demonstrate how job opportunities arising from the proposed development will be made accessible to the city's residents, particularly those in the most deprived areas of the city and priority groups. In this regard applicants will be expected to give consideration to a range of measures including:
  - a. enhancement of the accessibility of the development to residents by a choice of means of transport;
  - b. developments must be well designed to accommodate the needs of all transport modes and must be fully integrated with existing transport networks;
  - c. the provision of support to residents in applying for jobs arising from the development;
  - d. the provision of training opportunities to assist residents in accessing employment opportunities;
  - e. childcare provision which enables residents to access employment opportunities; and/or
  - f. measures to assist those with physical or mental health disabilities to access employment opportunities.
2. In respect of planning applications for new employment development the Council may require applicants to make developer contributions to maximise the accessibility of job opportunities to the city's residents.

## **Location of Research and Development (R&D)**

- 5.39 The Council's preferred location for new Research & Development (R&D), development are the various sites allocated for such purposes under Policy JE2. Notwithstanding this, it is acknowledged that proposals may come forward on other non-allocated sites within the city for these uses. All R&D developments on such sites should be accessible by a choice of means of transport, have an acceptable impact on the highway network and be compliant with other Plan Policies.
- 5.40 The R&D sector is closely linked to the work of the local universities and its culture of innovation and enterprise, and it is important that this is supported in order to grow and evolve the economy. The Economic Development Strategy seeks to encourage 'creators, designers and makers' to work alongside homegrown talent to shape new industries and technologies, as well as attracting, retaining and growing new and better jobs that will drive the city's future.

5.41 Coventry's strong history of innovation and first-class support ecosystem means the city is well placed to lead the way in delivering a "Green Industrial Revolution", given that it produces the fourth highest number of patents per head of all major UK cities (75.6 per 100k population), and R&D will play a key role in delivering new green industrial technologies.

### **Policy JE8: Location of Research and Development (R&D)**

1. The Council's preferred location for new Research & Development (R&D), are the sites allocated under Policy JE2.
2. However, proposals for new R&D, (including changes of use and the expansion of existing operations) on sites not allocated under Policy JE2, will be permitted provided that they are:
  - a. Accessible by a choice of means of transport or will be made accessible by a choice of means of transport as a consequence of planning permission being granted for the development;
  - b. Have good access to a primary route on the highway network and an acceptable impact on the capacity of that network;
  - c. The proposal would not significantly compromise the viability or deliverability of land allocated in this Plan for employment development;
  - d. The development is compatible with other Plan Policies.

## 6. Delivering Coventry's Housing Needs

### Key evidence

Housing and Economic Development Needs Assessment (2022)

Review of Coventry's Local Housing Need (2024)

Housing and Economic Land Availability Assessment (2024)

Gypsy and Traveller Accommodation Assessment (2023)

Viability Assessment (2024)

Density Study (2024)

Purpose Built Student Accommodation Market Study (2024)

Authorities Monitoring Reports

Coventry City Council Housing and Homelessness Strategy 2019 - 2024

Coventry City Council Homefinder data

Housing Background Paper

### The Housing Market in Coventry

- 6.1 Since 2011, the [Authorities Monitoring Reports](#) show strong performance overall of housing delivery against the Local Plan requirement. The 2022/3 monitoring year showed cumulative delivery of 24.6% above the Local Plan requirement of 14,200 at this stage in the projection.
- 6.2 Monitoring shows an increasing number of family homes (3 bedrooms and larger) being completed as a result of the Strategic Urban Extensions (SUEs) starting to be delivered. However, recent monitoring has also shown a significant spike in the delivery of Purpose Built Student Accommodation (PBSA) and the conversion of a number of dwellings to Homes in Multiple Occupation (HMOs). In regard to HMOs these are now being regulated via an [Article 4 Direction](#) and a [Homes in Multiple Occupation Development Plan Document](#).
- 6.3 The HEDNA sets out details of market conditions across the Coventry and Warwickshire Housing Market Area (HMA). Overall house price growth has been stronger than the regional and national average since 2013, but the pattern is varied across the sub region, with Coventry, along with North Warwickshire, Nuneaton and Bedworth and Stratford on Avon displaying slightly weaker growth in recent years when compared to the West Midlands region. Rugby and Warwick show stronger growth during the same period.

- 6.4 In terms of house prices, however, Coventry, along with North Warwickshire and Nuneaton and Bedworth have lower than the national average values.
- 6.5 In regard to sales, across the HMA overall there is a balance between terraced, semi detached and detached stock, for Coventry 76% of sales in 2020 were either terraced or semi-detached homes. Sales of flats were highest in Warwick (18%) followed by Coventry (12%). When location and value were considered together, sales of properties under £200,000 were focused particularly in Coventry. This reflects the choice of stock available at that point in time and the situation can be expected to change now that the strategic urban extensions allocated through the 2017 plan are progressing.
- 6.6 The HEDNA also highlights the importance of the availability of mortgage products for first time buyers across the HMA: a combination of rising house prices and limited availability of mortgages with higher loan-to value ratios has been restricting first time buyer numbers.
- 6.7 In terms of the lettings market, the HEDNA shows Coventry to have higher median rents than the regional average (2021) but lower than the national average. However, in the HMA since 2018 relative growth in rents has been consistently stronger in Coventry (albeit median rates remaining below Stratford on Avon and Warwick). There is a clear need for rental properties with the HEDNA identifying that demand is outstripping supply, in Coventry this is particularly for 2 and 3 bedroom properties.
- 6.8 In terms of the Council's Housing and Homelessness Strategy, the Local Plan can help to deliver its key priorities: Preventing Homelessness and Supporting Homeless Households; Support for People and Communities; Improving the Use of Existing Homes; Housing Development. Addressing a variety of needs requires a varied housing stock and this chapter explores this in more detail.

## **Scale of Housing Development**

- 6.9 The joint Coventry and Warwickshire HEDNA (2022) and the Coventry update Paper 'Review of Coventry's Housing Need' (2024) confirms that exceptional circumstances exist to justify applying an alternative approach to the national Standard Method for determining housing need. This is in accordance with the NPPF (December 2023 paragraph 61).
- 6.10 The HEDNA identifies a local housing need of 1,455 per annum over the plan period, 29,100 in total. Following a thorough consideration of sustainable development principles and in accordance with the NPPF, an assessment of land options through the Call for Sites and the HELAA and a density study informing a strategy of increased densification a capacity of around 31,954 homes has been identified, which provides a degree of flexibility above the local need figure of 29,100. Table 6.1 below identifies the Council's housing land supply and sets out how the requirement will be met.

Table 6.1 Components of housing supply 2021-2041

Housing Land Supply Components (data to 30/9/24)	Number of Homes
Past net completions	7,666
Committed supply	13,975
Remaining allocations (2017 Local Plan)	2,733
Proposed new site allocations (local plan review)	3,503
Other identified sites (HELAA)	816
Windfall allowance	2,800
<b>Total</b>	<b>31,493</b>

6.11 The trajectory contained in Appendix 3 shows how development will be delivered over the plan period.

## STRATEGIC POLICY

### Policy H1: Housing Land Requirements

1. Provisions will be made for a minimum of 29,100 additional dwellings between 2021 and 2041.
2. The housing requirement is to be delivered in line with the trajectory set out in Appendix 3
3. Housing land will be released in order to maintain a continuous 5 year supply of housing land in order to support a varied and flexible land supply to support housing delivery and sustainable development. This will be monitored through the Council's Annual Monitoring Report.

6.12 The identified land supply will offer flexibility and choice across the city. The following policy, accompanied by Table 6.2 sets out the allocations referred to in the Components of Housing Supply Table 6.1 above. As this is a review of the adopted 2017 Local Plan a commentary is also provided so it can be seen where the 2017 Local Plan allocations are underway or where they have been delivered, and those allocation reference numbers remain unchanged for clarity. New / amended allocation maps are at Appendix 9b.

## STRATEGIC POLICY

### Policy H2: Housing Allocations

1. Table 6.2 identifies the sites to be allocated for housing development alongside essential details that will support the principles of sustainable development. The development of all sites will also need to be considered in accordance with other policies in this Local Plan (and supporting documents) and the Infrastructure Delivery Plan, with the infrastructure needs of each site to be secured through legal agreements and developer contributions where appropriate.

2. The urban extension proposals at Keresley and Eastern Green are to be brought forward in full accordance with comprehensive Masterplans and in accordance with the Council's Urban Extension Design Guidance SPD.

Table 6.2 - Site Allocations for Housing

Site Ref	Site	Ward	Total Dwellings	GF / PDL	Essential Site Specific Requirements and Other Uses	HELAA Ref.
H2:1	Keresley SUE	Bablake	3,100	GF	Retail space within a local centre in the south of the site (policy R1). Distributor link road connecting Long Lane and Winding House Lane to be fully operational prior to the full completion of the SUE. Surrounding junction improvements as appropriate and identified through a robust TA. Provision of 2FE primary school and contributions towards a 8FE secondary school. Retention of medieval fishponds, ancient woodlands, important (ancient) hedgerows. Creation of publicly accessible green corridor along the Hall Brook and enhanced connectivity between the ancient woodlands. Protection of Jubilee Woodland. Inclusion of appropriate screening to existing residential areas.	
H2:2	Eastern Green SUE	Bablake	2,250	GF	15ha of employment land adjacent to the A45 (policy JE2), which is to be developed in tandem with the residential development. The provision of a new Major District Centre and a Local Centre (policy R1). Provision of 2FE primary school. New grade separated junction from the A45 to provide primary site access with surrounding junction improvements as appropriate. The new A45 junction should be fully operational prior to the occupation of the employment land and the Major District Centre, whilst no more than 250 homes should be occupied prior to this junction being fully operational (in accordance with Policy DS4D). Creation of publicly accessible green corridors along the Pickford Brook and its tributaries. Retention of medieval moat at Pond Farm and retention of important hedgerows. Inclusion of appropriate screening to existing residential areas. Buffering and screening at Pickford Green to protect the transition of land use into the wider Green Belt.	
H2:3	Walsgrave Hill Farm	Henley and Wyken	900	GF	Retention and enhanced setting of listed buildings at Hungerley Hall Farm. Site to incorporate blue light access linking the A46 to the University Hospital. Facilitate and work with Highways England on highways proposals linked to a new Grade Separated junction at Clifford Bridge. Provision of essential drainage and flood risk infrastructure.	HE002-24

H2:4	Land at Whitmore Park, Holbrook Lane	Holbrook	730	PDL	As part of mixed use scheme to deliver 8ha of redeveloped employment land (policy JE2). The retention of the sports field fronting Beake Avenue. Highway works to open up Swallow Road to public traffic as appropriate. Retention of locally listed building facades and boundary walls.	
H2:5	Paragon Park	Foleshill	700		2017 Local Plan allocation, <b>now delivered.</b>	
H2:6	Land at Browns Lane	Bablake	475	GF	Retention of important trees and hedgerows. Need to focus primary access to Coundon Wedge Drive.	
H2:7	Land at Sutton Stop	Longford	285	GF	Total Allocation is linked to extant permission (FUL/2013/0727) and should also include a 225 berth marina and ancillary provisions (as appropriate) and 1.5ha of employment land (policy JE2). The site should also incorporate in excess of 5ha publicly accessible green space and the inclusion of appropriate screening to existing residential areas. Development will need to ensure that highways access and provisions are adequate and suitable for the site. This could include remodelling of the junction at Sutton Stop and Grange Road and at Alderman's Green Road	
H2:8	Land West of Cromwell Lane	Westwood	240	GF	Creation of woodland area to the western boundary of the site to reflect Ancient Arden landscape characteristics and ensure defensible boundary to the wider Green Belt. Retain and enhance the setting of Westwood Farm and other listed buildings within and adjacent to the site. Inclusion of appropriate screening to existing residential areas. Explore opportunities to introduce residents parking schemes on site and along adjoining streets with surrounding junction improvements as appropriate.	
H2:9	Land at London Road/ Allard Way	Binley and Willenhall	200	GF	Retention and reuse of locally listed pumping station and lodge. Retention of important hedgerows and management of biodiversity/ ecology impacts. The provision of at least 2.5ha of publicly accessible green space as part of the development.	
H2:10	Former Lyng Hall playing fields	Upper Stoke	185	mix	Provision of 1ha of publicly accessible green space as part of development. 2017 Local Plan allocation, <b>now delivered.</b>	
H2:11	Elms Farm	Henley	150	GF	Creation of publicly accessible green space along eastern boundary of site.	
H2:12	Site of LTI Factory, Holyhead Road	Sherbourne	110	PDL		
H2:13	Grange Farm	Longford	105	GF	Retention of important hedgerows. Highway improvements to Grange Road. 2017 Local Plan allocation, <b>now delivered.</b>	



H2:14	Former Transco site, Abbots Lane	Sherbourne	100	PDL	Retention of sandstone boundary walls.	
H2:15	Land at Sandy Lane	Radford	250	PDL	Retention of the Daimler Office building on Sandy Lane.	R004-24
H2:16	Land at Carlton Road / Old Church Road	Foleshill	85	PDL	Retention of chimney, art-deco façade and railings of former weaving mill.	
H2:17	Nursery Sites, Browns Lane	Bablake	80	GF	2017 Local Plan allocation, <b>now delivered.</b>	
H2:18	Former Mercia sports field	Foleshill	75	GF/ PDL	Provision of 0.5ha of publicly accessible green space as part of development. 2017 Local Plan allocation, <b>now delivered.</b>	
H2:19	Land at Mitchell Avenue	Wainbody	50	GF	Existing sports facilities are to be re-provided at the site of the former Alderman Harris School at Charter Avenue or an appropriate alternative site within the local area as part of this development (in accordance with policy GE2).	
H2:20	Land at Durbar Avenue	Foleshill	45	PDL	As part of mixed use scheme to deliver 1.5ha of redeveloped employment land (policy JE2).	
H2:21	Woodfield school site, Stoneleigh Road	Wainbody	30	mix	New homes to link in with new railway station to be delivered as part of the wider NUCKLE project (policy AC6).	
H2:22	Land at the Junction of Jardine Crescent and Jobs Lane	Woodlands	25	PDL	Retail space within extended district centre (policy R1).	
H2:23	Land west of Cryfield Heights, Gibbet Hill	Wainbody	20	GF	2017 Local Plan allocation, <b>now delivered.</b>	
H2:24	Land West of Cheltenham Croft	Henley	15	GF		
H2:25	The Grange Children's Home, Waste Lane	Bablake	15	PDL/ GF	Locally Listed buildings to be retained and converted with limited new build allowed to support a comprehensive scheme. Dense tree boundaries to be retained to protect wider Green Belt setting.	
H2:26	Coventry Central Police Station, Little Park Street	St Michael's	600	PDL	Development needs to be sensitive to View Cones 8: Mile Lane and 10: Quinton Rd, as defined in the Tall Buildings Design Guide and the Three Spires View Management Framework SPD.	STM009-24
H2:27	New Union Street Car Park	St Michael's	170	PDL	Development needs to be sensitive to View Cone 9: Mile Lane (Christ Church) as defined in the Tall Buildings Design Guide and the Three Spires View Management Framework SPD.	STM011-24

H2:28	New Gate Court Business Park, Paradise Street	St Michael's	303	PDL	Consented application for mixed use commercial and high rise flatted (C3) development FUL/2022/2635. Site to retain and enhance the Old City Wall Scheduled Ancient Monument (SAM) and may be required to divert a gas pipeline running through it.	STM001-23
H2:29	Former Vintage House, St Nicolas Street / Leicester Row	Radford	100	PDL	Development needs to be sensitive to the character of the Coventry Canal Conservation Area that it is located in.	R003-23
H2:30	Whitefriars Street Car Park	St Michael's	185	PDL	Development needs to be sensitive to View Cone 7: Parkside, as defined in the Tall Buildings Design Guide and the Three Spires View Management Framework SPD.	STM012-24
H2:31	Paybody Building, Stoney Stanton Road	Foleshill	280	PDL	Existing NHS health facility within the city centre boundary that is likely to become available for residential or healthcare-based use or mix of both.	F008-24
H2:32	Dale Buildings, Tower Street	St Michael's	200	PDL	Enhancement of listed medieval wall and Cook Street gate scheduled monuments and adjacent conservation area and Registered Park and Garden. Development needs to be sensitive to Archaeological Constraint Aea and View Cone 1: Foleshill Rd, as defined in the Tall Buildings Design Guide and the Three Spires View Management Framework SPD.	STM013-24
H2:33	The Allesley Hotel, Birmingham Road	Bablake	48	PDL	Retention and enhancement of adjacent listed buildings and heritage assets and the Allesley Village Conservation Area that the site is within. Consideration needed of the Allesley Bypass dual carriageway that runs along the south of the site.	Bab001-23
H2:34	Former Chace School, Chace Avenue	Binley and Willenhall	60	PDL		BW001-23
H2:35	Former School Site, New Century Park – Land to the South of Isadora Lea	Lower Stoke	93	PDL	Site was formally earmarked as a location for a primary school, but it has been determined that this is no longer needed.	LS001-23
H2:36	Land at Spon End	Sherbourne	750	PDL	Site part of Citizen Housing regeneration portfolio. Enhancement and improvement to the River Sherbourne and consideration given to the associated floodplain. Majority of the site is in Flood Zone 2 and part with Flood Zone 3.	SH004-24
H2:37	City Centre South	St Michael's	1,575	PDL	Total allocation is linked to extant Outline and Reserved Matters permissions: OUT/2020/2876 and PL/2023/0002533/RESM to provide a high-density mixed-use development that provides commercial and learning and community uses, and public realm works. Retention and Enhancement of heritage asset.	STM18-24

H2:38	Friargate – Land bounded by Railway, Grosvenor Road, Manor Road and including Greyfriars Green and Station Square	St Michael's	1,350	PDL	Total allocation linked to extant permission OUT/2011/0036 for a mixed-use development that includes office, residential, leisure and retail development. Retention and enhancement of listed Coventry Railway Station and Greyfriars Green Conservation Area and adjacent listed buildings. Development needs to be sensitive to View Cone 12, Spencer Park and Footbridge as outlined in the Tall Buildings Design Guide and the Three Spires View Management Framework.	STM014-24
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## Housing Development principles

- 6.13 Future housing developments will be designed to create new and stable communities providing a mix and choice of housing types and tenures. Opportunities to create new areas of housing as part of mixed-use developments will also be encouraged. In accordance with the NPPF the Council will also encourage new self and custom build programmes, and community-led housing schemes, where local people wish to build their own homes and promote the provision of entry-level homes as part of meeting affordable housing need.
- 6.14 When considering the suitability of a site for housing development that is not already allocated, Policy H3 must be considered to ensure it is situated within a sustainable location and will ensure the creation of an appropriate and acceptable residential environment.
- 6.15 The principles of supporting sustainable residential development which helps support healthy communities have been considered through a range of evidence and best practice as well as an overview of local services and facilities and their proximity to homes and development opportunities across the city. It is vital that new homes are well designed, resilient and adaptable for a range of users, are free from pollution, energy efficient, easily accessible to schools, shops, health facilities, leisure provisions, open spaces, public transport and a range of other services and facilities.
- 6.16 As set out in the above paragraph, it is important that dwellings provide adequate space to enable a good standard of living and the Nationally Described Space Standards are to be applied. In addition, the HEDNA explores the needs of different groups in Coventry, particularly (but not exclusively) relating to an ageing population. It is important that the provision of housing is able to meet the needs of the local community including those with mobility difficulties. Therefore, in line with the HEDNA policy sets out additional standards to help meet this need.
- 6.17 Should development come forward that is deficient against the criteria in policy H3 then the site-specific circumstances will be considered to understand the extent to which the criteria are not met and how mitigation might be provided.

Should it be deemed appropriate and justified without excessively impacting on development viability, developer contributions will be required via a Section 106 agreement. This will be managed through Policy IM1.

## **STRATEGIC POLICY**

### **Policy H3: Provision of New Housing**

- 1.** New residential development, both open market and affordable housing and including the conversion of buildings from non-residential to residential use and which provides opportunities for self-build homes and community led housing, must provide a high-quality residential environment that ensures all new dwellings:
  - a.** comply with Nationally Described Space Standards (NDSS);
  - b.** comply with internal and external standards set out in the Design Guide for New Residential Developments SPD, Householder Design Guide SPD and Open Space SPD;
  - c.** meet M4(2) - Adaptable and Accessible Dwellings;
  - d.** For major schemes, 10% of all new dwellings meet M4(3) - Wheelchair User Dwellings Adaptable and Accessible - of Building Regulation standards for access;
  - e.** Where possible be located to meet Natural England's Accessible Natural Greenspace Standards (ANGST) doorstep standards or future equivalent and where this is not possible developer contributes may be sought for local projects identified in the Council's Blue and Green Infrastructure Strategy and Action Plan; and
  - f.** contribute to the delivery of urban regeneration or to the creation of sustainable communities and overall enhance the built environment.
- 2.** New developments must result in a satisfactory residential environment for neighbouring and future occupiers.
- 3.** New developments must not result in existing businesses having unreasonable restrictions placed on them because of the new residential development.
- 4.** New developments should provide sustainable and liveable neighbourhoods, have consideration to the accessibility mapping as set out in the Council's Transport strategy and where possible have convenient, reasonable and practicable access that can be accessed safely and by all abilities to:
  - a.** local medical services;

- b. convenient shopping facilities;
  - c. primary school;
  - d. sustainable transport modes; and
  - e. high quality publicly accessible green space that can be used for a range of leisure and sporting activities, in line with the Open Space SPD.
5. Proposals should also be in conformity with all other relevant plan policies.
  6. Sustainable transport provision and the infrastructure required to support housing development must be considered from the onset and conform to the City Council's adopted Transport Strategy to ensure all sites have easy access to high quality public transport and walking and cycling routes.
  7. The delivery of custom and self-build homes and community led housing will be supported where they meet the criteria of this policy and are in accordance with all other development plan policies.

## Securing a Mix of Housing

- 6.18 National planning policy requires local planning authorities to plan for a mix of housing. The city has undertaken a Joint HEDNA with its Warwickshire neighbours, which sets out the housing needs for Coventry, including the need for all types of housing and the needs of different groups in the community.
- 6.19 Policy H4 is concerned with the mix of general market housing only, whilst Policy H6 refers to the mix of housing in respect of the affordable homes element of housing developments.
- 6.20 Where possible, large strategic sites should reflect the housing mix set out in the HEDNA. However, it is accepted that some locations, sites and their local context lend themselves to particular types and sizes of development and therefore a pragmatic approach will be taken, with the HEDNA being used as the starting point. It is important that the objectives of the plan as a whole are taken into account in achieving the mix of homes identified by the HEDNA over the plan period.

### Policy H4: Securing a Mix of Housing

1. The Council will require proposals for residential development to include a mix of market housing which contributes towards a balance of house types and sizes across the city in accordance with the latest Housing and Economic Development Needs Assessment (HEDNA) or its future equivalent.

2. In assessing the housing mix in residential schemes the Council may take into account the following circumstances where it may not be appropriate to provide the full range of housing types in accordance with the latest Housing and Economic Development Needs Assessment or its future equivalent:
  - a. physical constraints, such as those associated with small sites of less than 5 houses and conversion schemes, where opportunities for a range of different house types are limited;
  - b. locational issues, such as highly accessible sites within or close to a designated centre where larger homes and low/ medium densities may not be appropriate;
  - c. sites with severe development constraints where housing mix may impact on viability;
  - d. sites where particular house types and/ or building forms may be required in order to sustain or enhance the setting of a heritage asset;
  - e. developments in parish or neighbourhood plan areas, where there is an up-to-date local housing needs assessment which provides a more appropriate indication of housing need; and
  - f. evidence that there is no grant or equivalent funding available which would ensure that the development could viably proceed.

## **Managing the existing Housing Stock**

- 6.21 People's need for housing is met by both new build and through the existing stock. As such, it is important that there is a balance between the maximum use of existing dwellings and the development of new housing. This may involve an improvement in the quality of homes, including retrofitting to improve energy efficiency and address fuel poverty as well as the clearance and redevelopment of housing which has reached the end of its useful life, but only when this has been considered in line with the environmental management policies of this plan.
- 6.22 In line with the above, demolition and redevelopment schemes will be considered where the existing housing does not meet local housing market needs or is in a very poor state of repair. Regeneration will be undertaken to promote sustainable urban living, enhance the public realm, combat climate change, improve accessibility and address social deprivation. Replacement provision should also represent the most efficient use of land in accordance with the Local Plan density policy. Together these considerations will ensure that regeneration projects respond to the 3 aspects of sustainable development outlined in the NPPF.

## **Policy H5: Managing Existing Housing Stock**

1. Where appropriate, the existing housing stock will be renovated and improved, in association with the enhancement of the surrounding residential environment and to meet local housing needs. Where appropriate these works should include opportunities to retrofit existing properties with features that meet existing climate change requirements while maintaining the existing character of the existing property and to improve energy efficiency of existing homes.
2. Demolition and redevelopment schemes will be supported where:
  - a. Existing housing stock does not meet local housing market needs;
  - b. the redevelopment represents the principles of sustainable development;
  - c. the development does not result in a net loss in the quality and size / type of dwellings currently on the site, unless it can be robustly justified;
  - d. the development has considered the embodied carbon in existing buildings, along with waste disposal, transportation and construction; and
  - e. the development is in line with the requirements of all other relevant policies of the Plan.
3. The conversion of existing dwellings to uses other than primary residential will be resisted, unless very special circumstances can be demonstrated including why the non-residential use would better meet the need of the local area and the aims of the Local Plan than the existing dwellings.

## **Affordable Housing**

- 6.23 The NPPF provides the definition of Affordable Housing to which Policy H6 applies. The Council is committed to planning for high quality affordable housing for people who are unable to access or afford market housing. The policy intention is to ensure that a choice of housing is available to all in mixed tenure, balanced and sustainable communities.
- 6.24 In line with the NPPF, the HEDNA considers two main outputs, the need for social / affordable rented housing and consideration of the need for affordable home ownership products. It concludes an annual need of 941 Social / Affordable rental dwellings and 149 Affordable Home ownership dwellings. It should be noted that the need estimate is on a per annum basis and should not be multiplied by the plan period to get a total need. Essentially, the estimates are for the number of households who would be expected to have a need in any given year (i.e. needing to spend more than 30% of income on housing), and this does not necessarily need to be met by new build.

- 6.25 The NPPF sets out specific levels of requirement for affordable home ownership on development schemes, and once these specifications have been met councils can then specify their own requirement for any remaining affordable homes which need to be provided.
- 6.26 The Council's preference is for social rented housing and the mix of this would be determined in line with the advice from the Council's Housing strategy team using the Council's Homefinder Data which provides the most current information on local need at a particular point in time. Currently there is a particular need for larger family-sized affordable homes as people with this type of need do not progress through the waiting list as quickly as those in need of smaller accommodation. To ensure effective and timely delivery it is important that affordable housing is built on site wherever possible and is integrated into the development in a way which ensures it is indistinguishable from open market housing.
- 6.27 Purpose Built Student Accommodation (PBSA) has provided a significant portion of residential development in the city in recent years, and in line with Policy H10, any PBSA which is delivered outside of the defined university campus / boundary areas will need to contribute to the delivery of affordable housing in the city. Beyond the campus areas of the universities, PBSA is competing for residential land, much of which is required to deliver the urban-focused spatial strategy of the reviewed Local Plan. Should PBSA be permitted by virtue of the exceptions approach of H10, it should contribute to the delivery of affordable stock, much of which will be needed to retain recent graduates and attract other young professionals in the city, ensuring they have affordable options available to them to live and work in the area. The calculation in policy is based on the Housing Delivery Test average number of students in student-only households calculation (2.5) multiplied by the Council's affordable housing unit threshold.
- 6.28 Build to rent will also be expected to contribute to affordable housing, in the form of affordable private rents. This will be a 10% provision requirement with a local unit threshold of 10 units. This approach recognises the unique circumstances of the build to rent model whilst ensuring a unified ownership and management of all homes for the long term. The discounted private rent should be managed collectively with the market units by a single build to rent landlord, as set out by national guidance. The affordable private rent homes should be fully integrated into the development with no differences between them and the market units. Eligibility for occupying affordable private rent homes should be agreed locally between the Council and the scheme operator with regard to local household income levels and local rent levels and with regard to criteria set out in national guidance.
- 6.29 The supporting text to Policy H13 sets out the mechanism that could be included in the Section 106 Agreement to recoup (clawback) the value of the



affordable housing provision that is withdrawn if affordable private rent homes are converted to another tenure or if the private market rent homes are converted to another tenure before the end of a covenant period.

- 6.30 Co-living developments will be expected to contribute to the delivery of affordable housing, in the form of affordable private rent.

## **STRATEGIC POLICY**

### **Policy H6: Affordable Housing**

#### **Proportion of Affordable Housing**

1. The Council will seek to maximise the delivery of affordable housing across the city, in accordance with the high level of need set out in the HEDNA. Affordable housing delivery should be in accordance with the Council's Affordable Housing SPD.
2. Positive weight will be given to schemes which contribute to the delivery of house types which address the Council's long-standing need for larger house types on the affordable housing waiting list, as identified and monitored by the Council's Homefinder data or future equivalent.
3. New residential developments of 10 or more dwellings (gross) located within the area identified at Appendix 9(c) on individual sites, or on sites of more than 1ha will be required to provide 25% of all dwellings as affordable. This excludes Purpose Built Student Accommodation, co-living accommodation and Built to Rent accommodation, where the affordable housing provision is set out in points 5, 6 and 7 of this policy.
4. Affordable housing will be expected to be provided on site with the exception of Purpose Built Student Accommodation (PBSA) as set out in Point 5.
5. On sites providing 25 bed spaces or more of Purpose Built Student Accommodation (PBSA) outside of Campus as defined at policy H10, a commuted sum will be required in lieu of on-site 20% affordable housing provision
6. On sites providing build to rent accommodation of 10 units or more, developments will be expected to provide 10% of all dwellings as affordable private rent in line with the following:
  - a. The affordable rent homes should be in accordance with the requirements of the PPG and be at genuinely affordable rents to be agreed with the council.

- b. The eligibility criteria for the occupants of the affordable homes and the discount, size and mix of the affordable units is to be agreed with the council.
  - c. Affordable private rent and private market rent units within a development should be managed collectively by a single build to rent landlord (no need for the involvement of a registered landlord). The affordable private rent should be distributed throughout the development and physically indistinguishable from the market rent homes in terms of quality and size.
7. On sites providing co-living accommodation of 25 bed spaces or more (gross), developments will be expected to provide 25% of all bed spaces as affordable private rent.

### **Tenure**

8. The affordable housing tenure and mix will be based on the need highlighted in the latest HEDNA supplemented with Homefinder (or equivalent) data. On this basis the Council will expect to seek:
- a. a tenure split of 60% social/affordable rent and 40% intermediate provision,
  - b. of the social and affordable rent provision a minimum of half should be for social rent; and
  - c. Accounting for any nationally set contribution for intermediate home ownership products, the remainder of the affordable home ownership is to be delivered as other intermediate home ownership products.
9. Proposals must meet national policy requirements relating to affordable home ownership initiatives and local eligibility criteria, and where these are updated or altered, the latest requirements will be applicable.

### **Housing Size Mix**

10. The expected mix for affordable housing provision will initially be guided by the HEDNA, however, through engagement with the Council and Registered Providers, positive weight will be given to a housing mix that is also informed by the latest Homefinder data (or future equivalent) to ensure the delivery reflects the most up to date need and circumstances. The affordable housing mix should reflect the overall mix and type of housing proposed across the application site guided by an updated affordable housing SPD.

### **Where a policy compliant provision is not provided**

11. Where the required specified level, tenure and size mix of affordable housing cannot be provided on site, including for reasons of viability, robust evidence must be presented to justify a reduced or alternative form of contribution.

12. A reduction in the requirements of policy EM11 may be presented for assessment in order to maximise Affordable Housing delivery.

### **Design Standards**

13. Through high design standards, new affordable housing units must be appropriately integrated within developments and with other affordable homes adjoining the site.
14. Affordable housing proposals must be in accordance with the design principles set out in Policy H3, including NDSS standards and the internal and external standards set out in the Design Guide for New Residential Developments SPD and Householder Design Guide SPD.

## **Gypsies and Travellers**

- 6.31 A Gypsy and Traveller Accommodation Assessment (GTAA) was completed in February 2023. This concludes that there are currently 5 authorised pitches on Burbages Lane and an expected supply of 12 pitches following the redevelopment of the Siskin Drive site. This is able to cater for the assessed need (15 pitches) over the short term 2022/23 to 2026/27. Over the longer plan period to 2041 the GTAA concludes there will be a shortfall of 6 pitches but that these could potentially be accommodated at Burbages Lane.
- 6.32 In order to provide resilience over the plan period the GTAA also recommends a series of requirements which should be taken into account when assessing planning applications. The study recommends that the criteria in policy are updated to ensure sustainability of location, adequate access and servicing, appropriate screening and landscaping, free from environmental hazards and flood risk, integration with the local community, enabling mixed business and residential accommodation and make adequate provision for on site requirements including play areas, storage, provision for recycling and waste management. The GTAA also recommends supportive policy for the provision of transit facilities or negotiated stopping points.

### **Policy H7: Gypsy and Traveller Accommodation**

1. Provision will be made for at least 6 permanent pitches for Gypsies and Travellers.
2. Proposals for additional Gypsy and Traveller sites outside of the Green Belt (and within it, if very special circumstances have been demonstrated) will be assessed against the following criteria as set out in the Council's Gypsy and Traveller Accommodation Assessment (GTAA):
  - a. The site's use should not conflict with other development plan policies or national planning policy relating to issues such as risk from flooding,

including sites not being in functional floodplains; contamination; or agricultural land quality;

- b. The site should be in a sustainable location in terms of being within reasonable travelling distance of local services and community facilities, including health care and schools;
  - c. The site should enable safe and convenient pedestrian and vehicle access to and from the public highway, and adequate space for vehicle parking, turning and servicing;
  - d. The site should be served by adequate water and sewerage connections, and drainage, power and waste and recycling facilities;
  - e. Proposals must not have an adverse impact on the amenities of occupiers of nearby properties or the appearance or character of the area in which it would be situated, with proposals including appropriate landscaping;
  - f. The site must not be affected by environmental hazards that may affect the residents' health or welfare;
  - g. Proposals should make adequate provision for on-site facilities that meet best practice for modern Traveller site requirements, including play areas, storage and mixed business and residential accommodation; and
  - h. The proposal must be well related to the size and location of the site and respects the scale of the nearest settled community.
3. Proposals for transit and / or stop over areas will be supported where they meet an evidenced need and accord with other policies in this plan.

## Specialist Housing

- 6.33 As set out in the HEDNA there is a need to ensure that the Local Plan can positively support all specialist forms of housing including a range of types of older persons housing, housing with elements of care, and hostels. As the population ages, it can be expected that there will be associated increases in the numbers of people presenting with long term health problems or disability.
- 6.34 Invariably, there will be a combination of those with disabilities and long-term health problems that continue to live at home with family, those who chose to live independently with the possibility of incorporating adaptations into their homes (see Policy H3) and those who choose to move into supported housing.
- 6.35 The HEDNA identifies a range of different types of older persons accommodation Definitions of Different Types of Older Persons' Accommodation.
- Age-restricted general market housing: This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared

amenities such as communal gardens, but does not include support or care services.

- Retirement living or sheltered housing (housing with support): This usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services, but provides some support to enable residents to live independently. This can include 24-hour on-site assistance (alarm) and a warden or house manager.
- Extra care housing or housing with care: This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24-hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.
- Residential care homes and nursing homes (care bedspaces): These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.

6.36 Whilst it is important that a range of specialist accommodation will need to be supported over the plan period, in Coventry the need is particularly for affordable housing (housing with support).

### **Policy H8: Specialist Housing including specialist housing with elements of Care, Older Persons accommodation and hostels**

1. Proposals for specialist housing, which includes accommodation with elements of care, support for people in need and older person housing will be supported where a local need can be demonstrated. Positive weight will be given to proposals that provide private rental opportunities that are affordable for those who do not meet social care eligibility criteria.
2. Proposals will be encouraged in areas which are accessible by a choice of means of sustainable transport and which are easily accessible to the key local services listed in point 3 of policy H3 and which are appropriate to the specific needs of the residents and employees.
3. Proposals should be laid out to allow the intended residents to live with the maximum level of independence that considers the changing needs of residents and should be of a high quality and design, compatible with the character of the

surrounding area and be in line with the design requirements set out in Policy H3 where applicable.

4. Where relevant, proposals should ensure all dwellings meet M4(2) and 10% of dwellings meet M4(3) standards.

## **Residential Density**

- 6.37 The NPPF requires that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Local plan policies should make as much use as possible of previously-developed or 'brownfield' land.
- 6.38 The NPPF specifically encourages the identification of locally set density requirements that reflect local circumstances. Housing density can affect the quality of life, the environment, the economy, and the social cohesion of a place. Higher density developments are recognized to encourage the provision and use of public transport and the retention and development of social and community facilities.
- 6.39 The Residential Density Study (2024) and accompanying Background Paper seek to maximise the effective use of land in a way which takes into account Coventry's distinct local context, market delivery and best practice.
- 6.40 Coventry demonstrates the scale of built form and residential density increasing towards the city centre, and therefore the density of new residential development should reflect the patterns which have emerged through the study.
- 6.41 It is important that density policies are applied in tandem with other policies of the plan and related SPDs to ensure appropriate levels of amenity space, landscaping and other onsite infrastructure. As such the Council's policy is set in the context of net densities that seek to maintain:
  - At least 20% of gross site area to remain undeveloped on sites in excess of 2ha
  - At least 15% of gross site area to remain undeveloped on sites below 2ha;
  - At least 10% of gross site area to remain undeveloped on sites within the transition zone
  - At least 5% of gross site area to remain undeveloped on sites within the city centre
- 6.42 The undeveloped areas should focus on providing localised green spaces, landscaping and other public realm provisions as appropriate. Main roads, parking spaces and gardens have been considered essential elements of a residential property and are counted towards the developable area. The reduction of site area to reflect density will also help to support the Council's green space standards and ensure high quality built environments. Exceptions to this may exist as part of site proposals to reflect site specific circumstances.

## Policy H9: Residential Density

1. Residential development, including conversions, must make the most effective and efficient use of land.
2. Proposed development density should be informed by a site's local character and context, in alignment with other plan policies.
3. To ensure that the most effective use of land, new developments, with relevant consideration to Part 2 of this policy, should seek to deliver the following densities:
  - Greenfield sites – 35 dwellings per hectare (net).
  - Brownfield sites 45 dwellings per hectare (net).
  - Sites within the City Centre Transition Zone\* 125 dwellings per hectare (net).
  - Development within the defined City Centre boundary 250 dwellings per hectare (net).

\*City Centre Transition Zone as shown at Appendix 9(d)

\*\*City Centre boundary as shown at Appendix 9(d)

## Student Accommodation

- 6.43 The Council commissioned a Purpose Built Student Accommodation (PBSA) Study in 2024, to provide an up to date position in terms of the student market and to reflect upon the proliferation of PBSA in the city as evidenced by the Authorities Monitoring Reports. Whilst student accommodation provides an important element of residential need for the cities' two universities (Coventry and Warwick, the campus for the latter also sitting within Warwick District), in order to deliver sustainable development the situation needs to be carefully managed.
- 6.44 The study made a series of recommendations based upon its assessment of the current market. These include a zoned approach to determine where PBSA should be encouraged to be located (and where it should not be encouraged), recommendations for good quality design and adaptability especially for future potential changes of use, up to date understanding of the current market including the universities own masterplans, and ongoing monitoring.
- 6.45 The changing face of student accommodation means that it now sits within a variety of use class categories. In terms of creating living environments specifically for students within existing residential provisions this policy will only relate to schemes that will occupy more than 6 students. Where proposals relate to purpose built student accommodation or the conversion of non–

residential properties to student accommodation however the policy will apply in all cases.

- 6.46 The tenure of student accommodation will be secured through a Section 106 agreement. This reflects the fact that should the properties be occupied by other aspects of the city's population then it would be required to contribute affordable housing and potentially other Section 106 contributions. Should the tenure change to general market or affordable housing then such contributions will need to be considered through a variation of the Section 106 agreement and/or planning permission.
- 6.47 For the purposes of 'Campus' within policy H10, the areas are as per the adopted Warwick University SPD, and the University and Enterprise Area of the City Centre, or future adopted university masterplan Supplementary Planning Document.

### **Policy H10: Student Accommodation**

1. PBSA development must be located within or immediately adjacent to the University of Warwick Campus or Coventry University Campus, unless exceptional circumstances demonstrate otherwise.
2. Purpose Built Student Accommodation (PBSA), proposed outside of the areas identified in point 1, whether new build or conversions, will be delivered in line with the Council's PBSA monitor and manage approach and will only be considered appropriate where:
  - a. The PBSA monitor and manage approach demonstrates evidence of need for additional student accommodation; or
  - b. There is support from one of the City's universities that evidences a need for additional student accommodation.
3. Proposals must provide evidence to show adaptability to other uses by being designed in such a way that it can be capable of being re-configured through internal alterations to meet NDSS standards to meet general housing needs in the future.
4. Developments that comprise a predominant studio ratio will be considered in line with the most up to date available evidence.
5. Proposals should comprise predominantly cluster units of no more than 8 units per cluster.
6. Design innovation will be encouraged within the sector, particularly in high quality affordable products, in line with the design standards set out in the Residential Design Guide SPD.



7. To support the intended use of the proposals the specified tenure will be secured through a Section 106 agreement.
8. Where a change of use is proposed to part of an existing student accommodation block to another residential use, the residential use must be self-contained and segmented from the student accommodation.

## Homes in Multiple Occupation

- 6.48 The Council has a separate Homes in Multiple Occupation (HMO) Development Plan Document and applications for HMOs must be considered in accordance with this.

### Policy H11: Homes in Multiple Occupation (HMOs)

All applications for Homes in Multiple Occupation (HMOs) will be determined in accordance with the Council's Homes in Multiple Occupation Development Plan Document alongside other policies in the adopted Local Plan.

## Build to Rent

- 6.49 The NPPF glossary defines Build to Rent as 'Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control.'
- 6.50 Build to Rent is an emerging sector which has significant potential to address some of Coventry's local housing need particularly in line with the increased densification, urban-focused strategy and a need to deliver a range of housing types. The build to rent policy has been developed in recognition of the unique way that build to rent operates. Build to rent relies on income through rent over several years, rather than an upfront return on sales.
- 6.51 The Build to Rent policy along with Policy H6 provides the specific approach to the affordable housing offer for Build to Rent proposals. The approach recognises the build to rent model whilst ensuring a unified ownership and management of all the homes for the long term. Where a build to rent development meets the specific affordable housing threshold, Policy H6 states the affordable homes should be discounted private rent, managed collectively with the market units by a single build to rent landlord, as set out by national guidance. The affordable private rent homes should be fully integrated into the development with no differences between them and the market units. Eligibility

for occupying affordable private rent homes should be agreed locally between the Council and the scheme operator having regard to local household income levels and local rent levels and to criteria set out in national guidance.

- 6.52 Circumstances may arise where developers need to sell all or part of a build to rent scheme into owner occupation or to multiple landlords or, exceptionally, to convert affordable private rent units to another tenure. As a result, national guidance states Section 106 Agreements should include a mechanism to recoup (clawback) the value of the affordable housing provision that is withdrawn if affordable private rent homes are converted to another tenure or if the private market rent homes are converted to another tenure before the end of a covenant period. National guidance also includes a formula that may be used to calculate the amount of clawback payable when affordable private rent homes are withdrawn with the proceeds to be spent on the provision of alternative affordable housing.
- 6.53 Consideration should also be given to a covenant period for the retention of private market rent homes in that tenure and potential compensation mechanisms in the event that private market rent homes are sold before the expiration of an agreed covenant period.

## **Policy H12 – Build to Rent**

1. Proposals for the development of Build to Rent housing will be supported where they are in accordance with all other development plan policies and where they comply with the following criteria:
  - a. the development provides a high-quality residential environment that improves housing choice and makes a positive contribution to the achievement of mixed and sustainable communities in accordance with Policy H3;
  - b. all the dwellings are self-contained and let separately;
  - c. the build to rent housing is under unified ownership and will be subject to common management;
  - d. the development will provide professional and on-site management;
  - e. the development will offer tenancies of at least 3 years available to all tenants;
  - f. the development complies with the Nationally Described Space Standards;
  - g. The homes will be secured as part of a Section 106 agreement, which should include the process for the management and letting arrangements, covenants the build to rent homes are held under and any clawback arrangements.
  - h. The development delivers a level of affordable housing as set out in Policy H6.

## Co-Living

- 6.54 As set out in the HEDNA, the concept of co-living in its modern form of housing is relatively new, and whilst it is not specifically defined in the NPPF, it is often used as part of a wider definition relating to a type of intentional community where residents share living space and a set of interests, values and/or intentions.
- 6.55 In its current form, modern co-living in the UK tends to be urban focused and integrated into a single building, house, or apartment, a sharing of amenities, and a demographic trend towards young professionals. As a market segment, this is most well developed currently in London, in models that offer private bedrooms, shared common spaces and community events, and an all-inclusive rent. However the model is starting to expand to other cities, especially due to the decline in affordability of home ownership, the associated demand for private rental housing but also for the flexibility and choice it provides including shared live / workspace opportunities.
- 6.56 Given that this is an emerging housing sector, it is important that co-living schemes are distinguished from HMOs and that in determining that distinction this is reflective of the local context.
- 6.57 In line with the recommendations of the HEDNA and its citation of emerging models of typical co-living schemes the City Council defines Co-Living developments as shared living that comprises small private living accommodation alongside communal kitchens, living areas, outside amenity space and other amenities that is under a common management and would typically come under the sui-generis use as they are non-self-contained market housing.
- 6.58 In the absence of a clear national policy position on co-living developments the Co-living policy has been developed in recognition of the growing attractiveness of this form of housing in the emerging housing market and to ensure co-living schemes provide good quality residential accommodation; support the Council's objectives of creating sustainable and healthy neighbourhoods; and contributes to meeting the city's housing need.
- 6.59 Drawing on the policy frameworks established in the London Plan, the HEDNA provides detailed recommendations for a policy which supports high quality co-living schemes against a number of criteria. The HEDNA analysis concludes that there is a market for co-living in Coventry and while it is in its infancy, the current co-living business model and characteristics principally draw on a large base of transient younger, high skilled professional households and individuals - particularly those without dependents.

- 6.60 The Council has based the minimum private bedroom size of 25sqm for a single occupancy room on policy and guidance on co-living produced by other local authorities, namely the core cities research undertaken by SWAP Architects for Birmingham City Council 'Co-living Key Metrics' (data on UK co-living schemes located outside of London). The Council has used this research by virtue of the size and profile of many of the core cities being comparable with Coventry.
- 6.61 A two-person room should be designed for two people, including greater distinction and separation between sleeping and living areas and not just a minor enlargement of a single occupancy room.
- 6.62 Private rooms should include an ensuite, seating, desk space for home workings and sufficient storage space for clothes, luggage cases, bathroom items, laundry, general and recyclable waste and for other possessions. It should also provide a good living environment in line with the Council's New Residential Development Design Guide SPD, including good levels of natural light, outlook, privacy and ventilation.
- 6.63 The policy stresses the importance of adequately sized communal space to ensure an overall high-quality residential environment. This includes ensuring a range of indoor communal spaces are provided such as kitchens, lounges, dining rooms, workspaces and indoor recreation spaces for the exclusive use of residents without a charge and that these are sufficient so they can be used by residents at relatively high levels of demand.
- 6.64 The Council has based the average internal communal amenity space of 4.5sqm per bedspace to be provided, also on the core cities researched by SWAP Architects for Birmingham City Council 'Co-living Key Metrics' (data on UK co-living schemes located outside of London, again because the size and profile of the core cities the research was based on were considered as comparable with Coventry).
- 6.65 Internal communal space excludes laundry rooms, toilets, residents' storage, circulation space, any space that residents incur additional cost to access and use, spaces that are open to the public to use or are not for the exclusive access and use of residents, management areas, cycle storage, car parks and external communal space.
- 6.66 The policy stresses the importance of communal kitchens and sets a maximum number of 8 bedrooms per communal kitchen. This is in line with the Council's maximum number of bedspaces per cluster unit for PBSA developments, given the similarity in residential accommodation. Communal kitchens, along with other internal communal amenity space should be sufficient, in terms of location, spread, facilities and size, to meet the requirements of the intended number of residents at times of relatively high demand. Shared kitchens should have convenient access that does not require any residents to travel between

different floors and which has adequate facilities and space for residents to store food and cooking and eating utensils and to prepare meals at times of relatively high demand (typically 6pm until 8:30pm).

- 6.67 Adequate laundry and drying facilities will be provided solely for the use of residents and should not also be used by the management company and be separate from the residents' internal communal space. At least one washer and one dryer should be provided for every 10 residents along with an additional secure and naturally ventilated space for air drying clothes.
- 6.68 Co-living schemes should include adequate onsite communal outdoor amenity space in line with the Council's New Residential Development Design Guide SPD and Open Space SPD and is designed and managed in a way that fosters social interaction and encourages engagement between people.
- 6.69 Exceptions to the space standards set out in the policy will only be considered where a robust justification has been provided to the satisfaction of the Council. This could include appropriate evidence that to deliver innovative high-quality design, deal with site specific issues or respond to local character, adhering to the standards is not feasible due to physical constraints or financial viability issues. Any reduction in standards as a result must demonstrate that residential amenity will not be significantly diminished.
- 6.70 Co-living schemes will be required to contribute to the delivery of affordable housing in the form of discounted private rent as set out in Policy H6. A 25% provision will be required on schemes of 25 co-living bedspaces or more. This is based on the Housing Delivery Test ratio calculations for student living, by reason of the most comparable residential model. Shared accommodation like co-living is not an affordable housing product as it does not meet minimum housing space standards and does not provide stable long-term accommodation that meets the affordable housing need in the city.
- 6.71 A management plan should accompany any planning application showing how the whole development will be managed and maintained and how it will be positively integrated into the surrounding communities. The agreed management plan should be secured through planning condition or a Section 106 agreement and should include, but not be limited to, detailed information on:
- a. security and fire safety procedures
  - b. moving in and out arrangements
  - c. the maintenance and repair of internal and external communal areas including cycle storage
  - d. cleaning regime of communal spaces and private units
  - e. how linen changing services will operate

- f. how deliveries for servicing the development and residents' deliveries will be managed
  - g. crime prevention and anti-social behaviour measures
  - h. key responsibilities of the site staff which should include the organisation of social activities and a system communication for residents to foster a sense of community
  - i. promoting good neighbourliness
  - j. an annual monitoring and review framework to ensure the effectiveness of the management plan
- 6.72 Tenancies should be for a minimum of three months to ensure co-living developments do not effectively operate as a hostel or hotel. A maximum stay should be defined for short-term lets, for example, twelve months. However, tenancy durations should be reviewed on an on-going basis to ensure they remain appropriate.
- 6.73 Developments will be encouraged to be designed in a way that can be easily converted into self-contained policy compliant dwellings so as to provide flexibility to respond to changing needs if required.

### **Policy H13 – Co-living**

1. Co-living proposals will be supported where they are in accordance with all other development plan policies and where they comply with the following:
  - a. it is of good quality and design and adhere to a minimum bedroom size of 25sqm for a single occupancy room, inclusive of an ensuite and storage space;
  - b. it is well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency;
  - c. it is under single management;
  - d. The facility has a concierge or other adequate safety and security onsite personnel;
  - e. its units are all for rent with minimum tenancy length of no less than three months;
  - f. The average internal communal amenity space is at least 4.5sqm per bedspace;
  - g. communal facilities and services are provided that are sufficient, in terms of location, spread, facilities and size, to meet the requirements of the intended number of residents at times of relatively high demand and offer at least:

- h.** Direct access to a communal kitchen that does not require any residents to travel between different floors and which has adequate facilities for a maximum of 8 bedrooms and adequate space for residents to store food and cooking and eating utensils and to prepare meals at times of relatively high demand.
  - i.** outside communal amenity space (roof terrace and/or garden);
  - ii.** internal communal amenity space (dining rooms, lounges, workspace); and
  - iii.** laundry and drying facilities.
- i.** the private units provide adequate functional living space and layout, and are not self-contained homes or capable of being used as self-contained homes;
- j.** a management plan is provided with the application;
- k.** it delivers a level of affordable housing (discounted private rent) as set out in Policy H6.

# 7. Retail and Centres

## Key Evidence

Retail and Centres Study Stage 1 April 2023

Retail and Centres Study Stage 2 February 2024

Retail Background Paper 2024

## Overview

- 7.1 The role and function of town centres nationally is changing as people shop and undertake leisure activities in different ways than they have done in the past. As such, town centres need to diversify, making wider provisions to support their community, whilst ensuring they are attractive, diverse and accessible to those wanting to use them. Successful centres are of vital importance to local communities across the city as they play an important part in supporting economic growth, encouraging investment, urban regeneration and job creation.
- 7.2 Retail and centres in Coventry, along with the rest of the UK are facing many challenges. Online shopping trends, the pandemic, economic uncertainty and the cost of living have all had an impact. The commercial sector, which includes restaurants, cafes and recreational, cultural and other uses has also experienced major changes and challenges in recent years but with leisure spend expected to increase in real terms in the future, such uses will continue to be an important component of a town centre's offer.
- 7.3 The NPPF states that planning policies and decisions should support the role that town centres play at the heart of local communities. Planning policies should define a network and hierarchy of town centres and the extent of the town centre boundaries should be defined.
- 7.4 The NPPF determines what uses are important to the vitality and viability of town centres. It defines 'Main Town Centre Uses' as follows: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).
- 7.5 In order to protect the vitality and viability of Town Centres, should any of these uses be proposed outside of a town centre boundary, a 'sequential test' will be applied to planning applications looking first at whether these could be accommodated in a centre, then edge of centre, with out of centre sites only being suitable for consideration as a last resort.



- 7.6 With this in mind this plan will support new town-centre developments across Coventry building upon the NPPF's centres-first approach and establishing the city centre as the primary focus for appropriate investment. It sets out Coventry's hierarchy of centres, as well as identifying a range of proposals which will support and enhance the respective roles of these centres. Proposals will also be encouraged which diversify the range of uses in designated centres without compromising the shopping function, particularly those uses which make the town centre more attractive to residents, employers, shoppers and visitors.
- 7.7 Across the city there are also a range of out of centre retail parks. It is recognised that whilst these areas currently complement the city's retail offer, any proposals for the future expansion, intensification or changes of use at these locations should be carefully assessed to ensure that they do not have a detrimental impact on designated centres and any existing, committed or planned town centre investment.
- 7.8 The city also contains a network of local centres and local shops serving the daily needs of local communities. These facilities are within easy walking distance of many people thus reducing the need to travel and contribute towards sustainable communities.
- 7.9 To support the review of the Local Plan a Retail and Centres Study was commissioned to inform Local Plan Policy. It assesses whether there is any need to allocate sites for retail and the capacity for these (to ensure they serve an appropriate level of need without undermining other centres), sets out a recommended centres hierarchy, and advises on the application of the sequential and impact tests.

## **Retail Growth**

- 7.10 Centres now serve a much wider range of needs than retail. However, retail is still an important aspect of centres and assessment has been undertaken to consider whether any further growth in this sector needs to be specifically planned for. The new Strategic Urban Extensions at Eastern Green need to provide retail space for the day to day needs of these growing communities and as such this need has been defined.

### **Policy R1: Delivering Retail Growth**

1. The following sites/areas are allocated to support the provision of retail floor space across Coventry. These schemes are to be delivered in accordance with the specifications in this policy and other policies within this plan.

Site	Proposed floor space (sq.m gross)	Details
New Eastern Green District Centre	Up to 10,000	To include a range of retail and leisure uses
New Eastern Green Local Centre	Up to 1000sqm	<p>1 To include a range of small scale units providing a range of local community uses and top up provisions.</p> <p>2 The comprehensive redevelopment of the Riley Square element of Bell Green District Centre will be supported in accordance with an overarching Masterplan for the area.</p> <p>3 Further retail, leisure and other town centre uses at Arena Park and Brandon Road Major District Centres will not be supported during the plan period unless it is demonstrated that it will not have a significant adverse impact on the city centre or is an essential element of supporting the wider tourism functions.</p>
New Keresley Local Centre (South)	Up to 1,500	Local centre to include a range of small scale units providing a range of local community uses and top up provisions.

## Centres Hierarchy

- 7.11 The Centres Hierarchy is defined in Policy R3. Maps can be seen at Appendix 9e. At the top of the Hierarchy is Coventry City Centre. Policy R2 sets out the development strategy for the centre: it is the main shopping and town centre

use destination and it needs to remain competitive, not just in the wider region but also locally.

- 7.12 Coventry City Centre is generally a vital and viable centre, serving shoppers from across the City and beyond, particularly for comparison (eg clothes, shoes, household goods) shopping. However, it is demonstrating clear signs of weakness, including a declining comparison offer and high and increasing vacancy rates.
- 7.13 The centre however does have a strong leisure service-orientated function, including a reasonably strong food and beverage offer. This provides a good basis for a diversified city centre offer which, together with the delivery of planned new developments and improvements, will help to ensure the City Centre's continued health and role at the top of the City's retail hierarchy.

## **Policy R2: Coventry City Centre – Development Strategy**

- 1.** The city centre will continue to be developed and regenerated to ensure it is a truly world class city centre, leading in design, sustainability and culture. This will be achieved by:
  - a.** Enhancement of its position as a focus for the entire sub-region and as a national and international destination to live, work and play;
  - b.** Enhancement of its retail and leisure offer to strengthen the city's sub-regional role;
  - c.** Provision of high quality office space;
  - d.** Becoming a hub for education;
  - e.** Including a variety of places to live which cater for different needs;
  - f.** Preserving or enhancing the character and setting of the historic built landscape and the archaeological environment;
  - g.** A connected public realm including public squares and green spaces, easily accessible through the creation of desirable and legible pedestrian routes;
  - h.** Accessible for all;
  - i.** Providing an attractive and safe environment for pedestrians, cyclists and motorists;
  - j.** Provide a high-quality public transport system that benefits from seamless integration and is well connected to existing and new infrastructure;
  - k.** High quality sustainable built design;
  - l.** Continuing to develop a vibrant and attractive night time economy;
  - m.** Providing opportunities to improve health and wellbeing;

- n. Continuing to support greater integration of the university within the wider city centre in accordance with the City Centre policies of this plan;
- o. Recognising and preserving key views to the iconic three spires of St Michaels, Holy Trinity and Christchurch;
- p. Supporting the reintroduction of green and blue infrastructure throughout the city centre, including opportunities for de-culverting wherever possible.

7.13 To ensure that the vitality and viability of town centres is protected and enhanced it is important that a hierarchy of centres is established, in line with the NPPF. As set out previously Coventry City Centre sits at the top of this hierarchy. In line with the recommendations of the Retail and Centres Study 2024 the following hierarchy is established.

## **STRATEGIC POLICY**

### **Policy R3: The Network of Centres**

1. To support the city centre, the Council will designate, enhance, maintain and protect a network of Centres consisting of Major District Centres, District Centres and Local Centres. These Centres will be the preferred locations for new shops, and other Main Town Centre and community facility uses which do not serve a city-wide catchment.

- a. A residential element will be promoted and encouraged, subject to the creation of a satisfactory residential environment and so long as it does not undermine the functionality of the centre;
- b. Improvement to the environment and accessibility will be promoted and encouraged.

2 Centre boundaries and Primary Shopping Areas (PSA) for the following Major District Centres are shown on the Policies Map at:

- a. Arena Park;
- b. Cannon Park;
- c. Brandon Road.

They will complement but not compete with the city centre and will contain a scale of development which is demonstrated to not impact negatively on the city centre and supports the needs of their part of the city.

3. Centre boundaries and Primary Shopping Areas for the following District Centres are shown on the Policies Map at:

- a. Ball Hill;
- b. Bell Green;

- c. Brade Drive;
- d. Daventry Road;
- e. Earlsdon;
- f. Eastern Green\*
- g. Foleshill;
- h. Jardine Crescent;
- i. Jubilee Crescent.

They will contain a scale of development which is demonstrated to not impact negatively on higher order centres and supports the needs of their district of the city for bulk convenience shopping as well as an element of comparison shopping, service and catering uses. Social, community, leisure and small scale office uses will also be acceptable.

4 Centre boundaries for the following Local Centres are shown on the Policies Map at:

- a. Acorn Street;
- b. Ansty Road;
- c. Baginton Road;
- d. Bannerbrook;
- e. Barkers Butts Lane;
- f. Binley Road;
- g. Birmingham Road;
- h. Broad Park Road;
- i. Charter Avenue;
- j. Eastern Green\*
- k. Far Gosford Street;
- l. Green Lane;
- m. Hillfields;
- n. Holbrook Lane;
- o. Holyhead Road;
- p. Keresley Road;
- q. Keresley South;\*

- r. Longford;
- s. Quorn Way;
- t. Radford Road;
- u. Station Avenue;
- v. Walsgrave Road;
- w. Willenhall;
- x. Winsford Avenue.

They will contain an appropriate scale of development which is demonstrated to not impact negatively on higher order centres and supports their immediate locality for day-to-day convenience shopping and also some service and restaurant uses; and social, community and leisure uses. Small scale office uses will also be acceptable.

\*Eastern Green District and Local Centres and Keresley South Local Centre are identified as broad locations due to the sites not yet being built out.

- 7.14 In line with the NPPF and to ensure that the vitality and viability of the centres hierarchy is not undermined it is important to establish an approach for the consideration of Main Town Centre uses where these are proposed outside of a centre.

## STRATEGIC POLICY

### Policy R4: Out of Centre Proposals

1. Proposals for retail and other Main Town Centre uses (including proposals for the expansion or re-configuration of existing uses and the variation of existing conditions) will not be permitted in out-of-centre locations unless they satisfy the Sequential Assessment and the Impact Test (where appropriate).
2. Sequential Assessment
  - a. A Sequential Assessment will be required for all Main Town Centre use proposals or any other use within use class E and F (or subsequent equivalent of these use classes), outside a defined centre and should be prepared in accordance with national guidance. This should have regard to the centres hierarchy set out in policy R3.
  - b. Where in-centre options are exhausted, the sequential assessment will be applied to edge of centre locations as follows:
    - Where there is a defined Primary Shopping Area within a centre, retail proposals which are within 300m of a defined Primary Shopping Area boundary as follows:
      - i. Arena Park;

- ii. Cannon Park;
- iii. Brandon Road.
- iv. Ball Hill;
- v. Bell Green;
- vi. Brade Drive;
- vii. Daventry Road;
- viii. Earlsdon;
- ix. Foleshill;
- x. Jardine Crescent;
- xi. Jubilee Crescent.

- Other Main Town Centre use proposals within 300m of a defined centre boundary
- c. Retail proposals close to centres which do not have a defined PSA.

### 3. Impact Test

- a. An Impact Test will be required for all retail and other Main Town Centre use proposals outside a defined centre that exceed:
  - 1,000 sqm gross for schemes expected to impact on, or have the potential to impact on Coventry City Centre;
  - 500 sqm gross for schemes expected to impact on, or have the potential to impact on the Major District Centres; and
  - 250 sqm gross for schemes expected to impact on, or have the potential to impact on the District Centres.

The Assessment of Impact should be prepared in accordance with national guidance and consider the potential impact on the vitality, viability, role and character of a defined centre(s) within the centres hierarchy (as set out in policy R3).

Centres to be considered when undertaking sequential assessments and impact tests will be considered on a case-by-case basis.

## **Retail Frontages and Ground Floor Units in defined centres**

- 7.15 Designated centres have been identified on the basis of their function and role within local communities, with a primary purpose of making retail and shopping provisions available to their local community in a sustainable and accessible way. The role and offer of centres is changing though and the need for flexibility is becoming increasingly important. This is particularly true within Coventry where vacancy rates are relatively high. Therefore, with the exception of the

city centre, there are no plans to designate primary or secondary retail frontages.

- 7.16 When considering uses within the centres hierarchy this is generally focused towards the ground floor of units. As such, the ground floor element of these units is of primary importance as they offer the 'shop windows' for the centre.
- 7.17 By considering the issues identified in Policy R5, such proposals will be assessed in the context of ensuring and maintaining a viable and vibrant centre with lively street frontages.
- 7.18 By way of prominence and size of the unit, consideration will need to be given to the character of the centre and how the unit in question compares to other units within the centre. For example, Coventry's defined centres are characterised by a concentration of smaller units supplemented by a small number of larger units that are more prominent in terms of size and frontage within the centre. They are also often 'anchor' type units within the centres and provide a principle focus and attraction. The change of use of such a unit is likely to have a greater impact in terms of prominence and frontage than the change of use of a smaller unit. Furthermore, consideration will also need to be given to the layout of the centre. This will need to have regard to whether the centre is a single grouping of units in a continuous row or if it is segregated by roads or open space etc. Where a centre is focused around more than one grouping of units, it should normally be the single grouping that is considered when examining the prominence of the unit. Where it is a single grouping the whole centre should be assessed. Further detail can be found in the Design Guidance for Shopfronts SPD.
- 7.19 It may also be important to consider the highway implications of non-retail proposals, especially if such proposals involve larger social or community provisions which may require significant car parking or concentration of activity at certain periods.

### **Policy R5: Retail Frontages and Ground Floor Units in defined centres**

1. Proposals to use ground floor units within defined centres for non-A E class uses will normally be permitted provided that:
  - a. the primary function of the centre would not be undermined in the context of Policy R3;
  - b. the use would make a positive contribution to the overall role, vitality and viability of the centre;
  - c. the use is compatible with other Plan policies.



2. Proposals should seek to actively enhance the frontage of a unit within a defined centre in accordance with the Design Guidance for Shopfronts SPD

## **Restaurants, Bars and Hot Food Takeaways**

- 7.20 The creation of food and drink uses have become increasingly flexible in recent years following changes in permitted development rights and reflects the change and diversification of modern town centres.
- 7.21 The Council has pledged to improve its population's health and wellbeing and to reduce health inequalities. One of the challenges the Council faces in promoting healthy eating is the availability of foods high in fat, salt and sugar in local neighbourhoods, including the prevalence of hot food takeaways in some areas.
- 7.22 Such uses do, however, have the potential to cause significant problems with impact upon residential amenity, highways and parking. Hot food takeaways often attract considerable customer numbers and are regularly associated with issues such as litter, waste disposal, noise, odour, traffic and health. For a combination of these reasons, they will normally only be supported within defined centres where residential amenity is less likely to be an issue and will be resisted elsewhere. Where homes are situated above such premises, specific care will need to be given to odour extraction, noise insulation and general public convenience. Where appropriate provisions cannot be included then such uses will not be supported, even within designated centres.

### **Policy R6 Restaurants, Bars and Hot Food Takeaways**

1. Outlets should be located within defined centres and will normally be discouraged outside those locations.
2. Proposals within defined centres will be permitted provided they:
  - a. would not result in significant harm to the amenity of nearby residents or highway safety;
  - b. would not result in harmful cumulative impacts due to the existence of any existing or consented proposed outlet;
  - c. are in accordance with the emerging Adopted Hot Food Takeaway Supplementary Planning Document and any subsequent replacement
  - d. are compatible with other Plan Policies.

## 8. Communities

### Key evidence

The One Coventry Plan

Playing Pitch and Outdoor Sports Strategy (August 2023)

Indoor Sports Facilities Strategy (2024)

University masterplans

Infrastructure delivery plan

Communities Background Paper

### Context

- 8.1 This chapter considers social, community and leisure facilities that are not defined as Main Town Centre uses by the NPPF. These include provisions for sporting uses, including swimming pools, leisure centres and sporting venues, health centres and hospitals, educational establishments including nurseries and universities, meeting places, libraries and places of worship.
- 8.2 The policies in this chapter set out the approach to safeguarding and improving social, community and leisure premises and providing support for the development of new facilities where there are identified gaps in provision. The policies will support and facilitate the implementation of existing and future strategies for the provision and improvement of social community and leisure premises across Coventry.
- 8.3 The NPPF also promotes the creation of healthy communities and vibrant and viable town centres both of which help support local communities and provide a focal point for services over and above retailing facilities. The NPPF recognises that these two objectives can complement one another by providing for social, community and leisure uses within designated centres. The provision of such facilities can make significant contributions to the diversification of designated centres, helping to promote sustainable development and sustainable travel through the creation of linked trips and mixed use developments.
- 8.4 The Council will encourage applications that promote the re-use of existing facilities which support and enhance existing local communities, with a view to protecting those particular features of the neighbourhood valued by its residents.
- 8.5 It is also recognised that local shopping parades and public houses can play an important role in local communities. Shopping parades sit outside of the 'centres hierarchy' because of their small very localised scale. Public houses are classed by the NPPF as 'main town centre uses'. Yet both shopping

parades and public houses can, in some circumstances perform a broader function in serving a local community and, this needs to be recognised and planning judgement exercised on a case by case basis depending upon local context.

## **New or improved social and community premises**

- 8.6 In providing social, community and leisure services the NPPF requires local authorities to plan positively for the provision and use of shared spaces, community facilities (such as meeting and sports venues, cultural buildings and places of worship) and other local services to enhance the sustainability of communities and residential environments. In doing so Local Plans should guard against the unnecessary loss of valued facilities and services, allow established facilities to develop and modernise in a sustainable way and ensure that the location of housing, economic uses and community facilities and services are considered and promoted in an integrated way.
- 8.7 New cultural and community premises (as outlined below) will therefore be considered in accordance with the sequential approach set out in policy CO1. This is with a view to locating facilities in defined centres, making them easily accessible by foot, bicycle or public transport and fully accessible by all sections of the community and facilitating more integrated communities. They should be provided in buildings and facilities which are flexible and adaptable to communities' needs and sited to maximise the shared use of premises to facilitate their longevity.

## **Local Health Provisions**

- 8.8 As the city's population continues to grow and the needs of the population change in terms of an ageing population, the Council will continue to work with the Integrated Care Board and The University Hospital Coventry and Warwickshire NHS Trust. Although the city's population will remain one of the youngest across the sub-region it is still expected to age, and as such it will be important to ensure new facilities are easily accessible to those who need them.

## **Cultural and Community Buildings**

- 8.9 Such facilities include sporting uses, including swimming pools, leisure centres and sporting venues, meeting places, libraries and places of worship.
- 8.10 The Council will seek to bring forward the recommendations of its Sports Strategy and its supporting documents to inspire more people to take up and regularly take part in sport; provide a range of high quality sporting opportunities; and to provide a range of modern, accessible and high quality sports facilities. The Council is also committed to maintaining a library provision

across the city as well managing an appropriate level of other community halls and buildings.

- 8.11 The provision of places of worship will need to be carefully considered having regard to the needs of local communities and faiths.

## **Universities, Schools and Educational Facilities**

- 8.12 Coventry's education offer is varied and successful, with a range of improving primary and secondary schools, supported by strong colleges and two of the countries most respected universities. In addition to a number of private institutions the city offers a range of State-funded schools including local authority maintained schools (community, foundation and voluntary aided and controlled schools).
- 8.13 In order to support sustainable development the Council recognises the importance of maintaining an adequate and appropriate supply of education provision. Opportunities should be taken to ensure schools are located in sustainable locations that complement neighbouring uses. They should be within easy access of local communities as well as offering opportunities to generate linked trips by being located close to other social and community provisions and local retail and service offers as well as being easily accessible by a range of transport options.
- 8.14 Where possible schools and their grounds should be utilised for other community provisions such as social, cultural, leisure and indoor sports facilities. This will help to develop a schools position at the centre of the community with significant benefits to local residents. It can also help ensure the effective use of resources and help minimise travel distances for users.
- 8.15 The Council will continue to work with both universities to enable on-going development of their masterplans. This collaborative working will help to facilitate future development proposals and ensure they are in harmony with the overall aims of regeneration, education and investment in Coventry and the sub-region.
- 8.16 To support compatibility with nearby uses community premises should be appropriate to their surroundings in terms of scale, character and mix of uses, and should not harm residential amenity, the environment, or result in adverse transport impacts in line with other relevant policies. Some facilities within residential neighbourhoods can have an impact on residential amenity which may need to be carefully managed. For example, the hours of operation will need to be balanced against the needs of service providers and users of the premises against impacts on neighbouring residents. Planning conditions will be used, as appropriate, to mitigate potential adverse amenity impacts.

- 8.17 Proposals should promote active frontages and encourage linked trips and shared services wherever possible. They should satisfy the above sequential approach in order to ensure that centres remain as the focus for not only retailing but also community uses, which ensures that the centre has a diverse mix of uses and addresses where appropriate any unmet local need. It will also be important to locate these provisions in the most sustainable places relevant to the proposed use to generate linked trips and promote sustainable communities.
- 8.18 It is recognised that there may be occasions where a proposal is not suitable for an in-centre use. This may be due to a number of factors including space requirements, neighbouring uses or local amenity. The Council will require evidence and justification for the reasons why centres have been discounted and why similar uses such as educational facilities, for example, cannot be located in the same locations.

### **Policy CO1: New or improved social, community and leisure premises**

1. Proposals for social, community and leisure facilities will be considered through the following sequential approach:
  - a. Designated centres to support the centres hierarchy;
  - b. Where no suitable sites are available in a designated centre, an edge-of-centre location;
  - c. Where no edge of centre sites are available, a site adjacent to other associated facilities including existing schools and educational facilities;
  - d. Only where no suitable site can be identified having regard to points 1-3, will stand alone sites be supported, subject to:
    - i. the proposal addressing an unmet need within a local community;
    - ii. there being no significant adverse impact upon the role of a defined Centre;
    - iii. there being no material impact on neighbouring amenity.
2. Proposals will be considered on the basis of:
  - a. The appropriateness of their proposed location in relation to their scale and intended catchment;
  - b. Compatibility with nearby uses;
  - c. Accessibility by a choice of means of transport;
  - d. Compatibility with other Plan Policies.

3. Where proposals are in accordance with the approved Masterplans for Coventry University or the University of Warwick they will normally be approved subject to high quality design proposals.

## **Re-use or Redevelopment of Facilities**

- 8.19 There may be circumstances where an existing facility ceases to operate and a site becomes vacant. Under such circumstances the first consideration will be whether there is still a local need for services currently or last provided on that site.
- 8.20 In order to demonstrate that there is no further need or demand for a building to support social, community or leisure use, applicants should undertake the following measures as a minimum:
- Where appropriate, seek confirmation in writing from the relevant agency that the proposed loss of premises is consistent with the agreed strategy for delivery of that service in the local community and city as a whole;
  - In accordance with Appendix 2 of the Local Plan, market the land or premises for D1 or D2 use continuously for a period of at least three months;
  - Close to the beginning of the marketing period, notify the Council of the proposed vacancy, so that community organisations, arts, sports and cultural groups seeking premises can be made aware of it.
- 8.21 Proposals involving the loss of land in use, or previously in use, by an education facility will only be supported, if it is clearly demonstrated to be surplus to educational requirements and its development for other uses would contribute to improvements in the delivery of school places in the city.
- 8.22 Where replacement facilities are intended, they should be located in accessible locations. The quality of new provision should be equivalent to or exceed what is being replaced.
- 8.23 Where premises have been registered with the Council as Assets of Community Value under the Localism Act 2011, this will be a material consideration in the determination of applications for change of use to non-community related use.

## **Policy CO2: Re-Use of or Redevelopment of Facilities**

1. Proposals for the re-use or redevelopment of community premises for a use outside the scope of this policy will not be supported if:
- a. There is an outstanding local need which could reasonably be met at that location;
  - b. The site remains viable for existing uses or could be made viable through appropriate diversification of use; and

- c. the proposal is not compatible with nearby uses.
- 2. In all cases consideration should be given to the suitability of the location for such facilities having regard to other Policies in this plan and its supporting documents
- 3. Where replacement facilities are intended, they should:
  - a. continue to serve the community;
  - b. be of appropriate scale and character;
  - c. be of high quality design.

## Neighbourhood and Community Planning

8.24 The Localism Act and NPPF provide the framework for Town or Parish Councils and defined neighbourhoods across Coventry to engage in community and neighbourhood planning. This can include a host of activity including Neighbourhood Plans, Parish Plans or other forms of design guidance etc. Where local neighbourhoods wish to engage in the development of local planning policy the Council will help support this process and work with communities to achieve their planning aims, where these are in conformity with the NPPF and the strategic policies of this Plan. Once adopted, a Neighbourhood Plan will form part of the statutory development plan and must be taken in to account in making planning decisions in that locality. Once proposed they will also be referred to within the Council's Local Development Scheme.

### Policy CO3: Neighbourhood and Community Planning

1. Where appropriate the Council will support communities in the preparation of:
  - a. Parish Plans;
  - b. Parish Design Statements, and;
  - c. Neighbourhood Plans.
2. When preparing these plans they must remain in accordance with national legislation, this Local Plan and any other city wide planning documents which support it.
3. Where appropriate the Council will support the application and designation of land or buildings as Assets of Community Value.
4. The Council will not support applications for Neighbourhood, Parish Plans or Assets of Community Value where they conflict with this Local Plan or supporting documentation.

## 9. Green Belt and Green Environment

### Key evidence

Coventry and Warwickshire Joint Green Belt Review (2015)

Coventry Green Belt Technical Update (2024)

Strategic Green Infrastructure Study (Coventry, Solihull & Warwickshire) (updated 2024)

Coventry Green Space Strategy (2010)

Coventry Urban Fringe Landscape Assessment & Guidance March 2007

Agricultural Land Classification (2024)

Green Environment Background Paper

### Green Belt

9.1 Green Belt policy is set out in the NPPF. Green Belt serves five purposes:

- a. to check the unrestricted sprawl of large built-up areas;
- b. to prevent neighbouring towns merging into one another;
- c. to assist in safeguarding the countryside from encroachment;
- d. to preserve the setting and special character of historic towns; and
- e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

9.2 National policy sets out stringent criteria for the assessment of proposals for development in the Green Belt to avoid inappropriate development causing harm to the five purposes set out above, not allowing development unless 'very special circumstances' can be demonstrated.

### STRATEGIC POLICY

#### Policy GB1: Green Belt

1. The city's Green Belt boundaries are identified on the Policies Map.
2. Inappropriate development will not be permitted in the Coventry Green Belt unless very special circumstances exist. Development proposals, including those involving previously developed land and buildings, in the Green Belt will be assessed in relation to the relevant national planning policy.



## Safeguarded Land in the Green Belt

- 9.3 The NPPF sets the approach to defining the Green Belt boundaries. Its purpose is to help ensure that the Green Belt (as defined in this Plan) endures beyond the Plan period and that defensible boundaries are maintained.
- 9.4 Through the 2017 Local Plan the Council put a mechanism in place that responded to potential longer term development options in Warwick District meaning its own Plan remained flexible and was able to respond to emerging circumstances in neighbouring areas.
- 9.5 Land along the southern boundary of Coventry was therefore designated as safeguarded land for consideration as part of the 'next Local Plan review', i.e. the review now taking place. This safeguarding would have explicit regard to development proposals within Warwick District, that if brought forward for development over the course of this Plan period would create Green Belt policy 'islands' which would not meet the five test of Green Belt set out in in the NPPF.
- 9.6 In this context, these sites were safeguarded as their long term designation as 'Green Belt' is dependent upon the development of adjoining land in a neighbouring local authority. The sites themselves are largely utilised for a small number of low density homes, education provisions or are undevelopable due to the presence of ancient woodlands.
- 9.7 The 2017 Coventry Local Plan stated that should such development proposals not materialise within Warwick District these sites would be considered for a formal return to the Green Belt due to the issues raised above.
- 9.8 At the time of writing, proposals are being considered for this neighbouring area through the emerging South Warwickshire Local Plan (SWLP), which is being produced jointly by Warwick and Stratford on Avon District Councils. As the SWLP has not yet reached an advanced stage the land will need to remain safeguarded for the reasons set out in the preceding paragraphs, and its future designation will need to be considered through a future Local Plan update.

### STRATEGIC POLICY

#### Policy GB2: Safeguarded Land in the Green Belt

1. The areas of Safeguarded Land proposed partly or wholly comprise the following sites and are shown on the Policies Map.
  - a. Land south of Westwood Heath Road;
  - b. Land south of Bishop Ullathorne School;
  - c. Playing Field south of Finham Park School; and

**d. Land west of Finham Primary School.**

Any development of these sites will be subject to consideration through a full or partial review of this Local Plan having explicit regard to development proposals in Warwick District and progress on the South Warwickshire Development Plan.

## **Local Green Space**

9.9 The designation of land as Local Green Space is to protect green areas of particular importance to local communities. Local Green Spaces were formally designated through the 2017 Local Plan and are shown on the Policies Map. The NPPF states that Policies for managing development within a Local Green Space should be consistent with those for Green Belts. Green Belt policy is nationally set through the NPPF and will therefore be applied accordingly to Local Green Space designations.

## **STRATEGIC POLICY**

### **Policy GB3: Local Green Space**

1. The city's Local Green Space boundaries are identified on the Policies Map.
2. Inappropriate development will not be permitted unless very special circumstances exist. Development proposals, including those involving previously developed land and buildings, will be assessed in relation to the relevant national planning policy.

## **Green and Blue Environment**

9.10 For the purposes of this plan, the term 'Green Infrastructure' also includes what is sometimes called 'blue infrastructure', that is, various water bodies such as canals and rivers for example. A sustainable growth strategy relies on protecting and improving the quality of the environment. Future development must be located to maximise the efficient use of land, well integrated with existing development, and well related to public transport and other existing and planned Green Infrastructure, so promoting sustainable development.

9.11 Natural England's [Green Infrastructure Framework](#) describes Green Infrastructure as generating multiple benefits for people and nature and creates greener, healthier places to live that supports a more productive economy. A Green Infrastructure network can include street trees, green roofs/walls, parks, private gardens, allotments, sustainable drainage systems, through to wildlife areas, woodlands, wetlands and natural flood management functioning at local and landscape scale. Linear Green Infrastructure includes roadside verges, green bridges, field margins, rights of way, access routes, and canals and rivers.

- 9.12 Improvements can be delivered as part of new development via the planning system, upgrading of existing, and delivering new Green Infrastructure in areas where provision is poor. In the Coventry context, enhancing and increasing green infrastructure is particularly important as some areas are particularly deficient.
- 9.13 High quality and well-connected green infrastructure has the potential to make Coventry a much more attractive and prosperous city, and a healthier place to live, work and enjoy, with multiple benefits for the economy, the environment and people. Local networks of high quality and well managed open spaces help to create urban environments that are attractive, clean and safe, and can play a major part in improving people’s sense of wellbeing. In order to underpin the overall quality of life in all areas and support wider social and economic objectives, the development and maintenance, to a high standard, of a well-connected and multi-functional green infrastructure network, is essential.
- 9.14 Green infrastructure will also have an important role to play in helping the city adapt to climate change. This will include moderating urban temperatures, storing excess rainfall, increasing surface porosity to ease drainage, providing shade via tree canopies, and providing green oases in urban areas.
- 9.15 Green Infrastructure provision is currently informed by the City Council’s [Green Space Strategy](#), and the [Open Space SPD](#) and at a sub regional scale by the Coventry, Solihull and Warwickshire Strategic Green Infrastructure Study.
- 9.16 In 2021, the Environment Act came into force requiring the development and implementation of Local Nature Recovery Strategies (LNRS), with the LNRS regulations following in April 2023. The boundary for the emerging [West Midlands LNRS](#) includes Coventry, Birmingham and the Black Country and this work is being led by the West Midlands Combined Authority (WMCA).
- 9.17 At the time of writing work is ongoing to prepare a Green and Blue Infrastructure Strategy and Action Plan for Coventry, in line with Natural England’s [Green Infrastructure Framework](#) and this is at an early stage of preparation. Once adopted by the Council the new strategy, along with the aforementioned LNRS will become a material consideration in the decision-making process.

## STRATEGIC POLICY

### Policy GE1 Green and Blue Infrastructure

1. The Council will protect and enhance green and blue infrastructure based on an analysis of existing assets, informed by, and contributing to the delivery of the Local Nature Recovery Strategy and the Green and Blue Infrastructure Strategy and Action Plan or its future equivalent.

2. New development proposals should make provision for green and blue 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, demonstrating how this links to the wider delivery of the Local Nature Recovery Strategy and the Green and Blue Infrastructure Strategy and Action Plan.
3. Coventry's existing and planned network of green infrastructure should be used as a way of adapting to climate change through the management and enhancement of existing and new habitats. The creation of new habitats will be supported wherever possible to assist with species movement, to provide a source of locally grown food through allotments and community gardens, to provide sustainable and active travel routes for people, to provide shade and counteract the urban heat island effect, and to assist in improving public health and wellbeing.
4. New development will be expected to maintain the quantity, quality and multifunctionality of existing green and blue infrastructure. Where quantity is not retained, enhancement to quality is expected. Where the opportunity arises, and in line with the city's most up-to-date Green and Blue Infrastructure Strategy and Action Plan, the Council will also expect new developments to enhance green and blue infrastructure, and create and improve linkages between individual areas. Any development which is likely to adversely affect the integrity of a green corridor will be required to be expressly justified and where appropriate, mitigation measures put in place.
5. A key element of Coventry's approach to green and blue infrastructure will be the continued development of a network of green spaces, water bodies, paths and cycle ways, with priority given to those parts of the city where there is an identified deficiency of green space. Where a development proposal lies adjacent to a river corridor or tributary, a natural sinuous river channel should be retained or, where possible, reinstated. Culverts should be removed unless it can be demonstrated that it is impractical to do so.
6. Development must respect the importance of conservation, improvement and management of green infrastructure in order to complement and balance the built environment. A strategic network of green and blue infrastructure already exists in the city, connecting natural heritage, green space, biodiversity, historic landscapes water bodies and other environmental assets, together with links to adjacent districts in Warwickshire and Solihull. This strategic network will be safeguarded and enhanced by:
  - a. Not permitting development that compromises its integrity and that of the overall green and blue infrastructure framework (including the Coventry/Oxford Canal);

- b. Using developer contributions to facilitate improvements to its quality, connectivity, multifunctionality and robustness;
- c. Investing in enhancement and restoration where opportunities exist, and the creation of new resources where possible, such as linking green and blue infrastructure to other forms of infrastructure;
- d. Improving its functionality, quality, connectivity and accessibility;
- e. Ensuring that a key aim of green and blue infrastructure is the maintenance and improvement and expansion of biodiversity;
- f. Integrating proposals to improve green and blue infrastructure in the delivery of new developments, particularly through area based regeneration initiatives and major proposals and schemes;
- g. Flood risk management and improving surface water quality, with preference being given to nature-based solutions where possible.

## Green Space

- 9.18 In order to address health inequalities and to promote healthier lifestyles, people need to have good access to a range of parks, open spaces, indoor and outdoor sports and recreational facilities. These spaces also add to the quality of the environment. This includes formal sports provision such as playing fields and play areas, as well as more informal areas of open space suitable for general relaxation, children’s play, walking and cycling.
- 9.19 The Council has adopted a Green Space Strategy, which sets out minimum local standards for green space provision. It sets out the provision standards for the various categories of open space looking at quantity, quality and accessibility. There is also a set of quality standards for each of the provision standard categories. The same green space can sometimes contribute to more than one category in the standards. This will ultimately be superseded by the emerging Green and Blue Infrastructure Strategy and Action Plan for Coventry.

### Policy GE2: Green Space

1. Development involving the loss of green space that is of value for amenity, recreational and/or community use will not be permitted unless specifically identified as part of a strategic land use allocation, or it can be demonstrated that:
  - a. An assessment showing there is no longer a demand, or prospect of demand, for the recreational use of the site or any other green space use; or
  - b. A deficiency would not be created through its loss, measured against the most up-to-date Coventry Green Space standards; or

- c. The loss resulting from any proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location of the city.
2. The loss of sports provision will be considered in line with the approach set out in the NPPF and the Councils most up to date evidence including the Playing Pitch and Outdoor Sports Strategy.
3. To support the proposed allocations at H2:19 and JE2:4 the following sites are allocated for the provision of new sports pitches:
  - a. Land at Charter Avenue (former Alderman Harris School site).
  - b. Land east of Coundon Wedge Road.
4. Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.

## **Biodiversity, geology and landscape**

- 9.20 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.
- 9.21 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 development 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.
- 9.22 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 and blue 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.

- 9.23 As set out in the text supporting Policy GE1, work is being undertaken to prepare a Local Nature Recovery Strategy, and more locally a Green and Blue Infrastructure strategy is to be prepared for Coventry.
- 9.24 [Biodiversity Net Gain](#) (BNG) became mandatory from 12<sup>th</sup> February 2024. The aim is that when developments are proposed, proposals ensure that habitats for wildlife are left in a measurably better state than they were before the development. Legislation requires that developers must deliver a BNG of 10%.
- 9.25 Through site selection and layout, developers should avoid or reduce any negative impact on biodiversity. They must deliver at least 10% BNG, as measured by the statutory biodiversity metric. There are 3 ways a developer can achieve BNG. They can create biodiversity on-site (within the red line boundary of a development site). If they cannot achieve all of their BNG on-site, they can deliver through a mixture of on-site and off-site. If neither can be achieved then as a last resort they can buy statutory biodiversity credits from the government. The steps must be followed in order. Further information can be found on the [government website](#), and local guidance is contained in the [Biodiversity SPD](#) which will be updated.

### **Policy GE3: Biodiversity, Geological, and Landscape 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 minimum 10% net gain of biodiversity, by means of an approved ecological assessment of existing site features and development impacts, and the creation or enhancement of habitats, urban greening features such as green walls and roofs, and/or the implementation of species specific features such as bird and bat boxes;
  - b. protect or enhance biodiversity assets and secure their long term management and maintenance;
  - c. avoid negative impacts on existing biodiversity;
  - 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, the net gain must be delivered off site. Only if evidence demonstrates that insufficient gains cannot be made to meet the 10% requirement will statutory credits be allowed to be purchased.
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, contributing to the delivery of the Local Nature Recovery Strategy and the Green and Blue Infrastructure Strategy and Action Plan or its future equivalent. Protected Species, and species and habitats identified in the Local Biodiversity Action Plan, 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.

Further detail will be provided in an updated Biodiversity SPD. In the case of archaeological remains, all practical measures must be taken for their assessment and recording.

## Trees

- 9.26 Trees make a valuable contribution to the city's green landscape. New developments should seek to retain existing trees and other landscape features, incorporating them into a high quality design and landscape proposals where possible. Should loss be unavoidable, compensatory provision of new trees should be proposed as part of a well-designed landscape scheme or within other areas of green space within the local community. This will ideally be within 400m of the site to reflect the distance recommended within the Green Space Strategy. All replacement trees should also be of an appropriate type and status to reflect those which have been lost.
- 9.27 Trees that are already subject to protection either as part of an Ancient Woodland (as shown in Appendix 4) or through a Tree Preservation Order should be retained for the value they add to the visual amenity of the area, as such development proposals should retain protected trees.
- 9.28 In exceptional circumstances where the benefits of development are considered to outweigh the benefit of preserving protected trees, development will be permitted subject to adequate compensatory provision being made. This could take the form of replacement trees or a financial contribution equivalent to the value of the removed tree(s). Further details are provided in the [Trees and Developer Guidance SPD](#).



## **Policy GE4: Tree Protection**

- 1.** Development will be positively considered provided:
  - a.** there is no reasonably unavoidable loss of, or damage to, existing trees or woodlands during or as a result of development. Any proposed loss must be supported by a tree survey;
  - b.** trees not to be retained as a result of the development are replaced with new trees as part of a well designed landscape scheme; and
  - c.** existing trees worthy of retention are sympathetically incorporated into the overall design of the scheme including all necessary measures taken to ensure their continued protection and survival during construction.
  - d.** recommendations within the Coventry Trees and Development Guidelines SPD have been fully considered.
  - e.** proposals are in accordance with the requirements of planning national legislation
- 2.** Development proposals that seek to remove trees that are subject to 'Protection', without justification, will not be permitted.

# 10. Design

## Key evidence

Green Space Strategy (2019-2023)

Sustainable Urban Extensions Design Guidance SPD

Householder Design Guide SPD

New Residential Development Design Guide SPD

Tall Buildings Design Guide and View Management Framework SPD

Design Guidance on Shopfronts for Conservation Areas and Historic Buildings

Design Background Paper

## Context

- 10.1 The city's built and natural environments reflect the public realm or public face of Coventry. They are integral in creating a positive image and help create a sense of place, shaping cultural identities and helping to instil civic pride. They play an important part in improving the health and wellbeing of the population and can help mitigate the impacts of climate change. Furthermore they can play an important role in helping to attract investment, visitors and encourage tourism.
- 10.2 In all cases well designed, safe and well-maintained streets and public spaces can help encourage walking and cycling and can reduce anti-social behaviour and crime including the perception and fear of crime for all in the community. Furthermore, creating routes and spaces that are green, through the use of trees, living walls, green roofs and other types of green infrastructure, will not only enhance the quality and attractiveness of the city but will also contribute to ecological diversity.
- 10.3 The Council wants to significantly raise the standard of design in the built and green environments as good design assists in the creation of sustainable and inclusive communities and can improve the quality of people's lives. Furthermore, good design can help to reduce some of the environmental inequalities between the more deprived neighbourhoods and the rest of the city.
- 10.4 This Local Plan will ensure that development follows an effective design process, which assesses the physical, social and economic context, evaluates options and involves affected groups of people.
- 10.5 Opportunities to reflect existing materials and characteristics as part of new developments should be the starting point of any design proposals. Where there is no established character, or the character is poor quality there will be a clear and justifiable need to bring about improvements and enhancement to the

existing built and natural environment. As such, proposals which demonstrate high quality design; reflect the requirements of policy DE1 and would reflect a significant enhancement of the built environment may be considered acceptable even where they divert from current characteristics.

- 10.6 Policy DE1 requires development proposals to create safe and attractive streets and public spaces, which reduce crime and the fear of crime. As well as considering the impact of development proposals on public safety and the incidences of anti-social behaviour, the reference to safety in the Policy also relates to creating buildings and places that are better protected from terrorist attack, this reflects the Government's strategy for countering terrorism. Applications for development which affect higher risk buildings or spaces such as those that could attract crowds of people, should always fully consider the advice provided by National Counter Terrorism Security Office (NaCTSO) or future equivalent.
- 10.7 To support the importance of promoting high quality design across Coventry a series of design SPDs have been adopted and a series of design codes will be developed to guide high quality and contextually responsive design across the City.

## STRATEGIC POLICY

### Policy DE1 Ensuring High Quality Design

1. All development proposals should follow a design-led approach to deliver sustainable, high quality placemaking. Development should contribute positively to the wellbeing of existing and new communities, the quality of the surrounding built and natural environment, and should be planned and designed with reference to the climate change strategy and the adaptation and resilience strategy.
2. The setting, integrity and character of heritage assets will be protected in accordance with Policy HE2.
3. Where buildings in excess of 20m in height are proposed, these must be informed by the guidance of the Tall Buildings SPD.
4. In and around the City Centre, the location of proposed development must be considered in relation to the identified views of the City's three spires, and the tall buildings design guide and view management framework SPD.
5. 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. consider the safety and security of new and existing users, showing how these considerations have informed the design process;
- i. make places that inter-connect and are easy to move through;
- j. ensure places are easily understood by users, with clear routes and distinct physical features;
- k. 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;
- l. be adaptable to changing social, technological, economic and market conditions and ensure that developments maximise the use of the site;
- m. promote diverse, viable places;
- n. be proactive in responding to climate change and adopt sustainable and low carbon construction principles in terms of their design, layout and density;
- o. 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);
- p. support the integration of through routes for public transport and incorporate suitable bus priority measures as appropriate;
- q. minimise adverse impact on important natural resources;
- r. conserve and enhance biodiversity; and
- s. respect and enhance landscape quality including trees, hedges and other landscape features of value.

- t. Ensure that car parking is integrated into the development in a convenient, accessible manner and does not dominate the development and its surroundings or cause safety issues;
  - u. Provide safe, secure, convenient and accessible provision for cycle parking and storage, facilities for waste management, recycling and collection in a manner that is appropriately integrated within the overall development;
6. Development located in areas covered by Coventry City Council Design Codes, must demonstrate compliance with the Design Codes key principles.
  7. Outline major applications located in areas not subject to a Coventry City Council Design Codes, will be required to submit a Design Code to assess compatibility with local context.

10.8 The public realm is essentially the network of routes and spaces that connect the city together. They are like the arteries of the city and the better they operate the better the city functions. These routes and spaces are usually but not always fronted or bounded by development, and they contribute to the city in different ways. Whatever the type of route they all need to be designed to ensure they are safe for all users, attractive, accessible and pleasant to use. Through-city and city-wide routes are very important at conveying the image of the city to those merely passing through and creating good first impressions of the city to vehicle-borne visitors alike. Whilst local and neighbourhood routes are fundamental in ensuring that the city is a pleasant and attractive place to live and work.

10.9 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 the city centre, be it landmark pieces such as the Whittle Arches or small more intimate pieces such as the Niad or historically important pieces such as the Coventry tapestry located in St Mary's Guildhall.

10.10 To build on this legacy, public art will be encouraged to be incorporated into buildings and public spaces. Furthermore, public art will be encouraged along transport corridors, gateways and pedestrian and transport nodes.

10.11 Wherever possible, development proposals should look to incorporate existing landscape features – landform, trees, hedges, water bodies etc. These should be used to inform and guide how a development is designed and they should be incorporated in a way that ensures they will contribute positively to the development and surrounding area.

10.12 Like the routes and spaces, the buildings that front them must positively contribute to the built environment. They need to be designed to enhance their

immediate location and the city as a whole. They should be energy efficient and incorporate sustainable technologies to help combat climate change. They should also be designed to be safe and easy to use by all members of the community, including people with restricted mobility.

- 10.13 Design proposals relating to landscaping, public realm and green spaces should also be prepared in accordance with the Green Environment and Environmental Management policies of this plan. Any sites brought forward within or immediately adjacent to a Conservation Area or which has an impact on the setting of a listed building should also be considered in accordance with the heritage policies of this plan.
- 10.14 Good design also includes careful consideration of the physical process of redevelopment and ensuring that steps are taken to mitigate any negative impacts during the process of redevelopment. The City Council therefore expect that where site hoarding is required these are of high quality and informed by local context, whilst opportunities for meanwhile uses to be accommodated on sites should also be explored to retain vibrancy and activity within areas of redevelopment.
- 10.15 High quality design also requires understanding of a sites context and the wider role in local townscape, this is particularly of importance where development sites are located in areas of mixed urban character and typology, Sites brought forward for redevelopment should therefore demonstrate how they have been informed by local character and an understanding of how the site contributes toward the wider townscape.

## **DE2: Delivering High Quality Places**

### **1. Public Realm**

- a. Where relevant, all development proposals will be required to integrate high quality soft and hard landscape designs.
- b. The palette of materials and street furniture for any development proposal will need to respect the prevailing character of its respective area or adjoining landscape.

### **2. Public Art**

- a. Public art should, where appropriate, form an integral part of the design process of development proposals.
- b. As an alternative to stand-alone pieces of public art, opportunities should be taken to incorporate this into the design of the buildings e.g. through the use of artist/architectural glass or ironmongery etc. thus giving it more legitimacy and integrity.

- c. Established public art shall be retained within redevelopment proposals unless the benefits of its removal outweigh the harm of its loss. Where public art is lost replacement works shall be incorporated into new development unless robust justification is provided highlighting that this it is not viable.
- d. Where public art is provided, contributions and commuted maintenance sums for up to 10 years will be required and include the cost of decommissioning where appropriate.

### **3. Lighting**

- a. Lighting should be carefully considered in order to meet the requirements of creating attractive and safe environments for all, whilst also mitigating impacts upon neighbours and ensuring that lighting does not adversely affect biodiversity.
- b. Carefully considered architectural lighting proposals for new buildings and refurbishment of existing buildings will be encouraged to enhance the overall appearance of the city during the hours of darkness.

### **4. Designing for Healthy Communities**

Major development proposals must fully consider how physical and mental health and well-being for people of all abilities and ages has been considered and catered for. For residential developments of 10 units and above, proposals should include access to high quality open space and nature, the provision of attractive walking and cycling routes, play facilities, seating, and spaces for all mobility's to interact, with well-connected permeable layouts that incorporate desire lines.

### **5. Meanwhile Uses**

- a. Vacant plots/sites planned for redevelopment must investigate provision of meanwhile/temporary uses prior to commencement of any redevelopment work. Any meanwhile/temporary use of such sites will be appropriate where:
  - i. the meanwhile/temporary use does not preclude permanent use of the site, particularly through the length of any temporary permission;
  - ii. the proposed meanwhile/temporary use contributes to the function of the area where it is located or meets a specific need identified by the Council;
  - iii. potential adverse amenity impacts are prevented or mitigated; and
  - iv. the proposed use meets all other Local Plan policies relevant to the use.
- b. Site hoardings must be of high quality and responsive to their context.

- c. The use of high-quality accessible landscape areas will be welcomed for plots which may remain vacant for periods greater than 6 months.

## **6. City Centre and Transition Zone**

- a. In line with other plan policies, proposals located within the City Centre Transition Zone\*, should fully consider their local context and the sites role in transitions to the City Centre context.
- b. Proposals within the defined City centre\*\* and the City Centre Transition Area\* should demonstrate how they contribute to the key aims and objectives of Coventry City Council.

\*City Centre Transition Zone as shown at Appendix 9(d)

\*\*City Centre boundary as shown at Appendix 9(d)



# 11. Heritage

## Key evidence

The Coventry Historic Environment Record (HER)

The National Heritage List for England

The Coventry Local List of Buildings of Historic and Architectural Interest

Coventry Heritage at Risk Register

The Gould Report on the 20th Century City Centre (2009)

The Coventry Historic Landscape Characterisation (2013)

Spon End and Nauls Mill Area of Local Distinctiveness (2003)

Conservation Area Appraisals and Management Plans

Design Guidelines for Development in Coventry's Ancient Arden (1995)

Design Guidance on Shop fronts for Conservation Areas and Historic Buildings (2014)

Heritage Background Paper

## Context

- 11.1 Coventry has a rich and diverse historic environment which is evident in the survival of individual historic assets and in the local character and distinctiveness of the broader landscape. Prehistoric flint tools which have been collected from fields around the city demonstrate that there has been human activity in the Coventry area since at least the Mesolithic period, some 10,000 years ago.
- 11.2 The landscapes and buildings that can be seen today predominantly date from the medieval period onwards when Coventry grew from a small Saxon settlement to become one of the principal cities of medieval England. The wealth of the medieval city peaked in the 15th century and was followed by a slow economic decline that saw Coventry stagnate until a second period of dramatic expansion occurred in the late 19th century with the emergence of industries such as ribbon weaving and watch making. Twentieth century Coventry became a major centre for manufacturing and the city grew rapidly with factories and housing expanding over the previously rural landscape absorbing many of the surrounding villages and farms. The concentration of industry in Coventry resulted in it suffering from extensive bombing during World War II, causing significant damage to the fabric of the city. However the wartime destruction was followed by an era of extensive reconstruction with innovative architecture and design in the 1950s and 60s.

## Conservation Areas

- 11.3 Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a duty on local planning authorities to designate as Conservation Areas any 'areas of special architectural or historic interest the character and appearance of which it is desirable to conserve or enhance'. The Act also requires local planning authorities to review their Conservation Areas from time to time and designate extra areas where appropriate. Appraisals and Management Plans need to be produced for all Conservation Areas. Therefore, areas of the city considered to have special architectural or historic interest or where the character and appearance of an area is of a desirable status to conserve or enhance, will be continually reviewed over the plan period to identify if further areas of the city may warrant conservation area designation in compliance with the approach set out in national policy.

### STRATEGIC POLICY

#### Policy HE1 Conservation Areas

1. The areas listed below have been designated as Conservation Areas under Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and are detailed on the Policies Map:
  - a. Allesley
  - b. Chapelfields
  - c. Coventry Canal
  - d. Far Gosford Street
  - e. Greyfriars Green
  - f. Hawkesbury Junction
  - g. High Street
  - h. Hill Top
  - i. Ivy Farm Lane
  - j. Kenilworth Road
  - k. Lady Herbert's Garden and The Burges
  - l. London Road
  - m. Naul's Mill
  - n. Spon End
  - o. Spon Street

p. Stoke Green

q. Earlsdon

r. Brownhill Green

2. Conservation Area Appraisals and Management Plans will be produced for all of the Conservation Areas to guide their preservation and enhancement. All development proposals within Conservation Areas will be determined in accordance with this Plan and the appropriate Appraisal and Management Plan.

## Conservation and Heritage Assets

- 11.4 Coventry has over 400 Listed Buildings ranging from the medieval St Mary's Guild Hall to the 1962 railway station that have been selected by the Government as being of national importance. In addition over 280 buildings have been selected by the Council for Local Listing due to their importance to Coventry. The city also has 18 Conservation Areas (, 20 Scheduled Monuments, 4 Registered Parks and Gardens and thousands of other archaeological sites, historic structures and features recorded on the Coventry Historic Environment Record.
- 11.5 Where it is considered necessary, the Council may propose buildings for Listing by national government and will also continue to enhance and maintain an up-to-date Coventry Local List of buildings of historic and architectural interest.
- 11.6 Where heritage assets are present on sites allocated for housing in Policy H2, the Council will seek to secure their retention and conservation through legal agreements.
- 11.7 In addition to the national Historic England Heritage at Risk Register the Council will maintain the Coventry Heritage at Risk Register and work with property owners and developers to reduce the number of heritage assets in Coventry that are deemed to be at risk. The Council will use its statutory powers where necessary to secure the preservation of listed buildings with Urgent Works and Repairs Notices. To reflect their historic importance, scale and strategic proximity to the city centre, the sites of Charterhouse and the London Road cemetery are to be designated as a Heritage Park. This is considered further in Policy HE3.
- 11.8 The Council will continue to maintain an up-to-date and accessible Historic Environment Record as the principal evidence base on the city's Historic Environment. Historic Landscape Characterisation and the Arden Design Guidance will be used to inform decisions on historic character and local distinctiveness.

## STRATEGIC POLICY

### Policy HE2: Conservation and Heritage Assets

1. In order to help sustain the historic character, sense of place, environmental quality and local distinctiveness of Coventry, development proposals will be supported where they conserve and, where appropriate, enhance those aspects of the historic environment which are recognised as being of special historic, archaeological, architectural, artistic, landscape or townscape significance. These Heritage Assets include:
  - a. Listed Buildings and Locally Listed buildings;
  - b. Conservation Areas;
  - c. Scheduled Ancient Monuments and Archaeological sites;
  - d. Registered Parks and Gardens; and
  - e. Other places, spaces, structures and features which may not be formally designated but are recognised as significant elements of Coventry's heritage and are positively identified on the Coventry Historic Environment Record.
2. Proposals likely to affect the significance of a heritage asset or its setting should demonstrate an understanding of such significance using currently available evidence.
3. Development proposals involving heritage assets in general and listed buildings in particular, should acknowledge the significance of the existing building and the area by means of their siting, massing, form, scale, materials and detail.
4. The sympathetic and creative re-use of heritage assets will be encouraged, especially for heritage that is considered to be at risk, so long as it is not damaging to the significance of the heritage asset. The embodied energy present in historic buildings contributes to sustainability.
5. The Council will use its statutory powers to secure the preservation of buildings and other heritage assets that are deemed to be at risk by the national and local heritage at risk registers.
6. Demolition or destruction of heritage assets will be resisted; proposals to demolish a heritage asset will therefore need substantial justification. The greater the damage to the significance of the asset, the greater the justification required and the public benefit needed to outweigh such damage.
7. All proposals should aim to sustain and reinforce the special character and conserve the following distinctive historic elements of Coventry:
  - a. The surviving buildings, defences and street plan of the medieval city centre and its suburbs;

- b. The surviving pre-industrial settlements and landscape features which have been subsumed by the expansion of the city such as Walsgrave, Canley, Binley, Brownhill Green, Coundon Green, Little Heath (Spring Road), Stivichall Croft and Lower Eastern Green (at Dial House Lane);
  - c. The wider Arden rural environment on the fringe of the city comprising field-systems, ancient woodlands and commons which developed over centuries; interspersed with a mix of settlements, farmsteads and smallholdings;
  - d. Buildings associated with the city's industrial heritage; ribbon weaving, watch making, cycle making, motor car manufacturing, brick making, coal mining, synthetic textiles, munitions, aeronautical engineering, canals and railways;
  - e. The Victorian and Edwardian suburbs such as Earlsdon and Stoke;
  - f. Designed landscapes, including historic parks and gardens (both registered and locally listed), historic cemeteries, churchyards and public parks;
  - g. The significant elements of Coventry's ground-breaking post-war reconstruction including its plan, built form, public art works and public spaces; and
  - h. The city centre primary shopping area, respecting the architectural design principles of the significant elements of the post- World War II reconstruction such as Broadgate and the shopping Precincts.
8. Where material change to a heritage asset has been agreed, recording and interpretation should be undertaken to document and understand the asset's archaeological, architectural or historic significance. The scope of the recording should be proportionate to the asset's significance and the impact of the development on the asset. The information and understanding gained should be made publicly available, as a minimum through the Coventry Historic Environment Record.
9. For development in relation to heritage assets and / or in conservation areas, these should demonstrate how the relevant Historic England Good Practice Guidance has been taken into account.
10. In exceptional cases, where harm cannot be outweighed by public benefit and where proposals produce harm to the setting of heritage assets which cannot be mitigated, the Council may seek contributions from developers for the enhancement, repair and/or maintenance of the impacted historic assets.

## Heritage Park Charterhouse

- 11.9 Through the Local Plan and partnership working, the Council are maintaining and further promoting the creation of a City Heritage Park in the Sherbourne Valley and the grounds of the Charterhouse and London Road Cemetery. The designation reflects the historic significance of the two sites as well as their

scale and strategic proximity to the city centre. There is also wider connectivity opportunities associated with the River Sherbourne. Proposals which positively contribute to the park will be supported, along with measures to improve linkages to the area and improve accessibility between the city centre and the Charterhouse grounds. These may include a riverside walkway along the exposed section of the River Sherbourne, connecting Far Gosford Street with Charterhouse along the west side of the river crossing Gulson Road and Humber Avenue, alongside a footpath and cycle route along the former Coventry loop line railway and a new pedestrian crossing on the London Road. These enhancements, in connectivity and green infrastructure, could facilitate comprehensive regeneration opportunities of brownfield land along the River Sherbourne, most notably between Gulson Road and Gosford Street and in Harper Road that will complement this part of the city. The City Heritage Park and its key routes and linkages are identified on the inset map at Appendix 5. The wider area will be supported by a Masterplan.

- 11.10 In addition, opportunities should be taken to improve the setting of the Charterhouse, the naturalisation of the river valley and the views through to the viaduct
- 11.11 These areas should then be proactively re-naturalised or appropriately landscaped, adding to the Heritage Park where appropriate and further improving the quality of environment within the Local Green Space designation to the West of the River. The Local Green Space should be supported by defensible boundary lines created as part of the Master planning process and brought forward in partnership working.

### **Policy HE3 Heritage Park – Charterhouse**

1. Proposals which support the City Heritage Park in the grounds of the Charterhouse and London Road cemetery will be supported along with measures to improve linkages to the area along the River Sherbourne (between Charterhouse and Far Gosford Street), the former Coventry loop railway line and across the London Road. Proposals that are detrimental to the heritage park and the improvement of linkages will be resisted.
2. The Heritage Park and any expansion of Blue Coat School should be guided by a comprehensive Master plan, which reflects the policies of this Plan (including Appendices).

### **Archaeology**

- 11.12 In order to be responsive to the historic character and local distinctiveness, proposals which are inclusive of intrusive groundworks are expected to

conserve and, where appropriate, enhance archaeological features across the City.

11.13 Archaeological assets which must be carefully considered include:

- Scheduled Monuments
- Known archaeological sites
- Areas of Archaeological Constraint
- Other places, spaces, structures and features which may not be formally designated but are recognised as significant elements of Coventry's archaeological heritage and positively identified on the Coventry Historic Environment Record
- Prehistoric human habitation to the modern period.

11.14 In considering proposals for development, the City Council the validation checklist will set out what is will usually be required including:

- a) an initial assessment establishing the archaeological significance of the site to be submitted as part of any planning application.
- b) where appropriate an archaeological evaluation and subsequent publication of results to be carried out prior to commencement, where, as a result of the initial assessment, important archaeological remains are likely to be present.
- c) preservation in situ to be the preferred approach
- d) justification together with appropriate mitigation before allowing any harm to, or loss of, the significance of a heritage asset.

## **Policy HE4 Archaeology**

1. In order to be responsive to the historic character and local distinctiveness, proposals which are inclusive of intrusive groundworks are expected to conserve and, where appropriate, enhance archaeological features across the City.
2. Where material change to an archaeological asset has been agreed, recording and interpretation must be undertaken to document the asset's historic significance and advance understanding of the asset to be lost. The scope of the recording should be proportionate to the asset's significance and the impact of the development on the asset. The information and understanding gained should be made publicly available, as a minimum through the Coventry Historic Environment Record.
3. Archaeological investigations must be undertaken where development is proposed on or adjacent to the line of the former site of the City Wall. Positive weight will be given to schemes which incorporate design responses to reflect and respond to the line of the medieval City Wall.
4. New development which include or take place adjacent to the remaining above ground sections of the medieval City Wall, must enhance the setting of the wall and seek to incorporate it into design.

5. In cases where loss cannot be avoided, the Council may seek contributions from developers for the enhancement, repair and/or maintenance of archaeological assets in the vicinity of the propos

## 12. Accessibility

### Key evidence

Coventry Transport Strategy (2022 – 2037)

Transport Background Paper 2024

Coventry Area Strategic Model (CASM) 2024

Coventry Local Air Quality Action Plan

Transport Design Guide

### Context

- 12.1 The transport background paper sets out the context and linkages to a range of local, regional and national strategies and action plans.
- 12.2 In addition to enabling everyday activities such as accessing work, education, shops and leisure facilities, transport can also have a significant influence on peoples' health and wellbeing and overall quality of life. Transport is also an enabler of economic activity, providing connections between people and jobs, access to markets and business supply chains.
- 12.3 Individual transport needs can vary significantly. It is therefore important to ensure that everyone who lives in, works in or visits the city is able to access a choice of accessible and high quality transport modes and make well informed and appropriate decisions about how and when they travel.
- 12.4 Coventry's existing transport network generally works effectively, however there are a number of important wider challenges to address:
  - The dominance of the car in the context of a compact growing city with a high proportion of short local car trips which discourages physical activity, thus promoting less healthy lifestyles.
  - Relatively low levels of cycling, and to a lesser extent walking and public transport usage for local trips, especially for trips to school and work.
  - Low levels of accessibility and a high reliance on access by car to some edge of city employment and retail sites.
  - Road congestion on some major road corridors, primarily during peak periods, which can negatively affect economic growth and air quality.



- The impact of the car in the street environment such as obstructive on-street parking, road safety and general street clutter.
- Working towards achieving current road casualty reduction targets and making our roads safer for all.
- The need for improved strategic connectivity to surrounding areas which are economically linked to Coventry.

12.5 Public health is also a key consideration. A citywide Air Quality Management Area (AQMA) was declared in Coventry in 2009 due to significantly high levels of air quality emissions. Research demonstrates that emissions from road transport are the principal source of elevated concentrations of Nitrogen Dioxide (NO<sub>2</sub>) which causes poor air quality. The main transport corridors to the North and North East of Coventry (linked to the M6) are identified as being most likely to exceed the NO<sub>2</sub> standard. Noise is another issue which impacts upon health, as set out in the environmental Management chapter of this plan but which is also cross referenced here.

12.6 The development and expansion of the city provides an opportunity to address these issues through investment in the existing transport network, and by ensuring that new developments cater for the accessibility needs of a diverse, forward looking low carbon city. This includes opportunities for the promotion of intelligent mobility and more active and environmentally sustainable modes of travel such as walking and cycling, public transport and ultra-low emission vehicles such as electric cars. Well linked and attractively designed, connected, safe and accessible green and blue infrastructure routes can play a key role in encouraging active lifestyles by walking, by mobility aids such as wheelchairs and by cycling for example.

12.7 There are already a number of positive initiatives taking place including a successful programme of investment in transport networks across the city. This includes a successful programme of public realm enhancements in the city centre, targeted investment to address congestion along a series of busy road corridors and the delivery of a substantial programme of cycle routes.

12.8 The need to enhance accessibility within the city is underpinned by a wider objective to strengthen accessibility across Coventry and Warwickshire and with neighbouring areas in the East and West Midlands. This approach recognises the established economic travel to work area and reinforces opportunities to enhance business connectivity and supply chains.

## **Accessible Transport Network**

12.9 In order to create a prosperous and attractive city, local people must have good access to the jobs and services they need. This can only be achieved if the transport network offers a wide choice of convenient, affordable, accessible and

reliable transport modes which meet the needs of the varying types of trips which people need to make.

12.10 The principles adopted in this reviewed development plan promote the utilisation of accessible brownfield sites with additional housing being met through the development of Sustainable Urban Extensions (the SUEs were allocated in the adopted 2017 plan and these are now underway).

12.11 The use of brownfield sites will:

- Make sustainable travel options, such as walking and cycling more attractive options for local trips;
- Help to focus development towards accessible locations making it easier for local people to access employment, education and skills, shops and leisure facilities and reduce the distance people need to travel;
- Support higher density development proposals which will help support the viability of public transport services

## **STRATEGIC POLICY**

### **Policy AC1: Accessible Transport Network**

1. The Council will encourage proposals that minimise the need to travel, maximise trips made by sustainable transport modes, incorporate liveable neighbourhood principles and reduce the dependence on the private car in accordance with the National Design Guide, National Model Design Code, Transport for West Midlands (TfWM) Local Transport Plan (LTP) and the Council's Transport Strategy and Coventry Connected SPD.
2. Sustainable transport modes should be fully integrated into the design and placemaking of developments to ensure sustainable and active travel is a real and long term alternative. As a result, proposals will be supported where:
  - a. The proportion of trips made by walking, cycling and public transport is high, and local connections by these modes are improved;
  - b. Car dominance is reduced;
  - c. Streets and the public realm are made safer, more accessible and where the quality and resilience are improved such as through materials and increasing biodiversity; and
  - d. Air quality, noise, and green and blue infrastructure are improved to create more attractive neighbourhoods for people.
3. Development proposals which are expected to generate additional trips on the transport network should:

- a. Integrate with existing transport networks including roads, public transport and walking and cycling routes through safe, accessible and sustainable links to promote access by a choice of transport modes.
  - b. Consider the transport and accessibility needs of everyone living, working or visiting the city. Special attention should be paid to the needs of disabled people, young children, and people with special needs. Special attention should be paid to the needs of an aging population to make Coventry an Age Friendly City.
4. Support the delivery of liveable neighbourhoods and new and improved high quality local transport networks which are closely integrated into the built form. This includes networks which support access to strategic growth corridors. The scale of measures required should be appropriate to the scale and impact of the proposed development.
5. Where appropriate, support the provision and integration of emerging and future intelligent mobility infrastructure, including Very Light Rail, Demand Responsive Transport, micro-mobility, Connected Autonomous Vehicles (driverless cars), autonomous delivery and drone technology.

## Road network

- 12.12 Coventry is well connected to the national road network having good access to the A46/M40, M69, M6, M45/M1 and M42. Highways England manage the strategic road network which surrounds Coventry and is crucial to its national connectivity needs. This includes the A46 corridor which has been designated as an Expressway in the Highways England Road Investment Strategy. This busy corridor is already benefitting from major investment at Tollbar Island to introduce a grade separated underpass. Further improvements are planned at Brandon Road and Walsgrave near the B4082 to introduce grade separation to improve traffic flow. Further enhancements are likely to be necessary within the plan period, such as the A46/ Stoneleigh Road junction located in Warwickshire, which supports access to several major employment sites within Coventry including the University of Warwick and Westwood Business Park. Future capacity enhancements on the strategic highway network which support Coventry's economic growth proposals will be supported.
- 12.13 Coventry's well maintained and managed local highway network is considered to be an asset for the city which should be protected. The historic evolution of the city has left a legacy of a concentric web of radial roads enabling direct linkages between the strategic road network and the Coventry ring road. Recent improvements to the road network as part of a major Pinch Point programme has helped to address local congestion hotspots and improve traffic flows, most notably on the A45 and A4600 corridors.

12.14 The Key Route Network is made up of main metropolitan roads - operating at agreed performance standards. This network will serve the main strategic demand flows of people and freight across the metropolitan area, and provide connections to the national strategic road network. It will also serve large local flows which use main roads and provide good access for businesses reliant on road based transport and will use highway capacity effectively to cater for movement by rapid transit and core bus routes, cyclists, Heavy/Light Goods vehicles and private cars to support growth on key corridors.

## **STRATEGIC POLICY**

### **Policy AC2: Road Network**

1. New development proposals which are predicted to have a negative impact on the capacity and/or safety of the highway network should:
  - a. Mitigate and manage the traffic growth which they are predicted to generate to ensure that they do not cause unacceptable levels of traffic congestion, highway safety problems and poor air quality. Highway mitigation and management measures should focus firstly on demand management measures (Policy AC3) including the promotion of sustainable modes of travel, and secondly on the delivery of appropriate highway capacity interventions. Highway capacity interventions should be appropriate to the scale of development and expected impact and will be determined through the associated Transport Assessment.
  - b. Developments should seek to support and accommodate, where appropriate, measures which facilitate enhancements to the wider transport network including those set out in the Infrastructure Delivery Plan. Be served by routes which are suitable for that purpose. Where this is not achievable, proposals will only be considered acceptable if appropriate interventions can be applied to suitably mitigate any negative impacts, including the construction of new access link roads.
2. Development will be expected to actively support the provision and integration of intelligent mobility infrastructure, such as electric vehicle charging points and include rapid charging points, car club schemes and bicycle hire infrastructure. These should be provided onsite unless justification shows that off site is the only feasible option.
3. New development proposals that require changes to the highway network will be required to positively integrate with and have consideration of the movement of people and goods on the existing road network, including walking, cycling and rapid transit routes in accordance with Policy AC4 and AC5.

4. Proposals should not negatively impact road safety and should be in line with the Council's Transport Strategy.
5. The Infrastructure Delivery Plan sets out specific measures and funding sources for the transport network improvements which are required to support the delivery of the Local Plan. The Council may seek to secure the provision of transportation infrastructure through planning conditions and legal agreements.
6. Further guidance will be contained in the Coventry Connected SPD and the emerging Transport Design Guide.

## Demand management

- 12.15 Highway resilience and journey time reliability are essential to supporting the needs of local businesses and the economic prosperity of the city. Coventry's existing highway network generally copes well with traffic incidents and peak flows; however congestion still exists in some areas during the peak period.
- 12.16 Evidence shows that a large proportion of existing peak car traffic consists of trips which start and finish within the city and are over relatively short distances, often less than two miles. As a priority, sustainable modes of travel will be promoted to reduce single occupancy car use for short journeys. However, it is recognised that as the city grows and the population and the number of jobs increase, other demand management measures will become increasingly important to maintain the integrity of the network.
- 12.17 The primary tools to achieve this are:
- Transport Assessments;
  - Travel Plans;
  - Car parking standards; and
  - Urban Traffic Management and Control.
- 12.18 **Transport Assessments** - New developments will need to be considered on a case by case basis to determine the accessibility requirements by all transport modes, the anticipated levels of traffic generated and the impact this would have on the highway network. Transport Assessments will be required for larger developments which create significant additional trips on the network, and will be used to determine the severity of the impact, including congestion and road safety, and the appropriate type and level of mitigation required.
- 12.19 **Travel Plans** - Travel Plans play an essential role in encouraging sustainable transport and flexible and agile working practices to support the management and generation of traffic associated with trip attractors such as local businesses, schools, universities, hospitals, railway stations and new residential developments. They are the first step in mitigating transport related issues before implementing physical road infrastructure measures.

12.20 Travel Plan support can be provided by the Council and TfWM on the cheapest and most sustainable ways to travel including journey planning, ticket advice and any travel support.

12.21 Travel Plans should be updated regularly and monitored to maximise their effectiveness against agreed objectives and targets. Where applicable, these should be closely linked to Transport Assessments to act as a monitoring tool and action plan.

12.22 **Car Parking** – The provision of car parking can influence:

- The generation of traffic and the potential for congestion.
- Occurrences of inappropriate on-street parking which can:
- Block access routes for emergency, refuse and delivery vehicles;
- Block footways preventing access for pedestrians;
- Impact negatively on the street scene; and
- Reduce visibility for all users at junctions causing safety issues.
- The ability to encourage sustainable transport modes.
- The visual impact of car parking on the built environment

12.23 New developments will therefore be expected to provide appropriate levels of car parking in order to address these issues. Local car parking standards are set out in appendix 5 of the Local Plan. They have been developed based on NPPF criteria, locally determined accessibility criteria and benchmarking of other Local Authorities.

12.24 Detailed standards have been developed for areas outside of the city centre including car parking standards for new residential and business development. The provision of car parking in the city centre will be determined on a site-by-site basis. The objective of this approach is to discourage the excessive provision of private car parking in the city centre because:

1. Adequate levels of publicly available car parking are already provided across the city centre.
2. The city centre is highly accessible compared to other parts of the city, so can be easily accessed by more sustainable non-car modes of transport.
3. Development in the city centre is proposed to be of a much higher density; but this would not be achievable if high levels of private parking are provided.

12.25 The car parking standards also include requirements for the provision of electric car charging and cycle parking infrastructure.

12.26 Developments which result in changes to the location or supply of publicly available car parking in the city centre the policy sets out the requirements and justifications necessary to ensure that a consistent and appropriate

supply of public parking is maintained to support new development proposals without having an unsustainable oversupply. This includes proposals to replace some existing surface level car parks with multi-storey car parking.

12.27 Proposals will be required to encourage and incentivise sustainable travel such as through the provision of mobility credits.

12.28 Urban Traffic Management Control (UTMC) - The on-going development of the UTMC system combined with the application of Intelligent Transport System (ITS) technologies will continue to be used to manage traffic on the highway network. Any new traffic control infrastructure required to support new developments must be compatible with, and where appropriate, link into the established UTMC network.

### **Policy AC3: Demand Management**

1. Transport Assessments will be required for developments which generate significant additional trips on the transport network. Thresholds for their requirement will be based on locally determined criteria set out in the Coventry Connected SPD.
2. Travel Plans will be required for new developments which generate significant additional traffic movements. Detailed guidance on the requirement for Travel Plans will be set out in the Coventry Connected SPD.
3. Proposals for the provision of car parking associated with new development will be assessed on the basis of parking standards set out in Appendix 6, with active and sustainable travel modes factored into the delivery of any new parking provision.
4. Development proposals which result in significant changes to the location or supply of public car parking spaces will be required to address any associated necessary changes to associated car park signing and management systems. In regard to development proposals in the city centre:
  - this should include clear justification as part of an on-going strategic review process and shown to have an acceptable impact on the performance and accessibility of the city centre and overall car parking provision.
  - The redevelopment and improvement of surface level car parks will be prioritised.
  - The provision of new surface level car parking will not be supported within the city centre unless its provision is to support the implementation of longer term regeneration schemes. In such cases surface level provision will only be allowed on a temporary basis.
  - New car parking should be accommodated in a multi-storey format.

- Proposals for multi storey car parks should respect the character and scale of the surrounding environment and maximise opportunities for high quality aesthetics.
  - Parking needs and the role of the car will also be balanced with promoting the use of public transport, cycling and walking.
5. Proposal will be required to encourage and incentivise sustainable travel, such as through the provision of Mobility Credits.
  6. New development proposals which require changes to the highway network will be required to integrate with any existing Urban Traffic Management Control (UTMC) and Intelligent Transport Systems (ITS) infrastructure and strategy and development of the Key Route Network.
  7. Further guidance will be contained in an updated Coventry Connected SPD.

## Active Transport Provision

### Walking and Cycling

- 12.29 The Council is placing a high priority on promoting walking and cycling (as reflected in the Coventry Transport Strategy) to help reduce road traffic congestion and carbon and air pollution, but also to improve the physical and mental health of residents. Perhaps the most significant advantages which are offered by these active travel modes are the physical and mental health benefits. Regular counts of private and public transport trips into the centre of Coventry show that between 2011 and 2021 light vehicles (including cars and taxis) consistently accounted for around 75%-80% of trips. Levels of cycling are particularly low, accounting for only 1% of journeys into the centre of Coventry and between 1% and 4% of residents' journeys when they are commuting, escorting children to school or travelling to their own place of education.
- 12.30 Coventry has a reasonably well-developed cycling and walking network which has benefited from recent initiatives including the city centre public realm programme and the Cycle Coventry project, introducing new cycle routes around the city. These schemes have helped to make a positive contribution towards the creation of an environment which encourages sustainable and active modes of travel. The Council will build on the successes and momentum gained from these projects and intends to implement additional phases of them in tandem with the growth of the city to help encourage residents to make more journeys by bike.
- 12.31 The expansion of safe cycling and walking networks will be delivered via a wide range of schemes, set out in the Council's Transport Strategy and will comprise physical measures to create an environment where walking and cycling are the preferred modes of transport. This concept will be prioritised



through the development of SUE sites. Further guidance is set out in the Coventry Connected SPD and such measures may include:

- segregated cycleways on key corridors;
- School Streets - temporary road closures around schools at pick up and drop off times;
- Liveable Neighbourhoods;
- Traffic calming and speed reductions;
- Wider pavements;
- Increased cycle parking; and
- expanding the provision of the West Midlands Cycle Hire scheme.

12.32 The West Midlands Cycle Charter also aims to raise cycling levels, and deliver change. The charter sees cycling as playing an important role in addressing the challenges the West Midlands face, which include reducing congestion, carbon and pollution, supporting economic growth and employment, tackling obesity and creating places where people want to live, work, learn, shop and do business. The Cycle Charter also supports a Metropolitan Cycle Network which will be integrated with local cycle networks. Opportunities will be sought to deliver additional phases of the network as part of new development proposals. For larger developments, financial contributions may be required which support the enhancement of cycle routes on the wider highway network which are consistent with the IDP and local cycling strategy. High quality cycle parking should also be provided at new sites and along the wider public transport network at interchanges and stations.

12.33 Development proposals should also be in accordance with the emerging Local Cycling and Walking Infrastructure Plan (LCWIP) in terms of incorporating safe, comfortable, convenient and accessible walking and cycling routes that create an environment which encourages walking and cycling when designing schemes both through the site and which link seamlessly to the existing pedestrian and cycling route network. This may require the upgrade of existing routes, facilities, cycle parking lightings, crossing, etc. or the creation of new routes and infrastructure.

12.34 Proposals will also be expected to support the provision of West Midlands cycle hire bike and docking stations to help expand the network across the city.

12.35 In terms of developments in the city centre and adjacent to it, they should, where appropriate, upgrade pedestrian and cycle routes that incorporate improvements to crossing the ring road to enhance connectivity to the city centre from the wider city.

12.36 The type of provision should be determined based on the expected level and speed of traffic and the location and type of development proposal. In accordance with the Manual for Streets cyclists should generally be accommodated on the carriageway in areas with low traffic volumes and speeds. Dedicated off-carriageway infrastructure will be required alongside

more heavily trafficked routes and at intersections. Opportunities will also be sought to develop cycle routes through areas of greenspace which provide opportunities for leisure cycling and direct quiet routes to surrounding areas and amenities. Other supporting measures such as advanced stop lines, directional signage and lighting form an important part of the cycle network and will be expected to be integrated into all major development proposals.

- 12.37 In terms of pedestrians, in many circumstances off-carriageway footways will generally be the preferred option. However, in quieter residential areas, within the city centre and areas where the ratio of pedestrians to traffic is high it may be appropriate to provide shared pedestrian / vehicle surfaces which encourage higher levels of interaction between different travel modes. On more heavily trafficked routes, pedestrian priority measures such as controlled crossing points will be required to make walking as safe and convenient as possible.
- 12.38 Cycle parking, in combination with shower/changing and clothing storage facilities are an essential part of supporting the needs of cyclists and should be catered for. Cycle parking standards are set out in the car parking standards in Appendix 5. The Coventry Connected SPD includes a local strategy for cycling which includes guidance on requirements for cycle route provision, and other supporting infrastructure requirements. This needs to include cycle parking for children's bikes as set out in Appendix 5, particularly at playgrounds and outside shops.

### **Policy AC4: Active Transport Provision including Walking, Cycling and Micro Mobility**

1. Development proposals should be in accordance with the emerging Local Cycling and Walking Infrastructure Plan (LCWIP) and incorporate:
  - a. safe, comfortable and convenient access to walking and cycling routes, appropriate for all abilities and needs that include wheelchair accessible routes, consideration of pedestrian desire lines within and outside site boundaries, pedestrian and cycle crossings and improvements and links to the city's towpaths;
  - b. new and upgraded pedestrian and cycle routes where these links do not exist, which are in accordance with national guidance on standards and best practice. These must appropriately link and integrate seamlessly into established networks to ensure that routes are continuous, and they should include connecting to the public transport network, interchanges and stops to deliver seamless integration together with provision of high quality cycle parking. The expected type of provision will depend on the scale, use and location of the site. Upgraded pedestrian routes should include, for development proposals in the city centre where appropriate, improvements to the significant routes and linkages as shown in Figure 8 and where appropriate, development proposals will be required to incorporate

improvements to crossing the Ring Road to ensure enhanced connectivity between the city centre and the wider city for pedestrians and cyclists and should reflect the priorities in the supporting text above. This will be of particular relevance at:

- Ring Road Junctions 1, 2, 4 and 5
  - The Canal Basin crossing between Ring Road junctions 9 and 1
  - Connectivity between Parkside and Much Park Street.
- c. High quality cycle parking (for residents, employees and visitors), which includes provision for children's bikes, larger bikes like cargo bikes and associated facilities, such as changing, showers and storage in line with the cycle parking standards in Appendix 5; and
- d. the provision for West Midlands Cycle Hire docking stations(s) and hire bikes on site for larger development proposals.
2. For larger developments, financial contributions may be required to support improved pedestrian and /or cycling routes on the wider network.
3. The Council will promote walking and cycling by delivering a wide range of walking and cycling schemes. This includes schemes set out in the Council's Transport Strategy and will comprise physical measures to create an environment where walking and cycling are the preferred modes of transport. Such measures may include:
- segregated cycleways on key corridors;
  - School Streets - temporary road closures around schools at pick up and drop off times;
  - Liveable Neighbourhoods;
  - Traffic calming and speed reductions;
  - Wider pavements;
  - Increased cycle parking; and
  - expanding the provision of the West Midlands Cycle Hire scheme.

These measures will be prioritised within existing areas of the city which are negatively affected by increased traffic associated with new development. Proposals should incorporate such measures and financial contributions will be sought to deliver those proposals where the predicted impact of development traffic is significant and measures are needed to support an improved pedestrian and cycle environment.

## **Bus, Demand Responsive Transit and Rapid Transit**

### **Bus Services and Infrastructure**

- 12.39 Buses offer a realistic modal choice for many local trips, and particularly those into the city centre. Bus network coverage across the city is generally good although there are some examples of where service frequencies are inadequate to provide an attractive and realistic option, such as more peripheral edge of town employment sites.
- 12.40 Coventry's Bus Network Development Plan and bus policies as highlighted in the Strategic Transport Plan demonstrate the importance of a partnership approach with TfWM. This will be vital in providing high quality bus services to new developments.
- 12.41 To ensure bus travel is an attractive and convenient option, new development must comply with TfWM access standards and be expected to have access to a bus stop within 400m, with regular service patterns serving the city centre. It is accepted that this may not be practicable for small scale development proposals in more remote parts of the city but developers will be encouraged to liaise with the Council and TfWM to ensure access standards are fully met. For larger development sites, in particular those in more peripheral locations, it will be important that bus services are fully integrated into the whole sites footprint with provision made to accommodate appropriate bus infrastructure including bus shelters and passenger information. Through routes for buses along with suitable bus priority measures should also be provided wherever possible and the Council will work in consultation with developers, bus operators, TfWM and the Passenger Transport Executive to achieve this.
- 12.42 The existing bus network primarily follows the radial network of roads across the city, and whilst this supports good access to the city centre, it does not necessarily support the demand for orbital trips such as those between residential and edge of town employment sites. More recently operators have introduced orbital services which have helped to address this issue. The West Midlands Strategic Transport Plan sets out a strategy for a core bus network which is closely integrated with a high frequency rail and rapid transit network to enhance connectivity to other strategic centres across the West Midlands.

### **Interchange, Information and ticketing**

- 12.43 One of the major barriers to encouraging public transport is the need to interchange between different modes and services, often paying separately each time at the point of use, and often with inadequate prior knowledge of when and where the next service will be. A step change is required in the quality of public transport provision which will require complementary measures to:

- Improve the ease of access to interchange facilities and to the quality of the waiting environment within them;
- Provide quality and timely information, both at bus stops and remotely via mobile devices, that can reduce uncertainty for travellers;
- Make payment quick and convenient through the introduction of integrated ticketing systems and cashless smart payment methods which work across all modes and services.

## **Rapid Transit**

- 12.44 In order to manage congestion to acceptable levels and maintain network resilience throughout the plan period, additional public transport provision will be required. To support jobs-led growth in the city, it is apparent that the current public transport network will not adequately address all of additional demands, or meet the expectations of the modern business sector. It is clear that a step change is required to remedy this, and the development of a high quality rapid transit system provides an appropriate and viable solution.
- 12.45 The West Midlands Strategic Transport Plan sets out comprehensive network of rail and rapid transit routes across the Metropolitan area including a new Rapid Transit network for the Coventry area.
- 12.46 The Council's preferred way to deliver rapid transit is the Very Light Rail system and development proposals which are expected to create significant numbers of additional trips on the network, and are located in close proximity to a proposed rapid transit route should seek to make provision for those routes including new infrastructure to facilitate the integration of the rapid transit network into the development site. The level of need and expected provision will be determined through Transport Assessments and Travel Plans.
- 12.47 Major trip generators such as the city centre, Ansty Park, Whitley Business Park, the Universities and the Hospital will be a priority for the provision of high quality rapid transit services. Routes will also serve Coventry main railway station and other transport interchanges to enable close integration with local and national transport networks. Options are also being considered for improved public transport connectivity to proposed HS2 interchange and the UK Central proposal in Solihull through the HS2 Connectivity Package. The identification and feasibility of individual routes will be subject to further study and delivered through the Coventry Connected Transport Strategy and the West Midlands Strategic Transport Plan.
- 12.48 In addition to supporting the needs of existing employment sites, rapid transit also provides a way of unlocking potential development growth sites by significantly improving accessibility. The high quality, fast and reliable

nature of rapid transit increases the viability and attractiveness of services and offers a realistic alternative to local car journeys.

### **Policy AC5: Bus, Demand Response Transit and Rapid Transit**

1. New major development proposals should have safe and convenient access to the existing bus network and comply with the TfWM access standards. In areas where this is not achieved, new development may be required to include the provision of appropriate bus infrastructure to enable services to be fully integrated into the development site. Development proposals should also have regard to, and where appropriate, make provision for the development of Mobility Hubs. The level of need and expected provision will be determined through Transport Assessments and Travel Plans.
2. The Council will support new bus and rapid transit networks that link communities more directly to places of work, education, essential services, centres, other sustainable transport modes and leisure / recreational / cultural attractions. This includes new or improved routes around the city and new and improved cross boundary routes outside the TfWM area.
3. The provision of demand response transit will be supported within all areas of the city as a convenient alternative for many people, including those less able.
4. The development of a rapid transit network, such as in the form of Very Light Rail will be supported to improve accessibility to existing and new major trip attractors. Major development proposals which are expected to create significant numbers of additional trips on the network, and are located in close proximity to a proposed rapid transit route should seek to make provision for those routes, including new infrastructure to facilitate the integration of the rapid transit network into the development site. The level of need and expected provision will be determined through Transport Assessments and Travel Plans.
5. Further details will be set out in the Coventry Connected SPD, the TfWM LTP and TfWM Bus Service Improvement Plan.

### **Rail**

- 12.49 Building on its core rail connectivity assets, including excellent rail links on the West Coast Main Line (WCML) between Coventry, London and Birmingham, the Council has developed an ambitious evidenced base in the Coventry Rail Investment Strategy (2013). The strategy sets out a clear case for the need to radically improve rail services which support the economic travel to work area such as services on the north-south corridor between Coventry, the Thames Valley, Warwickshire and the East Midlands. Allied to this, the Council is investing in the delivery of the Coventry Station Masterplan which will result in improved integration between rail and other

modes of transport and the adjacent Friargate regeneration scheme. The delivery of the Coventry Station masterplan redevelopment will improve transport interchange facilities, including facilitating the delivery of the NUCKLE rail scheme and enable the predicted growth in rail passengers to be accommodated. The scheme has already provided improvements to pedestrian accesses, car parking, bus interchange facilities and cycle parking.

- 12.50 Existing stations at Tile Hill and Canley predominantly cater for local rail services between Coventry and Birmingham, although Tile Hill offers some longer distance journey options as far as London. Both stations also act as rail Park and Ride facilities, although the car parks continue to operate at, or near capacity. Measures which address capacity issues will be supported including better integration with bus and rapid transit networks, walking and cycling routes and appropriate capacity enhancements to station car parking.
- 12.51 Additional local rail stations on the WCML to the east of the city serving Willenhall and Binley would allow some of the strong local rail service demand to be met and support the regeneration and economic growth of this part of the city. However, this will need to be considered in the context of wider strategic rail industry plans which plan for capacity on the busy WCML. Options are also being explored for a new station in the south of the city to support new development growth. These stations are also identified in the West Midlands Strategic Plan. Line capacity between Coventry and Birmingham is constrained which causes competition between fast long distance and local stopping services. It is clear that major infrastructure improvements will be required to meet the growing demands to support the growth of the city. Proposals to expand capacity on the WCML which support Coventry's rail connectivity objectives will be supported.

### **High Speed Rail (HS2) and West Coast Main Line (WCML)**

- 12.52 The construction of the high speed railway (HS2) between London and Birmingham is continuing to progress. It will include a new station located close to Birmingham International station approximately four miles from the western boundary of Coventry. Solihull Metropolitan Borough Council is promoting a masterplan called UK Central (UKC) which includes plans to create up to 100,000 new jobs and new housing growth.
- 12.53 It will be important that Coventry is well connected to UK Central and able to form part of a broader UK Central Plus economic offer supported by excellent highway and public transport services. This will enable Coventry to continue to develop and be a major sub-regional hub for growth supporting services and economic activity across the whole area. For example, significant benefits could be gained through improved connectivity to high

profile employers and development sites which are located on linked economic growth corridors including the A45 / A46 and M6 including the University of Warwick, Jaguar Land Rover and the area around Whitley and Coventry airport. Existing constraints along these corridors may impede the demands of potential growth and it is likely therefore that measures may be required to improve connectivity along new and improved transport corridors in or adjacent to Coventry. Proposals which enhance that connectivity will be supported.

- 12.54 The construction of HS2 is likely to affect service patterns on the WCML to reflect the introduction of new high speed services. It will be important that existing services which support the local growth agenda are protected, and opportunities are seized which support improved connectivity objectives in the Coventry Rail Investment Strategy.

### **Policy AC6: Rail**

1. Proposals which improve the quality of local rail services and access to stations and rail interchange facilities will be supported. These include:
  - a. Improved access to rail stations, including HS2, by all modes of travel;
  - b. Improved interchange facilities between rail and other modes; and
  - c. Enhancements on the rail network which increase the frequency and quality of rail services which serve Coventry.
2. Measures which support the delivery of objectives in the West Midlands Rail Executive Rail Investment Strategy and Midland Connect Strategic Transport Plan for improved rail connectivity will be supported. This includes measures which facilitate improved rail services and supporting rail infrastructure, including further electrification of the rail network, on the Coventry north-south corridor between Leamington, Kenilworth, Coventry, Bedworth and Nuneaton and on routes to Leicestershire and the East Midlands.
3. Proposals for additional local railway stations on the east-west and north/south rail corridor within Coventry will be supported where they are proven to be viable, support growth objectives and are consistent with the relevant national, regional or local rail strategies.
4. Further details are set out in the Coventry Connected SPD, West Midlands Rail Executive Rail Investment Strategy and Midland Connect Strategic Transport Plan.



## Freight

### Road Freight

- 12.55 The efficient movement of freight is essential to support economic growth. In addition to supporting existing businesses, freight movements provide opportunities to generate additional employment through the creation of logistical and freight industries. The central location of Coventry and its high level of access to the strategic route network strengthens this opportunity.
- 12.56 On-street lorry parking, particularly around major employment and distribution sites, can create highway safety issues. These issues arise through a combination of factors such as specific delivery slots resulting in vehicles waiting on-street, and a lack of dedicated onsite HGV parking. Where new developments are expected to require large numbers of lorry movements, appropriate parking and turning facilities must be provided onsite to minimise disruption on the public highway and on sites with 24 hour operations, overnight HGV parking and facilities (such as toilets and showers) should be provided.
- 12.57 It is also important that new developments demonstrate that they can function without requiring HGVs to travel on smaller, residential roads. This is in the interest of highway safety and to reduce congestion and air pollution in line with the Council's Future Highway Network Plan. To aid this, the Council will support, where appropriate, proposals for Freight Consolidation Centres, in appropriate edge of centre locations, close to the strategic road network, to reduce volumes of HGV/LGV traffic with the city.
- 12.58 Developments will be expected to provide for and make provision for sustainable delivery methods, such as e-bikes, cargo bikes and autonomous delivery methods and other emerging technologies as alternatives to deliveries made by vehicles.

### Rail Freight

- 12.59 There is currently limited scope for additional rail freight access within the city. Opportunities for additional facilities which arise within the plan period will generally be supported, but will need to be assessed on their individual merit and be consistent with the relevant rail industry plans.

### Policy AC7: Freight

1. New developments on sites which generate or are likely to generate significant HGV movements will be supported where they:
  - a. accommodate appropriate on-site lorry parking and turning facilities to minimise disruption and safety issues on the public highway.

- b.** Where they have 24 hour operations, provide overnight HGV parking and facilities such as toilets and showers;
  - c.** Can demonstrate that they can function without requiring HGVs to travel on smaller, residential roads, in line with Policy JE5.
  - d.** Submit a delivery and servicing plan that includes a method for monitoring trips to and from the site.
- 2.** Freight consolidation and distribution centres will be supported in appropriate edge of city locations close to the strategic road network to reduce the volume of HGV/LGV traffic within the city and where they provide appropriate welfare facilities for drivers as well as employees.
  - 3.** Where appropriate, the Council will support proposals that utilise sustainable delivery methods and make provision for them, such as e-bikes, cargo bikes and autonomous delivery methods and other emerging technologies.
  - 4.** New development which supports the use of rail and air freight facilities will be supported where there is an evidenced demand, proposals are consistent with the relevant air and rail industry plans, have an acceptable environmental impact and do not significantly compromise the capacity and safety of the local highway network.

# 13. Environmental Management

## Key evidence

Strategic Flood Risk Assessment 2022

Climate Change Strategy 2024

Water Cycle Study 2024

Carbon Policy Support 2024

Heat Network Zoning 2023

West Midlands Metropolitan Area Local Aggregate Assessment Report 2024

Coventry Air Quality Management Area Order, 2009

Coventry's Municipal Waste Management Strategy 2008-2020

Environmental Management Background Paper

## Planning for climate change

13.1 The impacts of flooding, overheating and other consequences of climate change have the potential to hinder the creation of vibrant, healthy and sustainable communities in Coventry. The outcomes of climate change will also have serious impacts on vulnerable and deprived communities and those least able to respond.

13.2 Coventry City Council's One Coventry Plan (2022-2030)<sup>1</sup> sets out a vision for the city which includes three delivery priorities, one of which is tackling the causes and consequences of climate change. This is supported by the Council's draft Climate Change Strategy<sup>2</sup>, which details the Council's ambitious commitments to transition to net zero by 2050 and become a leading city for the green industrial revolution.

13.3 Without comprehensive action, climate change will severely limit economic growth. However, the approaches now required present a significant opportunity to deliver a decarbonised and resilient economy that supports job creation. Through the Climate Change Act 2008 and as a signatory of the Paris Agreement, the UK Government has committed to:

- a. reduce emissions by at least 100% of 1990 levels by 2050; and

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<sup>1</sup> <https://www.coventry.gov.uk/onecoventryplan>

<sup>2</sup> <https://www.coventry.gov.uk/climate-change/tackling-climate-change/2>

- b. contribute to global emissions reductions aimed at limiting global temperature rise to well below 2°C and to pursue efforts to limit temperatures to 1.5°C above pre-industrial levels.

13.4 Local planning authorities are bound by the legal duty set out in Section 19 of the 2004 Planning and Compulsory Purchase Act, as amended by the 2008 Planning Act, to ensure that planning policy contributes to the mitigation of and adaptation to climate change. According to guidance issued by the Town and Country Planning Association and the Royal Town Planning Institute (updated in 2023),

13.5 Chapter 14 of the NPPF addresses the duty of planning in helping to contend with a changing climate and the vulnerabilities it generates in the built and natural environments. This includes planning for zero and low carbon development, requiring renewable and low carbon energy supply, reducing emissions and greenhouse gases, the mitigation of flood risks and employing appropriate policy and design solutions to address rising temperatures, ventilation, the need for additional green infrastructure and the protection of the natural environment. The NPPF states that plans should take a proactive approach to mitigating and adapting to climate change. Development should be planned for in ways that help eliminate greenhouse gas emissions, such as through consideration of its location, orientation and design. As part of this approach, the opportunity to reduce carbon in both the fabric of new buildings and the generation of related energy has also been taken into account.

13.6 The West Midlands Combined Authority declared a climate change emergency in June 2019. In July 2019, it committed to net zero carbon emissions by 2041. This means that the region will be working towards meeting these targets through the timescale of the Coventry Local Plan Review plan period.

13.7 A Net Zero Routemap has been produced for Coventry by Professor Andy Gouldson, a lead Climate Advisor for the UK Infrastructure Bank. The Routemap sets out the results of analysis that assesses past, present and projected energy use and carbon emissions from the different sectors in Coventry and explores different options for achieving net zero in Coventry. Given that the domestic and commercial properties account for 45% of the city's total carbon emissions, it is critical that there is a step change in the city's approach to future development to support the transition towards net zero. It is therefore vital that the Coventry Local Plan Review supports this scale of ambition and provides a policy framework to deliver more sustainable development.

13.8 Changes to Part L of Building Regulations came into effect in June 2022, which introduced a carbon reduction improvement of c.31% for all major developments. The changes also significantly improve energy efficiency

standards for new homes and further improvements under the “Future Homes Standard” are anticipated during the Plan period. However, given the urgency of the climate change crisis and the amount of development anticipated across the Plan period, it is vital that use of energy from non-renewable sources by new homes, and other types of development, is minimised as far and as early as possible, until overtaken by any further revision of Building Regulations.

13.9 To help increase the use and supply of renewable and low carbon energy and heat, the Council policy provides a positive strategy for energy from these sources. The policies set out how energy infrastructure will be considered, including how opportunities for decentralised energy<sup>3</sup> and district heating<sup>4</sup> will be identified.

13.10 In definition of Grey water the local plan considers this to be water from baths, showers, and hand basins for toilet flushing, irrigation, or washing machine supply.

## STRATEGIC POLICY

### Policy EM1: Planning for Climate Change Adaptation

1. Development is required to be designed to be resilient to, and adapt to the future impacts of climate change through the inclusion of the following measures:
  - a. using layout, building orientation, construction techniques and materials and natural ventilation methods to mitigate against rising temperatures and address overheating in new buildings;
  - b. optimising the use of multi-functional green infrastructure, including tree planting for urban cooling, local flood risk management and shading;
  - c. incorporating water efficiency measures, such as the use of grey water and rainwater recycling, low water use sanitary equipment to achieve a water efficiency target of 100l/pd to be achieved using a fittings-based approach;

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<sup>3</sup> Energy that is generated close to where it will be used, rather than at an industrial plant and sent through the national grid, including micro-renewables, heating and cooling. It can refer to energy from waste plants, communal or district heating and cooling, as well as geothermal, biomass or solar energy. Decentralised heat or power networks can serve a single building or a whole community, even being built out across entire cities.

<sup>4</sup> A system that distributes heat or hot water from a central source to a group of residential or commercial buildings through a network of underground pipes carrying hot water. Heat networks can be supplied by a range of sources including energy-from-waste (EfW) facilities, combined heat and power (CHP) plants and heat pumps. The advantages include cost savings, higher efficiencies and carbon emission reductions.

- d. minimising vulnerability to flood risk by locating development in areas of low flood risk and including mitigation measures including SuDS in accordance with Policy EM4 and EM5;
  - e. Where applicable, maintain and enhance the canal network to reflect the canals' role in urban cooling;
  - f. seek opportunities to make space for water and develop new blue infrastructure to accommodate climate change challenges;
  - g. major developments must consider making connections available to the Coventry Heat Network in areas identified as Heat Network Zones;
  - h. development must meet net zero (regulated operational carbon) for residential and non-domestic development including the need to address embodied carbon and waste;
  - i. demonstrate how the concept of water neutrality has been addressed in relation to the potential to provide a benefit in improving resilience to climate change and enabling all waterbodies to be brought up to 'Good' status; and
  - j. Larger residential developments (including new settlements), and commercial developments should consider incorporating greywater recycling and/or rainwater harvesting into development at the master planning stage to reduce water demand.
2. Set out how the requirements of the policy have been complied with including justification for why the above measures have not been incorporated.
  3. Where justification for non-compliance with the requirements is based on viability, this will need to be clearly demonstrated through an open book financial appraisal.

## **Note on Policies EM2 (Building Standards) and EM3 (Renewable energy)**

13.11 Policies EM2 and EM3 from the 2017 adopted plan have been deleted and a suite of new policies (EM11-EM14) have been introduced later in this chapter.

## **Water Quality and Flood Risk**

13.12 It is important to apply this policy in the context of the Council's Local Flood Risk Management Strategy and Surface Water Management Plan to ensure that all links are made to the aims and objectives of these plans. This will help ensure that the areas identified as at risk of flooding, either fluvial or surface water, are fully considered where applications in such areas are received.

- 13.13 In accordance with the NPPF, the overall aim of this policy is to direct development away from areas of high flood risk and avoid inappropriate development in areas at risk of fluvial and pluvial flooding. Where development cannot take place in areas of low flood risk, a sequential test should be applied in which it is acknowledged that extensive areas of built development fall into the high risk areas and that the re-use of previously developed land may be needed to avoid economic stagnation. Where in the wider overall interest, development is supported as an exception to this policy with high risk areas, applicants will need to demonstrate that they strictly comply with all criteria of the policy.
- 13.14 The Environment Agency have produced a local area climate change guide which sets out how they would expect climate change to be considered in applications. The most up to date indicative flood zone maps are available from the Environment Agency directly. Additional information may be obtained by contacting the Council's Flood Risk Management and Drainage team, in addition to the maps that accompany the SFRA.
- 13.15 All major developments must be assessed in respect of the level of flood risk from all sources taking into account the impact of climate change. If development in areas at risk of flooding is the only option following the application of the sequential test, it will need to consider the following:
- the type of development is appropriate to the level of flood risk associated with its location with reference to Coventry's Strategic Flood Risk Assessment (SFRA) flood zone maps (as amended) and/or a site specific flood risk assessment, as set out in Table 2 in the Flood Risk and Coastal Change section of the National Planning Practice Guidance (NPPG).
  - the type of development must be appropriate both at the time permission is sought and at the end of the lifetime of the development, taking into account the latest climate change guidance.

## **Policy EM4 Flood Risk Management**

1. All developments must be assessed in respect of the level of flood risk from all sources, taking into account current and future impacts of climate change. Where development in areas at risk of flooding is the only option following the application of the sequential test, it will only be permitted where all of the following criteria are met:
  - a. the type of development is appropriate to the level of flood risk associated with its location in reference to Coventry's SFRA flood zone maps and advice on appropriate uses within these zones from the Environment Agency and Lead Local Flood Authority (LLFA);
  - b. it is provided with the appropriate minimum standard of flood defence and resilience to aid recovery (including suitable warning and evacuation procedures) which can be maintained for the lifetime of the development;

- c. it does not impede flood flows, does not increase the flood risk on site or elsewhere or result in a loss of floodplain storage capacity;
  - d. in the case of dwellings, it is evident that as a minimum, safe, dry pedestrian access would be available to land not at high risk, and;
  - e. in the case of essential infrastructure, access must be guaranteed and must be capable of remaining operational during all flooding events.
2. All opportunities to reduce flood risk in the surrounding area must be taken, including creating additional flood storage and exploring areas for natural flood management. In this instance, reference should be made to the Councils IDP. In order to achieve this:
    - a. the functional floodplain (Flood Zone 3b) should be protected from development and reinstated in brownfield areas wherever possible;
    - b. single storey buildings, basements and buildings on stilts will not be acceptable in Flood Zones 2 and 3;
    - c. all opportunities to undertake river restoration and enhancement including de-culverting, removing unnecessary structures and reinstating a natural, sinuous watercourse will be encouraged;
    - d. unless shown to be acceptable through exceptional circumstances, development should be set back at least 8m (from the top of bank or toe of a flood defence) of Main Rivers and 5m from Ordinary watercourses for maintenance access. This includes existing culverted watercourses.
    - e. finished floor levels must be set a minimum of 300mm above the pluvial 1% Annual Exceedance Probability (AEP) (1 in 100 year) plus climate change and 600mm above the fluvial 0.1% AEP (1 in 1000 year) plus climate change flood level.
  3. Where a development benefits from existing or proposed flood measures, the development should contribute towards the capital and/or maintenance of these measures over the lifetime of the development.
  4. For sites in Flood Zone 3a, development should not impede flow routes, reduce floodplain storage or consume flood storage in a 'flood cell' within a defended area. If the development does result in a loss of storage, compensatory floodplain storage should be provided on a 'level for level' and 'volume for volume' basis.
  5. For sites in Flood Zone 3a, all types of new development behind flood defences should be avoided, where possible, due to the residual risks of breach and overtopping. Development should ensure that it would not prevent the Water bodies' ability to reach good status or its potential to do so as set in the Severn River Basin Management Plans and should support, where possible, to improving the status class.



- 6.** A sequential, risk-based approach to the location of suitable development will be undertaken by the Council based on flood maps, SFRA flood zones and Vulnerability Classification to steer new development to areas with the lowest probability of flooding avoiding, where possible, flood risk to people and property and managing any residual risk.
- 7.** The Exception Test is applicable where there are areas in Flood Zones 2 and 3 where the Sequential Test alone cannot deliver acceptable sites but where some continuing development is necessary. The Exception Test will apply where development will provide wider sustainability benefits that outweigh flood risk, fully informed by an appropriately scaled Flood Risk Assessment (FRA) which indicates that the development will be safe for its lifetime, taking account of the vulnerability of its users without increasing flood risk elsewhere and where possible, reducing overall flood risk.
- 8.** Land that is required for current and future flood management will be safeguarded from development. Where development lies adjacent to or benefits from an existing or future flood defence scheme, they may be expected to contribute towards the cost of delivery and/or maintenance of that scheme in accordance with Policy IM1.
- 9.** A FRA is required, appropriate to the scale and nature of the development proposed, where the development is:
  - a.** within a river floodplain, as defined by the Coventry SFRA indicative flood zone maps;
  - b.** within 20 metres of any watercourse;
  - c.** adjacent to, or including, any flood bank or other flood control measure / structure;
  - d.** within an area where there may be surface water issues and drainage problems;
  - e.** within an area where there is flood risk from canals, reservoirs or flooding from sewers.
- 10.** Where a development proposal lies adjacent to the existing de-culverted river Sherbourne, a natural sinuous river channel should be retained. Consideration should also be given to removing water bodies from culverts wherever possible and viable. This will be of particular importance along Fairfax Street and will be vital to create multi-functional green and blue spaces within the city centre.
- 11.** All proposals will be expected to demonstrate, how, in areas at risk of flooding, the safety of those sleeping in any ground floor accommodation will be secured.

## Sustainable Drainage

13.16 SuDS involve a range of techniques that mimic the way that rainfall drains in natural systems and avoids any increase in flood risk and improves water quality. Many existing drainage systems can cause problems of flooding, pollution or damage to the environment and are not proving to be sustainable in the long term. The key objectives in the use of SuDS are:

- reducing flood risk and mitigating the impacts of climate change;
- maintaining and restoring natural flow routes together with the rate and volume of surface runoff to reduce the risk of flooding;
- improving the water environment quality;
- minimising diffuse pollution;
- reducing pressure on the sewerage network;
- improving habitat, biodiversity and local amenity;
- harness opportunities to incorporate multi-functional uses such as green space play areas.

13.17 The Council is also the Lead Local Flood Authority (or LLFA for short) with responsibility for developing, maintaining and monitoring a Local Flood Risk Management Strategy in partnership with other relevant bodies in the area. In addition, the LLFA is a statutory consultee on all major planning applications and a consultee on a non-statutory basis on all minor applications whilst also advising on the approval of all sustainable drainage and related systems, surface flooding and ground water for all planning applications.

13.18 In respect of SuDS, it is important to emphasise the need for a management train where drainage techniques can be used in series to change the flow and quality characteristics of the runoff in stages. For a management train to work effectively the train must contain the right type of SuDS. The detail for this would be set out in the SPD, but all consideration should be given to the principle by ensuring developments implement source controls as part of the management train. In environmental terms this approach is good for water quality. With respect to future maintenance, it places the responsibility with the development owner and reduces or eliminates runoff from the small rainfall events which constitute the majority of rain events.

13.19 Separate guidance will detail how SuDS schemes will be designed, adopted and maintained in accordance with the technical standards set out by the Sustainable Drainage Systems Approval Bodies (SABs). As part of the Transport and Infrastructure Design Guide, a separate guide will indicate the National and Local technical standards for SuDS schemes.

## Policy EM5 Sustainable Drainage Systems (SuDS)

1. Schedule 3 of the Flood and Water Management Act (FWMA) 2010\* provides the framework by which all new developments are required to apply SuDS and should ensure that surface water runoff is managed as close to its source as possible. The FWMA gives SuDS Approval Bodies (SABs) statutory responsibility for approving and where appropriate, adopting, the approved SuDS features.
2. SuDS are the preferred way of managing and conveying surface water. All developments will consider and demonstrate how the following hierarchy for the discharge of surface water from a site will be applied:
  - a. Discharge by infiltration, attenuation, water reuse technologies and green roof technology;
  - b. Discharge to a watercourse allied with attenuation, water reuse technologies such as green roof technology;
  - c. Discharge to surface water sewer allied with attenuation, water reuse technologies and green roof technology.
3. Where proven that infiltration allied with water reuse technologies is not possible, surface water should be discharged into a main river or ordinary watercourse (in agreement with the Environment Agency and the LLFA) at a rate no greater than  $Q_{bar}$  greenfield runoff, or an appropriate minimum rate for small sites, agreed by the LLFA. If there is no watercourse available then, allied with water reuse technologies, surface water should be discharged to a surface water sewer at a rate no greater than  $Q_{bar}$  greenfield runoff.
4. In exceptional circumstances where a sustainable drainage system cannot be provided, it must be demonstrated that it is not possible, and an acceptable alternative means of surface water disposal is provided which does not increase the risk of flooding or give rise to environmental problems and improves on the current situation with a reduction in peak and total discharge.
5. The developer must agree all long-term maintenance arrangements for all SuDS with the SAB, including the means for funding the maintenance for the lifetime of the development.

\*Flood and Water Management Act (FWMA) 2010 or future equivalent.

## Previously Developed Land

- 13.20 When promoting land affected or potentially affected by contamination developers and site promoters are actively encouraged to engage with the Environment Agency as early as possible in the planning process to follow the risk

management framework provided in Land Contamination Risk Management (LCRM) 2020. Furthermore, it is advised to refer to the Environment Agency's Guidance on Requirements for Land Contamination Reports (2005) for the specific type of information that we require to assess the risks to Controlled Waters. It is recommend that developers should:

- Follow the risk management framework provided in Land Contamination: Risk Management, when dealing with land affected by contamination
- Refer to the Environment Agency's Guiding principles for land contamination for the type of information that they require in order to assess risks to controlled waters from the site - the local authority can advise on risk to other receptors, such as human health
- Consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land
- contamination risks are appropriately managed
- Refer to the contaminated land pages on:  
[www.gov.uk/government/collections/land-contamination-technical-guidance](http://www.gov.uk/government/collections/land-contamination-technical-guidance)

13.21 The Environment Agency require the risk to groundwater of any significant contamination to be considered by a desk study, site investigation and subsequent conceptual model and risk assessment, where necessary leading to suitable remedial action and related method statement. This is in accordance with the NPPF (Para 109 -112), which indicates that where development is proposed on land that is known or suspected to be affected by contamination then the risks to human health and the wider environment should be assessed by the applicant for consideration by the LPA prior to determination.

13.22 The assessment should provide such information as is necessary to determine whether the proposed development can proceed. Where such assessment shows that remediation is required then the standard of remediation that should be achieved through the grant of planning permission for new development is the removal of unacceptable risk and making the site suitable for its new use, including the removal of existing pollutant linkages. All receptors relevant to the site should be protected to an appropriate standard. As a minimum, after carrying out the development and commencement of its use, the land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990.

13.23 Development proposals will need to comply with the Environment Agency publication 'Groundwater Protection: Policy and Practice' (GP3) which may require development to be restricted at certain locations with a need to give careful consideration given to the potential water quality risks and impact on flooding and surface water drainage.

## Policy EM6 Redevelopment of Previously Developed Land

1. Development will be supported where proposals do not have a negative impact on water quality, either directly through pollution of surface or groundwater or indirectly through the treatment of wastewater by whatever means.
2. Prior to any potential development, consultation should be held with Severn Trent Water Ltd to ensure that the required wastewater infrastructure is in place in sufficient time. In line with the objectives of the Water Environment Regulations, development must not affect the water bodies' ability to reach good status or its potential, as set in the Humber and Severn River Basin Management Plans and where possible should support improving the status class.
3. Developers and operators must provide adequate information when submitting their proposals so that the potential impact on groundwater resources and quality can be adequately assessed. This should include a risk assessment demonstrating there would be no adverse effect on water resources.
4. Development will not be permitted within a groundwater Source Protection Zone 1 which would physically disturb an aquifer. This will include situations where proposed wastewater infrastructure could pose an unacceptable risk of pollution of the underlying aquifer or receiving watercourse.
5. Development must meet a water efficiency target of 100l/pd using a fittings-based approach.
6. New build non-residential development greater than 1000sqm to achieve at least 4 credits in the Wat01 Measure for water in the Building Research Establishment Environmental Assessment Method (BREEAM) New Construction standard.

## Air Quality

13.24 As previously highlighted in the Accessibility chapter of this Plan, the whole of Coventry is designated as an Air Quality Management Area and has been since 2009. Emissions from road transport are the major source of pollution in Coventry, with emissions from industry also contributing. It must be recognised that transport requirements associated with the construction phase itself has a negative impact upon air quality. Under Part IV of the Environment Act 1995, the Council carries out annual review and assessment of air quality in the city, within the context of national air quality standards and objectives.

13.25 As a partner of the Low Emissions Towns and Cities programme (LETCP), the Council is working together with its West Midlands neighbours to improve air quality and reduce emissions from road transport. This is alongside the emerging 'West Midlands Metropolitan Transport Emissions Framework' which sets out transport's role in tackling air quality issues and has proposed a range of policies. The intention is to do this by promoting the uptake of low emission fuels and technologies, establishing and sharing best practice policies, and developing various tools and resources. The objectives of the programme are to investigate and produce various regional strategies designed to improve air quality, with a view to meeting national air quality objectives.

13.26 Funded through the DEFRA Air Quality Grant, the aims of the LETCP and West Midlands Transport Emissions Framework are to:

- Improve air quality through the reductions in road transport emissions, and simultaneously reductions in carbon emissions;
- Establish best practice policies and measures for the West Midlands, creating transferable models for other towns and cities;
- Improve health; and
- Maximise opportunities for economic development through the transition to a green economy.

13.27 To support the improvement in the city's air quality this policy should be applied in conjunction with the Low Emissions Strategy and Good Practice Guidance on Planning and Procurement for the West Midlands (2014) developed by the LETCP. All major developments will therefore be required to undertake full air quality assessments. Where appropriate exposure assessments will also apply to smaller developments in accordance with this guidance.

13.28 Exposure assessments will need to include an understanding of potential exposure to pollutants, as well as a proposal for mitigation measures such as:

- designing buildings to ensure local people are less exposed;
- green areas are incorporated into development to help create barriers to pollutants;
- that building layout and design prevents the creation of wind tunnels and canyons to help the dispersal of pollutants.
- This policy should be applied in conjunction with the Low Emissions Strategy and Good Practice Guidance on Planning and Procurement for the West Midlands.

13.29 Specific attention should be paid to location of sensitive developments, e.g. schools, hospitals, residential areas. Detailed methodology for full air quality and exposure assessments should however be agreed with the Council. Mitigation and compensation measures, ensuring that all developments are sustainable from an air quality perspective, should be submitted with all proposals. Where

appropriate, such measures may be secured through a legal agreement. Recommended measures for all types of developments can be found in the LETCP Air Quality Planning Guidance.

### **Policy EM7 Air Quality**

1. Major development schemes should promote a shift to the use of sustainable low emission transport (electric vehicles and vehicles that use biofuels) to minimise the impact of vehicle emissions on air quality. Development should be located where it is accessible to support the use of public transport, walking and cycling. All major development proposals should be suitably planned to design out any adverse impact on air quality and be in accordance with the West Midlands Transport Emissions Framework and associated policies.
2. Major Development proposals will be required to demonstrate that they do not lead to a significant deterioration in local air quality resulting in unacceptable effects on human health, local amenity or the natural environment. The air quality assessment should address:
  - a. The existing background levels of air quality;
  - b. The cumulative background levels of air quality (related to the cumulative impact of developments in an area); and
  - c. The feasibility of any measures of mitigation that would prevent the national air quality objectives being exceeded, or would reduce the extent of the air quality deterioration.
3. This policy will be applied in line with the Air Quality SPD.

### **Waste**

13.30 The Council recognises the importance of sustainable waste management both locally and in cooperation with its neighbours to ensure that all the waste management needs of the area are met. The key challenges for future growth in waste will be balancing economic prosperity and associated growth with the financial strains of providing necessary infrastructure. Waste policy of the Local Plan is applied in accordance with the Council's [Waste Strategy](#).

### **Policy EM8 Waste Management**

1. The Council's Waste Management Strategy will be supported through:
  - a. encouraging less consumption of raw materials through the reduction and re-use of waste products;

- b.** a requirement for development proposals to incorporate adequate storage for waste and recycling services along with safe access for collection vehicles;
  - c.** encouragement of new methods of processing and recycling at waste management sites;
  - d.** supporting recycling proposals for aggregate materials subject to the criteria in part 2 of this policy;
  - e.** Existing waste management facilities or land allocated for waste management uses being protected from encroachment by incompatible land uses that are more sensitive to odour, noise, dust and pest impacts; and
  - f.** Proposals for waste management facilities only being permitted where they would not have an unacceptable impact on the quantity or quality of surface or groundwater resources.
- 2.** Proposed new or expanded waste management facilities will be assessed against the following criteria:
  - a.** The effect of the proposed waste facility upon the environment and neighbouring land uses;
  - b.** The impact of traffic generated by the proposal and the availability of alternative transit modes, such as rail and waterways;
  - c.** The need for pollution control measures appropriate to the type of waste to be processed or handled;
  - d.** The impact of proposals on residential amenity. New waste facilities will not normally be approved adjacent to existing housing and proposals for anaerobic digestion will not be approved in close proximity to existing housing;
  - e.** The effect of proposals on aircraft safety; and
  - f.** The design of the proposal. Careful consideration should be given to the need to minimise environmental and visual impact. Wherever feasible, waste operations should be enclosed within buildings or sealed structures in order to minimise impacts on adjacent uses from noise, ordure, vermin and wildlife. Proposals advocating open air unenclosed storage of organic odour producing material will not be supported.
- 3.** Proposals will be supported where it is demonstrated that these criteria are satisfied.
- 4.** Development proposals should demonstrate measures to minimise the generation of waste in the construction, use and life of buildings and promote more sustainable approaches to waste management, including the reuse and recycling of construction waste and the promotion of layouts and designs that



provide adequate space to facilitate waste storage, reuse, recycling and composting.

## Minerals

- 13.31 The continued supply of aggregates and other material, including recycled and secondary materials is required to meet current and future needs of the development and construction industry. Promoting the use of recycled and secondary materials will help to minimise both primary extraction and waste and so is reflected in Policy EM8.
- 13.32 The National Planning Policy Framework requires local planning authorities to define Mineral Safeguarding Areas (MSAs) in Local Plans in order that proven mineral resources are not needlessly sterilised by non-mineral development, although there is no presumption that resources defined in MSAs will be worked.
- 13.33 MSAs are required to identify what are considered to be economic deposits of mineral. The purpose of MSAs is to ensure that mineral resources are adequately taken into account in all spatial planning decisions. They do not automatically preclude other forms of development taking place, but highlight the presence of economic minerals so that it is considered, and not unknowingly or needlessly sterilised.
- 13.34 In areas where extraction is permitted or is planned, Mineral Consultation Areas will be designated. None are proposed for Coventry during this plan period as there are no anticipated active mineral sites that are being brought forward during the plan period. This has been evidenced through the British Geological Society's Mineral Safeguarding Project, which has been undertaken for the Coventry, Solihull and Warwickshire authorities.
- 13.35 In Coventry, the predominant economic mineral resource is coal. MSAs for this mineral have been identified having had regard to advice in the 'Guide for Mineral Safeguarding in England' produced by the British Geological Society (BGS) in November 2007. The former coal mining site at Daw Mill (which lies outside Coventry's boundaries) previously had a direct impact on the extensive concealed coal reserves that extend across the southern coalfield. These areas lie in the north western areas of Coventry's administrative boundary. Following the closure of the site however, the mining of this area is now highly unlikely.
- 13.36 Local authorities are required to prepare a Local Aggregate Assessment (LAA) to assess the capacity and outputs from existing sources, and to assess future supply options. Work is undertaken collaboratively by the seven West Midlands Metropolitan Authorities in order to address cross boundary mineral planning issues. The Council will continue to proactively work with its neighbours through

joint working and collaborative efforts via the West Midlands Aggregate Working Party.

### **Policy EM9 Safeguarding Mineral Resources**

Mineral Safeguarding Areas are defined for mineral reserves that are considered to be of current or future economic importance. Where developments are proposed in these areas, the application needs to acknowledge the presence of these mineral reserves. The extent of Mineral Safeguarding Areas are defined on the Policies Map.

13.37 In terms of non mineral development in Mineral Safeguarding Areas, the policy aims to take a balanced approach to protecting minerals resources in Coventry against the need to attract investment and urban regeneration to a primarily built up area.

13.38 This policy ensures that all proposals for non-mineral working within the designated MSAs are properly considered and evaluated in partnership with the Coal Authority. The Policy also aims to ensure that development proposals within the Plan are deliverable without complete sterilisation due primarily to the extensive deep cast coal reserves to the West and North West of the city. Within this location this has been further emphasised by the closure, and planned redevelopment of the Daw Mill Colliery, which would have provided the primary access point for the extraction of such reserves. Development identified within policies H2 and/or JE2 would not therefore be subject to this policy

### **Policy EM10 Non Mineral Development in Mineral Safeguarding Areas**

All non-mineral development proposals in the designated Mineral Safeguarding Areas should assess and evaluate the legacy of past mining heritage and should consider this in accordance with Policy EM2. It should also ensure that development does not entirely sterilise any potential future mineral extraction should this become viable and desirable. This should be considered in partnership with the Coal Authority.

## **Energy Infrastructure**

13.39 The ways in which heating and power are delivered to and used in development will need to change to meet the requirements of a zero-carbon future and the intended reduction of greenhouse gas emissions. The use of fossil fuels and traditional forms of energy generation will need to be phased out and replaced by zero-carbon, non-polluting and energy-efficient sources. These methods will

include the use of heat networks and communal heating systems, wherever possible.

- 13.40 Sections 1 – 4 of the policy should be addressed at design and post-completion stages, to ensure that the development has been built to intended standards. Post-completion resubmission of the original energy statement including energy performance calculations, informed by the relevant tests to systems and fabric, should be required as a condition as part of the planning application process. Compliance with sections 6 and 8 should also be demonstrated post-completion through planning condition.
- 13.41 Sections 1, 4 and 9 should also be demonstrated at planning application stage through the submission of an energy statement (and corresponding Viability Assessment if required), which should include associated output reports from energy modelling software (e.g. Standard Assessment Procedure (SAP), Building Research Establishment Domestic Energy Model (BREDEM), Passive House Planning Package (PHPP), or Home Energy Model (HEM) when available for general use).

### **Fabric efficiency**

- 13.42 Applicants are expected to target reductions in the energy demand of buildings under section 1; a minimum 63% improvement is sought. Reducing the total energy demand of a building will reduce the overall provision of renewable energy required by section 4. The Council will expect applicants to deliver energy savings to the greatest extent possible before renewable energy provision is designed, or if offsetting is proposed.
- 13.43 In addition, where it is not feasible or viable to deliver the required renewable energy generation to meet section 4, the Council will expect applicants to reduce the energy demand of the building(s) to the greatest extent possible. This seeks to ensure that the building reduces its energy demand first and operational costs are minimised for occupiers.

### **Non-mandatory energy targets in section 2**

- 13.44 Achievement of these energy efficiency performance levels will reduce the amount of solar PV required under section 4. This can save the applicant costs in renewable energy provision and / or energy offsetting.
- 13.45 Performance against these non-mandatory targets would need to be calculated using a method that accurately predicts energy use. SAP is not suitable for this due to its poor predictive accuracy. PHPP is a suitable methodology. The Council may subsequently take a view on whether the incoming HEM may be suitable when HEM's final form is known.

## Steps to calculating and narrating amount of renewable energy provision

- 13.46 First, calculate the total predicted annual energy use in Kilowatt Hour (kWh) for all proposed new buildings (whole buildings, regulated and unregulated, after all the measures proposed in the application towards compliance with section 1). This can be modelled using SAP, BREDEM (the methodology on which SAP is based), or PHPP. PHPP is the preferred model due to its accuracy, to avoid SAP's inaccuracies at predicting actual energy use in operation (SAP underestimates space heat demand, overestimates unregulated energy, and may overestimate hot water use). The Council may later take a view on whether the incoming HEM is a suitable method for energy use prediction when the final form of HEM is available.
- 13.47 Second, calculate the annual renewable energy generation for whole site in accordance with the Microgeneration Certification Scheme (MCS) guidance for the relevant renewable energy technology (anticipated to be solar PV in most cases as this is typically the most suitable technology in an urban setting). This does not have to be exclusively on the buildings themselves and can include provision of new standalone renewable energy installations within the site. The figure does not include renewable heat delivered by heat pumps, as that would count instead towards section 1.
- 13.48 Third, deduct the annual renewable generation from the annual energy use. The result should be zero or less. If the result is not zero or less, explore how to provide more on-site renewable energy (for example through an adjustment to roof orientation, and ensuring PV area provision has been explored up to at least equivalent of 70% of projected building footprint including roof overhangs and with reasonably efficient panels available on the market).
- 13.49 If it proves unfeasible to increase renewable energy generation on-site to result in an annual balance of energy generation with energy use, then divide the total annual renewable energy generation by the building footprint. This result should be at least 114.9kWh. If this is impossible, provide evidence as to why this is not possible even with a PV area equivalent to 70% of projected building footprint and reasonably efficient panels available on the market.
- 13.50 Finally, calculate the residual energy demand (whole building, not per m<sup>2</sup>) for all proposed new buildings after all measures proposed in sections 1 and 4, then proceed to use this figure to calculate the required amount of offsetting provision in section 5.

## Offsetting calculations

- 13.51 This is a one-off payment, where the annual shortfall in on-site renewable energy generation is multiplied by the energy offset price. Because the kWh energy use of the home and the kWh of energy generation that the offset fund will install are both annual figures, this amount does not need to be multiplied by a number of years.
- 13.52 The requirement for offsetting may be applied flexibly where it is demonstrated that this makes social and affordable housing unviable due to unique site circumstances that result in cost uplifts significantly higher than assessed in the Whole Plan Viability Assessment. As detailed previously, the flexibility could include a reduction in the scope of energy that has to be offset, or a reduced price per kWh if the Council is confident the scheme can still deliver the required amount of PV for that reduced price. The per-kWh price stated in the policy reflects an average of several recent years' per Kilowatt Peak (kWp) median cost for PV installations sized 4-50kWp (source: Department for Energy Security and Net Zero data), divided by a typical output (kWh per kWp) with Sandwell's annual average sunlight. The national data set gives costs for installations at three different sizes: 0-4kWp, 4-10kWp, or 10-50kWp. The larger-scale installations have a lower cost per kWp.
- 13.53 If the Council chooses to allow a lower offset price, a good guideline minimum would be no lower than the lowest price stated in the most recent available version of that national data set – unless the Council can deliver the PV at an even lower price (for example, via the Council's access to more affordable sites, local supply chains or combining the PV installation with other planned works). The degree of flexibility will depend on the unique scheme characteristics and evidence submitted the local authority about what could be viably accommodated.

## Assured performance methods

- 13.54 These are processes to follow throughout design, construction, commissioning and building handover that reduce the energy performance gap (the gap between predicted energy use and actual energy use). These not only help keep the building's actual carbon emissions to a minimum (as opposed to their predicted emissions using inaccurate methods like SAP), but they also help to ensure occupant satisfaction. Suitable methods include Building Services Research and Information Association (BSRIA) Soft Landings<sup>119</sup>, NEF / GHA Assured Performance Process<sup>120</sup>, and Passivhaus certification. Other processes may be available or become available during the course of the plan. Alternative processes proposed by the applicant will be subject to consideration by the Council on their evidence-based merits. There are also some additional tools available that are not in themselves an assured performance process but

that can assist in improving the energy performance of a building in use, such as BS40101121.

## **Applicability to outline applications**

- 13.55 Compliance with the policies will be conditioned at outline stage and must be confirmed in detailed reserved matters. However, the Council accepts that the degree of detail provided in the outline energy strategy will be less than that for full and reserved matters applications. It is also recognised that this means the outline energy calculations may be largely based on assumptions. The aim should be to demonstrate that options have been identified by which the development could comply with the policy targets, considering the broad mix of anticipated floorspace, typologies and site conditions. Statements made about estimated carbon and energy performance based on a high degree of assumptions at outline stage should be reassessed at detailed reserved matters, albeit the reserved matters may diverge in how the required compliant performance will be achieved.
- 13.56 Where more detail is known, it should be reflected in the outline application; for example, if development is expecting to connect to a site-specific low-carbon energy source. As a further illustration, if a limited number of repeated home types are expected on a site, the energy modelling would ideally reflect similar house types and identify a specification by which they could meet the policy targets for energy efficiency and renewable energy (taking into account site conditions). The modelled homes could reflect, for example, a sample of the intended housebuilder's house types that are most likely to be built on the site. This exercise benefits the developer in that it gives an early understanding of the degree of amendment needed to their existing regular specifications. This will then allow them to set up supply chains and benefit from economies of scale in advance of commencing on site; outline proposals typically relate to large-scale developments that can take several years to reach commencement.
- 13.57 The estimated offsetting contribution (if required) for an outline application should be stated in the outline Energy Assessment. These will be subject to a Section 106 agreement, but not paid at the time of the outline application. In that case the offset contribution must be recalculated within the subsequent reserved matters application and paid prior to occupation.

## **Post-occupancy energy monitoring**

- 13.58 The purpose of this element is to reveal the real energy performance of buildings compared to the energy use predicted using Building Regulations calculations. This is not intended as a policing or enforcement mechanism but as means of gathering data for both developers and the Council, to inform both future development and construction work and ongoing policy development. This data will help enable the development of local performance benchmarks.

There is often a significant difference between Building Regulations energy use predictions and reality, because there is currently no nationwide feedback mechanism on actual energy performance for those who consented, designed or built the homes. This is an issue which will need to be improved in order to meet the UK's carbon targets; this policy is intended to contribute to that learning process. Similar policies have been successfully implemented elsewhere for several years.

13.59 At design stage (and therefore planning application stage), it will be important to put metering arrangements in place to enable this data collection, with as little disturbance to occupants as possible (e.g. ideally automated meters and /or meters located in an area accessible by the reporter without entering individual homes or units). Residential data should be aggregated to a level that enables anonymisation before reporting (other locations' similar policies suggest a minimum of 5 homes' data should be aggregated together before reporting). For residential data collection, households' consent should be acquired.

13.60 The use of Heat pumps will be considered as a energy efficiency measure rather than a renewable energy measure. As a measure in aid of this Target Emissions Rate (TER) target, achieve an improvement (reduction) on Part L 2021 Target Fabric Energy Efficiency (TFEE) as follows:

- End terrace:  $\geq 12\%$
- Mid terrace:  $\geq 16\%$
- Semi detached with room in roof:  $\geq 15\%$
- Detached:  $\geq 17\%$
- Bungalow:  $\geq 9\%$
- Flats / apartments:  $\geq 24\%$  (weighted average, whole block).

## Policy EM11 Energy Infrastructure

All new build dwellings (use class C3 and C4) are required to submit an energy statement demonstrating that the development meets the requirements set out in section 1.

### 1. Building Efficiency Part L % improvement:

- a.  $\geq 63\%$  improvement (reduction) on Part L 2021 TER, from energy efficiency measures.
- b. Heat pumps are to be calculated as an energy efficiency measure, rather than a renewable energy measure.

All the above should be calculated using SAP10.2 or an updated version (or the Home Energy Model, HEM, once it is implemented).

### 2. Alternative Compliance

**a.** Positive weight will be given to applicants who can demonstrate the following absolute energy metrics:

- i.** Total Energy Use: 35 kWh/m<sup>2</sup>/year
- ii.** Space heating demand: 15 kWh/m<sup>2</sup>/year

Performance in these targets must be evidenced using a methodology that accurately predicts buildings' operational energy use. Suitable methodologies include PHPP.

Where a building achieves Passivhaus certification, it will be deemed to have complied with these targets.

**b.** Where this section is demonstrated to have been achieved, it will be assumed that Policy EM11 section 1 is also achieved, as the section 2 targets reflect an improved and preferable standard that more robustly reflects actual energy performance based on energy metrics guidelines.

### **3.** Clean energy supply

**a.** The use of fossil fuels and connection to the gas grid will not be considered acceptable.

In addition to the requirements in sections 1 and 2, positive weight will be given to applicants who can demonstrate the following requirements:

- b.** Major developments (residential development of ten or more dwellings) should include an assessment of decentralised energy networks within the Energy Statement.
- c.** This assessment should outline existing or planned decentralised energy networks in the vicinity of the development and should assess the opportunity to connect to them.
- d.** Where there is an existing or imminently planned network, the general expectation to pursue a connection may be waived if it can be demonstrated that the development is not suitable, feasible or viable for district heat or decentralised energy networks, or that an individualised solution would result in lower overall carbon emissions than connecting to the decentralised network, taking into account that network's carbon emissions factors.
- e.** For developments of over 10+ dwellings, applicants are expected to identify and address:
  - i.** Current or proposed major heat supply plants, or networks (for example, industrial uses, data centres)
  - ii.** Possible opportunities to utilise energy from waste, or waste heat from an industrial process
  - iii.** Opportunities for private wire electricity supply from renewable sources
  - iv.** Utilisation of natural and engineered heating or cooling systems.

### **4.** On-site renewable energy:

Where viable, all major development should seek to deliver the following on site renewable energy generation standards.



- a. On-site annual renewable energy generation capacity (in kWh) at least equal to the predicted annual total regulated and unregulated energy use (residual energy use in kWh after section 1 has been achieved, plus unregulated energy use).
- b. Where an on-site net zero regulated and unregulated energy balance is not possible or viable<sup>5</sup>, it should be demonstrated that the amount of on-site renewable energy generation equates to >114.9 kWh/m<sup>2</sup> projected building footprint/year.
- c. Where a building in a multi-building development cannot individually achieve the requirements in a. and b above, this shortfall is to be made up across other units onsite before carbon offsetting (section 5) is considered.
- d. Large-scale development (50 residential units or more) should demonstrate that opportunities for on-site renewable energy infrastructure (on-site but not on or attached to individual dwellings), such as solar PV canopies on car parks, have been explored.
- e. Regulated and unregulated energy use can both be calculated with Part L SAP or BREDEM, but a more accurate method such as PHPP is advised. Any other proposed methods are subject to Council confirmation of acceptability.
- f. The annual renewable energy generation and the annual energy use are whole-building figures, not per-m<sup>2</sup> figures.
- g. Renewable energy output should be calculated in line with MCS guidance for the relevant technology (expected to be PV in most cases).

**5. Energy offsetting:**

- a. Only in exceptional circumstances and as a last resort where it is demonstrably unfeasible to achieve an on-site net zero regulated and unregulated energy balance, any shortfall in on-site renewable energy generation that does not match energy use is to be offset via S106 financial contribution, reflecting the cost of the solar PV that will need to be delivered off-site.
- b. The energy offset price will be based on cost of solar PV data from the Department for Energy Security and Net Zero. The price should be revised annually. This is set as a one-off payment, where the annual shortfall in on-site renewable energy generation is multiplied by the energy offset price. This amount does not need to be multiplied by any number of years.

**6. Reduced performance gap:**

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<sup>5</sup> Exceptional circumstances where an on-site net zero energy balance is not achieved may only be found acceptable in some cases, for example with taller flatted buildings (4 storeys or above) or where overshadowing significantly impacts solar PV output

When enacting section 4, developments will need to consider the following requirement:

- a. An assured performance method must be implemented throughout all phases of construction to ensure operational energy in practice performs to predicted levels at the design stage.

**7. Smart energy systems:**

When enacting section 4, developments will need to consider the following requirements:

- a. Proposals should demonstrate how they have considered the difference (in scale and time) of renewable energy generation and the on-site energy demand, with a view to maximising on-site consumption of energy generated on site and minimising the need for wider grid infrastructure reinforcement.
- b. Where the on-site renewable energy generation peak is not expected to coincide with sufficient regulated energy demand, resulting in a need to export or waste significant amounts of energy, proposals should demonstrate how they have explored scope for energy storage and/or smart distribution systems. The purpose being to optimise on-site or local consumption of the renewable energy (or waste energy) that is generated by the site. Where appropriate, proposals should demonstrate that they have integrated these to optimise these carbon- and energy-saving benefits and minimise the need for grid reinforcements.
- c. This may include smart local grids, energy sharing, energy storage and demand-side response, and/or solutions that combine elements of the above.

**8. Post-occupancy evaluation:**

- a. Large-scale development (50 units or more) should monitor and report total energy use and/or renewable energy generation values on an annual basis. An outline plan for the implementation of this should be submitted with the planning application. The monitored in-use data are to be reported to the local planning authority for 5 years upon occupation.

## **Reducing operational carbon in new build non-residential development**

13.61 Sections 1 - 4 of Policy EM12 must be addressed at design and post-completion stages, to ensure that the development has been built to intended standards. Post-completion resubmission of the original energy statement including energy performance calculations, informed by the relevant tests to systems and fabric, should be required as a condition as part of the planning application process. Compliance with sections 6 and 8 should also be demonstrated post-

completion through planning condition. Sections 1 - 5 should be demonstrated at planning application stage through the submission of an energy statement, alongside associated output reports from energy modelling software (e.g. Simplified Building Energy Model (SBEM)).

## **Compliance with section 1 target emission rates (TER) reductions**

13.62 TER reduction targets are not limited to delivery solely through energy efficiency measures. There could be an element of clean energy supply or renewable energy measures included in them. However, further renewable energy will be needed to subsequently meet the requirement of section 4; applicants are advised to pursue energy efficiency measures as far as feasible in the first instance in pursuit of section 1, so that section 4 renewable energy requirements (to match 39% of regulated energy use) are not rendered excessively expensive or unfeasible. Designing to use less energy in the first place reduces the amount of renewable energy needed to match this, and / or the amount of carbon offset payment needed. The Council therefore expects applicants to demonstrate that energy efficiency has been maximised to the greatest extent feasible and viable, before renewable energy generation and / or offsetting is provided.

13.63 Applicants should be aware that in the current Part L for non-domestic buildings, the type of heating system in the 'notional' building (from which the TER is derived) is the same as the type of heating system in the actual proposed building. Therefore, no TER improvements will be made simply by switching from a gas or oil boiler to a heat pump or other all-electric or otherwise low-carbon heat system. However, Part L does define an assumed efficiency rate for each heating system type. Therefore, TER improvements can be made through selecting a heating system that is more efficient than Part L 2021's notional efficiency for that heating type.

## **On-site renewable energy target**

13.64 As with the residential approach, first calculate the total predicted annual energy use in kWh for all proposed new buildings (whole buildings, regulated and unregulated, after all the measures proposed in the application towards compliance with section 1). This can be modelled using SAP, BREDEM (the methodology on which SAP is based), or PHPP. PHPP is the preferred model due to its accuracy, to avoid SAP's inaccuracies at predicting actual energy use in operation (SAP underestimates space heat demand, overestimates unregulated energy, and may overestimate hot water use). The Council may later take a view on whether the incoming HEM is a suitable method for energy use prediction when the final form of HEM is available.

13.65 Second, calculate the annual renewable energy generation for whole site in accordance with the MCS guidance for the relevant renewable energy

technology (anticipated to be solar PV in most cases as this is typically the most suitable technology in an urban setting). This does not have to be exclusively on the buildings themselves and can include provision of new standalone renewable energy installations within the site. The figure does not include renewable heat delivered by heat pumps, as that would count instead towards section 1.

- 13.66 Third, deduct the annual renewable generation from the annual energy use. The result should be zero or less. If the result is not zero or less, explore how to provide more on-site renewable energy (for example through an adjustment to roof orientation, and ensuring PV area provision has been explored up to at least equivalent of 70% of projected building footprint including roof overhangs and with reasonably efficient panels available on the market).
- 13.67 If it proves unfeasible to increase renewable energy generation on-site to result in an annual balance of energy generation with energy use, then divide the total annual renewable energy generation by the building footprint. This result should be at least 114.9kWh. If this is impossible, provide evidence as to why this is not possible even with a PV area equivalent to 70% of projected building footprint and reasonably efficient panels available on the market.
- 13.68 Finally, calculate the residual energy demand (whole building, not per m<sup>2</sup>) for all proposed new buildings after all measures proposed in sections 1 and 4, then proceed to use this figure to calculate the required amount of offsetting provision in section 5.

### **Assured Performance Processes for energy performance**

- 13.69 Regarding assured performance processes, in addition to those mentioned in SCC1 (paragraph 4.23), there is also one additional method for non-residential development: National Australian Built Environment Rating System (NABERS) UK129 (administered by Chartered Institution of Building Services Engineers (CIBSE)). NABERS is currently only available for offices but is likely to extend to other building types in future.

### **Offsetting**

- 13.70 The requirement for offsetting may be applied flexibly where it is demonstrated that this makes otherwise desirable development unviable due to the unique energy use profile of the proposed building and site characteristics. The flexibility could include a reduction in the scope of energy that has to be offset, or a discounted price per kWh if the Council is confident this can still deliver the required offset projects within this price (when pooled into the offsetting fund, which will primarily consist of full price offset contributions). The justification for Policy SCC1 includes further information on the available national guidance on

cost of solar PV, which achieve economies of scale with greater amounts of PV installation. The degree of flexibility available will depend on the unique scheme characteristics and evidence submitted to the Council about what can be viably accommodated. It may also depend on the degree to which the proposed development represents a socially desirable facility that meets unmet community needs (such as for healthcare, education, or similar).

Please see also the supporting text for Policy EM11 regarding:

- a. calculating renewable energy provision and offset payments,
- b. applicability to outline applications, and
- c. assured performance processes.

## **Policy EM12 Reducing operational carbon in new build non-residential development**

All new build non-domestic development over 1,000sqm of non-residential floorspace including C1, C2 and C2a and C5 are required to submit an energy statement demonstrating that the development meets the following requirements:

1. Building Efficiency Part L % improvement
  - a. % improvement on Part L 2021 TER (or equivalent reduction on future Part L updates), through on-site measures as follows:
    - Offices:  $\geq 25\%$
    - Schools:  $\geq 35\%$
    - Industrial buildings:  $\geq 45\%$
    - Hotels (C2, C5) and residential institutions (C2, C2a):  $\geq 10\%$
    - Other non-residential buildings:  $\geq 35\%$
2. Energy metrics guidelines
  - a. Positive weight will be given to applicants who can demonstrate the following absolute energy metrics:
    - Total Energy Use: 65 kWh/m<sup>2</sup>/year
    - Space heating demand: 15 kWh/m<sup>2</sup>/year.
  - b. Employing absolute energy metrics reduces the amount of solar PV required under policy element 3 below for an on-site net zero balance of regulated energy. Applicable methodologies to calculate this include CIBSETM54 and the Passivhaus Planning Package. At present, the Part L calculation method (SBEM) is not considered suitable as it does not provide accurate predictions of a building's actual energy use.
  - c. must achieve at least 4 credits in the Wat01 Measure for water in the BREEAM New Construction standard.

### 3. Clean energy supply

- a. The use of fossil fuels and connection to the gas grid will not be considered acceptable.
- b. Major non-residential developments (over 1,000sqm of non-residential floorspace including C1, C2 and C2a and C5) should include an assessment of decentralised energy networks within the Energy Statement.
- c. This assessment should outline existing or planned decentralised energy networks in the vicinity of the development and should assess the opportunity to connect to them unless it can be demonstrated that the development is not suitable, feasible or viable for district heat or decentralised energy networks.
- d. For developments over 10,000sqm of non-residential floorspace, applicants are expected to identify and address:
  - i. Current or proposed major heat supply plants, or networks (for example, industrial uses, data centres)
  - ii. Possible opportunities to utilise energy from waste, or waste heat from an industrial process
  - iii. Opportunities for private wire electricity supply from renewable sources
  - iv. Utilisation of natural and engineered heating or cooling systems.

### 4. On-site renewable energy

Where viable, all major development should seek to deliver the following on site renewable energy generation standards.

- a. On-site annual renewable energy generation capacity to at least equal predicted annual total regulated energy use (residual energy use after policy element 1 has been achieved).
- b. In buildings subject to Part L's requirement for energy forecasting, that forecasting should be the source of the 'annual total regulated energy' figure. Where an on-site net zero regulated energy balance is not possible or viable<sup>6</sup>, it should be demonstrated that the amount of on-site renewable energy generation equates to >114.9 kWh/m<sup>2</sup> projected building footprint/year. Where a building in a multi-building development cannot individually achieve the requirements of Policy EM11 (3), this shortfall is to be made up across other units on-site before carbon offsetting (Policy EM11 (5) is considered.
- c. Large-scale development (5000 m<sup>2</sup> floorspace) should demonstrate that opportunities for on-site renewable energy infrastructure (on-site but not on or attached to individual dwellings), such as solar PV canopies on car parks have been explored.

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<sup>6</sup> Exceptional circumstances where an on-site net zero energy balance is not achieved may only be found acceptable in some cases, for example with taller flatted buildings (4 storeys or above) or where overshadowing significantly impacts solar PV output.

## 5. Energy offsetting

- a. Only in exceptional circumstances and as a last resort where it is demonstrably unfeasible to achieve an on-site net zero regulated energy balance, any shortfall in on-site renewable energy generation that does not match regulated energy use is to be offset via S106 financial contribution, reflecting the cost of the solar PV delivered offsite.
- b. The energy offset price will be based on cost of solar PV data from the Department for Energy Security and Net Zero. The price should be revised annually. This is set as a one-off payment, where the annual shortfall in on-site renewable energy generation is multiplied by the energy offset price.

This is set as a one-off payment, where the shortfall in annual on-site renewable energy generation is multiplied by the energy offset price.

## 6. Reduced performance gap

- a. An assured performance method must be implemented throughout all phases of construction to ensure operational energy in practice performs to predicted levels at the design stage.

## 7. Smart energy systems

- a. Proposals should demonstrate how they have considered the difference (in scale and time) of renewable energy generation and the on-site energy demand, with a view to maximising on-site consumption of energy generated on site and minimising the need for wider grid infrastructure reinforcement.
- b. Where the on-site renewable energy generation peak is not expected to coincide with peak onsite energy demand, resulting in a need to export or waste significant amounts of energy, proposals should demonstrate how they have explored scope for energy storage and/or smart distribution systems. The goal is to optimise on-site or local consumption of the renewable energy (or waste energy) that is generated by the site. Where appropriate, proposals should demonstrate that they have integrated these to optimise carbon- and energy-saving benefits and minimise the need for grid reinforcements.

## 8. Post-occupancy evaluation

- a. Large-scale development (over 5000 m<sup>2</sup> floorspace) should monitor and report total energy use and renewable energy generation values on an annual basis. An outline plan for the implementation of this should be submitted with the planning application. The monitored in-use data are to be reported to the local planning authority for 5 years upon occupation.

## Overheating in new buildings

- 13.71 Compliance with sections 1 and 2 of the policy should be demonstrated within an energy statement at planning application stage, with supporting output reports from CIBSE assessments.
- 13.72 Although mechanical ventilation is listed down the cooling hierarchy as part of section 1, the use of mechanical ventilation with heat recovery (MVHR) should not be viewed negatively as this may assist compliance with operational energy policies. However, MVHR should have the ability to bypass the heat recovery function in periods of warmer weather in order to support the overheating risk mitigation goal.
- 13.73 Overheating assessments are a requirement of Building Regulations Part O (for residential), and is a common measure performed in the design of good-quality non-residential new buildings especially where a BREEAM rating is sought. Therefore, it should not inflict any significant additional burden on the development industry to deliver these policy requirements.

### Policy EM13: Overheating in new buildings

All new build residential and non-residential buildings must meet the following requirements:

1. Cooling hierarchy:
  - a. Demonstrate that overheating risk measures have been incorporated in accordance with the cooling hierarchy:
    - i. Minimise internal heat generation through energy efficient design.
    - ii. Reduce the amount of heat entering the building in summer using:
      - Building orientation;
      - Shading;
      - Albedo;
      - Fenestration; and
      - Insulation.
    - iii. Manage heat within the building through exposed internal thermal mass and high ceilings.
    - iv. Passive ventilation.
    - v. Mechanical ventilation.
    - vi. Active cooling measures.
2. Overheating Assessment



- a. Residential development should complete CIBSE TM59 overheating assessment as their route to compliance with Building Regulations Part O. The simplified Part O route will not be considered acceptable. Non-residential development should complete CIBSE TM52 overheating assessment.

## **Embodied carbon and waste**

13.74 Compliance with sections 1, 2 and 3 of the policy are to be demonstrated within an energy statement. If applicable, output reports for section 4 should be submitted alongside an energy statement. For section 5, it is accepted that the level of detail will be lower the smaller the development proposal.

13.75 The aim is to ensure applicants explore the topic of embodied carbon, but without setting requirements that are impractical or excessively costly at small sites. Points of narrative encouraged in the fulfilment of section 5 could include, but are not limited to:

- Reuse of existing features and materials on site, where present
- Design for material efficiency (reducing the amount of material needed) such as through structural design or use of space and layouts to avoid unnecessary material use.
- Substitution of low-embodied-carbon materials (such as timber) in place of higher-carbon materials (such as steel, aluminium, and unadulterated Portland cement)
- Material sourcing for reduced 'product miles' or from manufacturers with low-carbon manufacturing credentials
- Construction processes that reduce the typical rates of material wastage.

13.76 Proposals for new development of 1 or more homes or  $\geq 100\text{m}^2$  non-domestic floor space, but below the size thresholds for embodied carbon reporting and targets as noted above, are encouraged to include a general narrative on the options that have been considered to minimise embodied carbon of the proposed development.

## **Policy EM14 Embodied carbon and waste**

Residential and non-residential buildings (thresholds given below) must meet the following requirement:

### **1. Embodied carbon reporting**

- a. All major new residential (10 dwellings or more) and non-residential (1000 m<sup>2</sup> floorspace or more) developments are required to complete a whole-life

carbon assessment in accordance with Royal Institute of Chartered Surveyors (RICS) Whole Life Carbon Assessment guidance.

## 2. Limiting embodied carbon

- a. All large-scale major development (50 dwellings or more; 5000 m<sup>2</sup> non-residential floor space or more) is required to limit embodied carbon (RICS/BS 15978 modules A1 – A5) to 600 kgCO<sub>2</sub>e/m<sup>2</sup> GIA.

## 3. Building end-of-life

- a. All new buildings are to be designed to enable easy material re-use and disassembly, subsequently reducing the need for end-of-life demolition.

## 4. Demolition audits

- a. All major development that contains existing buildings/structures to carry out a pre-redevelopment and/or pre-demolition audit, following a well-established industry best practice method (e.g. Building Research Establishment (BRE)).

## Noise

13.77 As with other types of pollution, noise pollution has the potential to impact adversely on environmental amenity and biodiversity. Particularly significant, however, are its impacts, both direct and indirect, on health and wellbeing, for instance through loss of sleep or other negative health externalities such as stress that can be caused by exposure to sustained noise over a longer term. This policy seek to address and mitigate these impacts.

13.78 In terms of noise mitigation in assessing such schemes for either a noise-generating or noise sensitive development, account should be taken of:

- The location, design and layout of the proposed development
- Land levels and existing topographical features
- Existing levels of background noise;
- Hours of operation and servicing (where relevant);
- Potential for cumulative impact with nearby noise-generating uses;
- Measures to reduce noise within the development to acceptable levels, including external areas where possible; and
- The need to maintain adequate levels of natural light and natural ventilation to habitable areas of the development.
- The need to ensure that where ventilation is required in areas of poor air quality, measures do not impact the amenity of end users where open windows may be inappropriate.
- The need to ensure mitigation schemes can be satisfactorily verified and adequately maintained for the life of the development.

## **Policy EM15 Noise**

- 1.** Development which could result in an unacceptable impact on amenity, biodiversity or the surrounding environment by reason of noise pollution and / or increased levels of general disturbance will only be permitted if a noise assessment and associated scheme of mitigation (if necessary) demonstrates that noise and / or general disturbance can be adequately controlled through design, planning conditions or other means of mitigation.
- 2.** Proposals for uses which are sensitive to noise will not be permitted close to existing or proposed potentially noise polluting uses unless it can be demonstrated that adequate mitigation measures can be provided to ensure adequate levels of amenity can be provided for future occupiers and the existing potentially noise polluting uses will not be prejudiced by the development proposed.
- 3.** Development will not be permitted if mitigation cannot be provided to an appropriate standard with an acceptable design.

# 14. Coventry City Centre

## Key evidence

Area Action Plan Background Paper 2024

One Coventry Plan 2022

Coventry City Council Climate Change Strategy

)

## Context

- 14.1 Coventry City Centre was the focus of the City Centre Area Action Plan which was adopted in 2017 alongside the Local Plan. As part of the review, it was assessed which parts of the AAP were out of date, which parts duplicated core Local Plan policies, and which were up to date and would add local detail. This chapter therefore sets out locally specific policy for the city centre. Further information about the review of the AAP is set out in the City Centre Area Action Plan Background Paper.
- 14.2 The city centre boundary is defined within Appendix 9(d), alongside a 'transitional area' surrounding the centre. This transitional area, outside of the defined city centre is acknowledged to be informed by both the contexts of the City Centre and those areas beyond. Any development within this area should therefore make reference to both policy contexts, whilst density guidance (policy H9) and parking standards (Appendix 6) also reference the identified transitional area to the City Centre Boundary.

## City Centre Development Strategy

- 14.3 The overall aims of the development strategy (Part A) accord with the key aims visions and objectives of Coventry City Council.

### **Policy CC1 (Part A) Coventry City Centre – Development Strategy**

The city centre will continue to be developed and regenerated to ensure it is a truly world class city centre, leading in design, sustainability and culture.

This will be achieved by:

- Enhancement of its position as a focus for the entire sub- region and as a national and international destination to live, work and play;
- Enhancement of its retail and leisure offer to strengthen the city's sub-regional role;
- Provision of high quality office space;

- Becoming a hub for education;
- Including a variety of places to live which cater for different needs;
- Preserving or enhancing the character and setting of the historic built landscape and the archaeological environment;
- A connected public realm including public squares and green spaces, easily accessible through the creation of desirable and legible pedestrian routes;
- Accessibility for all;
- Providing an attractive and safe environment for pedestrians, cyclists and motorists;
- Provide a high-quality public transport system that benefits from seamless integration and is well connected to existing and new infrastructure;
- Being a gigabyte city that offers high speed Wi-Fi and broadband facilities throughout the city centre;
- High quality sustainable built design;
- Continuing to develop a vibrant and attractive night time economy;
- Providing opportunities to improve health and wellbeing;
- Continuing to support greater integration of the university within the wider city centre
- Respecting key views to the iconic three spires of St. Michaels, Holy Trinity and Christchurch in line with the Tall Buildings Design Guide and View Management Framework SPD
- Supporting the reintroduction of green and blue infrastructure throughout the city centre, including opportunities for deculverting wherever possible; and;
- Contributing to the key aims, vision and objectives of Coventry City Council.

## City Centre Green and Blue Infrastructure

14.4 Part B sets out the Councils expectations around considerations of Green and Blue infrastructure within the city centre. Similar to many urban centres, the availability of such environments within the urban core can become constrained and as such the policy is seen to remain a necessary policy objective in the delivery of a high quality and resilient City Centre. The necessity for the policy

is also seen to be further reinforced with the anticipated growth of residential living in the city centre.

- 14.5 The policy addresses a number of environmental issues which are specific to the City Centre and therefore justify a standalone policy, including the considerations of development adjacent to the central ring road.

### **Policy CC1 (Part B) – Green and Blue Infrastructure**

- a. New development will be expected to maintain the quantity, quality and functionality of existing green and blue infrastructure. In line with the city's Green Space Strategy and Local Flood Risk Management Strategy, development proposals should enhance blue and green infrastructure, and create and improve linkages between the areas. Any development which is likely to adversely affect the integrity of a blue or green corridor will be required to be robustly justified and where appropriate, mitigation measures put in place. Development shall support meeting the objectives of the Severn River Basin Management Plan through ensuring that no deterioration of the River Sherbourne or its tributaries shall occur that may result in it failing its objectives under the Water Framework Directive.
- b. Development adjacent to the Ring Road should maximise all opportunities to develop the greening of vertical surfaces as far as reasonably possible. Opportunities to add greenery to areas adjacent to the Ring Road will be encouraged.
- c. Trees that contribute towards public amenity shall be retained and protected unless they are of poor quality, have a short life expectancy (less than 10 years), are dangerous, or the benefits of removing the tree significantly outweighs the harm that would be caused by its removal. Where trees are lost, replacement planting must be provided to a commensurate value to that which is lost.
- d. Introduction of new, accessible green spaces in the City Centre will be encouraged. Proposals which positively contribute toward the open space objectives of Coventry City Council will be encouraged.

### **City Centre Drainage and Flood Risk**

- 14.6 Part C relates to Drainage and Flood Risk. The core of the City of Coventry is located along the route of the River Sherbourne, this route being largely culverted and unavailable for access and viewing. The Council maintains an aspiration to make this watercourse available for view to capitalise upon the opportunity for environmental quality enhancements. Consideration of drainage and flood risk issues are key throughout the administrative area: the policy reinforces this important consideration alongside the aspirations of de-

culverting the river Sherbourne and acknowledging the that the increased levels of impermeability found in Urban Centres reinforce this important consideration and is to be read in conjunction with Policy EM4.

### **Policy CC1 (Part C) Drainage & Flood Risk**

- a. Development shall be designed in line with the requirements of policy EM4 and located to minimise the risk of flooding and if permitted development, be resilient to flooding. The opportunity must be exercised to maximise the absorption of surface water run-off by the ground. Sustainable Drainage methods shall be incorporated into new developments including treatment for water quality. Such provisions should consider opportunities to reflect the alignment of the River Sherbourne and/or its tributaries.
- b. When development occurs, a Flood Risk Assessment will need to be produced to appropriately consider the risk of flooding from all sources.
- c. When development occurs, it must consider the evidence in the Local Flood Risk Management Strategy, Surface Water Management Plan and Strategic Flood Risk Assessment. This includes all sites being treated as a Greenfield site when calculating permissible discharge rates in line with Policy EM5 of the Local Plan.
- d. When development is proposed it should utilise water use reduction systems such as grey water harvesting to reduce the water usage within the proposed developments.
- e. Where a development proposal lies adjacent to the existing de-culverted river Sherbourne, a natural sinuous river channel should be retained. Consideration should also be given to removing water bodies from culverts wherever possible and viable. This will be of particular importance along Fairfax Street and will be vital to create multi-functional green and blue spaces within the city centre.

### **City Centre Environmental management**

Part D. Environmental management policies are a key consideration in the creation of high quality environments, and may be considered of heightened importance within urban areas where higher density development takes place and close proximity interfaces between uses. In line with this it is assessed that policy this policy ensures such considerations are carefully considered in development proposals in the City Centre. In line with the integration of City Centre policies into the core local plan, minor referential wording updates are proposed to ensure that the policy is read across other relevant policy areas within the local plan

## **Policy CC1 (Part D) – Environmental Management**

New development must be designed to minimise environmental impact within the city centre and ensure that any impacts of pollution are appropriately considered and mitigated. In doing so new development schemes (including conversions and changes of use where appropriate) must ensure that:

- a.** All construction and demolition schemes adhere to a construction environmental management plan which must be submitted to and approved by the council before works commences. The CEMP must specify how the developer will mitigate noise and dust emissions from the works.
- b.** All opportunities to connect to heat line or implement renewable energy generation have been explored and included as part of new development unless shown to be unviable or inappropriate.
- c.** Ground contamination needs have been assessed and remediated using the Environment Agency Model Procedures for the Management of Land Contamination.
- d.** Proposals for site investigation and remediation schemes (where appropriate) utilise appropriate risk assessment and are approved by the Council in advance of development. Such measures should ensure that sites are ‘fit for purpose’.
- e.** New residential and commercial development schemes and the introduction of fixed plant machinery have been designed to meet internal and external noise levels specified in BS4142 and BS8223, or subsequent replacement standards.
- f.** Appropriate odour extraction systems are incorporated where the sale / preparation / consumption of food takes place within the relevant buildings. Appropriate consideration has been given to the West Midlands LETC Air Quality guidance (or replacement guidance) and necessary mitigation measures incorporated into schemes.
- g.** Have regard to all other relevant policies within the Local Plan.

## **City Centre Character areas**

Part E relates to a series of City Centre Areas which are distinct in terms of their character, both in terms of reflecting the current situation, and in terms of changes to character which will continue to take place during the forward plan period such as the recently consented City Centre South regeneration scheme. The character areas have been defined to reflect forthcoming expected change in the City



Centre. Additionally the nature of uses in the City Centre has undergone significant evolution in the last plan period as the economics of City Centres continues to evolve on a national level, therefore the character areas reflect their existing and foreseeable urban character. The Character Areas are mapped in Appendix 9(f).

This policy should also be read in conjunction with Density Policy H9 in that an area of higher density urban character is seen to existing in the periphery to the defined City Centre. The plan, read as a whole, proposes to be responsive to this character by incorporating elements of city centre policy into core plan policy. A transitional area is therefore identified beyond the defined City Centre boundary, acknowledging this periphery character area.

Whilst City Centre policies remain applicable within the defined City Centre boundary, development proposals within the transition zone should seek to acknowledge this 'transitional area' and consider how planned development may positively interface with the adjacent character areas within the defined City Centre

### **Policy CC1 (Part E) – City Centre Character Areas**

- All Development within the City Centre should reference the individual character area of its location and deliver high quality, contextually responsive proposals.
- All development proposals within, or with the setting of, Conservation Areas will only be considered acceptable if they demonstrate that they preserve and enhance the historic environment of the area and are in adherence with the policies of the respective Conservation Area Appraisals and Management Plans.

#### **The Friargate Area**

- a. Development within this area should deliver high quality office and residential development, alongside a mix of uses within its highly sustainable location. Uses considered to be acceptable include:
  - Office Development
  - High quality City Centre Residential Dwellings
  - Leisure and recreation uses, including hotels;
  - Social and community uses;
  - Provisions for public transport infrastructure.
- b. Improvements to and expansion of the Coventry Railway Station will be supported so long as it does not negatively affect heritage assets.

### **Cathedral and Cultural Area**

- a. Development in areas adjoining Conservation Areas should enhance their setting and improve linkages between them and other areas of the city centre.
- b. Development proposals must reference inter-relationships to heritage assets and ensure the primacy of Coventry Cathedral is retained in townscape.
- c. Development proposals must fully explore opportunities to reinforce the cultural offering of the City.

### **Civic Area**

- a. New development within the Civic Area must have regard to its historic characteristics of public service provision. As such, the following uses are encouraged :
  - High Quality Residential Dwellings
  - Social and community uses;
  - Leisure and recreation uses;
  - Educational uses, including new university and research provisions;
  - Office use;
- b. Other commercial activities will be supported where they support the provision of active frontages within a mixed use development.
- c. The provision of new retail development is unlikely to be supported within the Civic Area unless it can be demonstrably shown to form an integral part of a mixed-use scheme.
- d. Opportunities to expand the programme of public realm improvements will be supported

### **Far Gosford Street Area**

- a. New developments, changes of use and conversions within the Far Gosford Street Area must respect and reflect the area's historic character. As such all development proposals, including applications for signage and the provision of new and improved parking (for cars and cycles), within the area will only be considered acceptable if they demonstrate that they respect the historic environment of the area.
- b. To support the local centre designation a mix of creative industries, employment, residential and social and community uses will be supported within the Far Gosford Street Area.

- c. The use of upper floors of buildings for residential or office use will be supported and encouraged providing that appropriate noise insulation is included to ensure that the use is compatible with ground floor commercial activity.
- d. Opportunities to enhance the setting of the exposed River Sherbourne within this Area through improvements to green infrastructure will be encouraged. This should include opportunities to improve wider green linkages beyond the city centre boundary, especially towards the Heritage Park at Charterhouse.

#### **Stoney Stanton Road Area.**

- a. New developments within the Stoney Stanton Road Area must have regard to its established character; respond to the environmental issues associated with its proximity to the Ring Road and deliver high quality buildings and public space which reflect this areas position as a gateway to the city centre.
- b. All prospective developments should:
  - reflect and enhance the area's character through mixed-use developments;
  - improve and introduce high quality buildings;
  - Promote active travel and ensure it becomes easier and safer to move within the area and into adjoining parts of the city centre
  - Mitigate the negative environmental impacts of the Ring Road;
- c. The conversions of existing buildings, where appropriate, and the development of small infill opportunities for new residential developments will be encouraged and supported in principle.

#### **Corporation Street Area**

- a. All development proposals within the Spon Street Conservation Area, including applications for signage, will only be considered acceptable if they demonstrate that they respect the historic environment of the area.
- b. Spon Street will be encouraged as a suitable and attractive location for specialist and independent retailers. In order to protect the availability of property for such use, further hot food takeaways will be resisted.
- c. Development must be of high-quality design that both relates well to the modern Belgrade Plaza development whilst ensuring the setting of adjacent listed buildings and Spon Street Conservation Area is preserved
- d. Opportunities to improve the linkages into the precinct area will be encouraged from Corporation Street, Spon Street and Belgrade Plaza

- e. Opportunities to improve the linkages into the Corporation Street Area from the West will be encouraged.

### **Mixed Use Core**

Including the Primary Shopping Area

- a. The primary shopping area is defined as per core Retail policy R2.
- b. Other proposals that would introduce new town centre uses within the PSA will be encouraged and supported where they do not undermine or conflict with this or any other policy.
- c. Opportunities for new residential provision above new or existing ground floor town centre uses will be supported with a view to supporting the vitality and viability of the city centre as a whole.
- d. Opportunities to reinforce the original design concept of the Gibson plan and the precinct cross will be encouraged and supported
- e. Development proposals should reference the variety of typologies found in the surrounding context, including the heritage assets of the precinct area.

### **Parkside Area**

- a. Development proposals within the Parkside area, should support the hi-tech character that has been developed within this part of the city centre. As such, the following uses will be acceptable:
  - Hi-Tech industry use;
  - Research and Development activity;
  - Other Education facilities;
  - Residential provision;
  - Leisure and recreation uses;
  - Social and community uses;
  - Office use;
  - Car parking;
- b. Improvements in pedestrian connections from the area around Junction 5 toward London Road Cemetery to the South will be encouraged

### **University and Enterprise Area**

- a. Within the University and Enterprise Area, proposals for redevelopment, refurbishment, extension or conversion of buildings for the following uses will be supported subject to high quality building and landscape design:

- i. Education and faculty buildings;
  - ii. University administrative facilities;
  - iii. Supporting ancillary sport, recreation, retail and maintenance facilities;
  - iv. Research facilities;
  - v. Residential provision including student accommodation.
- b.** Proposals to bring the Grade I listed Whitefriars Monastery into appropriate and regular use will be strongly supported subject to that use not having a detrimental impact upon the architectural and historic interest of the building and surrounding public realm. Proposals shall respect the design unity of this part of the University and Enterprise area.
- c.** University Square shall remain as an attractive public square at the interface of Coventry Cathedral, the Herbert Art Gallery and Museum and Coventry University.

### **Northern Regeneration Area**

- a.** Proposals supporting the aims of mixed-use redevelopment of the Area will be encouraged.
- b.** The area will be primarily promoted for new residential development in a range of types and tenures although a range of other uses will be acceptable subject to conformity with other parts of this AAP. These include:
- Office;
  - Retail and commercial;
  - Social, community and leisure uses;
  - Education uses (including those linked to the university);

Such uses should contribute towards active frontages at ground floor level.

- c.** Green and blue infrastructure should form an integral part of all development proposals within the area. This should include the consideration of deculverting where possible and viable.
- d.** New development opportunities should not conflict with any other policies within this Local Plan.
- e.** Swanswell Pool is of historic importance to the local area and the city centre as a whole. Opportunities to expand the park and enhance its quality will be supported. This should include opportunities to improve its linkages to the wider city centre.

- f. Proposals for the redevelopment of White Street Coach Park will be encouraged, where they are linked to appropriate amendments to Ring Road junction 2

#### **The Warwick Row Area**

- a. Proposals for limited and sympathetic infill development in the Warwick Row area will be encouraged and supported where appropriate.
- b. Applications for conversions or changes of use will be considered on the basis of their relationship with adjoining buildings and uses. Where appropriate, proposals should complement existing styles and designs of adjoining buildings.
- c. Proposals should enhance the character and quality of the local environment and be compatible with other Local Plan policies.
- d. Greyfriars Green will continue to be protected as a conservation area and an important 'green' asset to the city centre. Any development proposals that would erode the character of the Green and damage the setting of the listed buildings will not be accepted.

# 15. Infrastructure Delivery, Implementation and Monitoring

## Context

- 15.1 The delivery of infrastructure to support the growth identified in the Local Plan will require a partnership approach. As a Local Authority, Coventry City Council has a number of responsibilities and obligations it has to meet and therefore has a pivotal role as an infrastructure and service provider. The roles the Council currently fulfils include:
- Local Planning Authority
  - Local Highway Authority
  - Local Education Authority
  - Waste and Minerals Authority
  - Strategic Housing Authority
  - Social Care Service Provider
  - Lead Local Flood Authority
  - Public Health
- 15.2 The Council has an important role to play in setting the level of and securing developer contributions to deliver the necessary infrastructure to support development. The Council will work closely and in partnership with a number of organisations across both the public and private sector to achieve this. As a major landowner within Coventry, the Council will play a leading role in bringing sites forward for development.
- 15.3 There are close links between Coventry and the rest of the West Midlands and Warwickshire. This includes Local Authorities, and the West Midlands Combined Authority, and ongoing discussions have taken place on a number of key issues, including housing and economic growth. The Council will work with these neighbouring authorities and organisations to ensure that cross boundary infrastructure issues are addressed to help deliver growth and development in the area.
- 15.4 Organisations in the public sector as well as other agencies are also responsible for meeting their statutory obligations and responding to growth.
- 15.5 The Council will continue to work closely with partners to maximise funding opportunities and to identify the most effective and timely delivery mechanisms for the necessary infrastructure.
- 15.6 The Infrastructure Delivery Plan along with explanatory text is contained at Appendix 7

## **Policy IM1: Developer Contributions for Infrastructure**

- 1.** Development will be expected to provide, or contribute towards provision of:
  - a.** Measures to directly mitigate its impact and make it acceptable in planning terms;
  - b.** Physical, social and green and blue infrastructure to support the needs associated with the development
- 2.** Infrastructure and mitigation measures will be provided in a timely manner to support the objectives of the Plan.
- 3.** The Council will, where appropriate, seek to secure site-specific infrastructure investments and/or contributions as well as off-site contributions and/or investments. The nature and scale of these will be related to the form of development and its potential impact on the site and surrounding area. The cumulative impact of developments will also be taken into account.
- 4.** Developer contributions will contribute towards strategic infrastructure required to support the overall development in the Plan as defined in the Infrastructure Delivery Plan.
- 5.** Where site specific issues generate viability concerns, applicants should discuss these with the Council at the earliest possible stage in the development process. Proposals that are unable to comply with the Plan's policies on viability grounds must be accompanied by a detailed Viability Assessment.
- 6.** The Council will work in partnership with infrastructure providers and other delivery agencies in updating the Infrastructure Delivery Plan to ensure an up to date evidence base regarding infrastructure requirements and costs is maintained.



# Coventry Local Plan Review 2021 - 2041

## Regulation 19 Proposed Submission Appendices

December 2024

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## Appendix 1 - Table of reviewed policies for the Local Plan and Area Action Plan

**Table 1: Local Plan reviewed policies**

<b>Policy reference</b>	<b>Policy heading</b>	<b>Policy status (Updated / no change / deleted / new policy)</b>	<b>Strategic policy?</b>
<b>DS1</b>	Overall Development Needs	Updated	Yes
<b>DS2</b>	The Duty to Cooperate and partnership working	Minor update	Yes
<b>DS3</b>	Sustainable Development Policy	Minor update	Yes
<b>DS4 (Part A)</b>	General Masterplan principles	Updated	Yes
<b>DS4 (Part B)</b>	Whitley Specific Masterplan Principles	Minor update	No
<b>DS4 (Part C)</b>	Keresley SUE Specific Masterplan Principles	Minor update	No
<b>DS4 (Part D)</b>	Eastern Green SUE Specific Masterplan Principles	No change	No
<b>HW1</b>	Health and Health Impact Assessment (HIA)	Updated	Yes
<b>JE1</b>	Overall Economy and Employment Strategy	Updated	Yes
<b>JE2</b>	Provision of Employment Land and Premises	Updated	Yes

<b>JE3</b>	Non-Employment Uses on Employment Land	Updated	No
<b>JE4</b>	Location and Type of Office Development	Updated	No
<b>JE5</b>	Industrial and Storage/Distribution Development	Updated	No
<b>JE6</b>	Tourism/Visitor Related Development	Updated	No
<b>JE7</b>	Accessibility to Employment Opportunities	Updated	No
<b>JE8</b>	Location of Research and Development (R&D)	New Policy	No
<b>H1</b>	Housing Land Requirements	Updated	Yes
<b>H2</b>	Housing Allocations	Updated	Yes
<b>H3</b>	Provision of New Housing	Updated	Yes
<b>H4</b>	Securing a Mix of Housing	Updated	No
<b>H5</b>	Managing Existing Housing Stock	Updated	No
<b>H6</b>	Affordable Housing	Updated	No
<b>H7</b>	Gypsy and Traveller Accommodation	Updated	No
<b>H8</b>	Specialist Housing including Specialist Housing with Elements of Care, Older Persons accommodation and hostels	Updated	No

<b>H9</b>	Residential Density	Updated	No
<b>H10</b>	Student Accommodation	Updated	No
<b>H11</b>	Homes in Multiple Occupation (HMOs)	Updated	No
<b>H12</b>	Build to Rent	New policy	No
<b>H13</b>	Co-Living	New policy	No
<b>R1</b>	Delivering Retail Growth	Updated	No
<b>R2</b>	Coventry City Centre – Development Strategy	Updated	No
<b>R3</b>	The Network of Centres	Updated	Yes
<b>R4</b>	Out of Centre Proposals	Updated	Yes
<b>R5</b>	Retail Frontages and Ground Floor Units in Defined Centres	Minor update	No
<b>R6</b>	Restaurants, Bars and Hot Food Takeaways	Minor update	No
<b>CO1</b>	New or Improved Social, Community and Leisure Premises	No change	No
<b>CO2</b>	Re-use of or Redevelopment of Facilities	Minor update	No
<b>CO3</b>	Neighbourhood and Community Planning	No change	No
<b>GB1</b>	Green belt	Updated	Yes
<b>GB2</b>	Safeguarded Land in the Green Belt	Updated	Yes

<b>GB3</b>	Local Green Space	New policy	Yes
<b>GE1</b>	Green and Blue Infrastructure	Updated	Yes
<b>GE2</b>	Green Space	Updated	No
<b>GE3</b>	Biodiversity, Geological, and Landscape Conservation	Updated	No
<b>GE4</b>	Tree Protection	Updated	No
<b>DE1</b>	Ensuring High Quality Design	Updated	Yes
<b>DE2</b>	Delivering High Quality Places	New policy	No
<b>HE1</b>	Conservation Areas	Updated	Yes
<b>HE2</b>	Conservation and Heritage Assets	Updated	Yes
<b>HE3</b>	Heritage Park - Charterhouse	No change	No
<b>HE4</b>	Archaeology	New policy	No
<b>AC1</b>	Accessible Transport Network	Updated	Yes
<b>AC2</b>	Road Network	Updated	No
<b>AC3</b>	Demand Management	Updated	No
<b>AC4</b>	Active Transport Provision including Walking, Cycling and Micro Mobility	Updated	No
<b>AC5</b>	Bus, Demand Response Transit and Rapid Transit	Updated	No
<b>AC6</b>	Rail	Updated	No
<b>AC7</b>	Freight	Updated	No

<b>EM1</b>	Planning for Climate Change Adaptation	Updated	Yes
<b>EM2</b>	Building Standards	Deleted	No
<b>EM3</b>	Renewable Energy Generation	Deleted	No
<b>EM4</b>	Flood Risk Management	Updated	No
<b>EM5</b>	Sustainable Drainage Systems (SuDS)	Updated	No
<b>EM6</b>	Redevelopment of Previously Developed Land	Updated	No
<b>EM7</b>	Air Quality	Updated	No
<b>EM8</b>	Waste Management	No change	No
<b>EM9</b>	Safeguarding Mineral Resources	No change	No
<b>EM10</b>	Non Mineral Development in Mineral Safeguarding Areas	No change	No
<b>EM11</b>	Energy Infrastructure	New policy	No
<b>EM12</b>	Reducing operational carbon in new build non-residential development	New policy	No
<b>EM13</b>	Overheating in new buildings	New policy	No
<b>EM14</b>	Embodied carbon and waste	New policy	No
<b>EM15</b>	Noise	New policy	No
<b>C1</b>	Broadband and Mobile Internet	Deleted	No
<b>C2</b>	Telecommunications	Deleted	No

<b>CC1</b>	City Centre Policy Parts A-E	New policy (see below regarding transfer from the Area Action Plan)	No
<b>IM1</b>	Developer Contributions for Infrastructure	Updated	No

**Table 2: Area Action Plan Policies review**

<b>Policy reference</b>	<b>Policy heading</b>	<b>Moved / deleted?</b>	<b>Comments (eg if moved, where, if deleted, why - summary)</b>
<b>CC1</b>	Coventry City Centre – Development Strategy	Moved	Retained, updated and included in the core local plan policy CC1 (Part A) - Coventry City Centre Development Strategy.
<b>CC2</b>	City Centre Heritage	Deleted	Deleted and incorporated into core local plan policies HE2 and HE4.
<b>CC3</b>	Building Design	Deleted	Deleted as duplicates core local plan policy.
<b>CC4</b>	Public Art	Deleted	Deleted as relates to the whole area so now in core local plan policy DE2.
<b>CC5</b>	Lighting	Deleted	Deleted as relates to the whole area so now in core plan policy DE2.
<b>CC6</b>	Public Realm	Deleted	Deleted as relates to the whole area so now in core plan policy DE2.
<b>CC7</b>	Tall Buildings	Deleted	Deleted and incorporated into revised core plan policy DE1.
<b>CC8</b>	Green and Blue Infrastructure	Moved	Retained and updated within Policy CC1 (Part B) - Green and Blue Infrastructure.



<b>CC9</b>	Drainage & Flood Risk	Moved	Retained but revised within Policy CC1 (Part C) - Drainage and Flood Risk.
<b>CC10</b>	Environmental Management	Moved	Retained and revised within Policy CC1 (Part D) - Environmental Management.
<b>CC11</b>	Accessibility	Deleted	Deleted and incorporated into AC policies and referenced in CC1 (Part E) - City Centre Character Area.
<b>CC12</b>	Friargate	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
<b>CC13</b>	Cathedrals and Cultural Area	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
<b>CC14</b>	Civic Area	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
<b>CC15</b>	Far Gosford Street Area	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
<b>CC16</b>	Health and Education Area	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
<b>CC17</b>	Leisure and Entertainment Area	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
<b>CC18</b>	The Primary Shopping Area	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
<b>CC19</b>	Primary Shopping Area Regeneration - South	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.

<b>CC20</b>	Primary Shopping Area Regeneration - North	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
<b>CC21</b>	Cathedral Lanes	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
<b>CC22</b>	Primary and Secondary Frontages	Moved	Retained but revised within Policy CC1 (Part e) - City Centre Character Area.
<b>CC23</b>	Technology Park Area - Parkside	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
<b>CC24</b>	University and Enterprise Area	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
<b>CC25</b>	Regenerations Areas	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
<b>CC26</b>	The Warwick Row Area	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.

## Appendix 2 - Marketing Guidance to support Policies JE3 and CO2

### Developer Marketing Standards – Policy JE2

Where a sites or premises owner is applying to the Council for change of use from employment to an alternative use, they have to prove there is a lack of demand for that site or premises. This table itemises the various marketing tools that should typically be used to market the interest.

Should these tools fail to identify potential purchasers or occupiers then it may be considered that there is a lack of employment demand for the site or premises in question.









Marketing tool	Individual building (premises)	Small Site (< 1ha)	Mid-Range Site (1-10ha)	Larger Site (>10ha)
On-site Marketing Board in prominent position	✓	✓	✓	✓
Targeted site promotion with Local Property Agents / Developers / Investors	✓	✓	✓	✓
Targeted site promotion with Regional Property Agents / Developers / Investors	✓	N/A	✓	✓
Targeted site promotion with National Property Agents / Developers / Investors	N/A	N/A	N/A	✓
Liaise with CWLEP and the Councils Inward Investment Team	✓	✓	✓	✓
Produce Marketing Particulars	✓	✓	✓	✓
Promotion on appropriate marketing website	✓	✓	✓	✓
Marketing Period (months)	6	6	9	12

## Developer Marketing Standards – Policy CO2

Where a sites or premises owner is applying to the Council for change of use from a Social, Community or Leisure use to an alternative use (outside of the scope of chapter 6 of the Local Plan), they will need to demonstrate that there is a lack of demand for that site or premises.

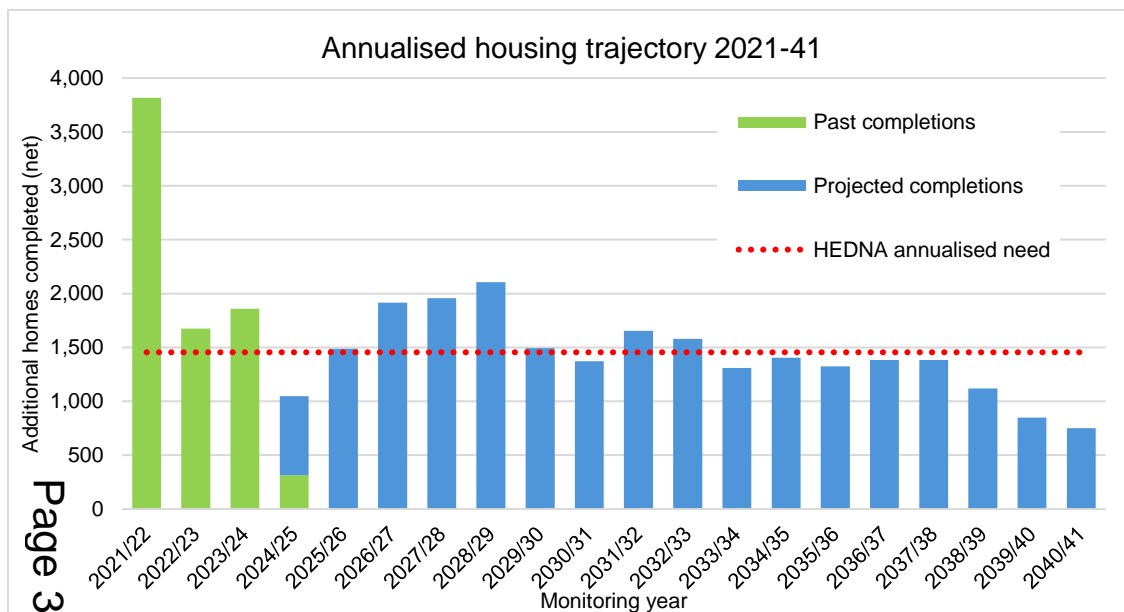
This table itemises the various marketing tools that should typically be used to market the interest.

Should these tools fail to identify potential purchasers or occupiers then it may be considered that there is a lack of demand/need for the site or premises in question.

Marketing tool	Premises	Vacant land
On-site Marketing Board in prominent position		
Targeted site promotion with Local Property Agents / Developers / Investors		
Liaise with CWLEP and the Councils Inward Investment Team		
Promotion on appropriate marketing website		
Marketing Period (months)	3	3

## Appendix 3 - Housing Trajectory

Housing supply type	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41
<b>Past completions</b>																				
Gross new build	3,447	1,426	1,430	315	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Net conversions & change of use	520	252	432	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Demolitions	-149	-4	-3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Projections (net)</b>																				
Under construction	0	0	0	746	997	853	301	477	131	40	0	0	0	0	0	0	0	0	0	0
Detailed consent	0	0	0	-17	368	1,017	1,343	1,280	435	353	191	0	0	0	0	0	0	0	0	0
Outline consent	0	0	0	0	1	25	112	150	542	460	685	685	569	335	335	335	335	320	225	200
Permitted development	0	0	0	4	122	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Existing Allocations (without permission)	0	0	0	0	0	0	0	0	72	75	125	176	225	445	365	250	225	225	275	275
Proposed Allocations (without permission)	0	0	0	0	0	0	0	0	60	90	353	365	225	325	375	535	575	375	150	75
HELAA sites not allocated	0	0	0	0	0	0	0	0	54	154	101	153	90	99	50	65	50	0	0	0
Small site windfall allowance	0	0	0	0	0	0	200	200	200	200	200	200	200	200	200	200	200	200	200	200
<b>Totals</b>																				
Past completions 2021-24	3,818	1,674	1,859	315	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Projected completions 2024-41	0	0	0	733	1,488	1,915	1,956	2,107	1,494	1,372	1,655	1,579	1,309	1,404	1,325	1,385	1,385	1,120	850	750
<b>Projected cumulative completions 2021-41</b>	<b>3,818</b>	<b>5,492</b>	<b>7,351</b>	<b>8,399</b>	<b>9,887</b>	<b>11,802</b>	<b>13,758</b>	<b>15,865</b>	<b>17,359</b>	<b>18,731</b>	<b>20,386</b>	<b>21,965</b>	<b>23,274</b>	<b>24,678</b>	<b>26,003</b>	<b>27,388</b>	<b>28,773</b>	<b>29,893</b>	<b>30,743</b>	<b>31,493</b>
<b>Cumulative local housing need (1455 p/yr)</b>	<b>1,455</b>	<b>2,910</b>	<b>4,365</b>	<b>5,820</b>	<b>7,275</b>	<b>8,730</b>	<b>10,185</b>	<b>11,640</b>	<b>13,095</b>	<b>14,550</b>	<b>16,005</b>	<b>17,460</b>	<b>18,915</b>	<b>20,370</b>	<b>21,825</b>	<b>23,280</b>	<b>24,735</b>	<b>26,190</b>	<b>27,645</b>	<b>29,100</b>
<b>Cumulative +/- performance vs need</b>	<b>2,363</b>	<b>2,582</b>	<b>2,986</b>	<b>2,579</b>	<b>2,612</b>	<b>3,072</b>	<b>3,573</b>	<b>4,225</b>	<b>4,264</b>	<b>4,181</b>	<b>4,381</b>	<b>4,505</b>	<b>4,359</b>	<b>4,308</b>	<b>4,178</b>	<b>4,108</b>	<b>4,038</b>	<b>3,703</b>	<b>3,098</b>	<b>2,393</b>



5YHLS 2024/5 to 28/29	Net additional Homes	+5% buffer
Local housing need 2021-2041*	29,100	
Net completions Apr 2021 to Sep 2024	7,666	
Remaining need 2024-41	21,434	
Remaining annualised need 2024-41	1,261	1,324
5-year need 2024-2029	6,305	6,620
Deliverable supply 2024-2029	8,514	
<b>5YHLS 2024-2029 (in years)</b>	<b>6.75</b>	<b>6.43</b>

\*Local housing need established by the Coventry and Warwickshire HEDNA 2022

## Appendix 4 - Ancient Woodlands Map and List

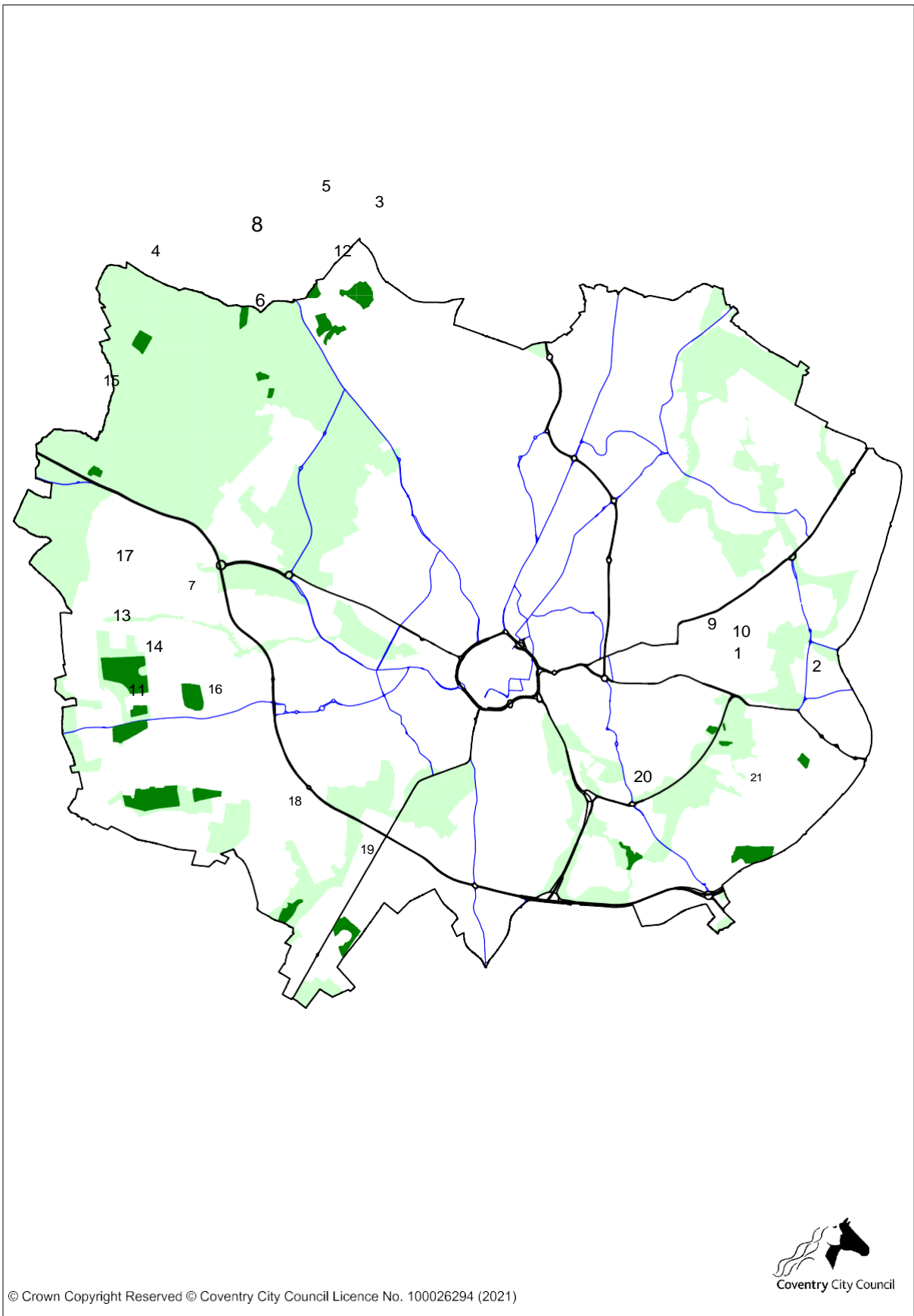
### List of Ancient Woodlands

Planted Ancient Woodland (PAWS)

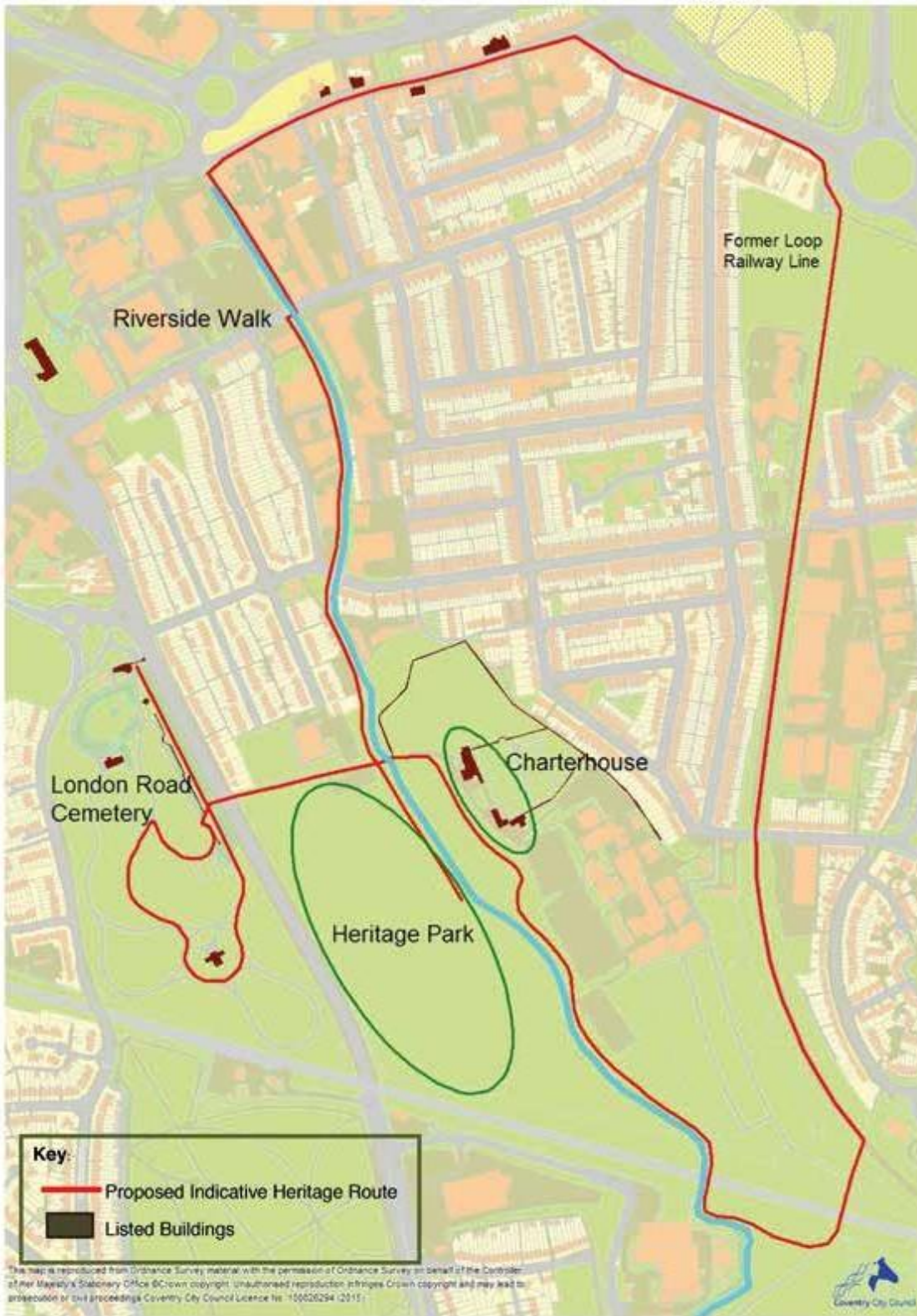
Ancient Semi Natural Woodland (ASNW)

1. The Alders (ASNW)
2. Binley Little Wood (ASNW)
3. Bunson's Wood (ASNW)
4. Elkin Wood (PAWS)
5. Hall Yard Wood (ASNW)
6. Hawkes End Wood (ASNW)
7. Limbrick Wood (ASNW)
8. Long Lady Wood (PAWS)
9. Moore Field Wood east (ASNW)
10. Moore Field Wood west (ASNW)
11. Park Wood (ASNW and PAWS)
12. Pickhorne Wood (ASNW)
13. Pig Wood (ASNW)
14. Plants Hill Wood (PAWS)
15. Plinkett's Wood (PAWS)
16. Ten Schilling Wood (PAWS)
17. Tile Hill Wood (SSSI) (ASNW)
18. Tocil Wood (ASNW)
19. Wainbody Wood (ASNW and PAWS)
20. Whitley Grove (ASNW and PAWS)
21. Willenhall Wood (ASNW and PAWS)

NB: This list only includes woodlands over 2 acres in size



## Appendix 5 – Heritage Park and Route Inset Map





# Appendix 6 - Cycle and Parking Standards for New Development

## Introduction

- 1.1 This appendix sets out standards for car and cycle parking associated with new development and changes of use in Coventry. The standards include requirements for electric car charging points and the provision of parking for people with disabilities.
- 1.2 These standards should be applied in combination with the main policies set out in the Coventry Local Plan, and specifically policy AC3.

## Relevant Local and National Car Parking Policy

- 1.3 The National Planning Policy Framework (NPPF) (December 2023) sets out the Government's approach to car parking standards stating in paragraph 111 that if setting local parking standards for residential and non-residential development, policies should take into account:
  - the accessibility of the development
  - the type and mix of the proposed development
  - the availability of and opportunities for public transport
  - local car ownership levels
  - the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.
- 1.4 The approach to car parking associated with new development as set out in this Appendix has been informed by and seeks to enable the objectives set out in a range of adopted city council strategies. Of particular importance are the 2023 Coventry Transport Strategy and the 2023 Climate Change Strategy.
- 1.5 The Transport Strategy notes the continued widespread reliance on the car across the city whilst also setting out the "Case for Change" and the priority of modal shift away from the private car. To this end, the aim of these parking standards is to enable appropriate and consistent levels of car parking across the city whilst encouraging behaviour change towards public transport and active travel in the most accessible areas of the city.

## Background

- 1.6 Coventry is a compact highly accessible city with a well-developed and maintained road network. The density, type and accessibility of housing varies greatly across the city, but typically Coventry is made up of large areas of terraced and semi-detached housing, in many cases with little or no off-street car parking. In more suburban lower density areas of the city, levels of car ownership levels are typically higher, but even with an increased availability of off-street parking, levels of on-street parking frequently remain high.

- 1.7 Since their adoption in 2017 the application of parking standards has successfully enabled car-free development in the City Centre. In order to ensure the effectiveness of this policy approach and prevent an overspill of car parking into local residential areas, the Council has encouraged the creation of Resident Parking Schemes around the periphery of the city centre. It is considered that the application of appropriate levels of car parking and the completion of a ring of residents parking zones around the edge of the city centre alongside a continued programme of promoting sustainable travel modes will help to deliver the objectives of the Local Plan and the Transport Strategy.

## Approach of these Standards

- 1.8 The availability of car parking can have a major impact on local traffic management and safety issues. It is therefore essential to try and get the balance right of ensuring that adequate levels are provided to manage inappropriate parking without providing excessive levels which dominate the built environment and overtly encourage car use.

- 1.9 The Local Plan includes policies setting out a balanced approach to supporting the movement needs of local residents and businesses in a growing city. Those policies recognise the role of the car in supporting connectivity to areas in and around Coventry, but also actively encourage sustainable and active modes of travel to help address traffic congestion, air quality and health issues.

- 1.10 The quality and accessibility of public transport, walking and cycling routes to key services can influence how people travel, for example, people living in or near the city centre are less likely to be reliant on car use, hence there will be a reduced need for car parking compared to less accessible areas of the city. The City Council is also exploring options for the introduction of car clubs, with a focus on the city centre, which support more efficient and flexible models of car ownership.

- 1.11 Recognising the variances in car ownership and accessibility across the city, the standards set out in this document are based on three distinct zones:

1) **City Centre (all sites within the city centre as defined in Figure 1 and on the Policies Map)**

A presumption in favour of car-free development will apply to all applications within the City Centre (as defined in Figure 1 and on the Policies Map). Proposals for development that include parking provision will be considered on a site-by-site basis based upon the merits of the application and criteria in the NPPF, as set out in paragraph 1.3 above.

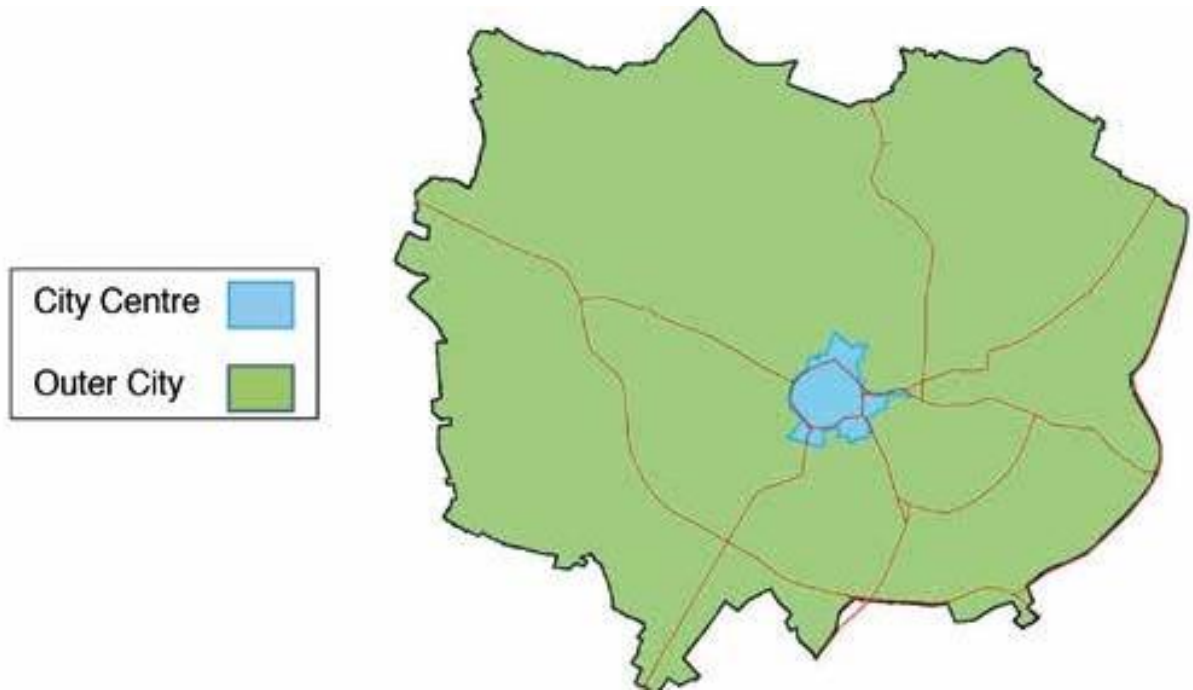
2) **Transition Zone (as defined in Figure 2 and on the Policies Map)**

Within the Transition Zone, applications will be required to provide 50% of the parking standard required for the Outer City (see below). Any variation from this standard must be justified using the criteria set out in paragraph 1.3 above.

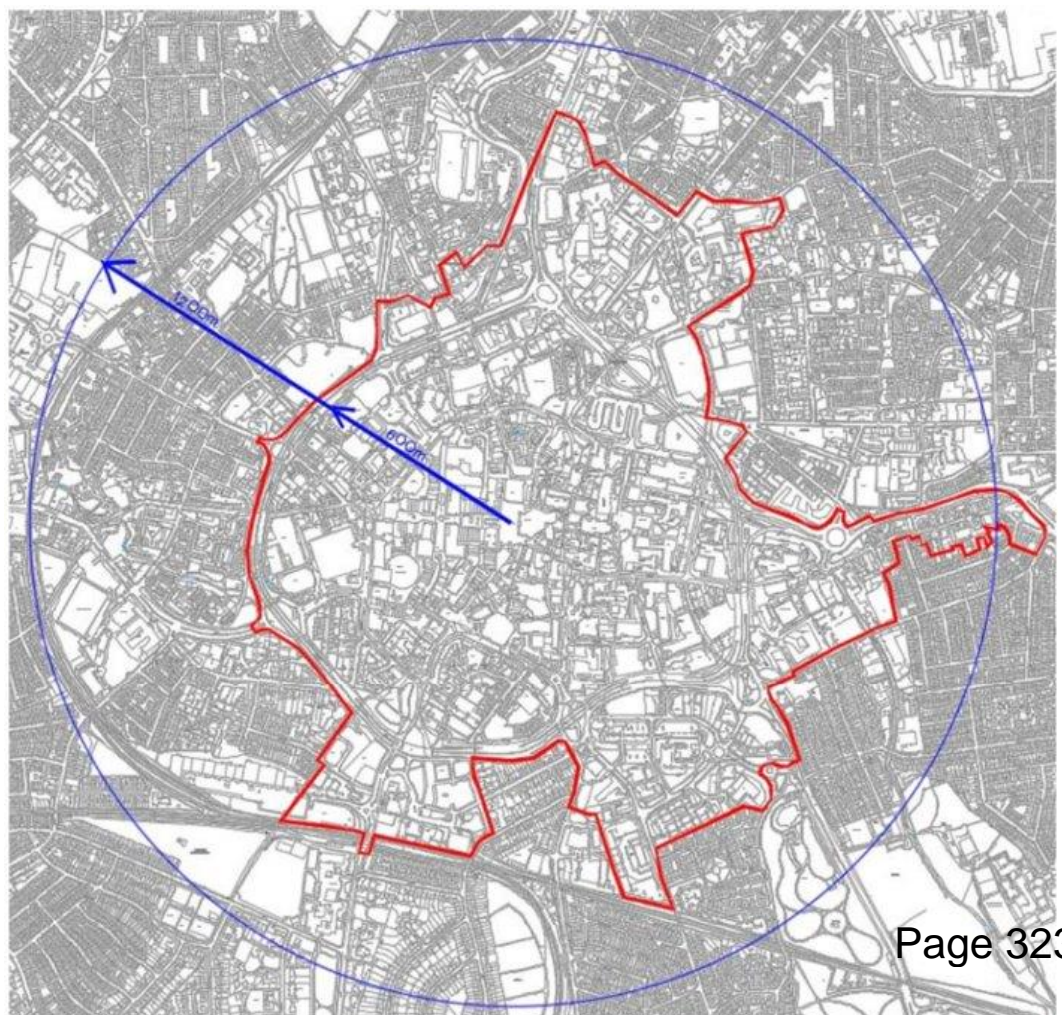
3) **Outer City (all other areas within the council's administrative boundary but outside of the Transition Zone)**

Within the Outer City, applications will be required to provide the level of car parking set out in Table 1 of this Appendix. Any variation from this standard must be justified using the criteria set out in paragraph 1.3 above.

**Figure 1 – City Centre and Outer City**



**Figure 2 – City Centre and Transition Zone**



- 1.12 It is recognised that there may be exceptional circumstances which may justify a lower level of parking provision to be appropriate. Exceptional circumstances are as defined within the Coventry Connect SPD. In such cases this would need to be fully and appropriately justified with detailed supporting evidence and referencing the standards in this guidance. In most cases this should be included within the associated Transport Statement or Assessments which should include:
- 1.13 Surveys of parking capacity and occupancy levels on surrounding streets and parking areas
- 1.14 Consideration of likely trip generation and parking accumulations for the proposed development with supporting evidence that this will be exceptional.
- 1.15 Details of how the parking will be managed.
- 1.16 This is not considered to be an exhaustive list, and there may be other factors associated with the specific characteristics of each site which may need to be considered. In all cases, where an applicant is considering a departure from the standards, the Council encourages early pre-application discussions.
- 1.17 Where a reduction in parking could lead to a transfer of parking into other locations, appropriate financial contributions may also be required for the introduction or expansion of Residents Parking Schemes.

## 2 Car Parking Standards

- 2.1 The standards set out in Table 1 below show the detailed car parking standards expected for each type of land use. These should be applied in accordance with the supporting guidance notes provided below.
- 2.2 Care should be taken to ensure that parking is well designed, easily accessible and is sympathetic to the surrounding environment, particularly in residential areas. Unallocated parking spaces required for visitor parking in residential areas should be seamlessly integrated into the public realm to reduce the visual impact, and be suitably located so that they do not cause obstructions to other users.

### **Parking for Electric Vehicles**

- 2.3 As set out in policy AC3, the City Council is supportive of an uptake in low emission and electric vehicles. In order to ensure that all new developments are equipped with the necessary infrastructure, new developments will be expected to include, where practical, appropriate provision for electric car charging points. Electric vehicle parking should be counted as part of the total parking provision, and bays should be clearly marked.
- 2.4 Proposals should provide for the provision for electric car charging points in accordance the building regulation standards.
- 2.5 For larger developments, details of how electric vehicle charging will be allocated, located and managed should, where applicable, be included within the relevant Transport Assessments or Transport Statement. The management of the charging points, including the mechanism/procedure for charging, will be the responsibility of

the developer/occupier.

- 2.6 In cases where charging points, including infrastructure to enable retrofitting, cannot be provided within the development site, developer contributions may be sought to enable those facilities to be suitably provided in other locations including public car parks or on-street parking spaces.
- 2.7 Inclusive mobility: making transport accessible for passengers and pedestrians, DfT January 2022, provides details on a recommended technical specification for electric charging points and should therefore be referred to in conjunction with these standards.

## **Parking for People with Disabilities**

- 2.8 In accordance with the City Council's objectives to promote equality, accessibility and to be an Age Friendly City, new developments must incorporate provision for blue badge holders. New developments, excluding individual dwellings with private off street parking, will be expected to allocate 5% of the total parking provision for blue badge holders. These spaces should be appropriately designed to meet the requirements of people with reduced mobility in accordance with good practice such as the Department for Transport's Inclusive mobility: making transport accessible for passengers and pedestrians, DfT January 2022, or future equivalent.

## **Parking for Goods Vehicles**

- 2.9 In accordance with Local Plan Policy AC7 appropriate off-street parking, loading/unloading, waiting and turning areas should be provided for HGVs to prevent obstructions to the highway causing delays and road safety issues. Each application will be assessed on its own merits.
- 2.10 It will be necessary to demonstrate in the application and through Transport Statements / Transport Assessments how goods vehicles will be managed as part of the proposed development, particularly in areas where the presence of HGVs has the potential to cause traffic management and road safety issues.

## **Drop-Off and Loading Areas**

- 2.11 Parking for coaches to set passengers down and pick them up will be considered appropriate and necessary for certain uses and developments, most notably those which are leisure related.  
However, this requirement will be unique to each site and therefore will be considered on a case by case basis.
- 2.12 For education establishments, appropriate provision for safe drop-off facilities should be considered to discourage inappropriate on-street parking. The level of provision will be determined on the merits of the application and the characteristics of the site and surrounding area.

## Cycle Parking Standards

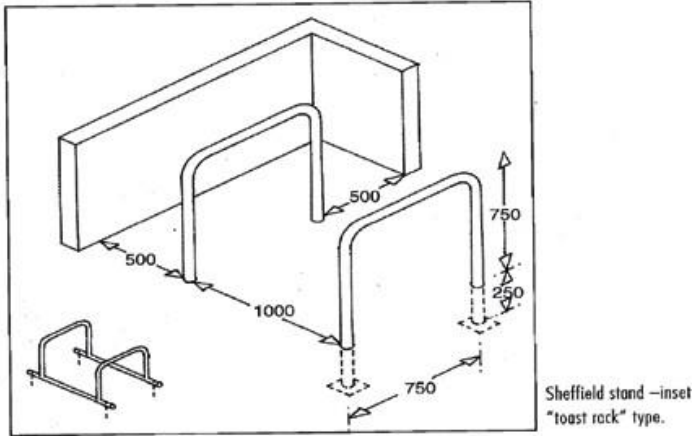
- 2.13 Fear of theft or damage to the cycle is often cited as a major deterrent to cycling. Well- planned and secure cycle parking is therefore an essential element in increasing the level of cycle use. The provision of cycle parking must be considered early in the planning and design process.
- 2.14 The standards in table 1 apply to all areas in the city, and specify different requirements for staff, residents, pupils/students and customers or visitors. This is because staff, residents and pupils/ students require cycle parking that is more secure for long-stay use whereas customers or visitors will usually be parking for a shorter period.
- 2.15 To increase the attraction of commuting by cycle, it is important to provide facilities for cyclists at their destinations. These facilities should include changing areas, storage areas for personal items and space to dry wet clothing and showers.

## Design Details

- 2.16 To discourage theft or vandalism, cycle parking should be secure, well lit, clearly signed and situated in prominent, accessible and convenient locations that benefit from casual surveillance by passers- by and more formal surveillance by staff or CCTV. It should also be located within a short distance of the main entrance(s) to the building(s), closer than the car parking provision to encourage bike use.
- 2.17 The use of 'Sheffield' stands is recommended as a minimum and is especially suitable for customer or visitor parking. The 'Sheffield' stand is a single 50mm diameter tube with two right angle bends and provides for two cycles. A detailed specification is shown at Figure 1 below.
- 2.18 Developments should cater for a variety of bikes and bike sizes, which includes smaller bikes for children and non-standard / larger bikes such as cargo bikes. Providing cycle parking to meet the needs of all users will better encourage modal shift and help to provide for changing mobility. Child cycle parking should be provided particularly when delivering cycle parking in green spaces, such as MUGA's and LEAP's, at schools and outside retail premises. Cycle parking that caters for child bikes should use M-Stands or Bilton Cycle Stands, which are a variation of a Sheffield Stand with a mid-bar to lock smaller bikes to. LTN 1/20 provides guidance for cargo and non-standard cycle parking.
- 2.19 Cycle Parking should be covered and enclosed for protection from the elements. Access should be step free and it should be well-lit and clearly signed and conveniently located. The detailed design and lighting of these facilities must have regard to the locality and setting of the proposed development.
- 2.20 In addition to standard cycle parking and to ensure that all new developments are equipped with the necessary infrastructure, new developments will be expected to include, where practical, appropriate provision for safe e-bike parking and charging points. The management of the charging points, including the mechanism/procedure for charging, will be the responsibility of the developer/occupier.

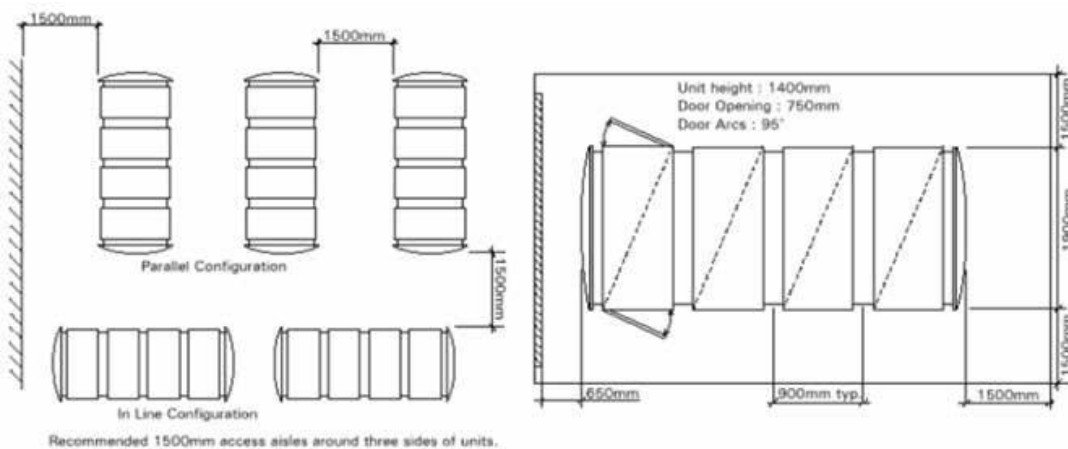
- 2.21 In cases where charging points, including infrastructure to enable retrofitting, cannot be provided within the development site, developer contributions may be sought to enable those facilities to be suitably provided in other locations.

**Figure 3: Sheffield Stand design specification (copyright Institution for Highways and Transportation)**

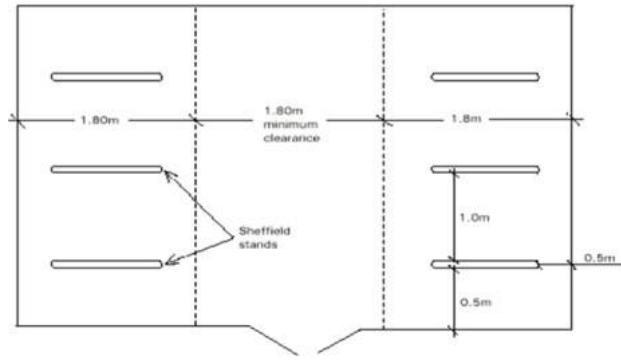


- 2.22 Cycle parking equipment which only holds one wheel of a bicycle e.g. 'butterfly' clips or concrete slots will not be acceptable. They provide inadequate security and can damage the wheels of a bicycle.
- 2.23 For long-stay parking for residents, staff and pupils/students, more secure provision will be expected. This should be in the form of cycle lockers, a locked compound with Sheffield Stands provided that they are under cover, enclosed for protection from the elements and located within a secure area (access restricted to staff or similar). Design specifications for cycle lockers and locked compounds are shown in Figures 2 and 3.

**Figure 4: Cycle Lockers Design Specification**



**Figure 5: Locked Compound Design**





## Notes for Table 1

### Car Parking Standards

1. All standards should be calculated on external gross floor area (m<sup>2</sup>) unless otherwise stated.
2. In order for garages in residential developments to qualify as part of the parking provision they must be a minimum of 3m x 6m internally.
3. Unallocated visitor car parking for C3 residential dwellings should be provided in the form of appropriately marked publicly available spaces. In cases where this is provided as part of the highway, spaces must be seamlessly integrated into the public realm to reduce the visual impact, and be suitably located so that they do not cause obstructions to other highway users.
4. FTE means Full Time Equivalent.
5. Where it is calculated that part of a space is required, this should be rounded up.
6. Provision should be allocated for Blue Badge holders, in accordance with para 2.27 above.
7. Provision should be allocated for electric car charging in accordance with paras 2.22 to 2.26 above.
8. 6% of the total car parking provision should be allocated for people with disabilities / blue badge holders.
9. The recommended minimum dimensions for car parking spaces should be as per Table 1 below. Parking spaces also need to take account of the minimum space requirements set out for electric vehicle charge points in Building Regulations Part S, which vary depending on whether they are free standing, or wall mounted.

Type of Space	Recommended Minimum Dimensions
<b>Standard Parking Space</b>	2.5m x 5.0m
<b>Parallel parking Space</b>	2.0m x 6.0m
<b>Disabled Parking Bay</b>	3.6m x 6.0m (This is equivalent to 2.4m x 4.8m, with an additional 1.2 metres at the side and end of the bay)
<b>Parking Space with EV Charger</b>	2.8m x 5.0m
<b>Garages (Internal sizes)</b>	3.0m x 6.0m

### Cycle Parking Standards

10. A Sheffield type stand (see Figure 2 below) is capable of allowing two bicycles to be parked if correctly installed (2 spaces).
11. In most residential developments, the use of suitably sized garages or sheds will be acceptable as cycle storage provision. A method of securing the cycle to a solid wall is encouraged.
12. For flats, maisonettes and managed schemes, secure communal space(s) should be provided on the ground floor or in a basement area provided that ramped access is available.
13. FTE means Full Time Equivalent.
14. All standards should be calculated on external gross floor (m<sup>2</sup>) space unless otherwise stated.

**Table 3 - Car and Cycle Parking Standards**

Use Class	Outer City Car Parking spaces	Inner and Outer City Cycle Parking spaces
<b>E(a) - Shops (m<sup>2</sup>) Food</b>	1 per 25m <sup>2</sup>	<b>Under 2,500m<sup>2</sup></b> 1 per 200m <sup>2</sup> for customers 1 per 400m <sup>2</sup> for staff Minimum of 2 spaces
		<b>Over 2,500m<sup>2</sup></b> 1 per 400m <sup>2</sup> for customers 1 per 600m <sup>2</sup> for staff
<b>E(a) - Shops (m<sup>2</sup>) Non-food</b>	1 per 35m <sup>2</sup>	1 per 400m <sup>2</sup> for customers 1 per 400m <sup>2</sup> for staff Minimum of 2 spaces
<b>E(c) - Financial and Professional Services</b>	1 per 30m <sup>2</sup>	1 per 400m <sup>2</sup> for customers 1 per 400m <sup>2</sup> for staff A minimum of 2 spaces
<b>E(b) - Restaurants and Cafés (dining area m<sup>2</sup>)</b>		
<b>E(g)(i) and (ii)- Business/Research &amp; Development</b>	1 per 45m <sup>2</sup>	1 per 400m <sup>2</sup> for staff 1 per 400m <sup>2</sup> for visitors Minimum of 2 spaces

<b>E(g)(iii)/B2 - Light or General Industrial</b>	1 per 60m <sup>2</sup>	<b>Under 4,000m<sup>2</sup></b> 1 per 400m <sup>2</sup> for staff 1 per 750m <sup>2</sup> for visitors Minimum of 2 spaces
		<b>Over 4,000m<sup>2</sup></b> 1 per 500m <sup>2</sup> for staff 1 per 1,000m <sup>2</sup> for visitors
<b>B8 - Storage and Distribution</b>	1 per 100m <sup>2</sup>	<b>Under 4,000m<sup>2</sup></b> 1 per 400m <sup>2</sup> for staff 1 per 750m <sup>2</sup> for visitors A minimum of 2 spaces
		<b>Over 4,000m<sup>2</sup></b> 1 per 500m <sup>2</sup> for staff 1 per 1000m <sup>2</sup> for visitors

<b>Use Class</b>	<b>Outer City Car Parking spaces</b>	<b>Inner and Outer City Cycle Parking spaces</b>
<b>C1- Hotels</b>	1 per 2 bedrooms+ parking provision for any A3 and D2 uses	1 per 10 staff members (FTE) 1 per 8 bedrooms for customers Minimum of 2 spaces
<b>C2 - Residential Institutions Care &amp; Nursing Homes</b>	1 per 4 bed spaces + 1 per 2 staff members (FTE)	1 per 10 staff members (FTE) 1 per 8 bedrooms for visitors Minimum of 2 spaces
<b>C2 - Residential Institutions - Hospital, nursing home, care home,</b>	1 per 2 staff members (FTE) + and 1 per 2 bed spaces	1 per 10 staff members (FTE) 1 per 20 beds for visitors Minimum of 2 spaces
<b>C2A - Secure Residential Institutions</b>	Parking provision will be considered on a site by site basis.	
<b>Sui Generis - Student Accommodation (Halls of Residence) &amp; C2 - Residential Schools/Colleges</b>	1 per 4 bedrooms (off campus / school / college locations)	1 per 4 bedrooms for students 1 per 20 bedrooms for visitors (See note 12 above)
<b>C3 - Residential Dwellings (per unit) 1 bedroom house/flat</b>	1 per dwelling + 1 unallocated space per 5 dwellings for visitors (See note 3 above)	1 per dwelling (See notes 11 & 12 above)
<b>C3 - Residential Dwellings (per unit) 2 bedroom house/flat</b>	2 per dwelling + 1 unallocated space per 10 dwellings for visitors (See note 3 above)	1 per dwelling (See notes 11 & 12 above)
<b>C3 - Residential Dwellings (per unit) 3 or more bedroom house/flat</b>	2 per dwelling + 1 unallocated space per 5 dwellings for visitors (See note 3 above)	2 per dwelling (See notes 11 & 12 above)
<b>C4 - Houses in Multiple Occupancy</b>	0.75 per bedroom	1 per 3 bedrooms (See notes 11 & 12 above)

<b>(HiMOs)</b>		
<b>E(e) - Medical or Health Services (Non Residential)</b>	Parking provision will be considered on a site by site basis.	1 per 6 staff members (FTE) 0.5 per treatment room for visitors Minimum of 2 spaces
<b>E(f) - Creche, Nursery</b>	1 per 2 FTE staff + appropriate drop off facilities	1 per 10 staff members (FTE), 1 per 15 children for visitors Minimum of 2 spaces
<b>F1(a) - Education Establishment Primary schools</b>	1 per 2 FTE staff + appropriate drop off facilities	1 per 10 staff members (FTE) and 1 per 500 students for visitors 1 per 5 students for student use
<b>F1(a) - Education Establishment Secondary Schools</b>	1 per 2 FTE staff + appropriate drop off facilities	1 per 10 staff members (FTE) and 1 per 500 students for visitors 1 per 5 students for student use
<b>F1(a) - Education Establishment Further / higher education (Colleges and Universities)</b>	1 per 2 FTE staff + appropriate drop off facilities	1 per 10 staff members (FTE) and 1 per 500 students for visitors 1 per 5 students for student use
<b>F1(b), (c), (d), (e) and F2(b) - Art Gallery/ Museum/ Library/Public Hall</b>	1 per 30m <sup>2</sup>	1 per 10 staff members (FTE) 1 per 20 people expected to use the facility at any one time
<b>F1(f) - Place of Worship</b>	1 per 10m <sup>2</sup>	1 per 10 staff members (FTE) 1 per 20 people expected to use the facility at any one time
<b>E(d) - Gym/ Fitness Centre</b>	1 per 15m <sup>2</sup> public areas	1 per 10 staff members (FTE) 1 per 20 people expected to use the facility at any one time
<b>E(d) - Indoor Sports Hall</b>	1 per 20m <sup>2</sup> public areas	1 per 10 staff members (FTE) 1 per 20 people expected to use the facility at any one time
<b>F2 (c) and (d) – Outdoor sport or recreation and swimming pool or ice skating rink</b>		
<b>Sui Generis (other than PBSA)</b>	Parking provision will be considered on a site by site basis.	

## **Appendix 7- Infrastructure Delivery Plan**

### **Introduction**

This Infrastructure Delivery Plan provides an initial overview of the infrastructure required to support the growth identified through Coventry's Local Plan. It also highlights the details that are currently available and important to the costing and delivery of such infrastructure. It has been prepared in consultation with infrastructure providers to ensure that the Plans not only enable new homes and employment premises, but that developments are properly supported by high quality physical, social and green and blue infrastructure, which allows these new places to function as thriving communities and locations for successful business.

The IDP is a 'living document' which will evolve as more information becomes available through detailed planning applications, funding discussions and monitoring. The IDP should be read in conjunction with the Local Plan policies, which set out a positive approach to supporting development across Coventry.

The following sections will provide an overview of infrastructure requirements identified at this time and will be supported by detailed tables which provide guide costs and links to specific development(s). These sections build upon the information contained within Chapter 13 of the Local Plan.

### **Highways, Public Transport and Supporting Accessibility**

Transportation infrastructure is the largest area of infrastructure needed in terms of scale and cost. The transport modelling that has supported the Local Plan has identified a range of schemes that will be essential to the delivery of new homes and jobs across Coventry. Prime examples include a new link road with wider highway improvements to support the Keresley SUE. This will help to create a significantly enhanced transport corridor between the southern end of Coundon Wedge Drive and Junction 3 of the M6. In addition, a new grade separated junction will be created on the A46 near Walsgrave Hill Farm to support new development access and secure a blue light access to the city's hospital. Both of these schemes represent clear commitments to using infrastructure to unlock growth not just for Coventry but jointly with Nuneaton and Bedworth and Rugby Borough Councils respectively. This is a prime example of on-going commitment to the DtC between neighbouring Councils, the County Council and Highways England. Further to highway improvements however, there will also be substantial development in the city's rail services supported by the Very Light Rail scheme which will link the Railway station to Poll Meadow bus station and other routes, including the University Hospital. Midlands Connect will also enhance connections between the West and East Midlands, including the creation of a direct link between Coventry and Leicester. Improvements in Coventry's cycle network will continue to be made, in Foleshill, at the University of Warwick and the creation of a segregated cycleway in the City Centre.

## Water Supply and Sewerage Capacity

The Coventry Water Cycle Study (2024) identifies that there is capacity to support growth across Coventry, but the water environment and water services infrastructure cannot support all of the development in the proposed allocations until further investigations and upgrades have been completed. There are some areas such as the City Centre, where growth is largely unconstrained by the water environment but others, such as the SUE's, which have some level of constraint and will require on-going collaborative working between the Council, Environment Agency and Severn Trent Water to resolve.

**Water Supply:** Water resources used to supply drinking water to the North West of the city are under pressure, and whilst Severn Trent is able to undertake system improvements to augment resources and reduce leakage, managing demand remains a core part of the solution. Therefore, new build developments should conform to at least the basic levels of water efficiency. It is important that development is carefully phased to ensure the integrity of supply.

**Waste Water and Sewerage:** Overall there is sufficient capacity at existing wastewater and treatment facilities to accommodate growth provided locational phasing requirements are considered.

**Flood Risk:** Overall, there is capacity to accommodate growth and the risk of fluvial or watercourse flooding is either low, or can be mitigated. Although surface water flooding is widespread and would be present at many development sites, careful planning and implementation can mitigate the issues through the use of natural attenuation and infiltration methods. Sustainable Drainage Systems and the use of multipurpose green spaces will be a key element in supporting sustainable drainage and reducing the risk of flooding. Detailed flood risk assessments will be required to support planning applications where appropriate.

## Utilities – Energy Supply

Energy supply covers infrastructure associated with the provision of electricity and gas. The infrastructure ranges from transmission and distribution networks to localised energy generation.

The energy providers who operate transmission and distribution within the city are Cadent and National Grid. Cadent is responsible for the provision of gas and National Grid is responsible for the provision of electricity.

Cadent have indicated that gas supplies will remain adequate for the level of growth set out in the plan. National Grid indicate that a number of enhancements will be required throughout the city to ensure a robust provision of electricity supply. Developers will need to engage with national Grid to ensure the timely provision and incorporation of such facilities to ensure appropriate and adequate power supply.

The Council will continue to liaise with Western Power to ensure future growth plans and the IDP is kept up to date. Of particular importance will be the provision of new sub-stations to support the larger development proposals. The Council is developing a Strategic Energy Partnership Masterplan 2024 which will support the achievement of net zero objectives and improve climate resilience

Examples include Friargate, the 2 SUE's, further growth at the University of Warwick and Whitley Business Park.

## Health

NHS England and the Coventry and Warwickshire Integrated Care Board are responsible for the commissioning of health care services for the population of the city. Working in partnership with the Council, the NHS is identifying areas of the city that will require investment to support the proposed level of population growth. This is informed by the Coventry & Warwickshire Integrated Health and Care Delivery Plan 2023-2028 and is regularly updated to reflect changing needs and funding streams. This will ensure that all local people have adequate access to health care facilities in order to further support the public health agenda. Funding and investment may take two forms over the course of the plan period: the possible development of existing primary care premises that are suitable for expansion, and/or exploring options for new premises in areas of significant growth.

Current evidence suggests that the creation of new facilities may be required in the Keresley and Eastern Green areas to ensure enhanced service provision within these SUE's, whilst Foleshill has been identified as a priority area for the provision of a new primary care development for a number of years. Plans are on-going for the potential delivery of a new facility within Foleshill over the course of the plan period.

Evidence has also identified a need to look at existing services to the east of the city near to Walsgrave Hill Farm and in the west of the city at Allesley. This could take the form of expansion or re-configuration of existing built premises to make more efficient use of existing facilities. The preferred locations for new and existing facilities will be in defined centres which are easily accessible and can provide a sustainable and efficient facility linked to other local services. Where existing facilities are outside of designated centres but still serve a defined local community, their expansion and reconfiguration will continue to be supported subject to conforming to other policies in the Local Plan.

On-going work by NHS England and the Coventry and Warwickshire Integrated Care Board will identify the scale of expansion and final costs required to deliver these services. This will also help to inform any future infrastructure requirements to support mental health services and ambulance facilities across the city and surrounding area.



The City Council are also working very closely with colleagues at University Hospital Coventry and Warwickshire. The Local Plan is supportive in principle of expanding facilities at the hospital to help meet growing demand and land is available at the site of the hospital to facilitate this. The proposed secondary/blue light access and additional parking facilities will also be supported through development at Walsgrave Hill Farm and the remodelling of the A46 junction at Clifford Bridge.

## Education

The local authority is responsible for ensuring there are sufficient pupil places throughout the city across all key stages. Where new development generates a direct need for new school places, the DfE anticipates that the Council will seek planning obligations, through Section 106.

Since 2008, the city has carried out expansions at over 30 of the city's primary schools, with over 7,000 primary places having been created. As at 2024, city wide primary place provision is considered adequate, although this fluctuates at a more local level: area by area and school by school there are some local shortfalls and some overprovision. This is expected to create some localised pressures as a result of new development. The creation of 'bulge' classes is being explored in order to meet surge demand at primary stage. Options may include the creation of three new classes per year until the end of the plan period. Forecasting predicts that further expansion on sites at Henley and Stoke park may be required to ensure the pupil pathway is robust. The growth of the city has also seen the increase in the numbers of pupils requiring Special Educational Needs (SEN) provision. The Council has a strategy of Enhanced Resource Provision (ERP), wherever possible, providing purpose built accommodation on existing sites. At present, forecasting suggests that three new ERP facilities will be required each year for the duration of the plan period.

Development proposals will require further secondary as well as primary places. The timing and progress of the developments are critical, remembering that schools need to be ready for the pupils in advance of them arriving.

The One Strategic Plan sets out the future options for the provision of school places in the city. Two key developments are Keresley and Eastern green SUEs.

- Keresley: 3,100 homes. This could comprise a new 2FE primary school (land and buildings) plus an extension to an existing local school.
- Eastern Green: 2,250 homes. At primary level, a new 3FE primary school will be required alongside additional capital funding to support the potential expansion of an existing primary school within the local area.

Other potential development sites are outlined in the IDP.

## Communities

The demand and need for social, community and leisure facilities is likely to grow significantly over the course of the plan period. In order to achieve adequate

provision, new or expanded facilities will be required to meet the needs of the city's population. Where appropriate, new development will help to fund the expansion and improved quality of existing facilities within local communities, at the same time as having regards to the Council's most up to date Green Space Standards and Sports and Leisure Strategies. This will also help meet the needs generated by the residents and/or workforce associated with new development. Community services such as libraries and community centres will continue to be considered in the context of multi-agency service provision where possible. Future collaborative working with a range of partners including charitable trusts, the Council and voluntary organisations will be fundamental to ensure the continued provision of a range of community facilities and services.

The cultural strategy for the city is centred on the Council Plan objectives to bring the city centre to life and promote the city as a visitor destination and centre for arts and culture; sports and leisure; music and events. This strategy reflects key capital aspirations and an analysis of priorities to support growth in leisure tourism.

## **Sports and Green Space**

There are numerous parks and open spaces across the city which will continue to be maintained by the Council and partner organisations including community groups who have a significant contribution to make in their local community. Funding for new or significantly enhanced parks and open spaces will be sought from a variety of sources, mainly; developer contributions, grant funding or lottery bids. Costing will be continually reviewed through the IDP.

The Coventry Playing Pitch and Outdoor Sports Strategy 2023 includes vision aims to provide a range of high quality sporting opportunities and to provide a range of modern, accessible and high quality sports facilities. A revised Indoor Sports Strategy is currently being developed and will be published in early 2025.

The Local Plan has identified two sites for replacement sports pitches which will be delivered to facilitate new developments at Whitley and Canley. In addition the regeneration of Whitmore Park will see the existing private sports pitches released and safeguarded for public use, whilst other developments in Eastern Green, Foleshill, Longford and Henley will help create new publicly accessible green spaces to the benefit of local communities.

The proposed SUE's are also expected to make significant contributions towards green infrastructure, especially along the existing brook corridors and around the ancient woodlands. Such quality based enhancements will also be realised through the new Heritage Park proposed around Charterhouse, the London Road Cemetery and the old Coventry loop line. In the future these areas are expected to become Local Green Space designations to reflect their status as new and improved infrastructure and support their importance to new communities within the city. In a similar context, the development at Cromwell Lane will also make provisions for a

new woodland feature along the western boundary, which will replicate Ancient Arden landscape principles.

## **Emergency Services**

There are four Fire Stations and three Police Stations located within the urban area. Both services have a central presence within the city centre with satellite facilities to the southeast and northeast. This includes the city centre fire station at Abbots Lane which has recently been redeveloped and enhanced. There is a fire station located in Canley to the southwest and a non-public facing police station. Initial evidence suggests fire station provision will be adequate to serve an increased population. On-going consultation will be required to identify longer term funding requirements to provide an adequate service. Contributions will therefore be sought from developers where appropriate. Consultation will continue with the Police Authority to identify specific sites and areas for service provision.

## **Waste**

The predominant residual municipal waste treatment method within Coventry is Energy from Waste (EfW). The facility saw expansion and improvement in 2020. Therefore, the land identified for the expansion of this facility has now been delivered as intended. On-going assessment of the needs and costs of both domestic and commercial refuse collection will continue to be assessed in detail to support the monitoring of the IDP. The supply of new domestic waste storage and disposal facilities will be required for all new properties and will be funded through a combination of council tax and, where viable, developer contributions.

## **City Centre Infrastructure**

In recent years there has been significant investment in city centre public realm improvements which have complemented the substantial investments in job creation and urban regeneration. Likewise, more people are now living in the city centre following delivery of new homes over the last 10 years. Coventry University also continues to grow, not only in terms of its student numbers, but also its national and global reputation and the size and quality of its campus.

The Local Plan makes provisions for significant levels of new homes, office provision and leisure and tourism facilities. These generate specific needs in terms of supporting infrastructure, principally around highway and public transport improvements to support accessibility. The expansion of the railway station, enhanced routes and linkages throughout the city centre and further improvements to Ring Road junctions 1, 2, 4, 5 and 9 with enhanced crossing facilities at the Canal Basin and Whitefriars Street all contribute to meeting this challenge. They will also support further public realm improvements and new green and blue infrastructure, with specific focuses around Greyfriars Green and Swanswell Pool, along with opportunities explored to deculvert parts of the River Sherbourne.

Site Name Location	Required infrastructure	Reason for infrastructure delivery	Funding and delivery partners	Cost of infrastructure	Timescale
<b>Utilities</b>					
City wide	Development of new additional utility networks and enhancements to existing utility networks to enable net zero carbon, resource efficient, resilient and adaptable buildings and transport, with appropriate energy supply capacity for expected future demands (both current and new need), across the city. The Strategic Energy Partnership Energy Masterplan 2024 and subsequent updates may provide a reference point to support opportunities.	To support achievement of net zero objectives, improve climate resilience, optimise heating/cooling helping to manage costs	To be determined through procurement process and subsequent business plans	To be determined.	Local Plan Period
<b>Air Quality</b>					
Improvements to air quality across the city will be made in-line with the priorities set out in the Climate Change Strategy, the Local Transport					

Plan and the Local Air Quality Action Plan and will be delivered throughout the life of the Local Plan.					
<b>Water and flooding</b>					
City wide	General water supply.	Work with Severn Trent Water to ensure water supply to new developments is identified within their investment programme. This will ensure adequate provision is made for new developments. Updated Water Cycle Study 2024.	Developer, Severn Trent Water (STW) and Environment Agency (EA) if needed.	Presently unknown.	Local Plan Period
City wide	Waste water and sewage facilities.	Work with STW to ensure waste water and sewage can be adequately dealt with and is identified within their investment programme. This will ensure new developments are adequately managed and supported. Updated Water Cycle Study 2024.	Developer, Severn Trent Water and Environment Agency if needed.	Presently unknown.	Local Plan Period

City wide	Flood Prevention programme.	Prevent/mitigate potential issues in the future, and resolve existing issues. To ensure all homes, business and public spaces are free from flood risk. Updated Water Cycle Study 2024.	Developer, Severn Trent Water and Environment Agency. New strategic Flood Risk Assessment produced.	To resolve existing issues will cost approximately between 4million and £5million.	Local Plan Period
Stoke Aldermoor	Upgrade to water supply provision and pipe network.	Improvement to overall water distribution, aided by the removal of Pressure Reducing Valve.	Funding sourced from both EA and STW.	Presently unknown.	Medium term (3-5 years).
City Centre - River Sherbourne	De-culverting the river, especially in the proximity of Fairfax Street.	To support the day lighting of the River Sherbourne within the city centre and promote environmental and economic benefits of this.	Developer contributions, UK Shared Prosperity Fund (UKSPF), Coventry City Council (CCC) and private investors.	Approximately £4 0,000 per metre	Across Plan Period
Broad Lane/Banner Lane; Canley	Flood alleviation measures.	Based on FCERM 6 year programme, review of recent flood events and the high-level identification of potential flood	Funding sourced exclusively from EA.	Presently unknown.	Short Term (1-2 years).

Brook; Upper Brookstray		storage locations in the updated SFRA. Essential to ensure that flood risk is not increased in areas where future development/growth is proposed.			
Lake View Park	Creation of targeted wetland area to promote environmental and flood alleviation improvements.	Promote environmental enhancements and support wider flood alleviation measures that creates wetlands and riverine restoration.	Funding sourced from both EA and Warwickshire Wildlife Trust (WWT).	£30,000.	Over plan period
Prior Deram Walk and the railway corridor, Canley	Regeneration of local park and green corridor to the south of the railway.	Enhanced quality of provision will help offset loss of lower quality green spaces to support regeneration projects.	Led by CCC with developer contributions and voluntary groups.	Presently unknown.	Medium Term (3-5 years).

Swanswell Pool and Volgograd Place	Extension of Swanswell Pool and refurbishment of Volgograd Place.	To promote high quality green and blue infrastructure in the city centre.	Charging through developer contributions. In addition to funding contributions from; UK Shared Prosperity Fund (UKSPF), CCC and private investors.	Presently unknown.	Local Plan Period
<b>Sport and recreation</b>					
North West Leisure Facility	Leisure Centre with potential swimming pool, sports hall and strategic sporting offer	North West housing growth	City Council, Public Leisure Operator	TBC	TBC
Football Hubs – Coundon Hall Park and War memorial Park <u>9v9 grass:</u> NE – 0.5 match sessions	Consolidating match pitches and improving the quality of match pitches	Playing Pitch strategy. To address the shortfall of pitches.	City Council, Football Foundation, FA	TBC	TBC



<p>City wide – 5 match sessions.</p> <p><u>5v5 grass:</u></p> <p>NE – 1 match session</p> <p>City wide – 5 match sessions</p>					
<p>3G facilities shortfalls:</p> <p>NW – 2 x 3G pitches</p> <p>SW – 0.5 x 3G pitches</p> <p>SE – 1 x 3G pitches</p>	<p><u>NW</u></p> <p>Cardinal Newman</p> <p>Woodlands</p> <p>Coundon Court</p> <p><u>SW</u></p> <p>Coventry University or alternative</p> <p><u>SE</u></p> <p>Caludon Castle Sports Centre</p>	<p>To meet shortfall</p>	<p>City Council, Football Foundation, FA, schools, clubs</p>	<p>Circa £1m per 3G</p>	<p>2023 onwards</p>

<p>Cricket Wickets Shortfall of pitches  SE – 24 sessions  SW – 24 sessions</p>	<p>Sites to be identified as part of the playing pitch action plan</p>	<p>Playing Pitch Strategy</p>	<p>City Council, ECB</p>	<p>TBC</p>	<p>TBC</p>
<p>Rugby Union shortfall of pitches  NE – 14.5 match sessions  NW – 4.75 match sessions  SE – 9.5 match sessions  SW – 12.5 match sessions</p>	<p>Sites to be identified as part of the playing pitch action plan</p>	<p>Playing Pitch Strategy</p>	<p>City Council, RFU</p>	<p>TBC</p>	<p>TBC</p>

City wide – 41.25 match sessions					
<b>Transport</b>					
Coventry Very Light Rail (CVLR) 'demonstrati on project'	Development of a short section of track between Coventry Railway Station and Pool Meadow Bus Station to allow CVLR vehicles to be tested in a live environment. This section will eventually form part of Route 1		City Region Sustainable Transport Settlement (CRSTS)	£25-£50m	2025/26
CVLR Route 1	A first CVLR route, connecting Coventry Railway Station to University Hospital		CRSTS/ Other sources TBC	£100m+	2027/28+
Further CVLR routes	Development of a further network of VLR Routes serving various key locations across the city		TBC	£100m+	2027/28+
Tile Hill Station improvement s	Station improvements aimed at establishing Tile Hill as a transport interchange/Park & Ride site, serving the West side of the city		CRSTS, Partnership with Transport for West Midlands (TfWM)	<£10m	2025/26
New direct connections to East Midlands	Establishing a direct rail connection between Coventry, Leicester and Nottingham		Midlands Connect / Rail Network Enhancement Pipeline (RNEP)	£100m+	6-15 yrs

More frequent service to Leamington, Kenilworth and Nuneaton	Improvements, including at Coventry Station and some double tracking of the line between Coventry and Leamington, to enable an increased service of two trains per hour		Midlands Connect / RNEP	£100m+	2027/28+
Potential further new railway stations	<p>Potential further new railway stations at Binley &amp; Willenhall, Coundon, Coventry South and/or Foleshill.</p> <p>Further work is required to determine whether some, or all, of these stations would be viable</p>		RNEP, Partnership with TfWM / West Midlands Rail Executive (WMRE)	TBC depending on how many of the 4 potential sites are considered viable	2027/28+
Bus Service Improvement Plan (BSIP)	Delivery of plans set out in TfWM's BSIP, including freezing fares, expanding the use of contactless payments, ensuring tickets can be used across different operators and expanding the use of real time information at bus stops		BSIP, TfWM	£50-100m (WMCA full area)	3 yrs

All Electric Bus City	All buses operating in the city to be replaced with electric buses		DfT - All Electric Bus City grant (£50m)/ Bus operator contributions, TFWM	> 100m	2025/26
Ansty Park & Ride	Establishing an, initially bus-based, park and ride service at Ansty as part of the Coventry and Warwickshire CLEAN Hub project (with the potential to add a CVLR service at a later date)		Partnership with Warwickshire County Council (WCC) / Rugby Borough Council (RBC)	£50-100m	2027/28+
City Centre Traffic Management Plan	Introduction of further restrictions on car travel within the Ring Road, with the aim of ensuring that the whole city centre is designed primarily as a pedestrian friendly environment		CRSTS	<£10m	2024/25
Further city centre public realm improvements	Ongoing programme of further public realm improvements in the city centre		TBC – potential for developer contributions	Ongoing programme	Ongoing programme
Local centre improvements	Ongoing programme of improvements to various local centres around the city, including public realm improvements and better walking, cycling and public transport connectivity		TBC – potential for CRSTS and developer contributions	Ongoing programme	From 2025/26

Ring Road Junction Remodelling	Remodelling of various Ring Road junctions	To remove congestion & improve pedestrian & cycle access in and out of the city centre	Programme/ Developer contributions	£25-£50m	2027/28+
Coundon and Binley cycleways	Completion of two fully segregated cycleways, connecting the city centre to Coundon and Binley		Coundon – Local Air Quality Action Plan (LAQAP)  Binley - Transforming Cities Fund (TCF)/ Active Travel Fund (ATF)	<£10m each	2024/25
City Centre Cycleway,	New segregated cycleway between Queen Victoria Road and Pool Meadow Bus Stations		ATF	<£10m	2024/25
University of Warwick cycle routes	Improved cycle connections between the University of Warwick and neighbouring residential areas, railways stations and the city centre		ATF/ Developer contributions/ Sustrans	<£10m	2024/25
Foleshill Transport Package	The package includes segregated cycle facilities on Foleshill Road, as well as junction improvements on the A444 (to accommodate	Package of improvements to reduce the level of through traffic on Foleshill Road and encourage greater levels of active travel.	CRSTS	<£10m	2025/26

	traffic displaced from Foleshill Road)				
Coventry South/ London Road Transport Package	Various improvements on the A444 and London Road corridors, including improvements to signage to reroute through traffic, remodelling of key junctions and the installation of segregated facilities for cyclists		CRSTS/ Developer contributions	£10-£25m	2026/27
Eastern Green cycleways	Two new cycleways connecting the planned Sustainable Urban Extension (SUE) at Eastern Green to the city centre and to Tile Hill Railway Station		Developer contributions	<£10m	2026/27
Keresley Connects cycleways	New cycleways connecting the planned SUE in Keresley to the city centre, Allesley/ Lyons Park and the existing Coundon Cycleway		Developer contributions	<£10m	2025/26
Further cycle network improvement	Ongoing programme to develop and deliver further cycleways, informed by the LCWIP.		ATF/ Developer contributions	Ongoing programme	From 2025/26

Liveable Neighbourhoods trials	Development of two initial Liveable Neighbourhoods, in collaboration with local residents		ATF	<£10m	2025/26
Further programme of Liveable Neighbourhoods	Ongoing, community-led programme to establish further Liveable Neighbourhoods		TBC	Ongoing programme	From 2025/26
WM Cycle Hire	Ongoing expansion of the existing WM Cycle Hire scheme, with the aim of covering the whole city		TfWM	Ongoing programme	1-15 yrs
E-scooter rental scheme	Expansion and roll-out of the existing pilot scheme. Further actions dependent on national changes to legislation expected in 2023/24 subject to parliamentary timetable		TfWM	TBC	1-15 yrs
A46 Stoneleigh Junction improvements	Complete upgrades to the A46 Stoneleigh Junction (currently underway)		WCC	£25-50m	2024/25
LAQAP highways schemes	Complete various highway improvement schemes aimed at reducing air pollution at several pinch points, including Spon End, Ring Road Junction 7 and the			£25-50m	2024/25



	Holyhead Road area (currently underway)				
Keresley Link Road	A new connection through the planned Keresley SUE, linking Long Lane in the West of Coventry and Winding House Lane in the North. This will also remove through traffic from existing residential areas in NW Coventry			£10-£25m	2025/26
A46 Walsgrave Junction improvements	Planned junction upgrade to improve journey times on a key strategic route		National Highways	£50-£100m	2027/28+
A46 Strategic Link Road	A new strategic link between the A46 South of Coventry (at Stoneleigh Junction) and either Solihull or the West of Coventry.	This would create a new travel corridor linking the North Warwickshire/South Coventry with UK Central Plus (including the new HS2 station) in Solihull	Partnership with WCC and Solihull Metropolitan Borough Council (SMBC)	£100m+	2027/28+
M6 Junction 3 improvements	Improvements to reduce congestion at a key junction		National Highways	£25-£50m	2027/28+

Highway maintenance programmes	Ongoing programme of work to maintain our highways, cycleways and footways according to identified prioritisation based on condition and other factors		CRSTS	Ongoing programme	Ongoing programme
Road safety programmes	Annual programme of road safety improvement schemes based on casualty reduction priorities		CRSTS	Ongoing programme	Ongoing programme
Average speed cameras	Ongoing programme to reduce vehicle speeds within the city.	Rolling out average speed camera enforcement, with the aim of installing these on all major radial routes into and out of the city according to a prioritised programme	CRSTS	Ongoing programme	Ongoing programme
5G monitoring/ Connected Autonomous Vehicles (CAV) Testbed	Various projects aimed at preparing our highway network for the future	Includes testing of CAVs and the rollout of 5G monitoring and other projects involving trialling and rollout of new transport technology	TfWM/ Commercial/ Government research funding e.g. Innovate UK	Ongoing programme	Ongoing programme
Local EV charging hubs	Programme of EV charging/ multi-modal transport hubs in various locations around the city		Ongoing programme		From 2024/25

Coventry and Warwickshire CLEAN Hub	Creation of a multi-modal transport interchange initially with electric vehicle charging facilities and park and ride services, with further features to be added later		£50-100m	Partnership with the private sector	2027/28+
Trial of dynamic charging of electric vehicles	Development of “wireless” charging allowing EVs to be charged on the move.		<£10m	Partnership with the private sector	2027/28+
Green Innovation Park	Creation of a ‘super charging hub’ for electric vehicles		£10-£25m	OZEV	2027/28+
Public electric vehicle charge points network expansion	Ongoing programme to expand the city’s network of public electric vehicle charge points		Ongoing programme	National Highways / CCC	Ongoing programme
Expansion of car clubs/ car sharing services	Ongoing work with commercial partners to expand the provision of car clubs/ car sharing in the		Ongoing programme		1-15 yrs

	city, and encourage the provision of more shared electric vehicles				
Project Skyway	Investigation of the potential for drones to undertake longer distance deliveries along pre-determined corridors		£50-100m	Partnership with WCC	2-3 yrs
Ansty freight consolidation centre	Establishing a freight consolidation centre in Ansty as part of the Coventry and Warwickshire CLEAN Hub project		TBC	Partnership with TfWM and private sector	2027/28+
<b>Education</b>					
Lyng Hall	4 classroom block, dining area expansion to provide increased internal dining and extension of sports hall.	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£2,000,000	Completed in 2023
Stoke Park	Refurbishment classrooms and changing rooms. External landscaping and pitch enhancement.	Due to rising demand for school places and within the One strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£1,000,000	Completed in 2023

Bishop Ullathorne	Provision of New Sports Hall on school site	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£3,000,000	Completed in 2023
Finham 2	Refurbish Edwards Keep to form new classrooms and changing facilities, update the current DT Workshop into a new food technology space, refurbish the existing science classroom in to a STEM classroom and expand the sports facilities to create a new Muga that has previous planning approval.	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£2,000,000	Completed in 2023
Westwood	Temporary accommodation for September 2021: changing space (split for girls and boys) and 2 x general teaching classrooms  Refurbishment of existing DT classroom (complete) (to create 2 x general teaching classrooms), refurbishment of existing Art classroom (to create 2 x general teaching classrooms) September	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£1,000,000	Completed in 2023

	2023 permanent changing space (new standalone block)."				
Baginton (Rebuild)	A potential project to rebuild and expand Baginton Special School to accommodate additional pupils.	To meet the needs of children with Special Educational Needs or Disabilities. Provisions forms part of school management programme to make more efficient use of resources and better deliver services.	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	Completed by 2027
Woodlands	<p>SEMH Woodfield's schools currently across 2 sites with buildings that have been deemed unsuitable for purpose in the long-term. There is an opportunity to use the site formally occupied by Woodlands School. This site contains listed buildings and successfully provides community sports use.</p> <p>The project is to enable the integration of the Primary and Secondary schools onto one site and continue to provide the community sport provision. It is proposed to dispose of the Primary and Secondary site for</p>	To meet the needs of children with Special Educational Needs or Disabilities. Provisions forms part of school management programme to make more efficient use of resources and better deliver services.	Charging through Section 106 agreements, and funding from DfE.	To be finalized with contractor undertaking work	Completed by 2024

	development to provide funding for the main scheme."				
Cardinal Wiseman	"3 modular classrooms and extension of existing classroom to create science room (external extension with internal refurbishment).  The school may wish to extend across the full width of the building and will be provided prices to confirm if they wish to proceed at their costs.	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£1,000,000	Completed in 2023
Blue Coat	Initial discussions with school indicate that the works will comprise the following element -  Provision of new single story sixth form block (6 classrooms) for September 2023	Due to rising demand for school places and within the One Strategic Plan for Education, an additional classroom block has been delivered at the school.	Charging through Section 106 agreements, and funding from DfE.	£2,000,000	Completed by 2023
Keresley SUE New School	Due to new housing in the local area, land has been secured for a 2FE Primary School	Due to rising demand for school places due to housing in the local area and within the One Strategic Plan for Education, a new school building will be created on site.	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	Completed by 2027

Eastern Green New School	Due to new housing in the local area, land has been secured for a 3FE Primary School	Due to rising demand for school places due to housing in the local area and within the One Strategic Plan for Education, a new school building will be created on site.	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	Completed by 2030
ERP	Extensions to existing primary schools to provide additional resources and facilities for Special Needs Pupils (SEN)	The number of special needs pupil is on the rise and extending existing primary schools to include Enhanced Resource Provision (ERP). These resources will provide an adaptive classroom, sensory areas, and spaces for development. This will ensure a supportive learning environment tailored to the diverse needs for pupils with special needs. It brings about inclusivity for the pupils.	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	3x per year till end of plan period
Primary Bulge Class	Temporary expansion of school facilities. This is for a single year, in which for example Year 3 increase, and that increase then moves through the school until that cohort reaches Year 6.	The recent increase in demand of school places across the city because of in-year migration has had the most substantial impact on the availability of places in all year groups. The consequence of this increased demand is that it has significantly reduced the number of school places	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	3x per year till end of plan period



		available in Coventry primary schools. Hence the need for bulge classes to address this issue.			
Foxford	Construction of four permanent classroom	Additional capacity in the model of both permanent and temporary expansions are being added in secondary schools to ensure sufficiency of places, viability for schools, and cost efficiency. This is to provide for the larger birth cohorts identified through the pupil forecasts. Foxford school is part of the expansion programme to deliver additional places.	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	To be completed by 2024
Castle Wood	Refurbishment of office space to create two classroom spaces and construction of office spaces.	The yearly increase in demand for Education Health & Care Plans has increased placing pressure on the specialist system. Since the introduction of the Children and Families Act which was enacted in September 2015, demand for EHC Plans has grown both nationally and locally. Consequently, demand for special school placements has increased excessively thereby exceeding forecasts	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	To be completed by 2025

		based on birth rates. So as to ensure that children with EHCP receive the right support expansion of specialist schools are in delivered in phases. Castlewood is one of those schools.			
Corley Centre	Creation of additional learning spaces	The yearly increase in demand for EHC Plans has increased placing pressure on the specialist system. Since the introduction of the Children and Families Act which was enacted in September 2015, demand for EHC Plans has grown both nationally and locally. Consequently, demand for special school placements has increased excessively thereby exceeding forecasts based on birth rates. So as to ensure that children with EHCP receive the right support expansion of specialist schools are in delivered in phases. Corley Centre is one of those schools.	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	To be completed by 2024

Henley College Site	Refurbishment or rebuild of former college site	Rebuilding or refurbishment of the site to create additional secondary school places due to the larger birth cohorts identified through the pupil forecasts and the high number of primary pupils leaving year 6 into Year 7. This project work is required to ensure there is sufficient places for pupils.	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	To be completed by 2027
Stoke Park	Expansion of the school facilities	Additional capacity in the model of both permanent and temporary expansions are being added in secondary schools to ensure sufficiency of places, viability for schools, and cost efficiency. This is to provide for the larger birth cohorts identified through the pupil forecasts (highest birth cohort currently in Year 7). Stoke Park school is part of the expansion programme to deliver additional places.	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	To be completed by 2026
Lyng Hall	Creation of a new sports hall	The school will be increasing its pupil numbers due to demand on school places around the city. The current sports hall provision at the school is not of a suitable size or standard to	Charging through Section 106 agreements, and funding from DfE.	To explored at feasibility Stage	To be completed by 2025

		accommodate the additional pupils.			
Health Infrastructure					
New/expanded health facilities to be provided to support population growth in accordance with the Integrated Care System Infrastructure Strategy.	In line with the NHS England Integrated Care System Infrastructure Strategy.	To support the provision of facilities and services in line with the Integrated Care System Infrastructure Strategy.	Charging Section 106 agreements and Section 278 agreements. Funding from the NHS and Integrated Care Boards.	Cost to be determined as scheme specific details emerge.	TBC
New health facilities to support Keresley SUE	New/expanded health facilities.	To provide appropriate services support the needs of a new community.	Charging Section 106 agreements and Section 278 agreements. Funding from the NHS and Integrated Care Board	Cost to be determined as scheme specific details emerge.	TBC

New health facilities to support Eastern Green SUE	New/expanded health facilities.	To provide appropriate services support the needs of a new community.	Charging Section 106 agreements and Section 278 agreements. Funding from the NHS and Integrated Care Board	Cost to be determined as scheme specific details emerge.	TBC
Ongoing provision of services at UHCW	New/expanded health facilities.	To ensure accessibility to high quality health care facilities for both present residents of Coventry and those that will reside in new developments.	Charging through Section 106 agreements and Section 278 agreements. Funding from the NHS and ICB.	Cost to be determined as scheme specific details emerge.	Across Development Plan Period
<b>Cross Boundary Infrastructure</b>					
Through the Duty to Cooperate the City Council is working with its Warwickshire neighbours to identify key cross boundary infrastructure in Warwickshire that has a close or direct relationship with Coventry and the delivery or facilitation of its wider housing and employment needs.					

## Appendix 8 - Monitoring Framework

### Monitoring

The Council will produce and publish an Annual Monitoring Report containing information on the implementation of the Local Development Scheme and on the extent to which policies set out in the Local Plan are performing.

The table below shows a set of indicators and targets related to the policies of the Local Plan. Further development plan documents will contain their own indicators and targets and the results will be brought together in the Annual Monitoring Report.

The Monitoring Framework has been appended to the Local Plan to reflect the fact that it is a 'living document'. Many of the Local Plan policies will require assessment over time to understand appropriate trends and impacts on development. This reflects the changing face of planning policy in recent years and the increasing need to consider the impacts of climate change and sustainable development. Where trends become apparent through monitoring this Framework will be updated through the Annual Monitoring Report process.

### Indicators and Targets

Policy	Indicator	Target
DS1	To monitor and record the completion of new homes and new employment land within the city's administrative boundary.	At least 29,100 homes delivered over the plan period (1455 p.a.)  60 ha employment land delivered over the plan period
	Support neighbouring authorities through the Duty to Cooperate to monitor the annual delivery and supply of new homes and employment across the Housing Market Area as a whole.	To support the monitoring of housing and employment requirements across the HMA and FEMA
DS2	Monitoring of Duty to Co-operate and partnership working to deliver growth	Actions delivered in partnership to deliver strategic priorities

<b>DS3</b>	Monitoring of sustainable development	Delivery of policy in accordance with policies in this plan relating to climate change, housing, economy, environment, health, transport, heritage, waste and energy.
<b>DS4 (A-D)</b>	To monitor the site-specific triggers associated with Parts B-D of this policy.	Development progress to be monitored on a rolling basis with the continuation of development and occupation linked to the relevant triggers.
<b>HW1</b>	Number of applications supported by completed HIA's each year.	Submitted HIAs successfully reviewed by Public Health offices to inform decision making outcomes
<b>JE1</b>	Monitor and record the supply and delivery of employment land as set out in DS1, broken down by use class Class B2, B8 and E (g). To be recorded as Ha of land and sq.m of floor space.  Monitor and record the level of vacant employment premises within the city's administrative boundary. This should be recorded by sq.m of floor space and by use class.	Monitor performance of policy against targets set out in DS1
<b>JE2</b>	Monitor and record the supply and delivery of employment land allocations. Sites to be assessed against delivery of land (in Ha) and floor space (in sq.m).	Annual reporting to identify the delivery progress of respective allocations.
<b>JE3</b>	Monitor and record the loss of employment land (by use class) to alternative uses. To be recorded as Ha of land and sq.m of floor space. As part of this monitor the loss of office premises to residential as part of permitted development rights.	To ensure local evidence remains up to date in terms of understanding market conditions
<b>JE4</b>	Disaggregate the information collected for Policy JE1 and monitor and record the supply and delivery of office development. Identify the proportion which is delivered within a defined	Target to reflect the annual review of delivery of new offices at Friargate (in line with JE2). All new offices to be delivered within a defined

	centre and that which is outside.  Monitor and record the proportion of new office development classed as Grade A.	centre.
<b>JE5</b>	Monitor and record the supply and delivery of Industrial and Storage/Distribution.	To be monitored as part of DS1, JE1 and JE2.
<b>JE6</b>	Monitor the supply and delivery of Tourism/Visitor Related Development.	To be monitored as part of DS1, JE1 and JE2.
<b>JE7</b>	Monitor how planning applications for employment are ensuring opportunities for local residents.	S106 agreements signed in accordance with JE7
<b>JE8</b>	Monitor and record the supply and delivery of Research and Development (R&D)	To be monitored as part of DS1, JE1 and JE2.
<b>H1</b>	Monitor and record the number of net housing completions per annum	In line with DS1
	Monitor and record the proportion of net annual completions which are categorised as either 'brownfield' or 'greenfield'.	With the exception of already allocated sites monitoring should clearly indicate successful application of the brownfield first presumption.
<b>H2</b>	Monitor the supply and delivery of allocated sites	Annual reporting to identify the delivery progress of respective allocations.
<b>H3</b>	Monitor the supply and delivery of new homes that: <ul style="list-style-type: none"> <li>• Comply with NDSS</li> <li>• Meet M4(2) Adaptable and Accessible Dwellings</li> </ul>	100% of new homes.
	Monitor the number of homes that meet M4(3) Wheelchair User Dwellings Adaptable and Accessible - of Building Regulation standards for access	10% of all new dwellings
	Monitor the number of dwellings located to meet Natural England's Accessible Natural Greenspace Standards (ANGST) doorstep standards or future equivalent, and where not possible the developer contributions received for local projects	To understand the effectiveness of the policy and measure trends.  Aim to achieve 100% policy compliance with Policy part 1e



	Monitor and record the completed number of custom and self-build homes and community-led housing schemes.	For the custom and self-build returns and to understand demand.
<b>H4</b>	Monitor and record the supply, delivery, size (number of bedrooms), type and tenure of new homes.	Achieve the mix across the Coventry administrative area as set out in the HEDNA
<b>H5</b>	Monitor schemes which aim to improve, retrofit and regenerate existing stock	Number of successfully completed regeneration schemes approved.
<b>H6</b>	Monitor and record the supply, delivery and type of new affordable homes.	In line with HEDNA target: 941 pa Social Affordable rented and 149 Affordable Home Ownership
	Monitor the number of relevant applications each year that contribute the full affordable housing contribution requirements.	100% of relevant schemes.
<b>H7</b>	Monitor and record the supply, delivery and type of Gypsy and Traveller Pitches (both temporary and permanent).	The completion of 6 additional pitches over the plan period (in addition to the redevelopment of Siskin Drive).  Number of transit sites and / or stop-over places delivered in line with evidenced need
<b>H8</b>	Monitor and record the supply and completion of Specialist Housing including specialist housing with elements of Care, Older Persons accommodation and hostels including reference to its type and size (number of bed spaces).	Maintain an appropriate supply of sites (as identified within the overall supply position as part of Policy H1 and H2) suitable to accommodate and deliver specialist accommodation in accordance with Policy H8 and the most up to date HEDNA
<b>H9</b>	Monitor and record the density of new development.	Greenfield sites – 35 dwellings per hectare (net) Brownfield sites 45 dwellings per hectare (net) Sites within the City Centre Transition Zone 125 dwellings per hectare (net) Development within the defined City Centre boundary 250 dwellings per hectare (net)

<b>H10</b>	Monitor and record both the supply and completion of new student accommodation (by conversion and new build), including reference to its type and size (number of bed spaces).	Maintain an appropriate supply of sites suitable to accommodate and deliver new student accommodation in accordance with Policy H10, and up to date evidence regarding the student market.
<b>H11</b>	See separate HMO DPD	See HMO DPD
<b>H12</b>	Build to Rent	Maintain an appropriate supply of sites (as identified within the overall supply position as part of Policy H1 and H2)
<b>H13</b>	Co-living	Number of co-living developments delivered in accordance with policy
<b>R1</b>	Monitor the supply and completion of allocated sites as illustrated in Policy R1 of the Local Plan.	Annual reporting to identify the delivery progress of respective allocations.
<b>R2</b>	Monitor the wider development strategy	Strategy being delivered in accordance with the policy
<b>R3</b>	For each identified centre, monitor and record the occupancy levels (by use class) and levels of vacancy.	100% occupancy with appropriate town centre uses
<b>R4</b>	To disaggregate the information for Policy R1 and record the supply and delivery of new town centre uses (by use class) which is categorised as: <ul style="list-style-type: none"> <li>› outside of defined centres;</li> <li>› as edge of centre;</li> <li>› within a defined centre.</li> </ul>	No town centre uses delivered within out of centre locations.  Where this target is not met – add explanation and justification to support performance understanding including exceptional circumstances
<b>R5</b>	Shop fronts improved in line with the Design Guidance for Shopfronts SPD	100% compliance with the SPD for shop fronts requiring planning consent
<b>R6</b>	Monitor the supply and delivery of new restaurant, bars and hot foot takeaway premises.	100% of uses to be in defined centres

<b>CO1</b>	Monitor and record the net supply and completion of new social, leisure and community uses both within and outside designated centres. To be recorded by use class and by Ha of land and sq.m of floor space (as appropriate).	To be monitored through annual trends.
<b>CO2</b>	Monitor and record the net loss of social, leisure and community premises to alternative uses. To be recorded by use class and by Ha of land and sq.m of floor space (as appropriate).	To be monitored through annual trends.
<b>CO3</b>	Monitor progress on neighbourhood plans	Where neighbourhood plans are produced, they should meet the Basic Conditions so they can be made (ie adopted)

<b>GB1</b>	Monitor any changes to Green Belt	No inappropriate development in Green Belt
<b>GB2</b>	Monitor any changes to Safeguarded land	No inappropriate development on safeguarded sites
<b>GB3</b>	Monitor any changes to Local Green Space	No inappropriate development on Local Green Space
<b>GE1</b>	Monitor the delivery of new appropriate green infrastructure against the relevant requirements in the most up to date Green Space Strategy.	To be monitored through the Green Space Strategy.
<b>GE2</b>	In line with the monitoring of development completions identify the proportion that is completed on greenfield sites.	To be monitored through annual trends.
<b>GE3</b>	Monitor the number of sites in positive conservation management.	To be monitored through annual trends including information relating to Biodiversity Net Gain and the Local Nature Recovery Strategy.
<b>GE4</b>	Monitor the number of new TPOs issued.	To be monitored through trees data.
	Monitor the net loss of protected trees.	To target no net loss.
<b>DE1</b>	To ensure delivery of high quality design	100% of developments to comply with design codes in areas where these are in force.
<b>DE2</b>	To ensure delivery of high quality design	100% of developments to comply with design codes in

		areas where these are in force.
<b>HE1</b>	To monitor existing and proposed conservation areas	All conservation areas to have appraisals and management plans in place.
<b>HE2</b>	To establish a declining trend of sites at risk and show an improvement in status of those remaining on the list.	To establish a declining trend of sites at risk and show an improvement in status of those remaining on the list.
<b>HE3</b>	To adopt a masterplan for the Heritage Park concept and monitor its development and completion.	Approved Masterplan and then rolling annual monitoring to assess the progress of the proposals.
<b>HE4</b>	To ensure the policy is successfully ensuring archaeology is taken into account where appropriate	Number of applications where policy has been successfully applied
<b>AC1 - AC3</b>	Monitor and record the impacts and mitigation measures of approved transport assessments on an annual basis. This should allow updates of the IDP and inform investment priorities through developer contributions.	To update the IDP annually to reflect approved highway mitigation measures and record funding and delivery proposals.  To regularly run a review of the strategic highway model at least every 5 years to review highway operation and reflect the most recent developments and mitigation measures.
<b>AC1</b>	To update the Coventry Connected SPD.	To be updated in 2025

<b>AC2</b>	Monitor the delivery of highway initiatives identified within the IDP including: new highway, junction improvements, Rapid Transit Corridors and Cycle Network.	To be monitored on an annual basis against the delivery of the IDP and schemes associated with site allocations.
	Monitor the proportion of trips undertaken by single occupancy car use.	Decreasing trend over the plan period

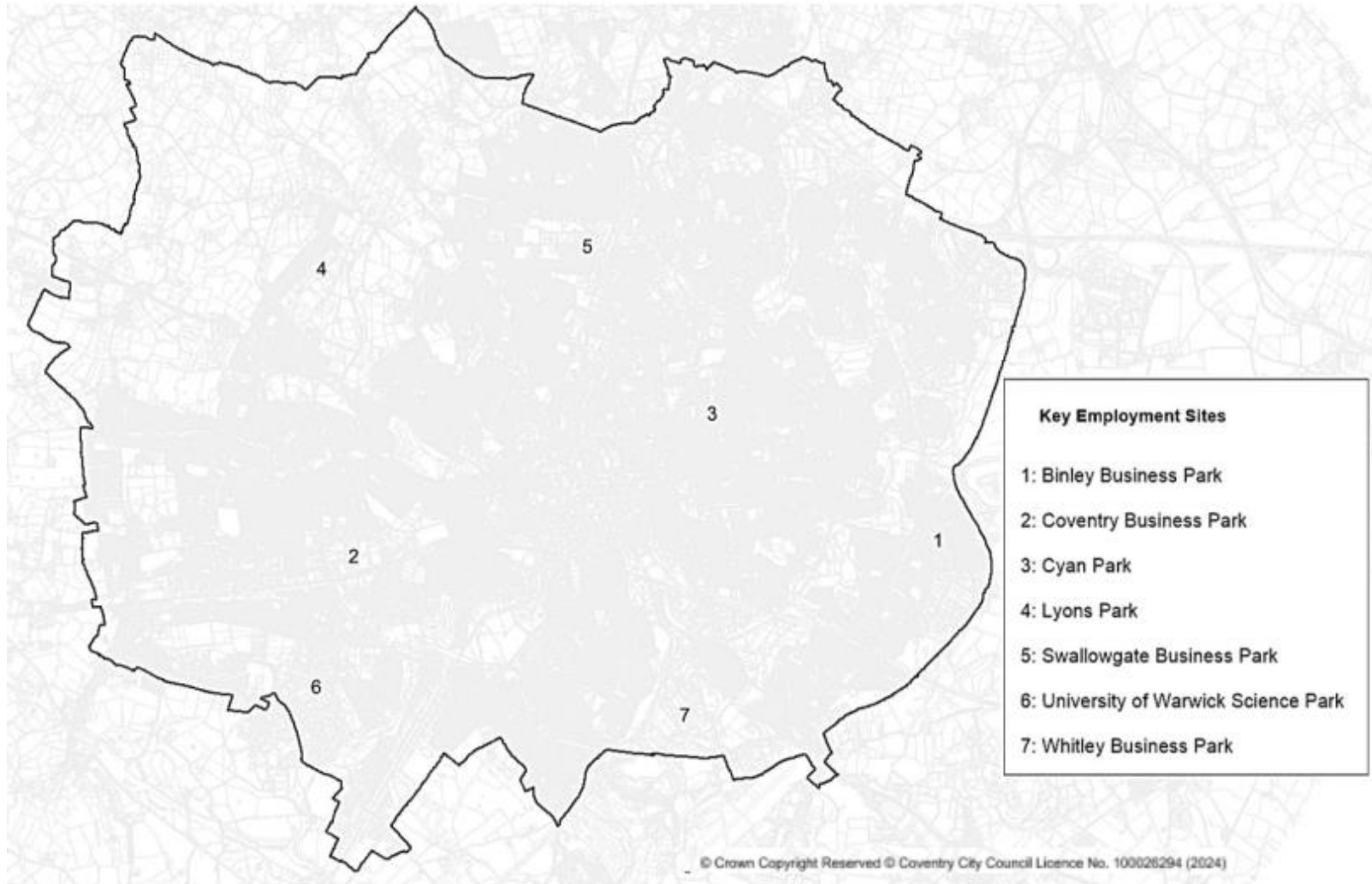
<b>AC3</b>	Monitor the number of applications approved that: 1/ meet the parking standards identified within Appendix 6 of the Local Plan. 2/ are supported by approved travel plans (where appropriate).	100% of applications as appropriate.
<b>AC4</b>	Monitoring of active transport schemes as set out in policy	Delivery of schemes set out in the IDP
<b>AC5</b>	To monitor bus patronage and its % of modal share.  Delivery of new Rapid Transit infrastructure to be monitored through Policy AC2.	Increasing levels of patronage - evidenced from transport data
<b>AC6</b>	To monitor rail patronage and footfall through Coventry stations.	Increasing levels of patronage - evidenced from transport data
<b>AC7</b>	Monitor improvements in provision for freight including overnight services for 24hr operations and the development of consolidation centres	To be monitored through planning consents issued in line with policy on a tends basis
<b>EM1</b>	To ensure that developments are planning to be able to adapt to climate change and progress towards net zero carbon dioxide emissions city wide.	Net zero
<b>EM2 / EM3</b>	Policies from the 2017 local plan deleted	Deleted
<b>EM4</b>	Monitor the number of homes and amount of employment land completed where built development is located within flood zones	No development in Zone 3b
<b>EM5</b>	Monitor the number of completed SUDs schemes brought forwards either as part of new development or introduced retrospectively to support existing areas.	To be monitored on a trend basis year on year.
<b>EM6</b>	Ensure no development within a groundwater Source Protection Ground 1	No development within a groundwater Source Protection Ground 1
<b>EM7</b>	To monitor background and peak levels of air quality on a biannual basis.	To achieve an improving trend with a view to removing parts of the city from the AQMA status (where appropriate).

<b>EM8</b>	Monitor the amount of waste recycled in line with the Council's Waste Strategy targets	Accord with the Council's waste strategy
<b>EM9</b>	Monitor to ensure safeguarding policy is applied	Monitor trends – applications refused on the basis of this policy
<b>EM10</b>	Monitor the amount of non-mineral based development that takes place within the defined MSA's. This should be presented as a proportion of completed homes, employment land and other floor space	To be monitored for record - no target set.
<b>EM11</b>	Average annual CO2 emissions of new build development (split into regulated and unregulated) and %TER reduction for the regulated portion  Percentage of new build residential units in the city with an installed heat pump	Annual decrease  Annual increase
<b>EM12</b>	Average annual CO2 emissions of new build development (split into regulated and unregulated) and %TER reduction for the regulated portion  Proportion of qualifying developments meeting BREEAM New Construction standards	Annual decrease  100%
<b>EM13</b>	Percentage of new build developments demonstrating active solutions in reducing overheating in new buildings	100%
<b>EM14</b>	Percentage of qualifying new build developments demonstrating embodied carbon assessments	Annual increase
<b>EM15</b>	Applications refused on the grounds of inadequate noise mitigation	100%
<b>C1</b>	Policy deleted	
<b>C2</b>	Policy deleted	
<b>CC1</b>	Monitoring of policy compliant City Centre Development	Delivery of development in accordance with City Centre policies in this plan, relating to overall development strategy, Green and Blue Infrastructure, Drainage and Flood Risk, Environmental Management and development responsive to the identified character areas of within the City Centre.

<b>IM1</b>	<p>Monitor the number of applications each year that secure planning obligations.</p> <p>To monitor the amount of secured financial contribution to infrastructure year on year.</p> <p>To monitor the amount of money spent on new infrastructure schemes year on year.</p> <p>To monitor the receipt of developer contributions against the delivery of infrastructure provisions within the IDP.</p>	<p>To be monitored on a trend basis year on year and show the successful delivery of infrastructure schemes related to site allocations etc.</p>
------------	---	--

## Appendix 9 – Designations & Allocations Maps

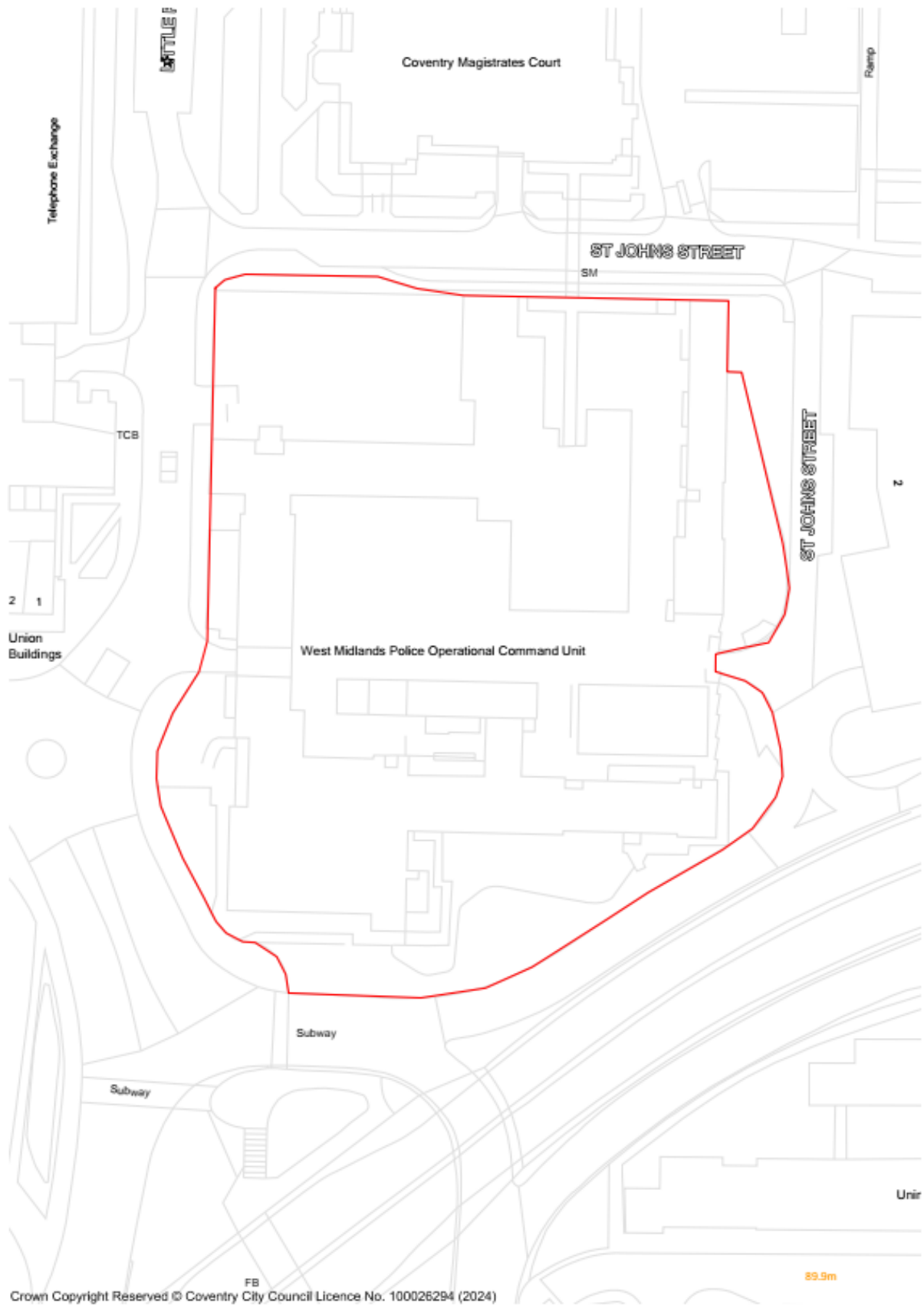
### Appendix 9a: Key Employment Sites



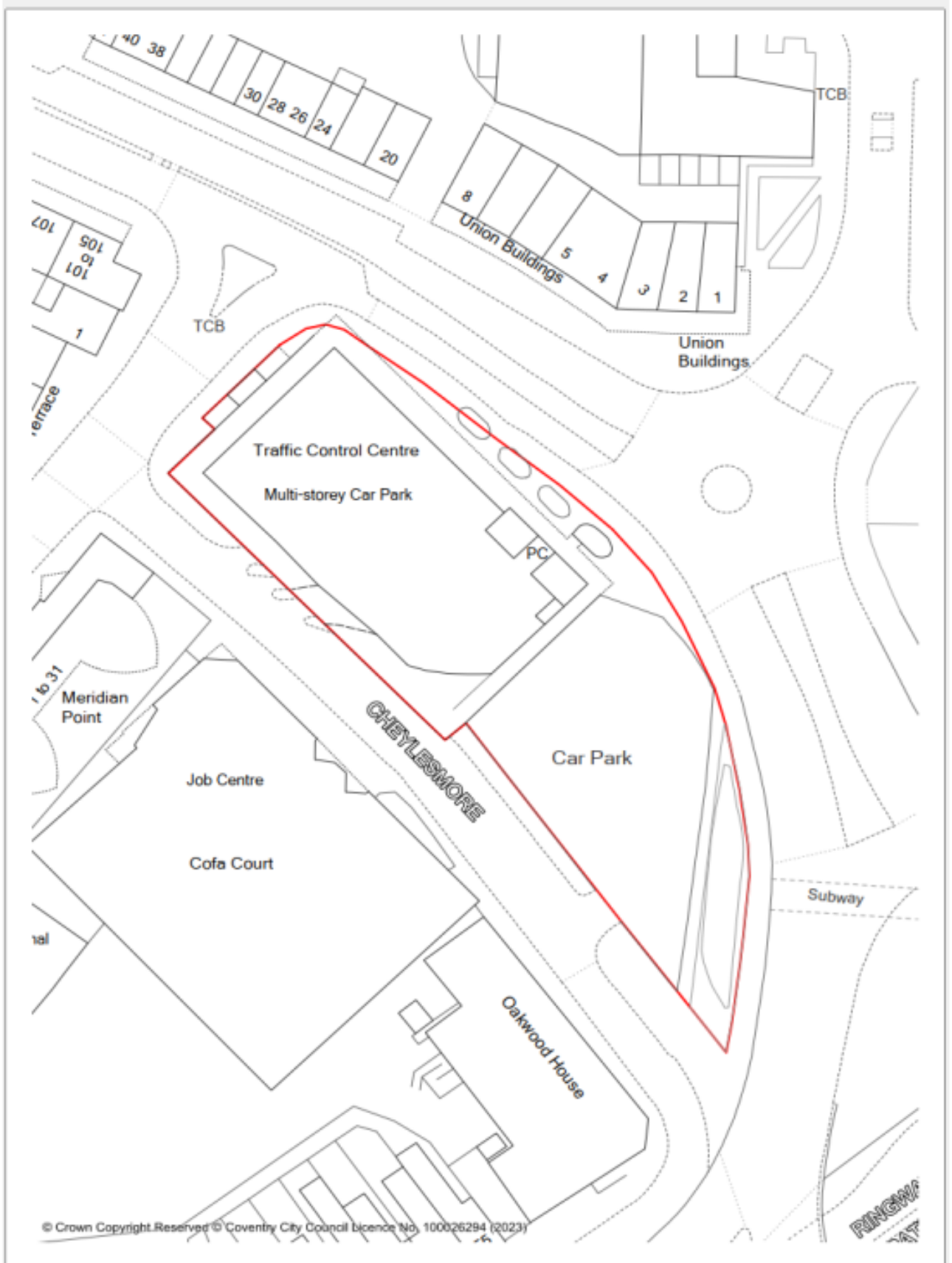




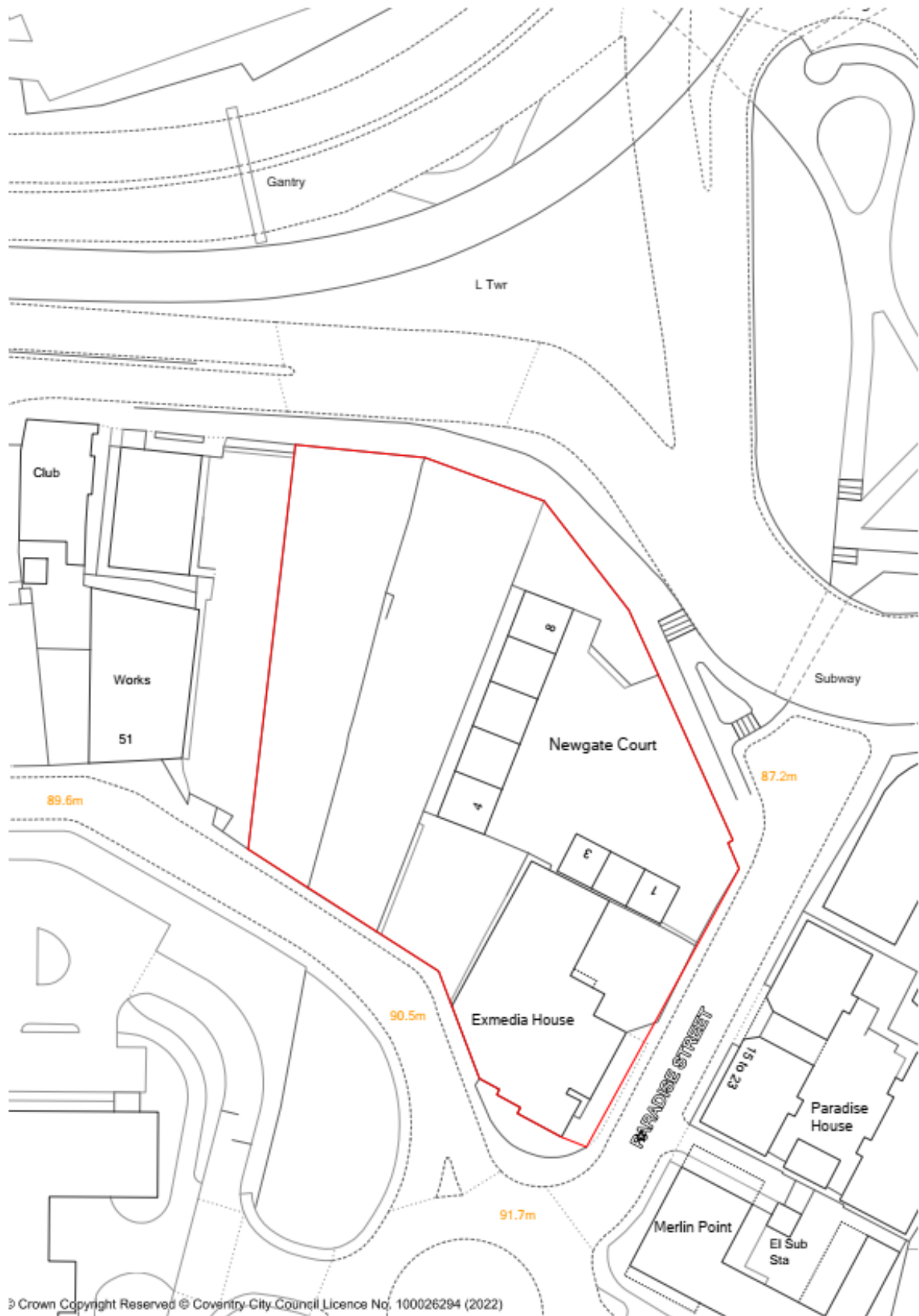
## Housing Allocation H2:26: Coventry Central Police Station



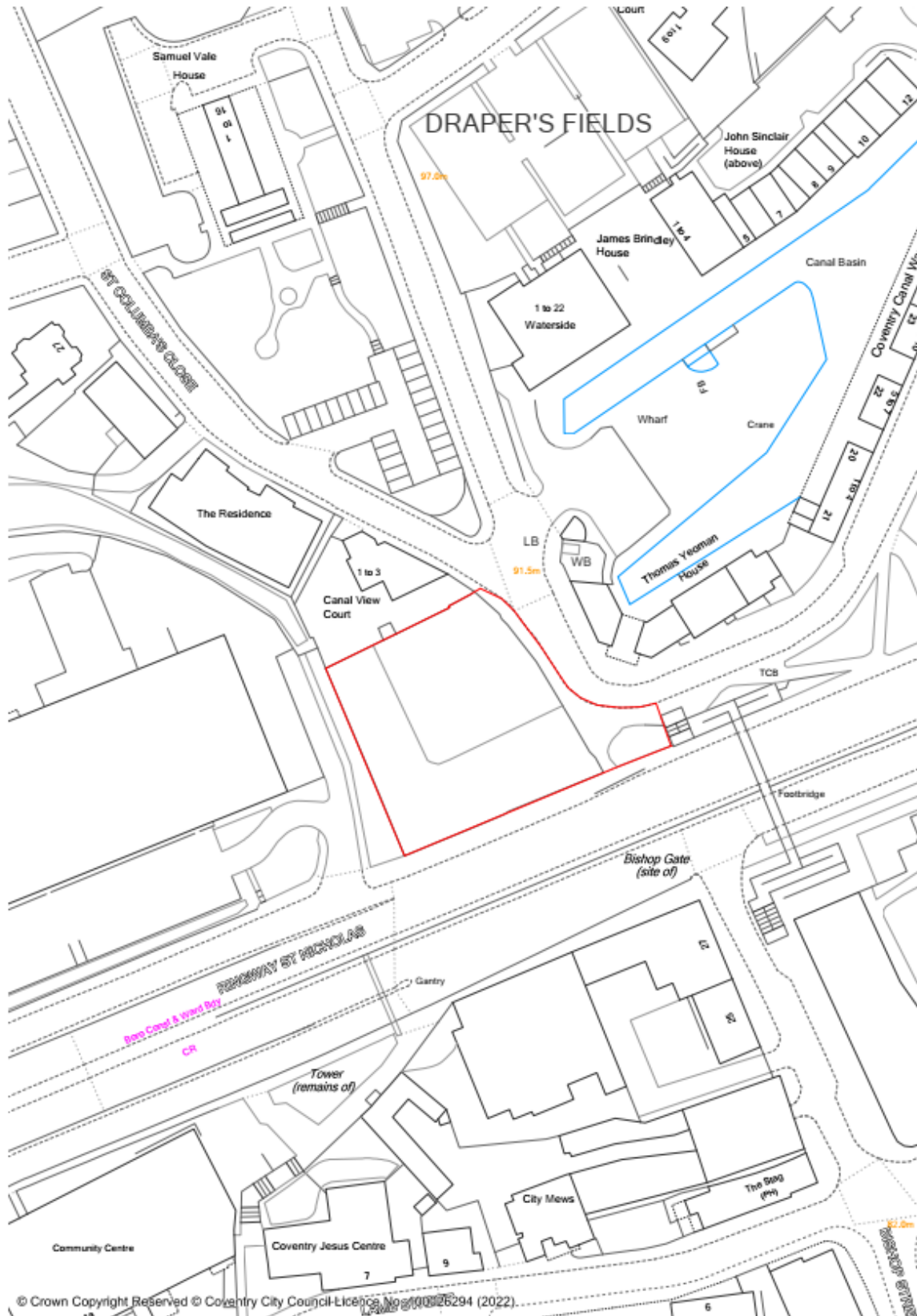
## Housing Allocation H2:27: New Union Street Car Park



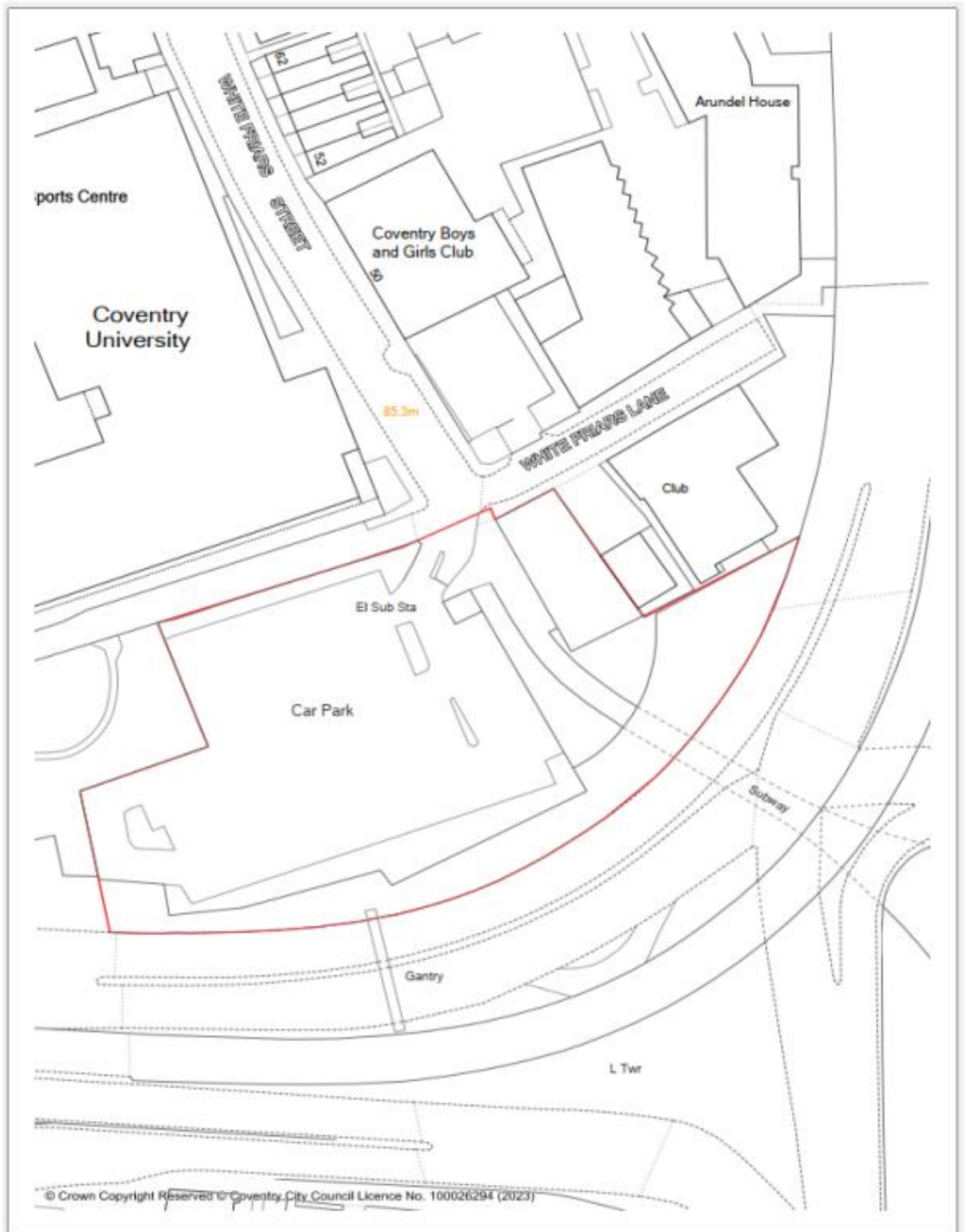
## Housing Allocation H2:28: New Gate Court Business Park



# Housing Allocation H2:29: Former Vintage House, St Nicholas Street



## Housing Allocation H2:30: Whitefriars Street Car Park



## Housing Allocation H2:31: Paybody Building, Stoney Stanton Road



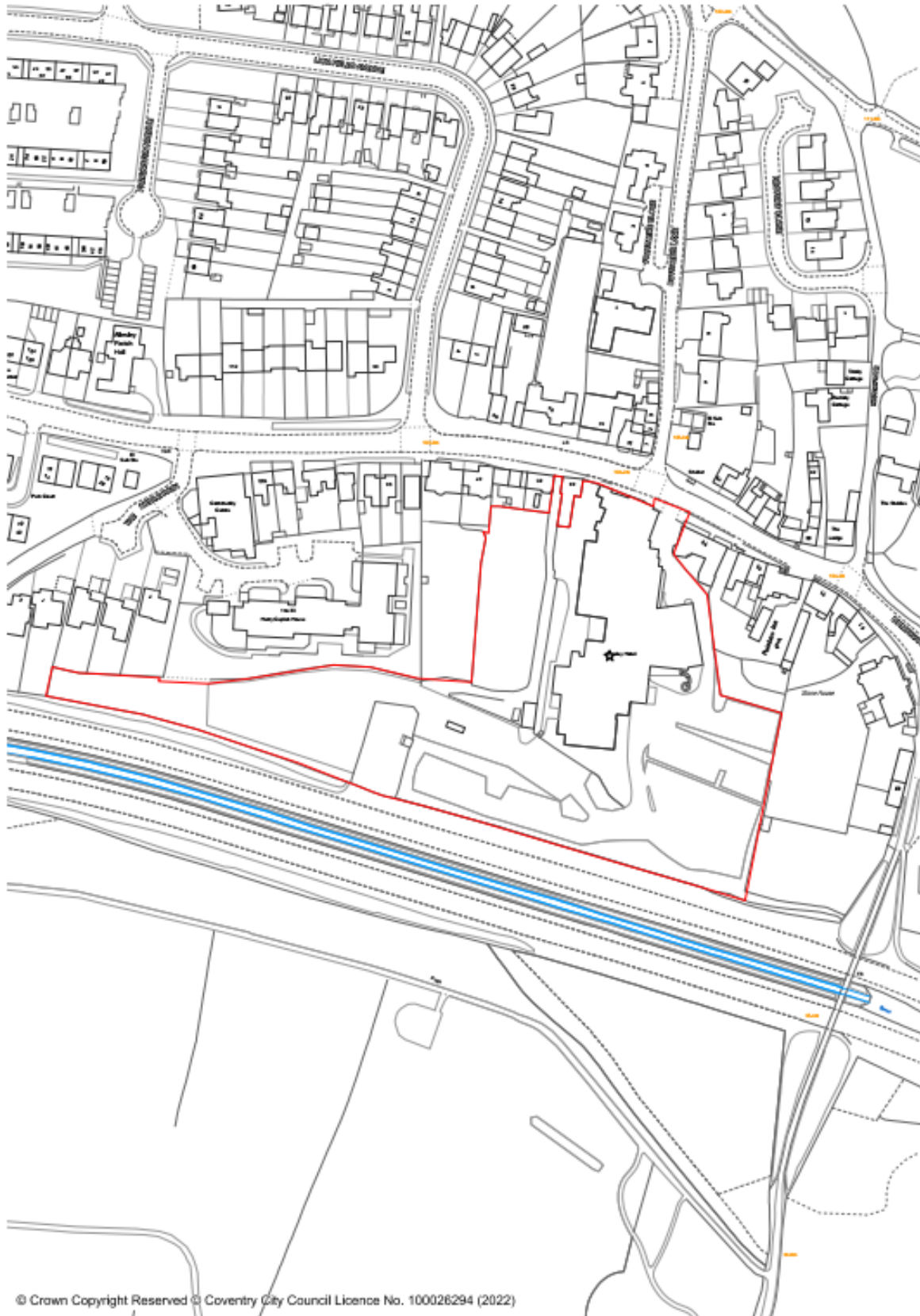
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## Housing Allocation H2:32: Dale Buildings, Tower Street





## Housing Allocation H2:33: Allesley Hotel, Birmingham Road



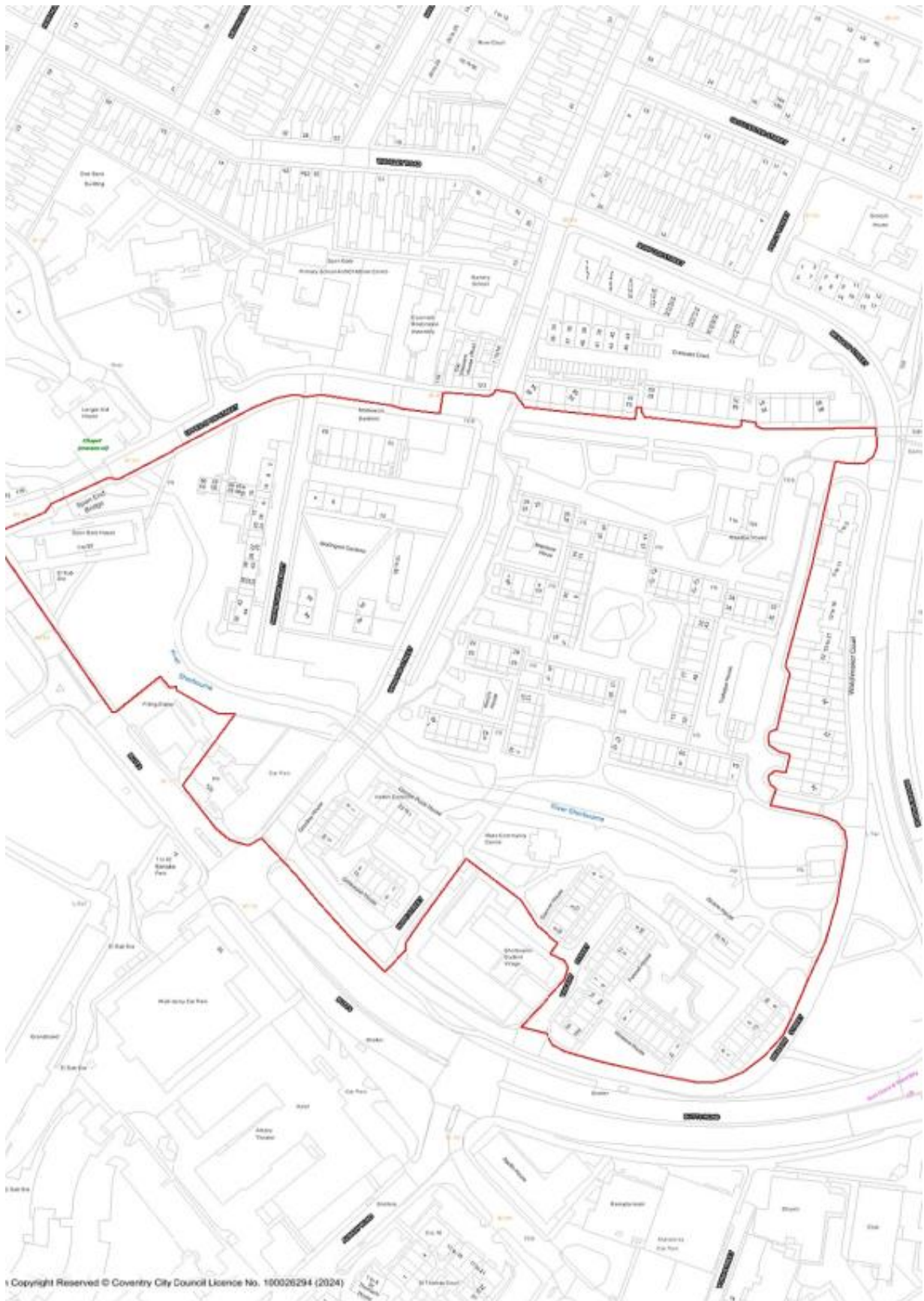
## Housing Allocation H2:34: Former Chace School, Chace Avenue



## Housing Allocation H2:35: Former School Site, New Century Park – Land to the South of Isadora Lea



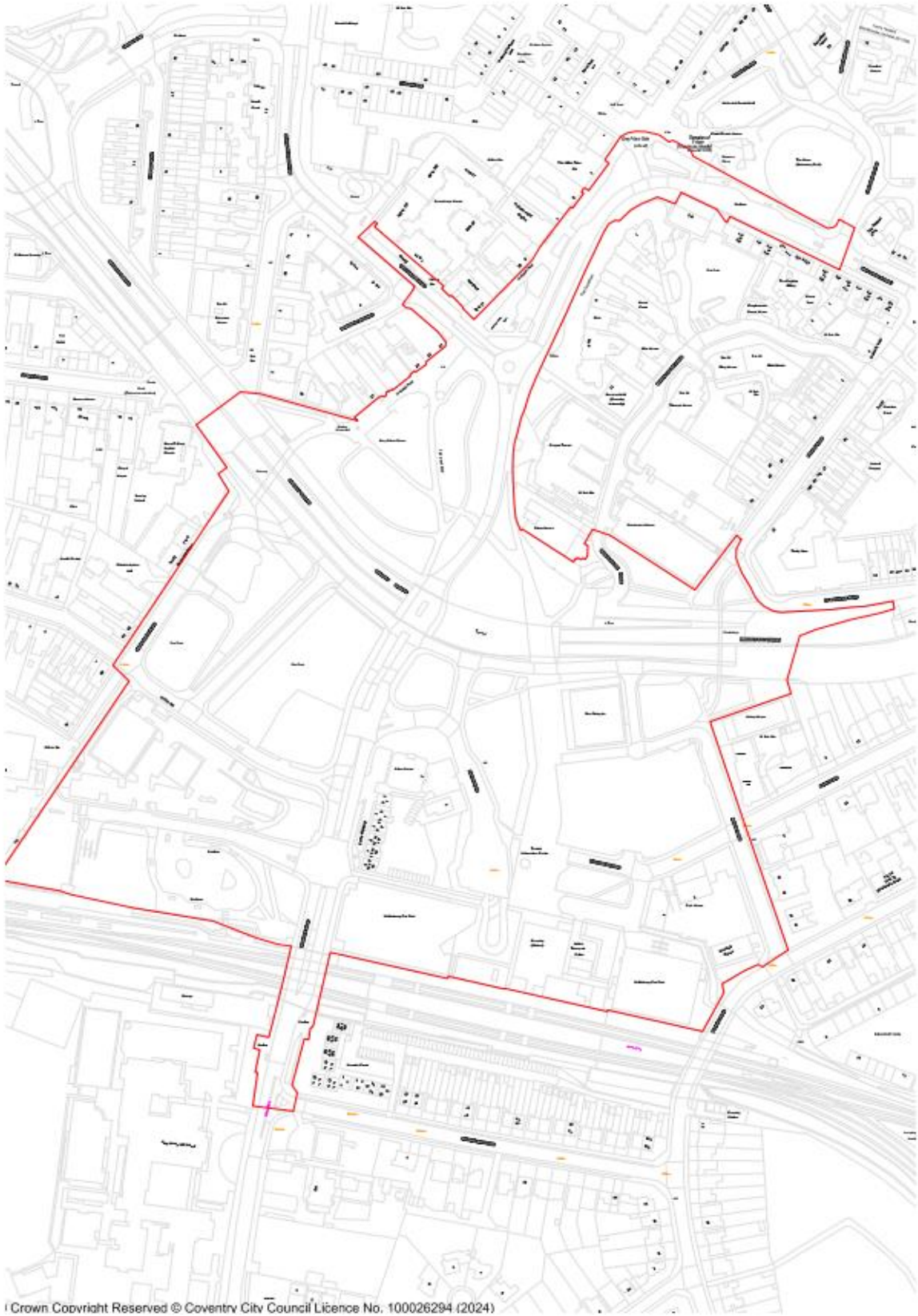
## Housing Allocation H2:36: Land at Spon End



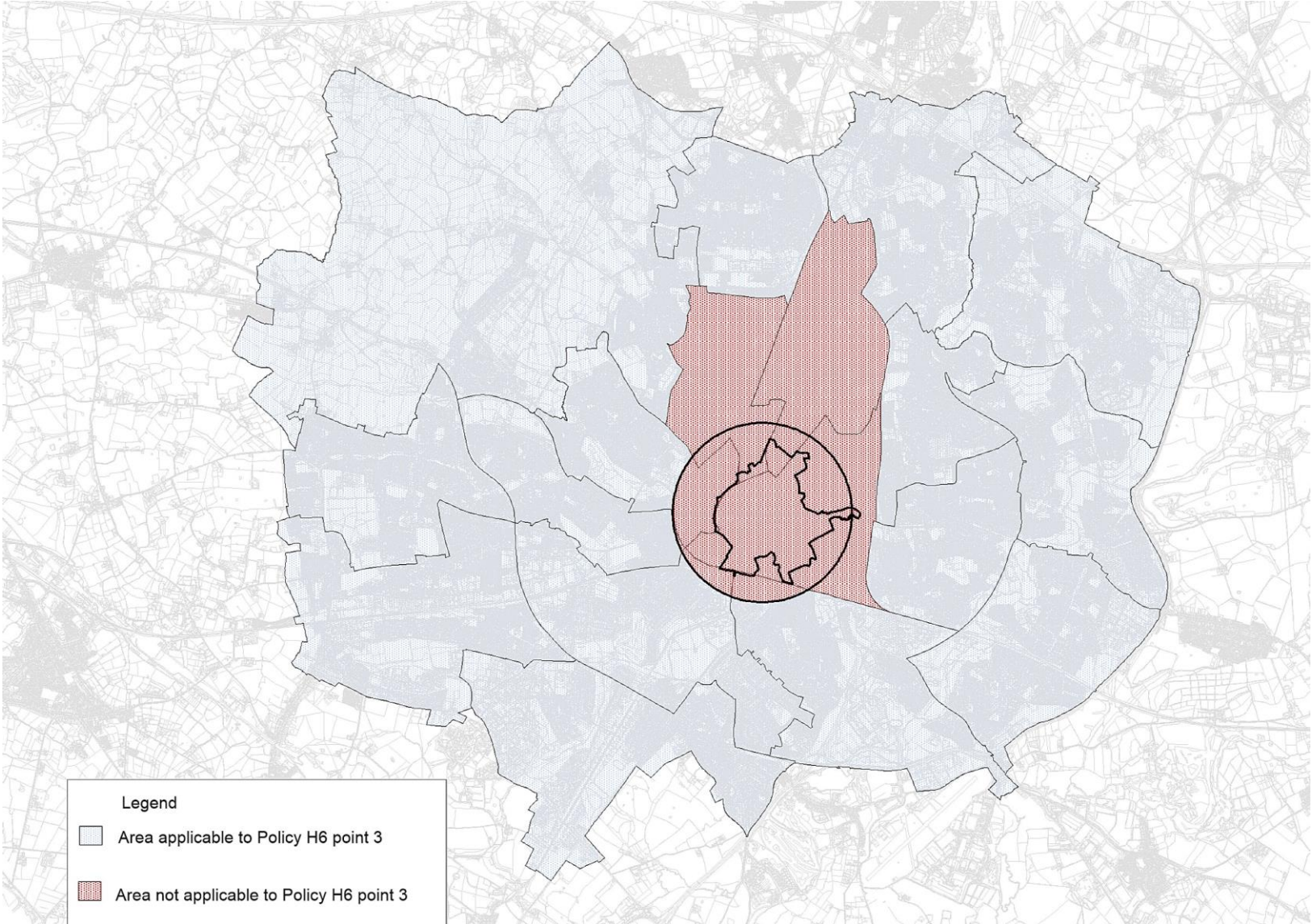
## Mixed use Allocation H2:37: City Centre South



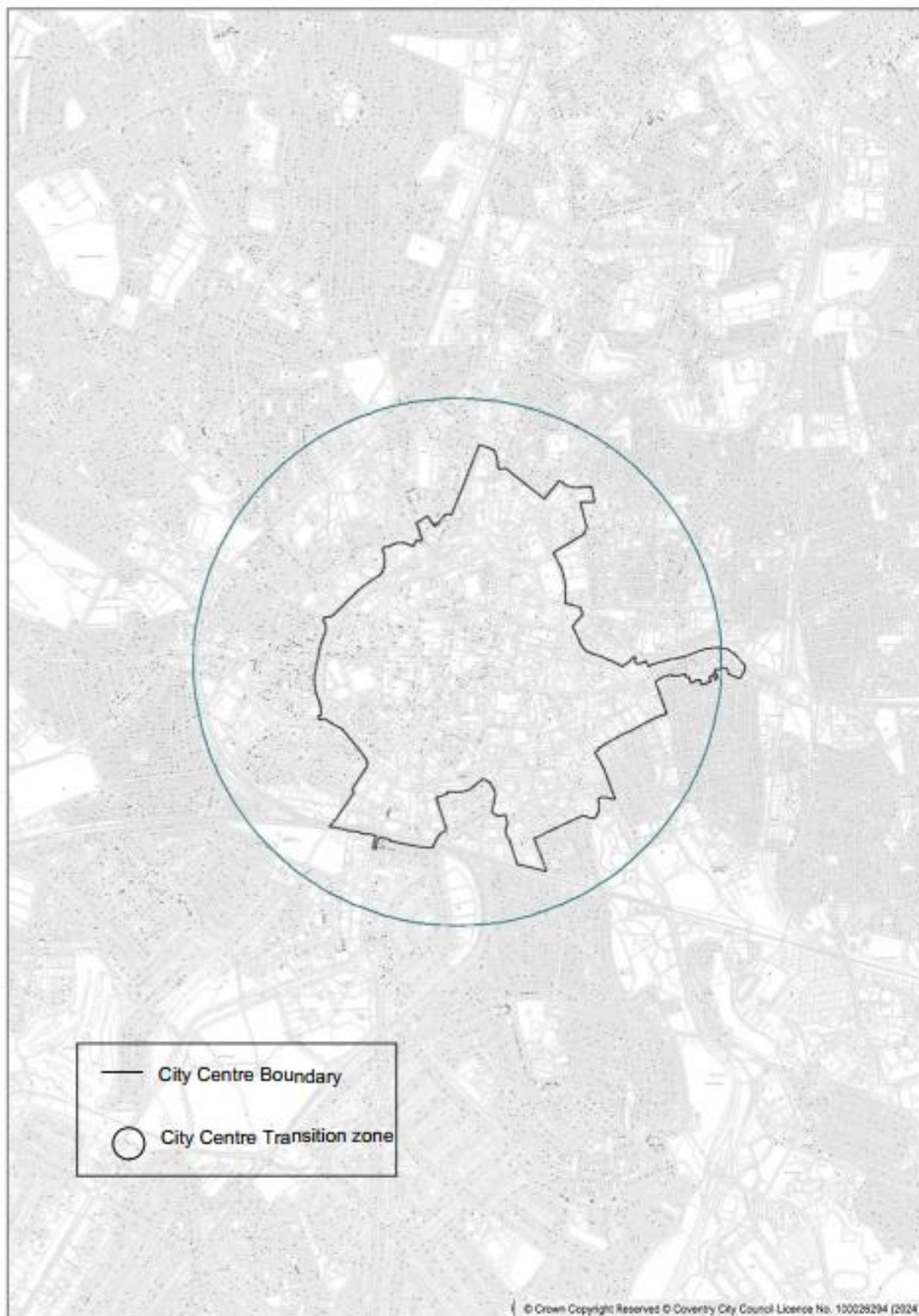
## Mixed Use Allocation H2:38: Friargate



**Appendix 9c: Affordable Housing Policy H6**



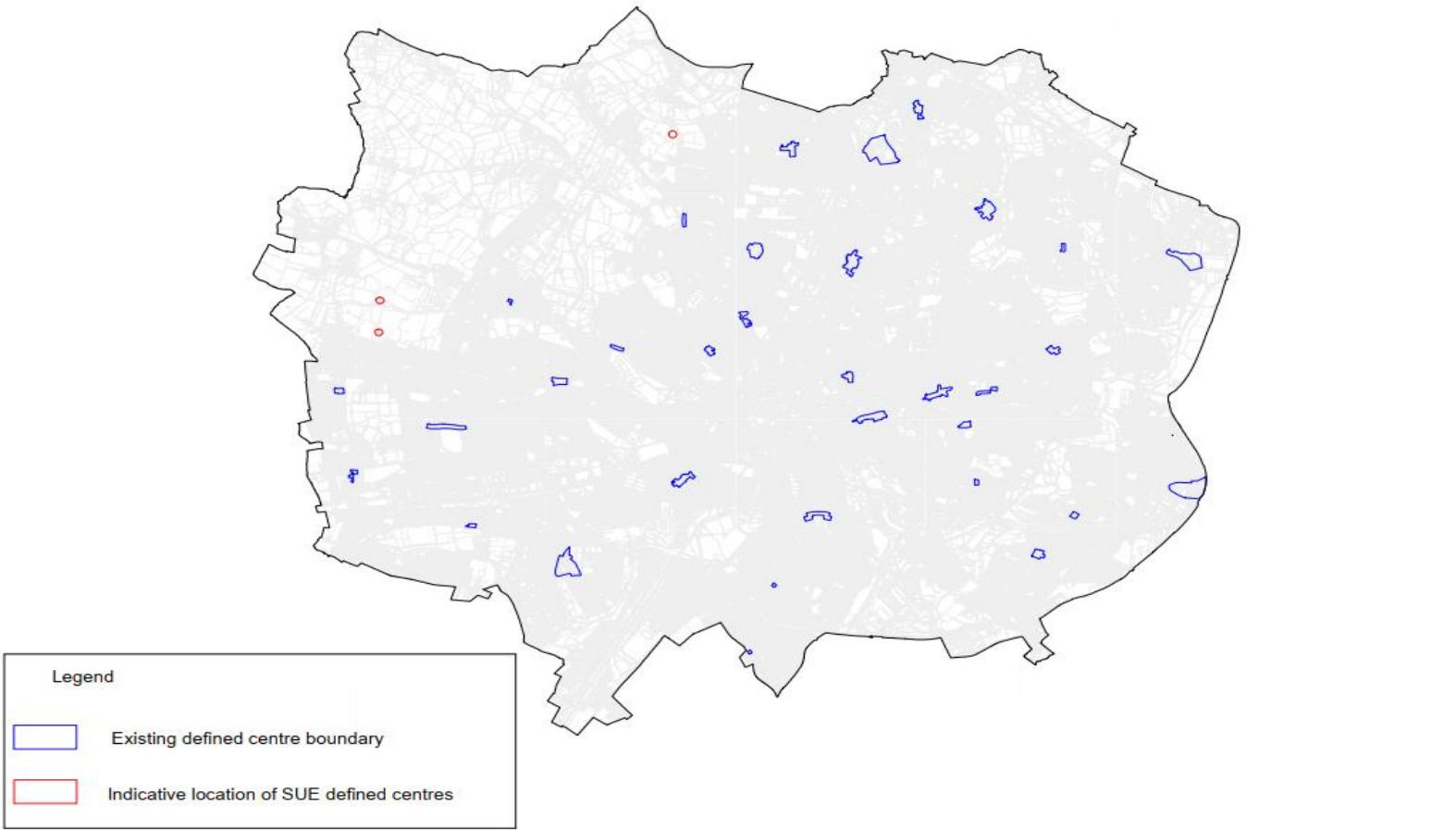
## Appendix 9d: City Centre Boundary and Transition Zone





# Appendix 9e: Centres and Primary Shopping Areas

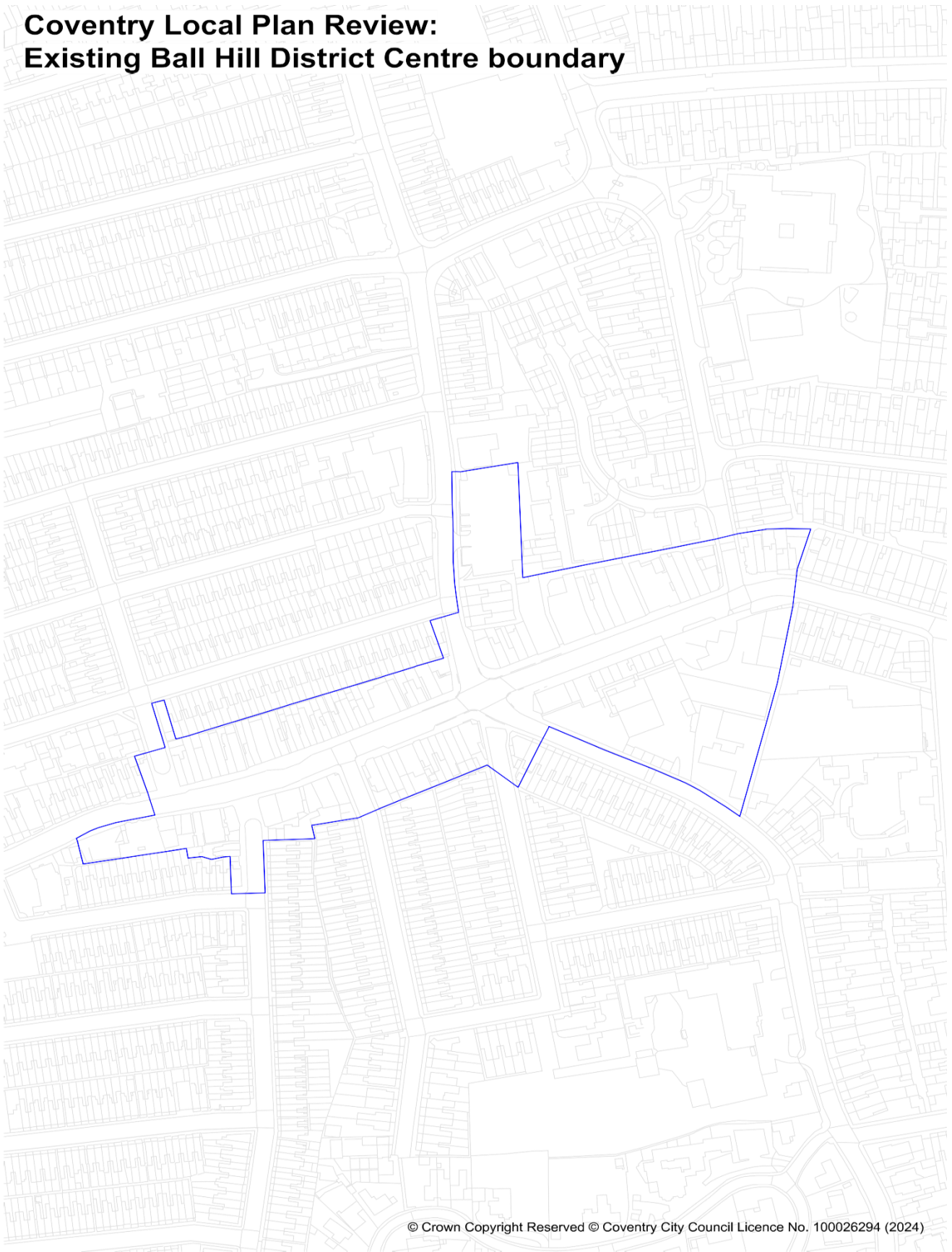
## City Wide Centres Maps



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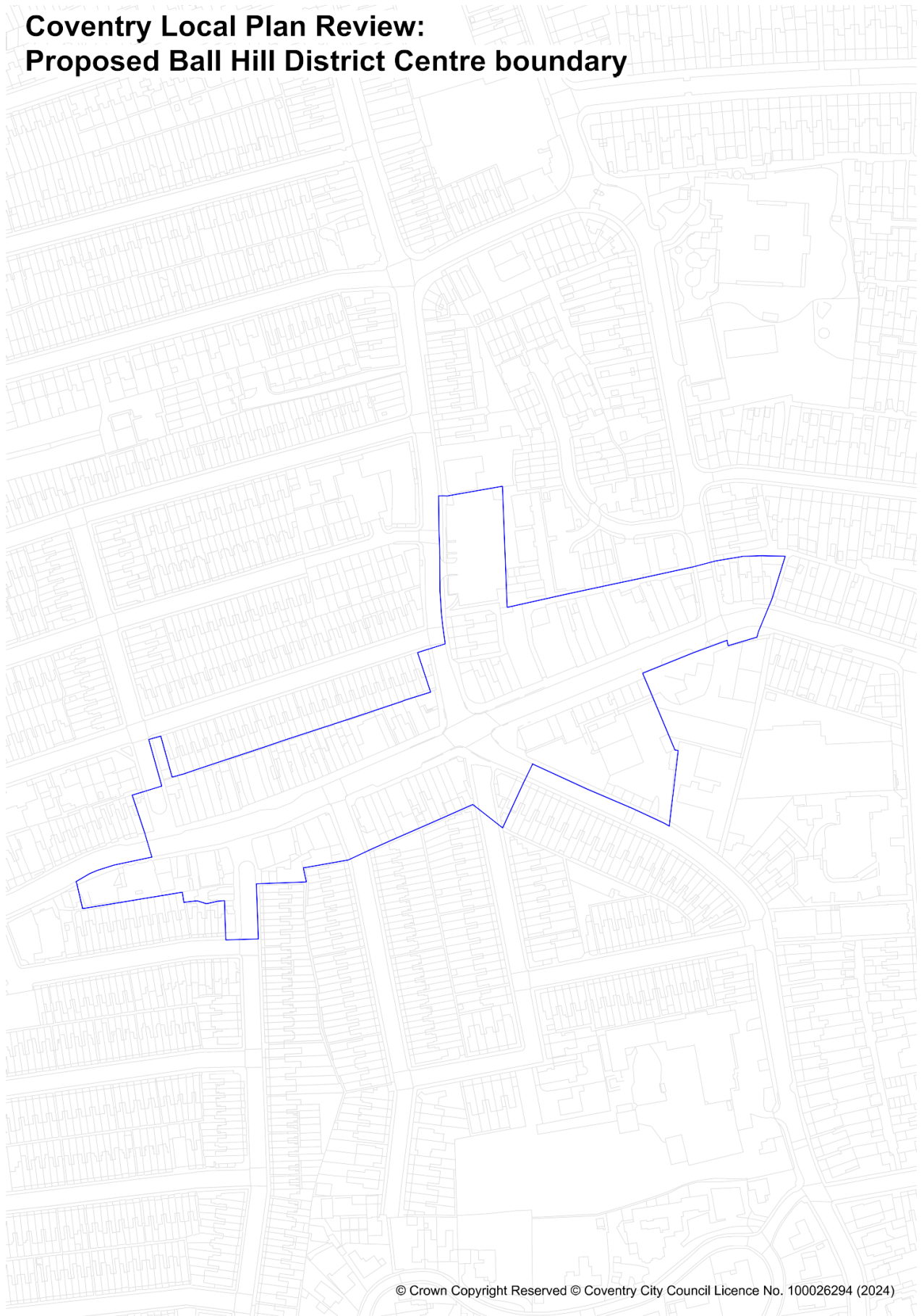
## Proposed Centre Boundary Changes

### Coventry Local Plan Review: Existing Ball Hill District Centre boundary



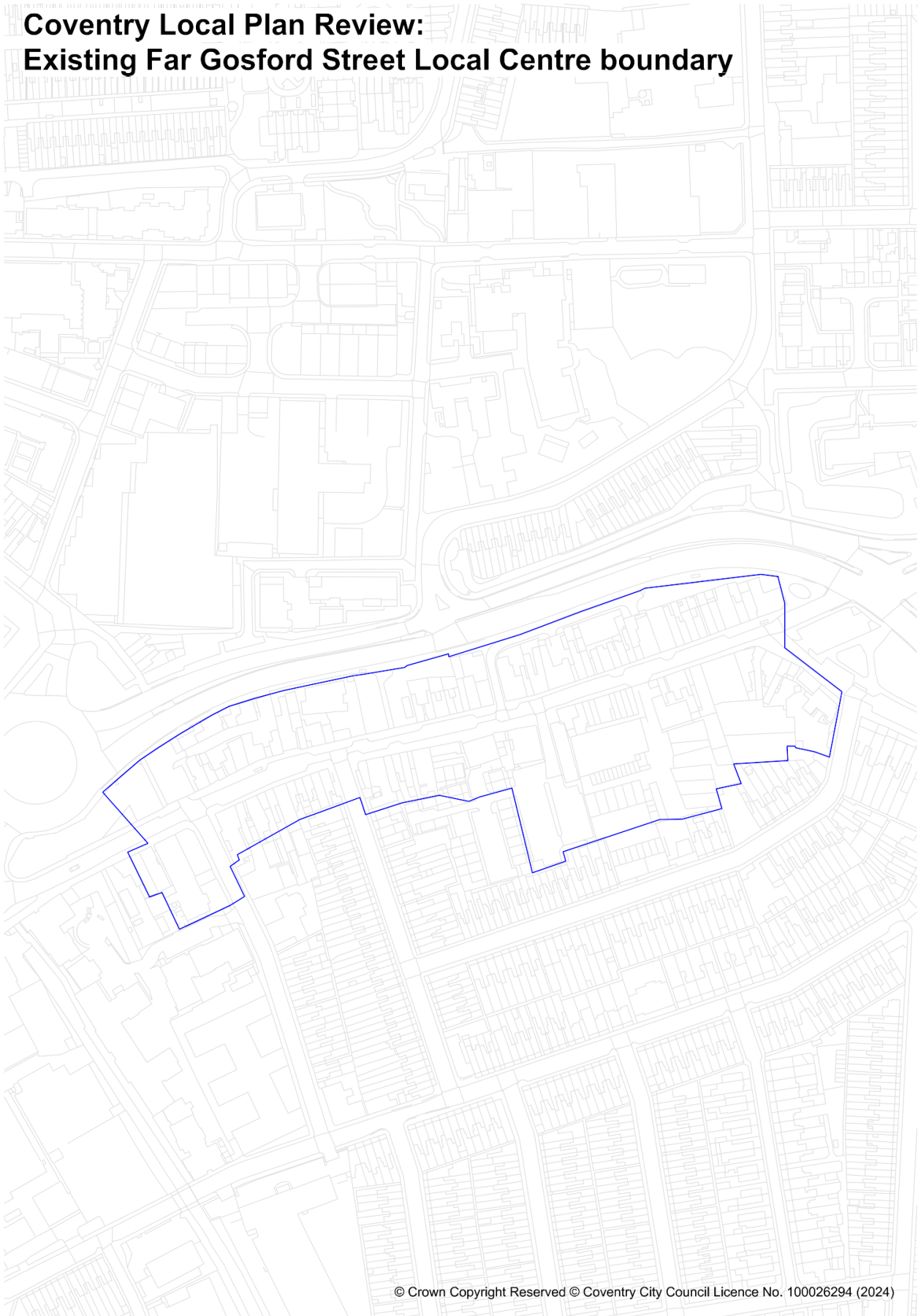
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# Coventry Local Plan Review: Proposed Ball Hill District Centre boundary



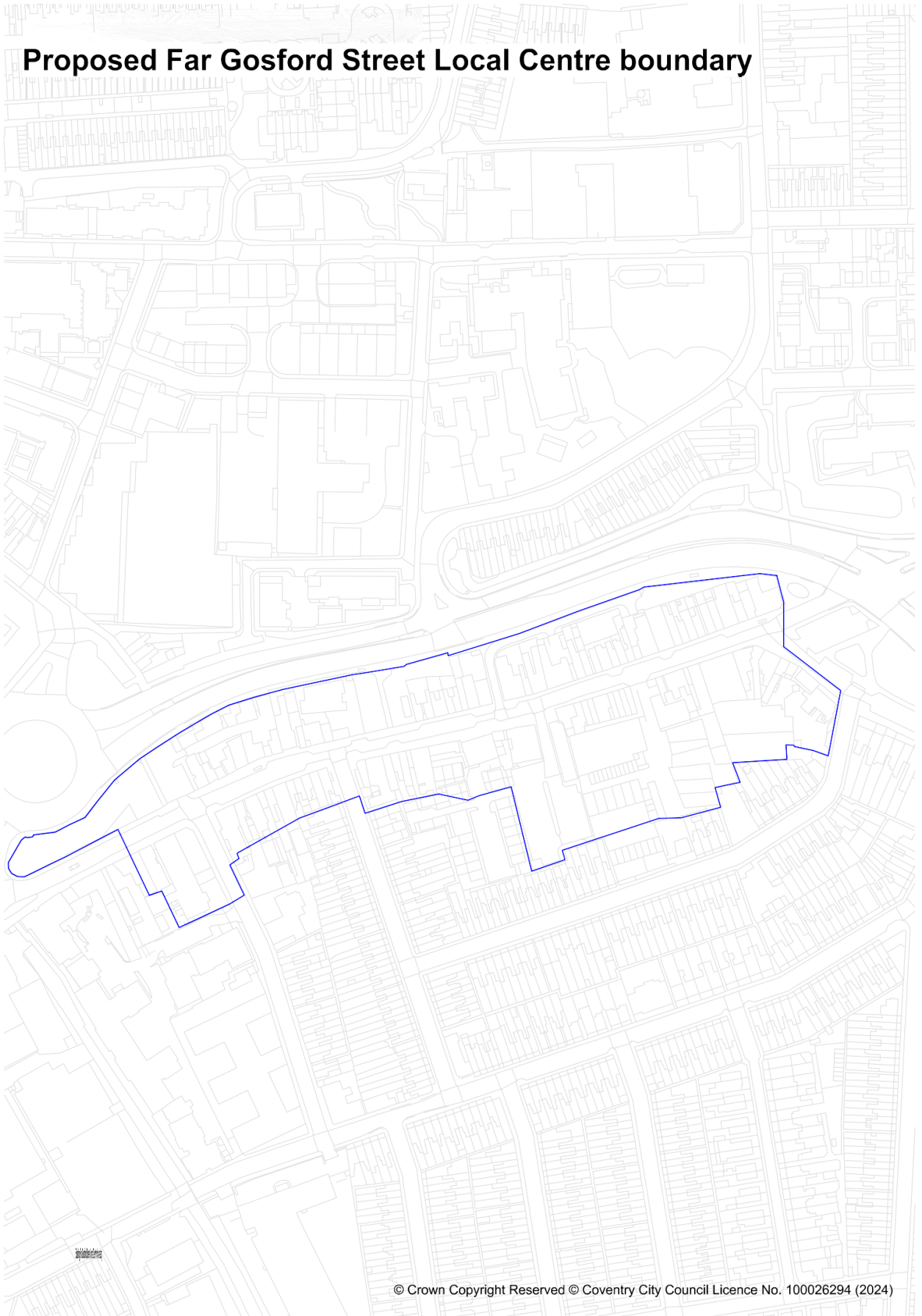
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# Coventry Local Plan Review: Existing Far Gosford Street Local Centre boundary



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# Proposed Far Gosford Street Local Centre boundary



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**Coventry Local Plan Review:  
Existing Keresley Road Local Centre boundary**



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# Coventry Local Plan Review: Proposed Keresley Road Local Centre boundary



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## Existing Jardine Crescent District Centre boundary



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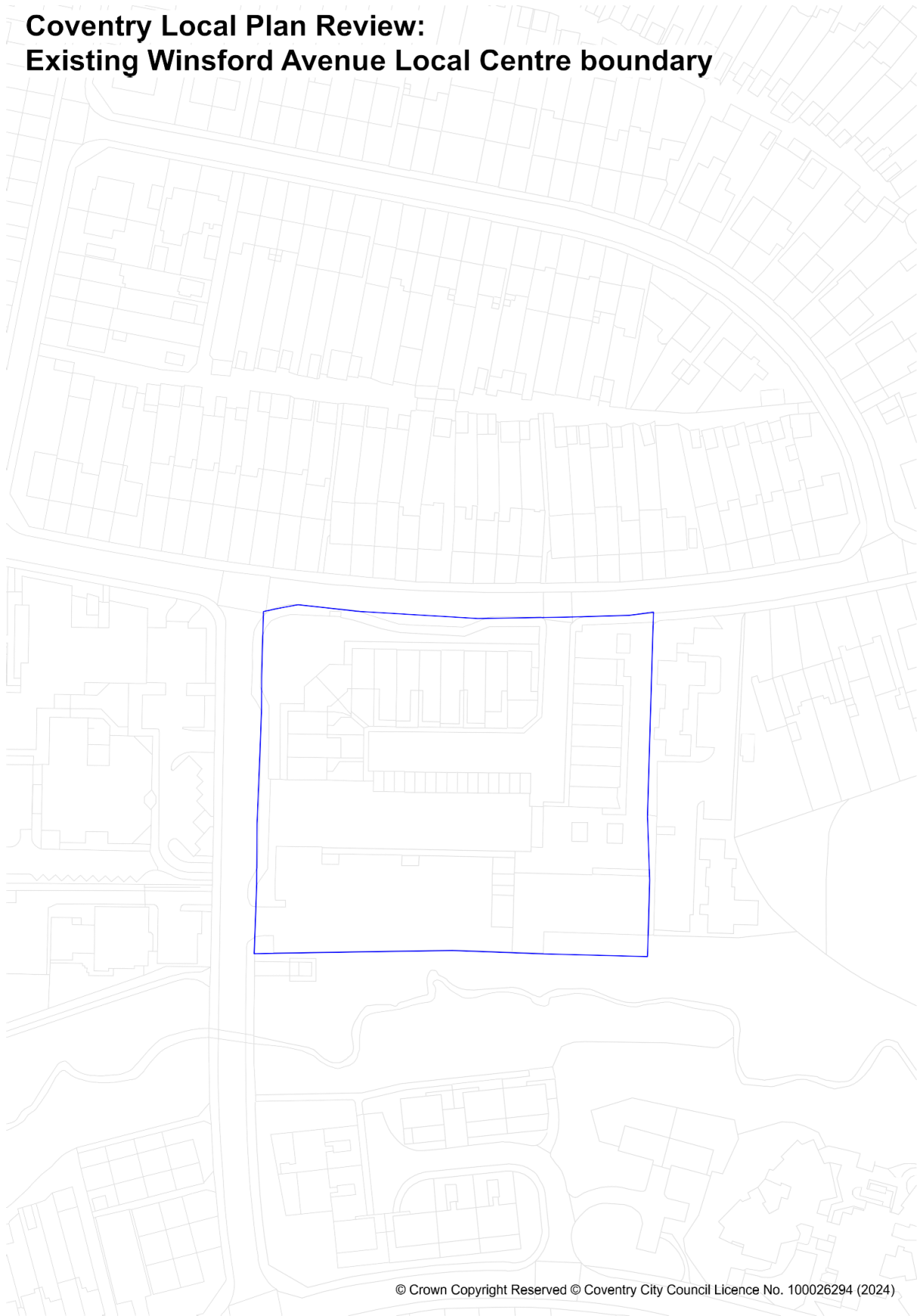


# Proposed Jardine Crescent District Centre boundary

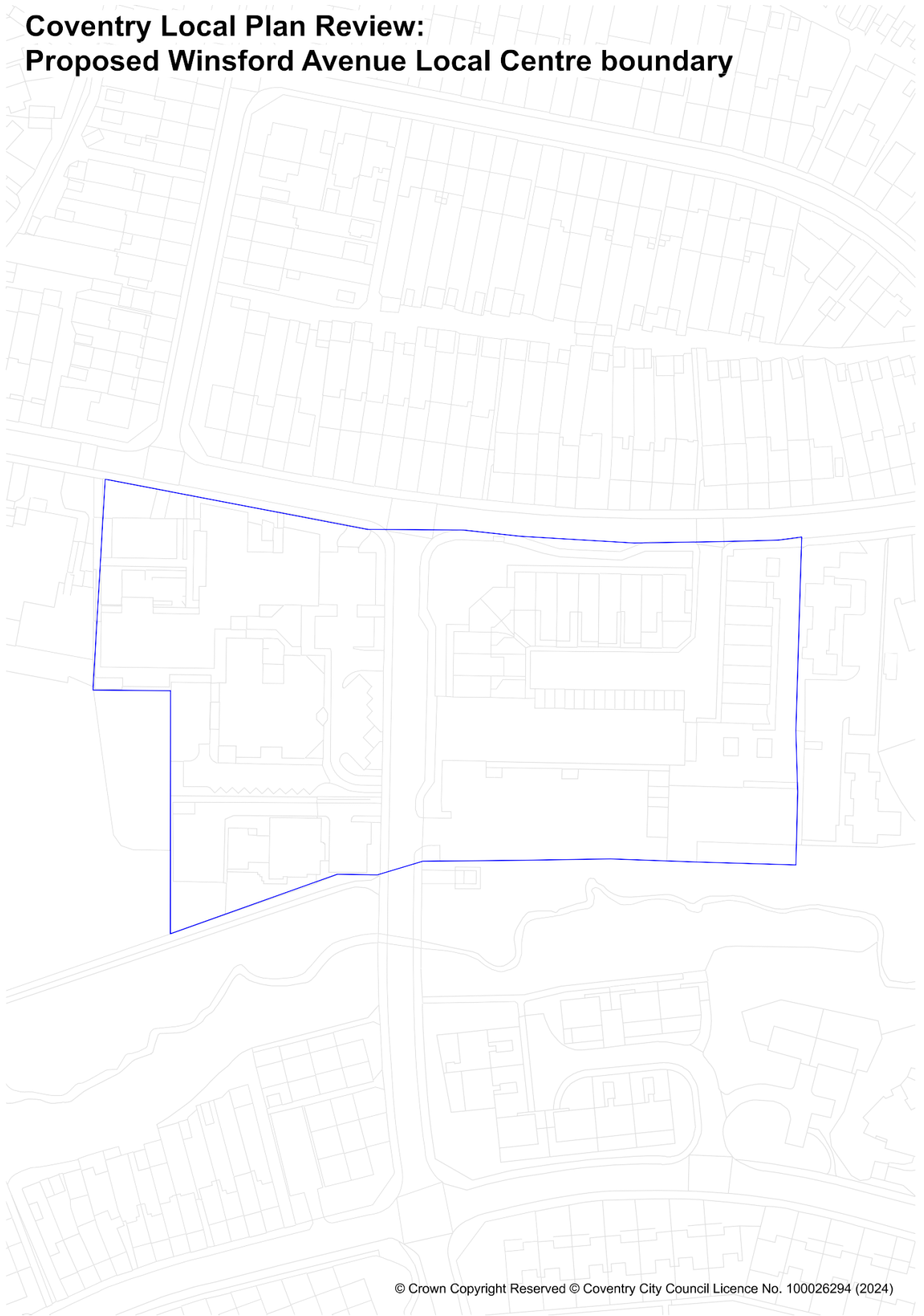


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**Coventry Local Plan Review:  
Existing Winsford Avenue Local Centre boundary**



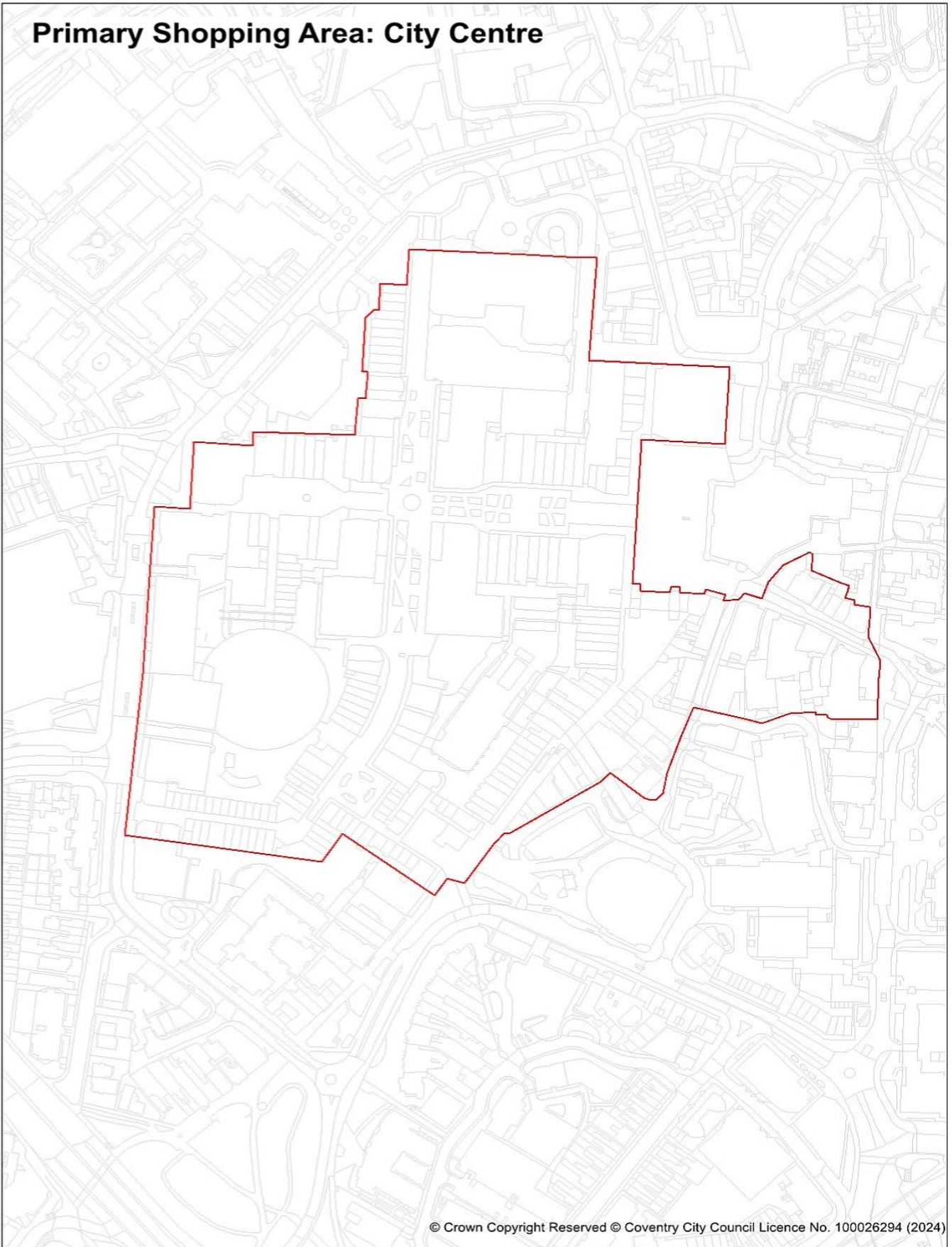
# Coventry Local Plan Review: Proposed Winsford Avenue Local Centre boundary



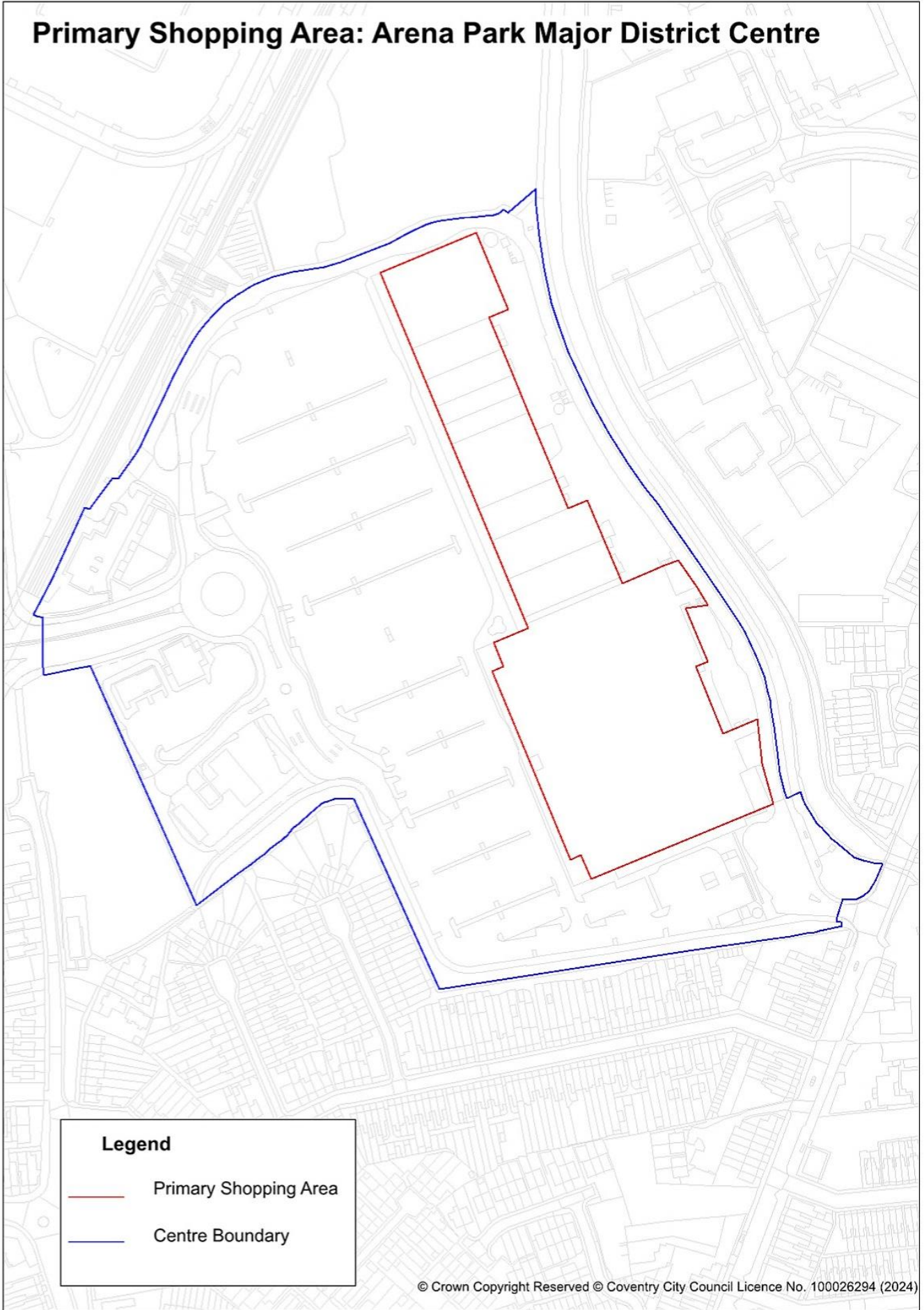
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## Proposed Primary Shopping Areas

### Primary Shopping Area: City Centre

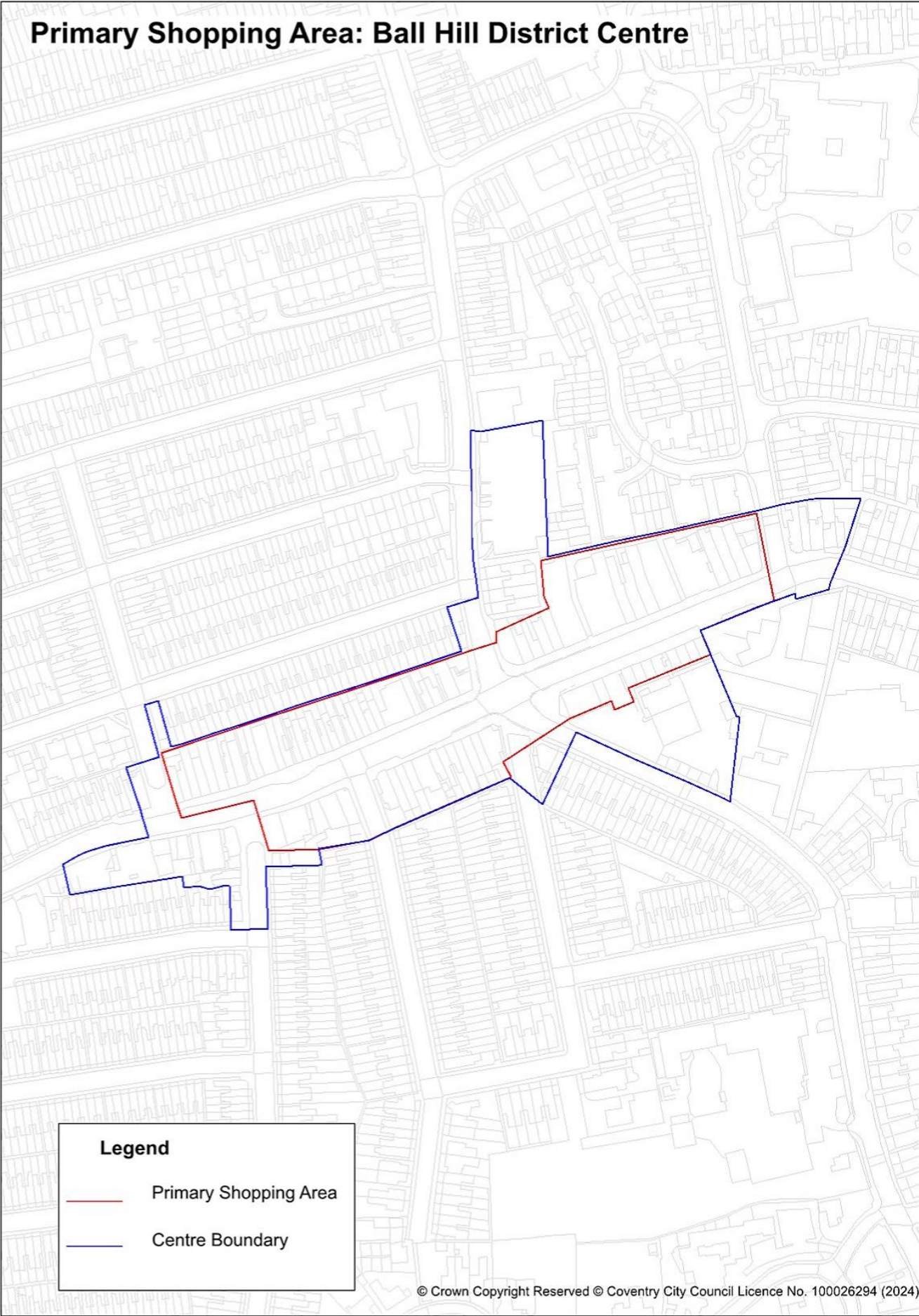


# Primary Shopping Area: Arena Park Major District Centre

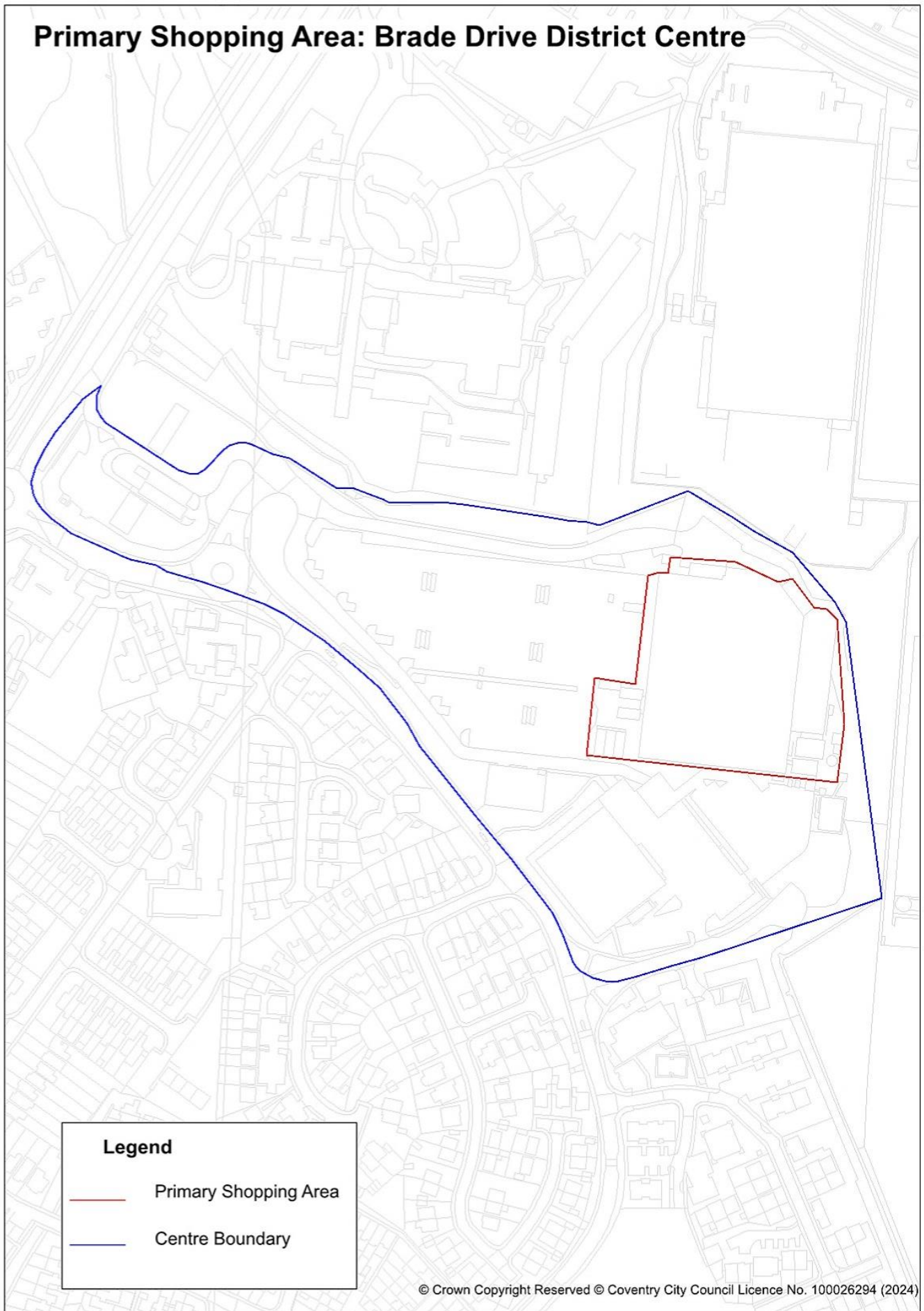


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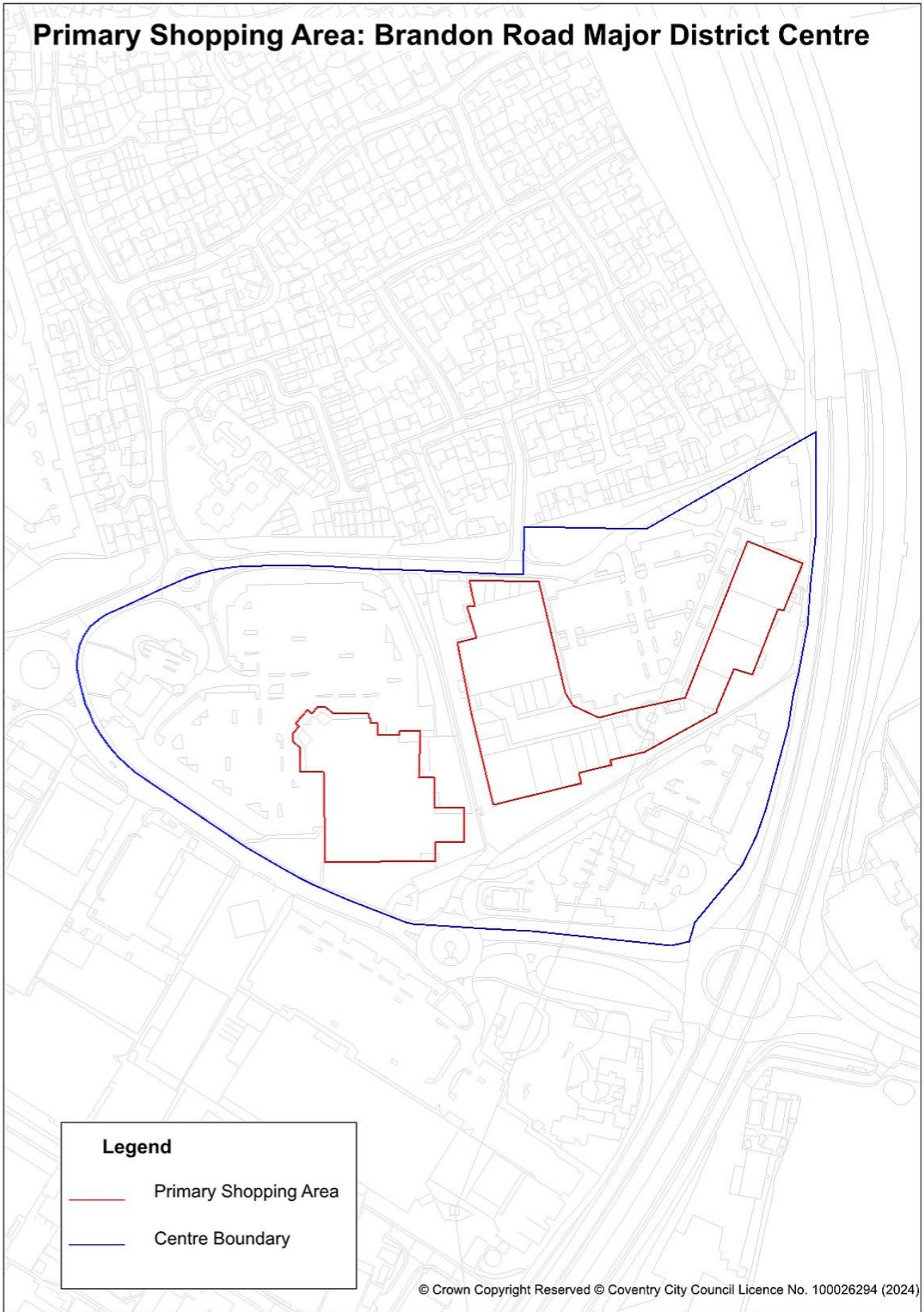
# Primary Shopping Area: Ball Hill District Centre



# Primary Shopping Area: Brade Drive District Centre

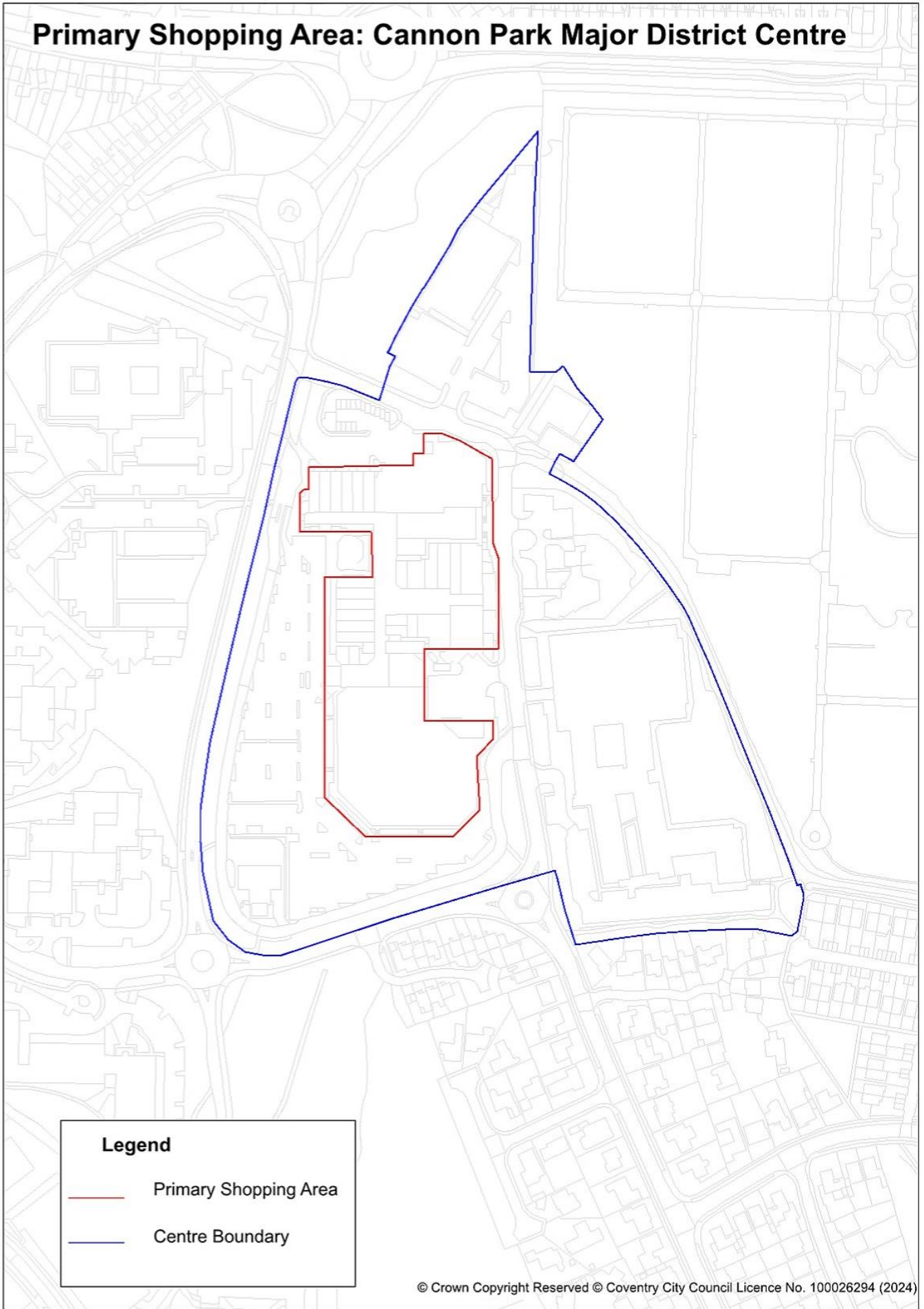


# Primary Shopping Area: Brandon Road Major District Centre





# Primary Shopping Area: Cannon Park Major District Centre

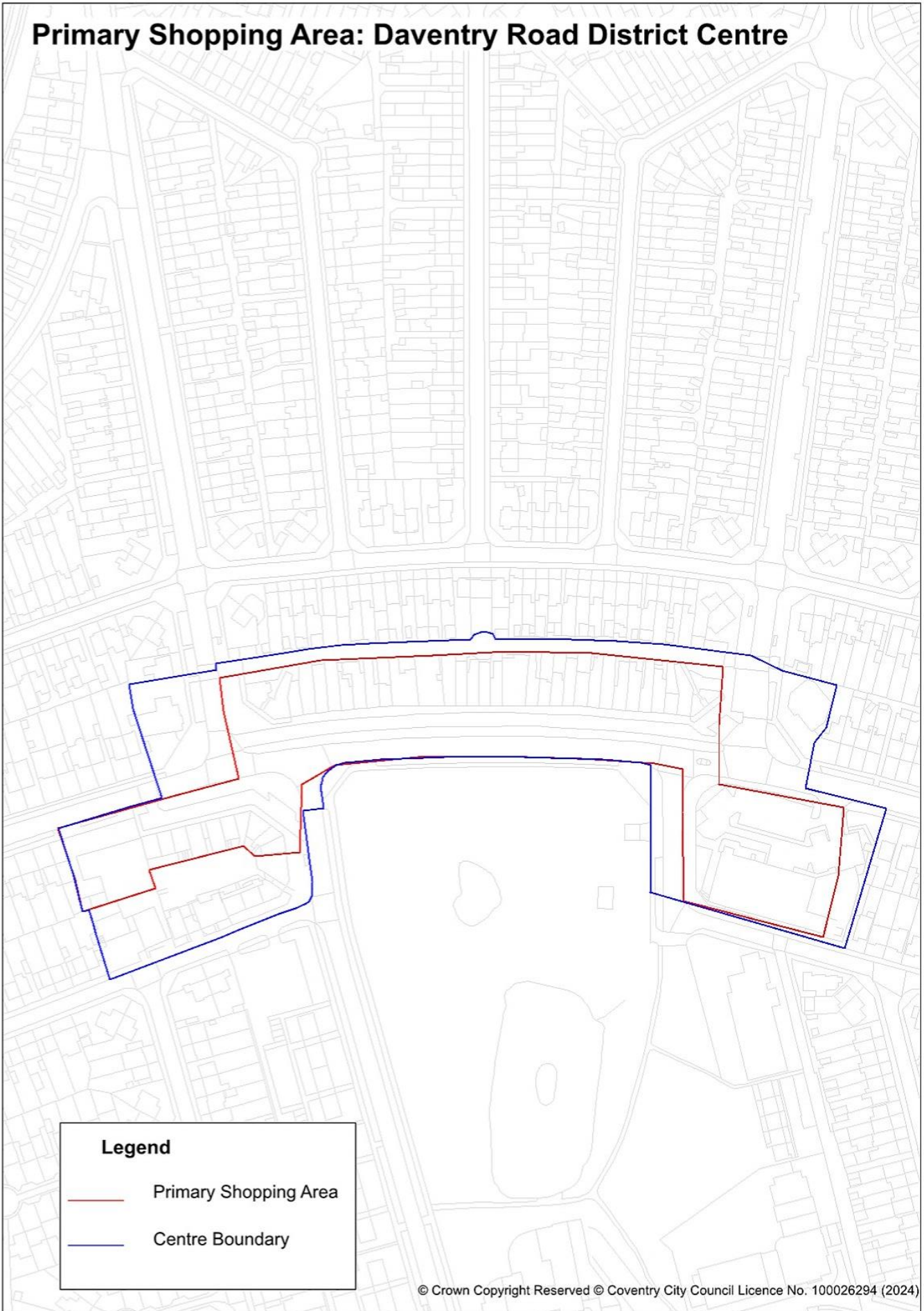


**Legend**

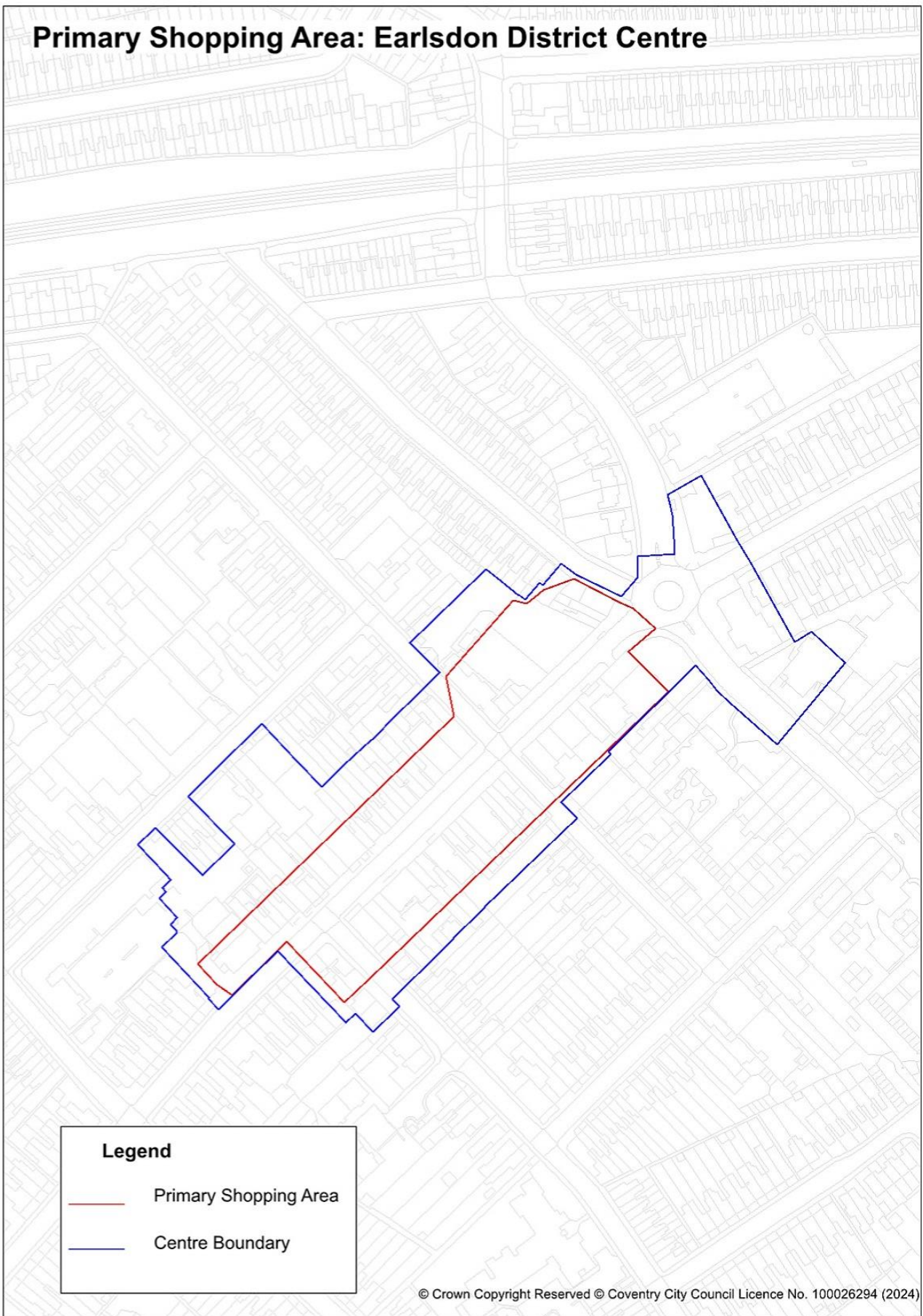
- Primary Shopping Area
- Centre Boundary

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# Primary Shopping Area: Daventry Road District Centre



# Primary Shopping Area: Earlsdon District Centre

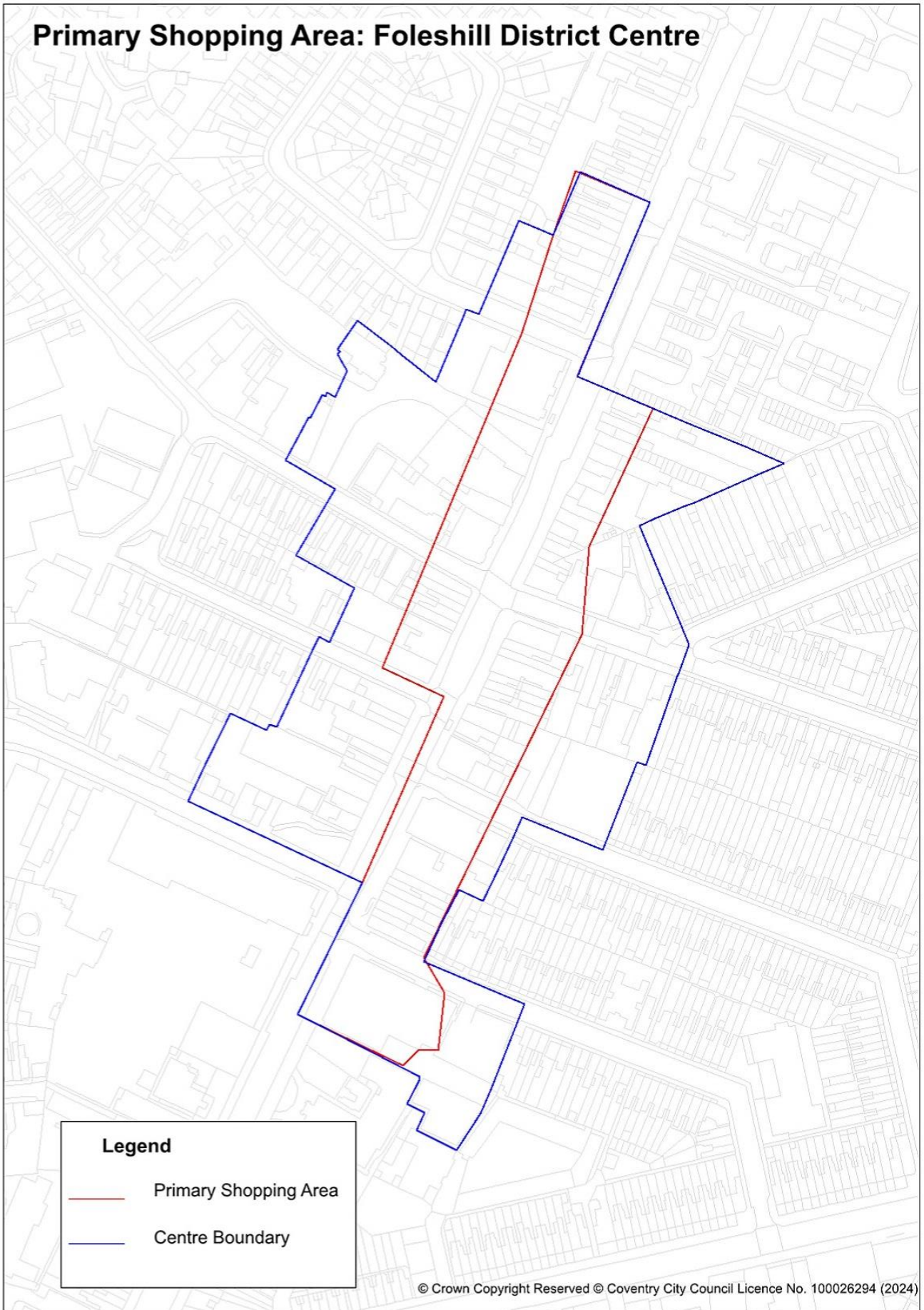


**Legend**

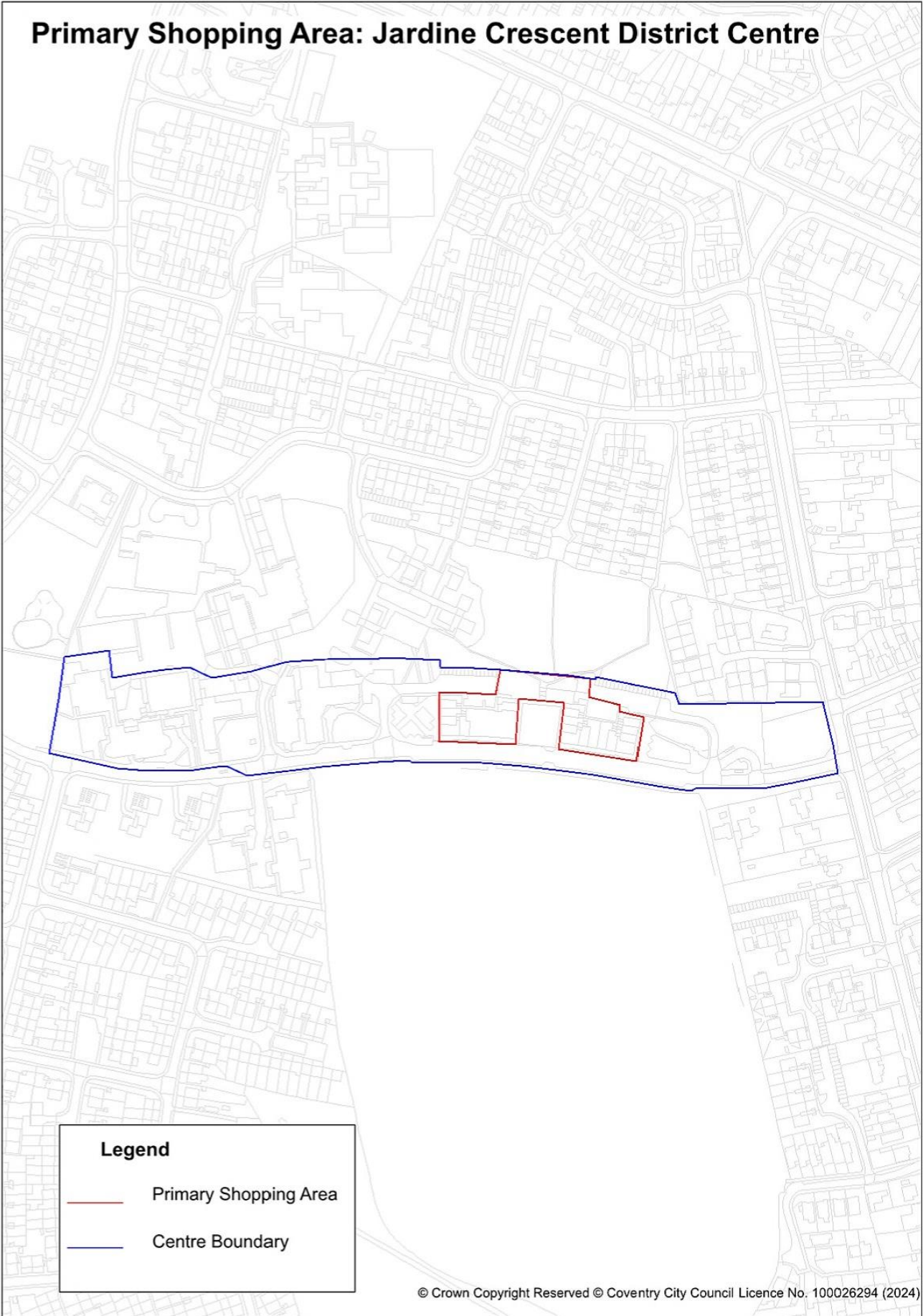
- Primary Shopping Area
- Centre Boundary

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# Primary Shopping Area: Foleshill District Centre



# Primary Shopping Area: Jardine Crescent District Centre

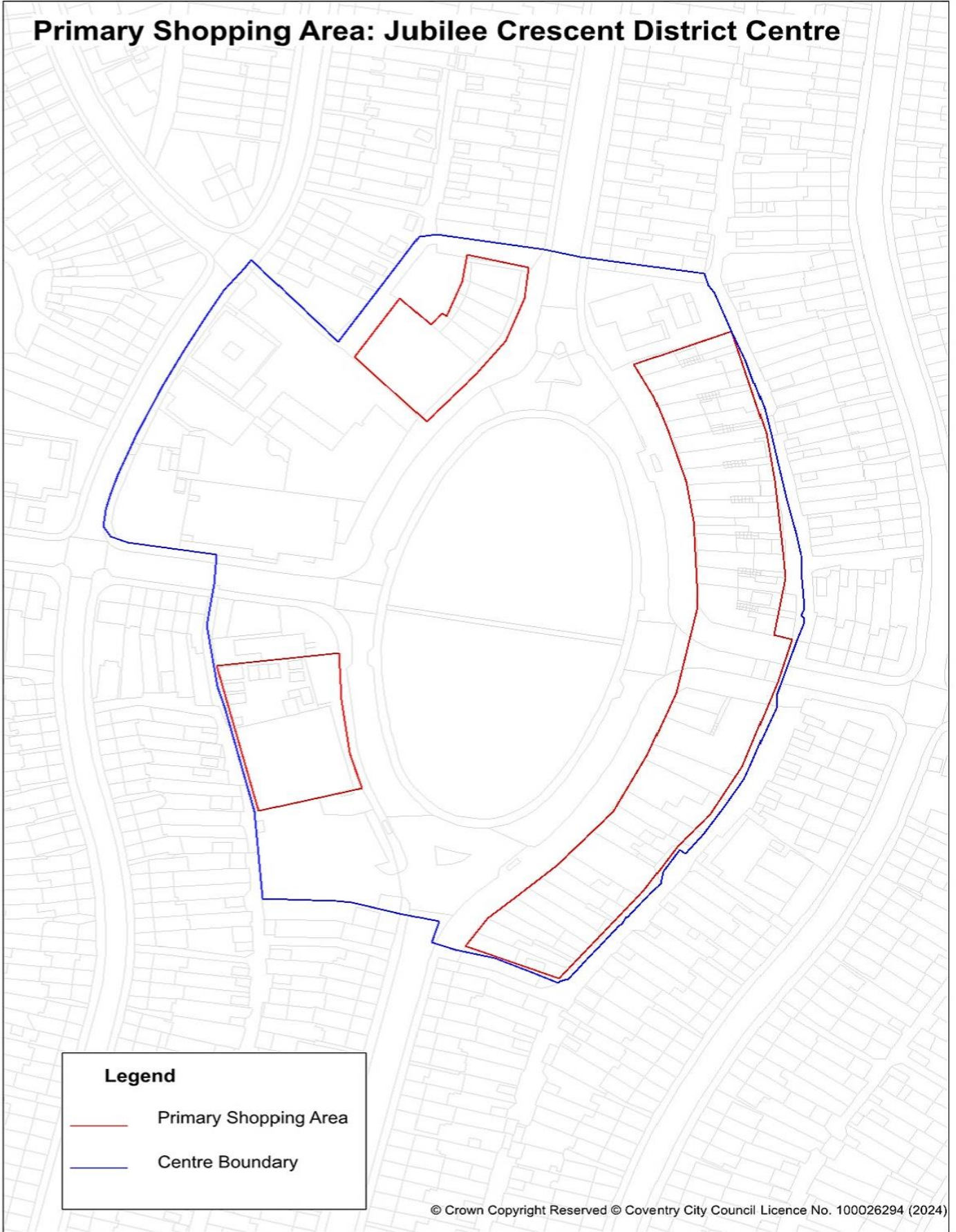


**Legend**

- Primary Shopping Area
- Centre Boundary

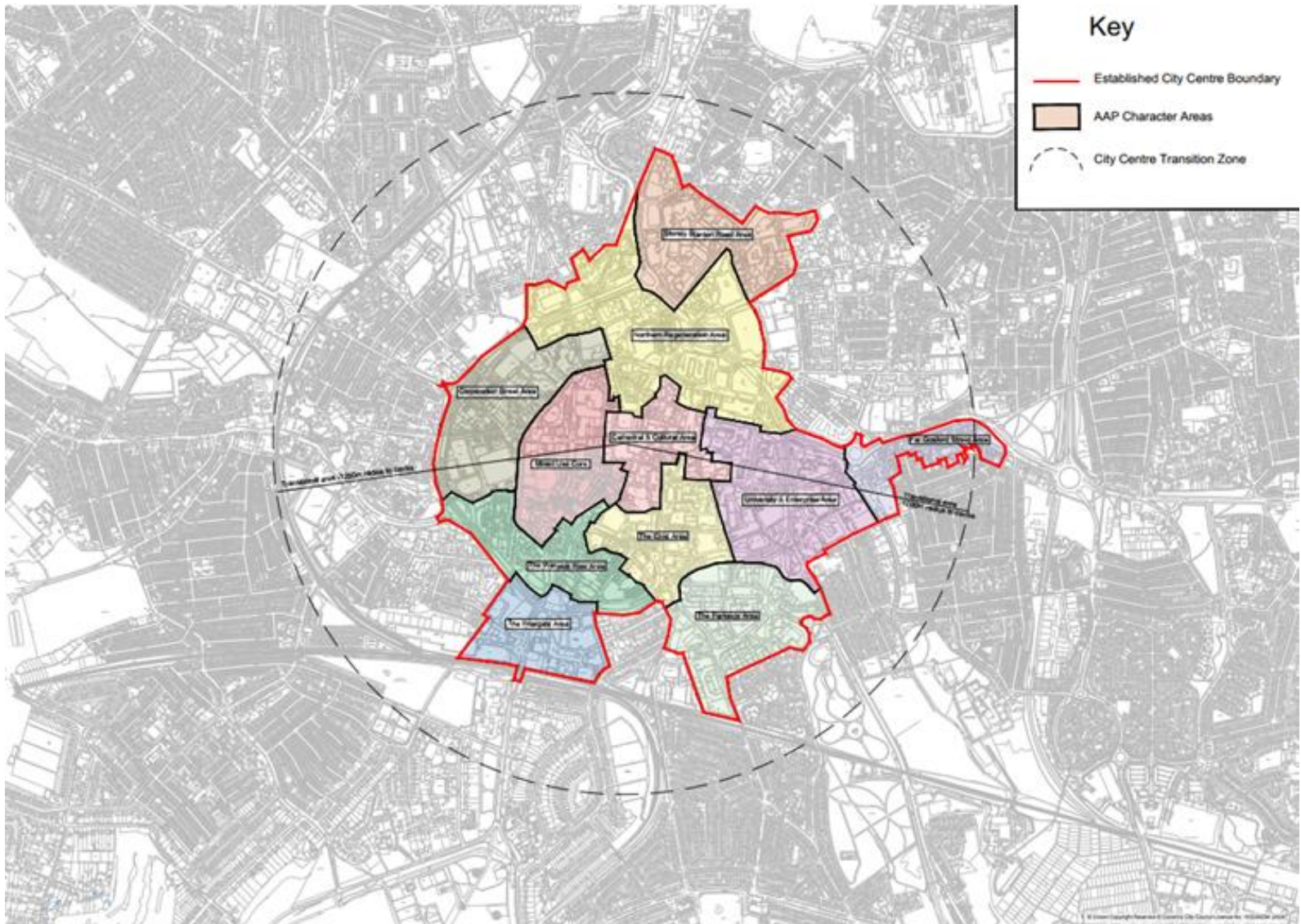
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# Primary Shopping Area: Jubilee Crescent District Centre



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## Appendix 9f: City Centre Character Area









**Coventry Local Plan Review  
2021-2041:  
Proposed Submission  
Regulation 19 Consultation**

**Sustainability Appraisal (SA)/  
Strategic Environmental Assessment (SEA)  
SA Report**

**October 2024**

enfusion 

# Coventry Local Plan Review 2021-2041: Proposed Submission Regulation 19 Consultation

## SUSTAINABILITY APPRAISAL (SA) (incorporating Strategic Environmental Assessment SEA)

### SA Report:

date:	May 2023 Initial August-September 2024 Drafts October 2024 Final	
prepared for:	Coventry City Council	
prepared by:	Barbara Carroll Dr Trevor Turpin	Enfusion
quality assurance:	Barbara Carroll	Enfusion



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## NON-TECHNICAL SUMMARY (NTS)

### This is the NTS of the Sustainability Appraisal (SA) Report

1. This is the NTS of the SA Report documenting the processes of Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) within an integrated appraisal for the Coventry Local Plan Review (CLPR, 2021-2041). This summary is an integral part of the SA Report that accompanies the proposed submission draft of the plan for Regulation 19 public consultation in autumn 2024. It provides an outline of the SA process and findings in non-technical summary.

### The Coventry Local Plan Review (CLPR) 2021-2041

2. The Coventry Local Plan 2021-2041 covers the entire administrative boundary for Coventry City Council, extending beyond the city centre, and located some 15 km to the south-east of Birmingham. Since the current Local Plan was adopted in 2017, there have been various wider reaching changes in both the national and local contexts, including major changes to climate change and environmental requirements. The longer term effects of Brexit and the Covid pandemic are still uncertain, for example, on patterns of working.
3. The Local Plan Review comprises chapters and policies in a similar format and numbering to the adopted Local Plan -Introduction, Overall Growth & Duty to Cooperate, Health & Wellbeing, Jobs & Economy, Housing, Retail & Town Centre Uses, Communities, Green Belt & Green Environment, Design, Heritage, Accessibility, Environmental Management, and Implementation/Monitoring. The current City Centre Area Action Plan has been updated and relevant elements (some are out of date now and some would be duplication) carried across to the new plan as a separate chapter. The overall development needs are set out to be a minimum of 29,100 additional homes and a minimum of 60 hectares of employment land.

### Sustainability Appraisal (SA)

4. The purpose of Sustainability Appraisal is to promote sustainable development through the integration of environmental, social, and economic considerations in the preparation of a Local Plan. SA is an iterative and ongoing process that informs plan-making by assessing developing elements of the plan, evaluating and describing the likely significant effects of implementing the plan, and suggesting possibilities for mitigating significant adverse effects and enhancing positive effects.
5. Initially the scope of the SA is determined by establishing the baseline conditions and context of the area, and by identifying issues, problems and opportunities. From this information, a SA Framework of objectives for sustainable development is prepared. This is relevant to the Coventry local authority area and the issues for

the Local Plan review, and it then forms the basis against which the draft plan is assessed.

### **Sustainability Characteristics of the Coventry City Area & Likely Evolution without the Local Plan Review**

6. The population of Coventry is predicted to increase to 422,919 by the year 2031 and to 454,534 by the year 2042 and, in line with the rest of England, there are more people in older age groups. Over the past decade, the city has become increasingly ethnically diverse with just under half of its school-aged population from an ethnic minority background. Whilst there have been improvements, there are pockets of deprivation and poor health/wellbeing in parts of the area and this limits people's opportunities to succeed in life.
7. Much of Coventry's housing stock is small, old and not built to modern energy efficiency standards. This means that many residents are living in damp, poorly insulated homes, and pay too much to keep warm. Migration is another factor affecting the housing needs. Before the pandemic, Coventry had experienced strong economic growth with particular skills in advanced manufacturing and engineering, but there have been challenges since Brexit and Covid-19. Tourism is also important, and the city is home to two successful universities.
8. The city has air quality problems, mostly associated with pollution from vehicles. Noise is a common problem – also from transport, and also light – for both people and wildlife. Pollution from wastewater remains a problem for water quality. Some of the new development completed has been on previously developed land, thus protecting agricultural land and greenfield. The city centre is generally well connected, including for sustainable transport but could be further improved to better encourage more active travel and linkages with green ways for cycling and walking.
9. Coventry has a range of unique historic sites and features that give the area its distinctive characters and cultural identity. The landscapes in the area are valued for their scenic qualities, rich wildlife, cultural associations and historic values. Coventry has many habitats associated with the built environment, and there are nationally designated sites for scientific interest, local nature reserves, and areas of ancient woodland. The area is also rich in the water environment with rivers, canals and waterbodies that form an important biodiversity network.
10. Without review of the Local Plan, there are likely to be some changes anyway in the sustainability characteristics of the Coventry area, for example, the increasing use of electric cars, and new standards for green infrastructure will lead to reduced greenhouse gas (GHG) emissions, improvements in air quality, and some recovery for the loss of nature and biodiversity.
11. However, the predicted increase in population, will challenge the ability of the Council and its partners to accommodate such changes for the quality of life of its citizens, and to be able to provide the right mix and type of homes in the most suitable locations. Without guidance from an updated Local Plan, the adverse effects from development, including cumulative effects, would not be managed

effectively. Opportunities from new development, such as improving accessibility to green space and enhancing townscape quality/character, would not be realised or optimised – including contributing towards reducing health inequities.

### How has the Coventry Local Plan Review been assessed?

12. The SA Framework, together with the baseline information, and professional judgment comprised the basis for assessment, and is summarised in the following table:

SA Objective
SA No 1: To enable vibrant and inclusive communities
SA No 2: To provide accessible essential services and facilities for all residents
SA No 3: To improve health and promote active living
SA No 4: To provide decent and affordable housing for all
SA No 5: To support sustainable inclusive economic growth
SA No 6: To help achieve the Council's ambition to reach net zero carbon emissions
SA No 7: To build resilience to climate change
SA No 8: To reduce traffic & improve sustainable transport choices
SA No 9: To reduce air, noise & light pollution
SA No 10: To protect & conserve natural resources - soil, water, minerals & waste
SA No 11: To protect and enhance nature & biodiversity
SA No 12: To protect and enhance the historic environment, and its setting
SA No 13: To protect and enhance the quality and character of townscapes and landscapes

13. The significance of effects was assessed using the categories, as follows:

Symbol	Meaning
--	Major Negative
-	Minor Negative
+	Minor Positive
++	Major Positive
?	Uncertain
0	Neutral or Negligible



### What reasonable alternatives have been considered & addressed?

14. During the progression of initial technical studies and early development of issues and options for plan-making, certain strategic options were identified and tested with high level appraisal using the SA framework of objectives, as follows:
- Amount of Housing
  - Density of Housing
  - Climate Change & Standards for Building Regulations (2 options)
  - Standards for Biodiversity Net Gain (BNG) & Green Infrastructure (GI) (2 options)
15. The SA made suggestions for mitigating likely negative effects and for enhancing any likely positive effects to inform the plan-making. It should be noted that there can be much uncertainty of the significance of effects at the strategic level, particularly for issues associated with climate change.
16. The Council considered the comments made during the initial consultation of the Issues & Options, further evidence studies, and the findings of the SA in order to identify and refine any further strategic options that should be tested through SA. The amended and additional strategic options that were tested through SA are, as follows:
- Amount of Housing (5 options)
  - Density of Housing (3 options)
  - Development in the Green Belt (2 options)
  - Amount of Employment Land (3 options)
  - Amount (3 options) & Distribution of Office Development (3 options)
  - Purpose Built Student Accommodation (PBSA) (2 options)
17. These strategic options were tested through SA using the SA framework of objectives and in a comparable and consistent manner. The findings of the SA, the comments made during consultation, and the findings of further technical studies informed the Council in its selection and rejection of options. The draft Local Plan includes those strategic options that have been tested and identified as the preferred approaches to plan-making.
18. **Amount of Housing:** Options 1 & 2 were found to have significant negative effects for many topics because the high numbers of dwellings would compromise the ability to meet with other objectives, especially for climate change and nature. Homes would have to be small and more densely located with less possibility to meet variety and adaptability of needs. Option 3 for 29,100 new homes was the preferred option as this aligns with the identified local housing needs and can be accommodated within the Coventry Council area and allows for a buffer over the plan period.
19. **Density of Housing:** Options 1 & 2 were found to not be able to accommodate the development needs. Option 3 identified four different areas according to their local character and ability to accommodate different densities of housing – and this is the preferred approach.

20. **Climate Change & Building Regulations Standards:** Compliance with national minimum standards for energy uses of new buildings as set out in Option 1 will be mandatory for the updated plan. However, such standards are unlikely to sufficiently progress the objectives for reducing greenhouse gas emissions in the Coventry Climate Change Strategy to 2030. Therefore, the Council progressed Option 2 – over and above the proposed new Building Regulations – seeking opportunities to progress towards net zero carbon beyond that controlled through Building Regulations.
21. **Nature & Biodiversity:** It was decided that a flexible approach to achieve the best outcomes through national standards is more effective than requiring standards higher than those at the national level. The Council has been applying a 10% gain in BNG for some time and this is working well with other initiatives.
22. **Development in Green Belt:** The Green Belt is very important for the Coventry plan area – it prevents urban sprawl, protects green and open space, retains openness, protects the landscapes and character of settlements. As the identified need for housing can be accommodated, the preferred approach is to avoid any development in the Green Belt, as set out in Option 2.
23. **Amount of Employment Land:** Option 1 is too high to be accommodated within the constrained boundaries of the Coventry plan area. Option 3 would result in development in the Green Belt and therefore, is not taken forward. Option 2 can be accommodated without resorting to Green Belt release and is the preferred option.
24. **Amount of Office Land:** Options 1 & 2 reflect earlier calculations of the amount of land needed for office; Option 3 is the preferred option that takes into account oversupply and reduced requirements due to changed patterns of working.
25. **Distribution of Office Land:** Option 3 with land to the City Centre and to local centres is the preferred approach as it supports a range of needs including smaller businesses.
26. **Purpose Built Student Accommodation:** Option 2 that limits student housing primarily to the city university area and the university campus is the preferred option as the student populations are more focused in more sustainable locations. It is also a more effective use of land for other housing needs.
27. The Council reviewed the status of the site allocations in the adopted Local Plan as some have been developed, some are being developed, some are consented, and others not yet started. The Council identified that 25 housing and mixed use sites, and 7 employment sites, were still suitable and should be retained in the Local Plan Review.
28. The Council assessed the site options that had been proposed through the calls for sites and found 12 new sites that were suitable and deliverable. All these sites were subject to SA and taken forward as proposed site allocations for housing and mixed use development. There was one new employment site that was being promoted and this was tested through SA. The site assessment process and the SA found that there would be negative effects for agricultural land, soils and

the Green Belt – and for these reasons, the site has not been taken forward into the new Local Plan.

### **What are the Likely Significant Effects of the draft Coventry Local Plan Review to 2041? How could negative effects be mitigated?**

29. The population of Coventry is predicted to increase and the Council has investigated how much housing and new development will be needed. The Council has prepared the draft Plan to support the Vision and priorities in the One Coventry Plan and the priorities in the draft Climate Change Strategy. The Coventry Local Plan area is heavily built-up, comprising a city centre that is rich with cultural and historical assets, surrounded by an urban area which is then defined by the encircling Green Belt land that is so important to prevent urban sprawl and coalescence. These characteristics constrain the opportunities for new development, so the Council identified updated character areas for the City Centre to better guide new development. It also identified four zones – greenfield, brownfield, city centre transition, and city centre – that better reflect precedent and context such that different densities of housing can be accommodated more sustainably with positive effects. The updated approach to development in the City Centre will support objectives for economic growth and regeneration with wider positive effects.
30. Taking into account these local circumstances, the Council has assessed that the identified need for housing and employment land can be accommodated within the urban environment and avoiding the Green Belt with significant positive effects. Good quality housing and access to employment is well established as contributing to better health and wellbeing – both physical and mental – and indicating further significant positive effects. Housing policies cover the needs of different types of people, including the young, older persons, those with special needs, students and travellers. This all contributes to positive effects for inclusive communities. Affordability is a key element of the new Plan and also adaptability and flexibility to be able to adjust to changing needs – all with significant positive effects.
31. The location and type of new development can have effects for communities and the Plan allocates sites for new development that are within good access of services and facilities. This provides mitigation measures to avoid significant negative effects. Development sites were also chosen to be easily accessible to public transport, cycling and walking routes and this will have positive effects for reducing dependence on car travel and increasing sustainable and active travel with positive effects for health and wellbeing. Transport policies further guide new development, encouraging active travel and reduce reliance on the private car, thus supporting the Council's emphasis on prioritising sustainable travel with positive effects for health and wellbeing.
32. Aiming to address the effects of climate change is a key feature of the updated Plan with new policies that reflect the new requirements for net zero carbon and Building Standards. Information and guidance is provided for new development such that in the longer term, the cumulative effects should be positive for climate change and people's health and wellbeing.

33. Updating of policies on the design of new development provide mitigation measures to ensure that potential negative effects are avoided and that possible positive effects are included. The historic environment continues to be protected and enhanced by policies that provide strong mitigation measures. The local townscapes and landscapes, including the important historic city centre and Arden rural environment, continue to be protected and enhanced by relevant policies that provide strong mitigation measures. The avoidance of new development in the Green Belt provides mitigation to avoid negative effects from urban sprawl and on communities by keeping open space. This is particularly important for the constrained land area for the Coventry Local Plan.
34. There is the potential for the overall scale of new development to have negative effects on nature and biodiversity. However, updated policies reflect the new national requirement that all development must provide at least 10% biodiversity net gain – with overall positive effects. Policies provide information and guidance of how development can link new green and blue infrastructure to benefit both nature and people with significant positive effects on health and wellbeing.
35. Strong policies remain in the Plan to reduce pollution and protect natural resources. Policies on design, air quality, light, and noise provide strong mitigation measures to avoid significant negative effects. Site allocations have been selected on previously developed land, thus making effective use of the land resources and avoiding negative effects on soils and greenfield land. Policies remain in the Plan for waste management and minerals development such that potential negative effects are mitigated.
36. All these factors are interconnected and contribute to helping Coventry achieve its ambitions for addressing the climate crisis and supporting the One Coventry Vision through mitigating potential negative effects and encouraging possibilities for positive effects.

### **Were there any difficulties encountered?**

37. There were no significant technical difficulties encountered during the preparation of this SA. There are inherent difficulties in predicting the likely future baseline and assumptions were made using professional judgment. Some uncertainties were identified – in particular for the significance of effects for climate change and with regard to nature and biodiversity.

### **How has the SA influenced the draft Coventry Local Plan?**

38. The SA made suggestions for improving the sustainability of the Plan, especially at the early stages of the plan preparation with the assessments of the strategic options for amount of housing and the density of housing. Overall, the findings of the SA were taken into account as the draft Plan was further developed.

### **Consultation**

39. The Initial SA Report (May 2023) was published alongside the Issues & Options draft Coventry Local Plan Review for Regulation 18 consultation in 2023. Comments were received from the statutory environmental bodies - Natural

England and Historic England. Comments were also received from a developer who had concerns that development should be considered in the Green Belt. These comments were taken into account during the preparation of this SA Report. The draft Coventry Local Plan Proposed Submission is being published for Regulation 19 consultation and this SA Report accompanies the draft Plan.

### Monitoring Proposals

40. Local planning authorities are required to produce Monitoring Reports (MRs) including indicators and targets against which the progress of the Plan can be assessed. There is also a requirement to monitor the predictions made in the SA and Government advises Councils to prepare a monitoring strategy that incorporates the needs of the two processes to make best use of shared information and resources. The Coventry City Council monitoring strategy for the Local Plan is considered satisfactory for the requirements from the SA process.

### Next Steps

41. Any comments on the SA will be submitted with the draft Plan and other evidence to the Secretary of State so that an independent planning inspector may be appointed for the Local Plan and its supporting evidence to be examined in public in due course.

## 1.0 INTRODUCTION

### Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA)

- 1.1 Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. The purpose of a Sustainability Appraisal is to promote sustainable development through assessing the extent to which an emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic, and social objectives<sup>1</sup>.
- 1.2 The requirement for SA is set out in Section 19 of the Planning and Compulsory Purchase Act 2004 and in paragraph 32 of the National Planning Policy Framework (NPPF, updated 2023)<sup>2</sup>. SA incorporates the requirements for Strategic Environmental Assessment (SEA,) as set out in the Environmental Assessment of Plans and Programmes Regulations 2004<sup>3</sup>. Coventry City Council has commissioned independent specialist consultants Enfusion Ltd to undertake the SA process for the Coventry Local Plan Review CLPR 2021 - 2041.
- 1.3 National planning practice guidance sets out the key stages and tasks for the SA process and their relationship with the Local Plan process – as illustrated in the following Figure 1.1. It is important to note that SA is an iterative and on-going process. Stages and tasks in the SA process may be revisited and updated or revised as a plan develops, to take account of updated or new evidence as well as consultation responses.
- 1.4 This SA Report explains the Stage A Scoping that has been undertaken and sent to the statutory consultation bodies in accordance with good practice. It reports the findings of Stage B Alternatives & Assessment and comprises Stage C Preparation of the SA Report. This SA Report accompanies the Coventry Local Plan Review Regulation 19 Draft Plan for statutory public consultation and seeks comments from the public, stakeholders and the statutory consultees.

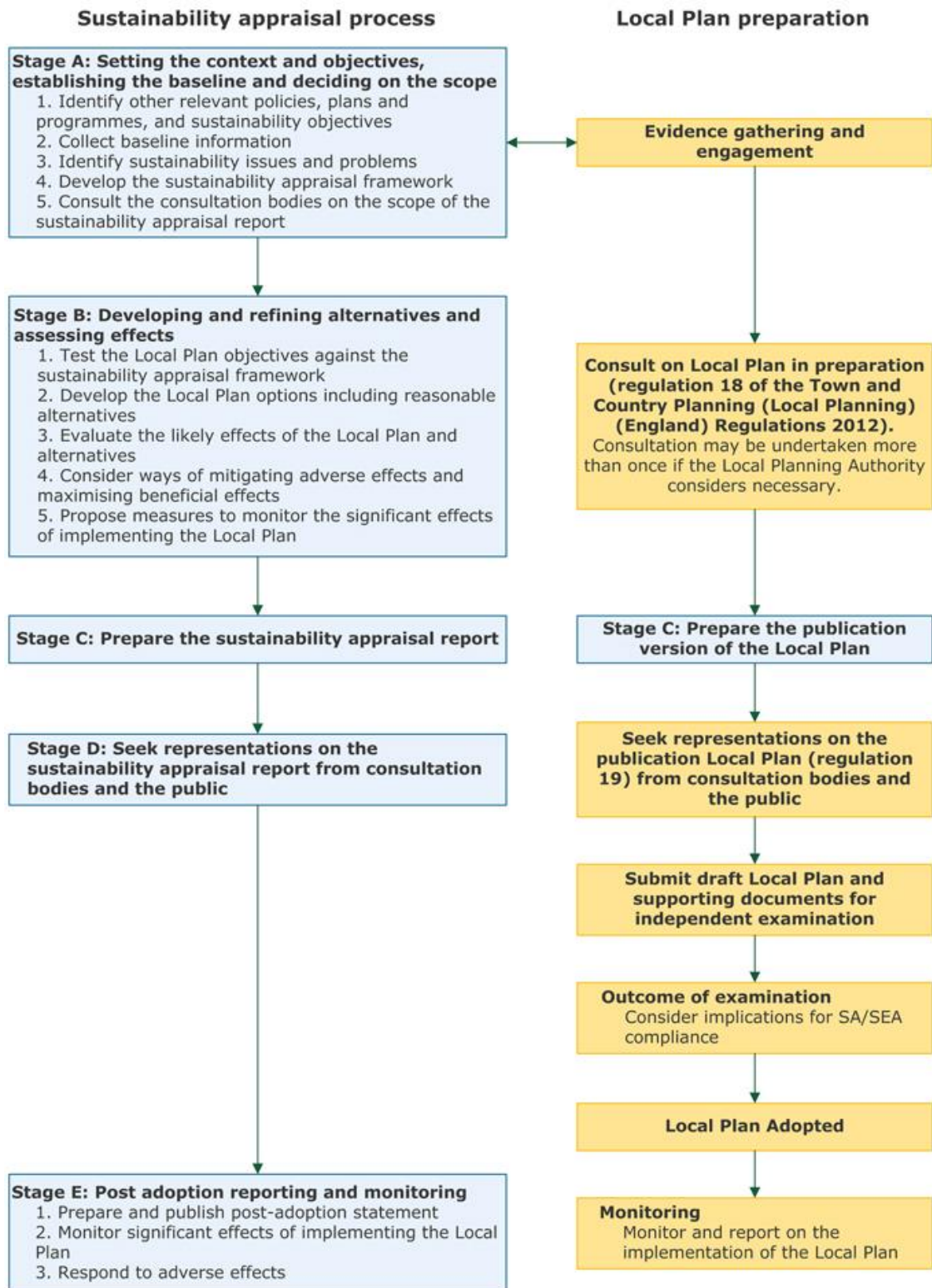
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<sup>1</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#strategic-environmental-assessment-and-sustainability-appraisal>

<sup>2</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>3</sup> <https://www.legislation.gov.uk/uksi/2004/1633/contents/made>

Figure 1.1: SA and Plan-making Stages and Tasks



## Habitats Regulations Assessment (HRA)

- 1.5 Coventry City Council is also required to undertake a Habitats Regulations Assessment (HRA)<sup>4</sup> of the Local Plan Review.<sup>5</sup> The Conservation of Habitats & Species Regulations (2017, amended 2018)<sup>6</sup> afford a high level of protection to sites in a network of internationally important sites designated for their ecological status. These sites comprise European Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), and Ramsar<sup>7</sup> sites. It is a requirement to consider if the plan is likely to have significant effects on the integrity of any relevant designated site.
- 1.6 HRA is a two staged process – initially screening and then appropriate assessment (if significant adverse effects are screened as likely). Planning practice guidance advises that an SA should take account of the findings of an appropriate assessment, if one is undertaken. HRA screening for the CLPR has been undertaken separately and the findings of the HRA taken into account in the SA.

## The Coventry Local Plan Review 2021-2041 (CLPR)

- 1.7 The Coventry Local Plan 2011-2031 and City Centre Area Action Plan 2011-2031 (CCAAP) (both adopted 2017), together with national planning guidance (NPPF), Development Plan Documents (DPDs), Supplementary Planning Guidance (SPDs), and Neighbourhood Plans (NPs), comprise the planning framework through which decisions are made on planning applications. The Government currently requires that the policies of an adopted Local Plan should be reviewed every five years to check that they are up to date.
- 1.8 It may be noted that the review of the CLP is being carried out during times of proposed planning reform and these changes could have a profound impact on development plans and projects. During 2020-2021, Government consulted on proposed changes to the planning system with revisions to the NPPF, the National Model Design Code and changes to the standard method for assessing local housing need. The Levelling-Up & Regeneration Act (LURA, 2023)<sup>8</sup> enacted the changes and introduced national development management policies (NDMPs). The new Government has proposed different changes to the NPPF (July 2024)<sup>9</sup> and transitional arrangements. These proposals are now being consulted upon until 24 September 2024.
- 1.9 The Coventry Local Plan covers the entire administrative boundary for Coventry City Council with an area of 99km<sup>2</sup> located in central England, approximately 15km south east of Birmingham and approximately 10km north of Leamington Spa – and as shown in the following figures:

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<sup>4</sup> <https://www.gov.uk/guidance/appropriate-assessment>

<sup>5</sup> <https://www.gov.uk/guidance/appropriate-assessment>

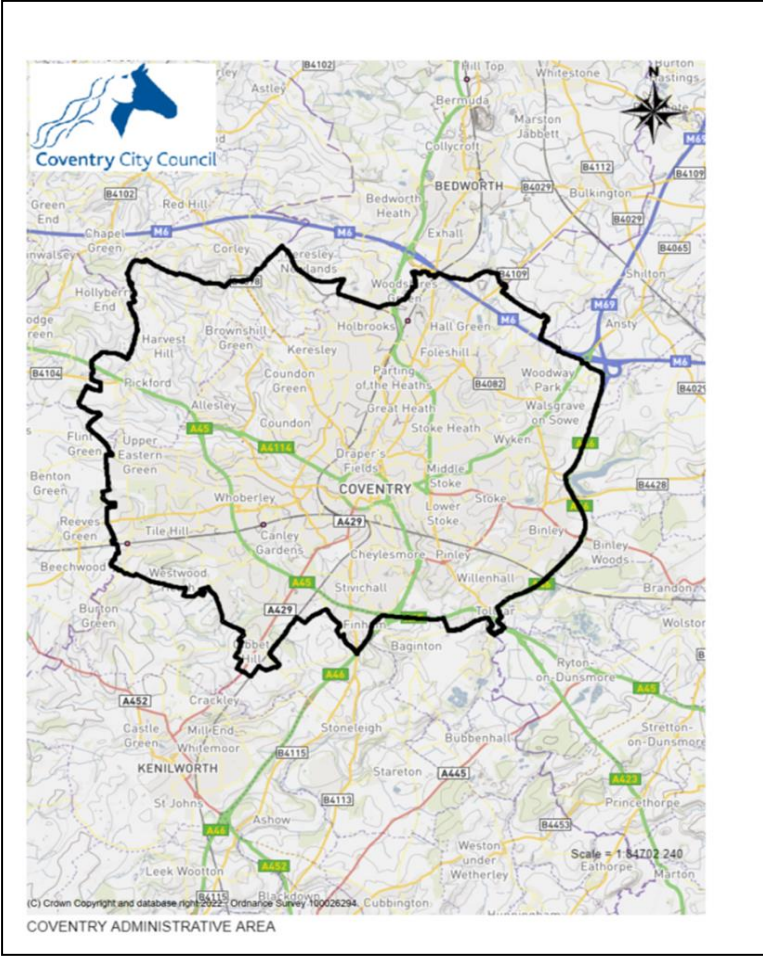
<sup>6</sup> <https://www.legislation.gov.uk/uksi/2017/1012/contents/made>

<sup>7</sup> Support internationally important wetland habitats and are listed under the Ramsar Convention on Wetlands of International Importance

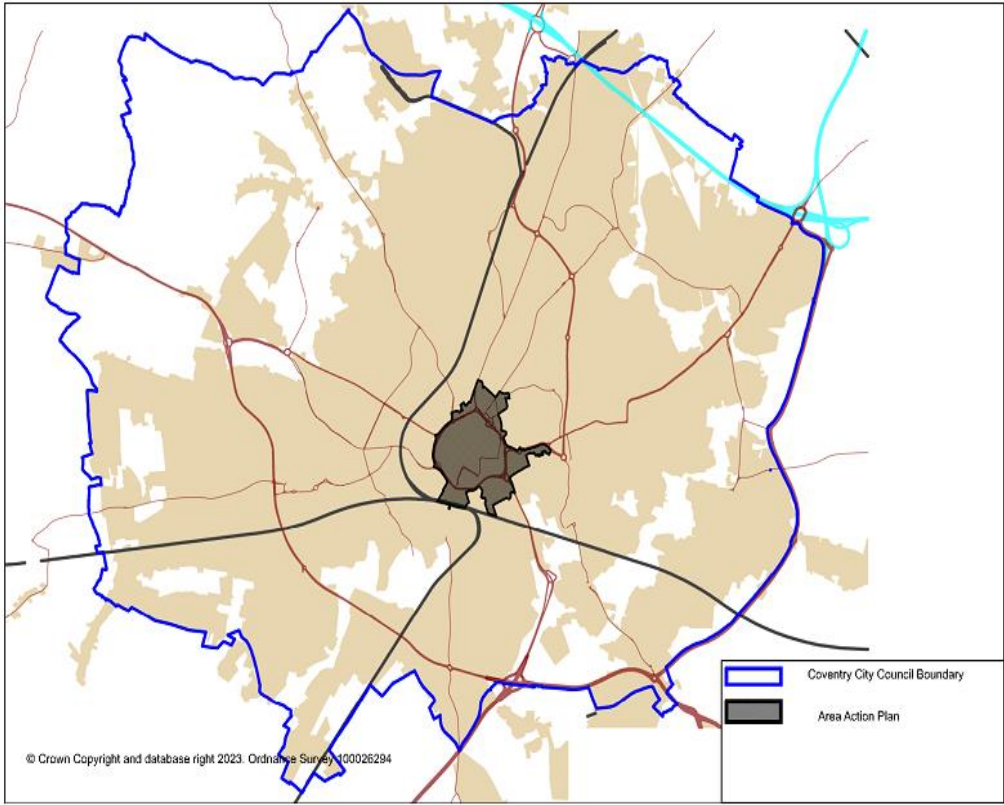
<sup>8</sup> <https://www.legislation.gov.uk/ukpga/2023/55>

<sup>9</sup> <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system>





**Figures 1.2 & 1.3:**  
Location of the  
Coventry Local Plan  
area



- 1.10 In consideration of the significant changes associated with Government calculations for housing need, as well as major changes to climate change and environmental requirements, the Council approved a full review of the Local Plan in December 2022. Since the Plan was adopted in 2017, there have been various wider reaching changes in both the national and local contexts, including effects of Brexit and the Covid pandemic. The Council's priorities now include the One Coventry Plan and the emerging Climate Change Strategy. It was decided that it was more effective to undertake a full rather than a partial review.
- 1.11 Many of the policies in the adopted LP are still relevant and needed only minor amendment or updating. Key policy areas have been updated in line with new national requirements and new evidence, most notably associated with the Coventry & Warwickshire Housing and Economic Development Needs Assessment (HEDNA, November 2022)<sup>10</sup>. This strategic study has been prepared to provide a joint and integrated assessment of the need for housing, economic growth potential and employment land needs for the city and the county. Other key evidence includes the Housing & Employment Land Availability Assessment (HELAA, 2024), the Residential Density Study (2024), and the Green Belt Technical Review (2024).
- 1.12 The studies for the preparation of the Local Plan Review indicated the possibilities for certain different strategic options for policies. These were determined to be reasonable alternatives such that they were investigated through the SA process. Strategic options were identified for the quantum of housing development, the density of housing, standards for Building Regulations, standards for Biodiversity Net Gain (BNG) and Green Infrastructure (GI), development in the Green Belt, the quantum of employment land, the quantum and distribution of office development land and the location of Purpose Built Student Accommodation (PBSA).
- 1.13 The draft Plan published for Regulation 19 consultation has considered the updated evidence, reviewed the extant policies, explored the issues and options arising, and considered the comments received from the Regulation 18 public consultation. The Plan aligns with the contents of the adopted Local Plan and comprises chapters, supported by appendices, as follows:

#### Introduction

- 1 Overall Development Needs & the Duty to Co-operate
- 2 Health & Wellbeing
- 3 Jobs & Economy
- 4 Housing
- 5 Retail & Town Centre Uses
- 6 Communities
- 7 Green Belt & Green Environment
- 8 Design
- 9 Heritage
- 10 Accessibility
- 11 Environmental Management

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<sup>10</sup> <https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

- 12 Coventry City Centre
- 13 Infrastructure, Implementation & Monitoring

1.14 The CLPR Policies with an outline of updating are listed in the Table 1.1, as follows:

**Table 1.1: CLPR Policies – Summary of Review Changes**

<b>CLPR Policy</b>	<b>Summary of Changes</b>
DS1: Overall Development Needs	<b>Strategic Policy</b> - Reflects change in quantum of development for period 2021-2041 – minimum of 29,100 additional homes & minimum of 60 hectares of employment land within the city's administrative boundary
DS2: Duty to Cooperate & Partnership Working	<b>Strategic Policy</b> - Updated
DS3: Sustainable Development	<b>Strategic Policy</b> - Updated
DS4 Parts A, B, C & D Masterplan Principles	<b>Strategic Policy</b> - Minor updating
HW1: Health & Health Impact Assessments	Updated to broaden scope & align with updated SPD
JE1: Economy & Employment Strategy	<b>Strategic Policy</b> - Updated to reflect national changes & local evidence
JE2: Provision of Employment Land & Premises	<b>Strategic Policy</b> - Updated – 52 hectares of land allocated for employment development within the city's administrative area, plus 27,100 sq m remaining floorspace at Friargate as part of wider mixed use allocation
JE3: Non-Employment Uses on Employment Land	Changes to context for policy application
JE4: Location & Type of Office Development	Updated to reflect national policy change and local evidence
JE5: Industrial & Storage Distribution Development	Previous JE5 split into 2 policies – JE5 Industrial and Storage and a new JE8 to focus on R&D
JE6: Tourism/Visitor-Related	Minor updating
JE7: Accessibility to Employment Opportunities	Updating to 'developer contributions'
JE8: Location of Research & Development (R&D)	New policy recognising that R&D has different locational needs
H1: Housing Land Requirements	<b>Strategic Policy</b> - Updated needs for 2021-2041 for a minimum of 29,100 additional dwellings
H2: Housing Allocations	<b>Strategic Policy</b> - Updated including status of remained allocations (some being developed, some consented, some not started), & new identified sites
H3: Provision of New Housing	Significant updating to reflect changes in national standards & legislation and local evidence

H4: Securing a Mix of Housing	Updating in line with HEDNA
H5: Managing Existing Housing Stock	Updated with latest climate change requirements & including emphasis on re-use & support for retrofitting
H6: Affordable Housing	Updated , including in line with HEDNA need (provision, tenure, housing size)and local evidence
H7: Gypsy & Traveller Accommodation	Updated in line with local evidence
H8: Specialist Housing, Older Persons Accommodation & Hostels	Updated & strengthened to widen scope and require accessibility & adaptability standards
H9: Residential Density	Changed policy that better reflects local character & context with four densities proposed – greenfield, brownfield, city centre transition zone, and city centre
H10: Student Accommodation	Updated policy in line with local evidence, restricting to areas close to the universities and encouraging better standards & including provision for adaptability of residences
H11: Homes in Multiple Occupation	Updating to reflect, and link to the new HMO DPD
H12: Build to Rent Housing	New Policy
H13: Co-living	New Policy
R1-R6 Retail Policies	Updating to reflect national policy & the Retail Study local evidence
CO1-3 Community Policies	Minor updating
GB1: Green Belt	<b>Strategic Policy</b> - Updating & new policy to differentiate between Green Belt & Local Green Space
GB2: Safeguarded Land in the Green Belt	<b>Strategic Policy</b> – Retained pending progress of the South Warwickshire Local Plan
GB3: Local Green Space	Updating & new policy to differentiate between Green Belt & Local Green Space
GE1: Green & Blue Infrastructure	Updated to reflect local strategy and national change
GE2: Green Space	Minor updating to reflect national change and local evidence
GE3: Biodiversity, Geological, Landscape & Archaeological Conservation	Differentiation & updating to include statutory 10% net gain biodiversity. Removal of archaeology as this will have its own separate policy.
GE4: Tree Protection	Updated & strengthened
DE1: Ensuring High Quality Design	Major revision requiring all development to follow a design-led approach; links to the Tall Buildings SPD & emerging City Wide Design Code

DE2: Delivering High Quality Places	New Policy including public realm, public art, lighting – and local context for City Centre & City Centre Transition areas
HE1: Conservation Areas	Minor updating
HE2: Conservation & Heritage Assets	Updating and strengthening
HE3: Heritage Park – Charterhouse	No change
HE4: Archaeology	New Policy to disaggregate archaeology from HE2 for clarity & detail
AC1: Accessible Transport Network	Significant updating to reflect national policy & guidance & the Council's emphasis on prioritising sustainable travel
AC2: Road Network	Updating to reflect latest transport strategy
AC3: Demand Management	Updated to reflect national policy & guidance & the Council's emphasis on prioritising sustainable travel, including mobility credits
AC4: Active Transport Provision including Walking, Cycling & Micro Mobility	Significant updating to reflect national policy & guidance & the Council's emphasis on prioritising sustainable travel
AC5: Bus & Rapid Transit	Significant updating to reflect national policy & guidance & the Council's emphasis on prioritising bus and rapid transit use
AC6: Rail	Minor updating to reflect current context
AC7: Freight	Updating to ensure better management of freight and management of HGV movements including parking, facilities, consolidation.
EM1: Planning for Climate Change Adaptation	Significant updating to strengthen strategic approach; refers to the Coventry Heat Network
EM2: Building Standards & EM3: Renewable Energy Generation	Policies deleted & replaced by EM11-EM14
EM4: Flood Risk Management	Minor updating to reflect national and local context
EM5: Sustainable Drainage Systems (SuDS)	Updated to reflect national legislation & policy
EM6: Redevelopment of Previously Developed Land	Updating to reflect Water Cycle Study (2024)
EM7: Air Quality	Minor updating
EM8: Waste Management	No change
EM9: Safeguarding Mineral Resources	No change
EM10: Non-Mineral Development in MSAs	No change
EM11: Energy Infrastructure	New Policy to address operational carbon;
EM12: Net Zero (Regulated Operational Carbon) New	New Policy to address operational carbon;

Build Non-Domestic Development	
EM13: Overheating in New Buildings	New Policy
EM14: Embodied Carbon & Waste	New Policy
EM15: Noise	New Policy as noise had not been addressed as an issue in the 2017 Local Plan
IM1: Developer Contributions	Minor updating
CC1 – City Centre Part A Development Strategy; Part B Green & Blue Infrastructure; Part C Drainage & Flood Risk; Part D Environmental Management; Part E Character Areas	Many elements of the adopted Area Action Plan are now incorporated into other CLP Policies; some key elements remain specific to the City Centre and are set out in Policy CC1 (Parts A-E) within a new chapter of the CLP

- 1.15 It is important to note that the draft plan is not a new local plan – it is a review – and, in particular, the issues and options for the review were framed within the context of changed national requirements, the Council's One Coventry Plan (2022-2030)<sup>11</sup>, and the five development pathways to sustainability set out in the draft Coventry Climate Change Strategy (2022-2030)<sup>12</sup>. The subsequent refinements to develop the plan to the Regulation 19 stage took into account the comments made on the initial consultations, further evidence from technical studies, and considered the findings from the SA and the HRA screening.

## Purpose and Structure of this SA Report

- 1.16 This document reports the SA process and its findings from the assessment of the emerging draft Coventry Local Plan Review to 2041. Following this introductory Section 1, this report is structured into further sections:
- Section 2 explains the approach to the SA, including consideration of reasonable alternatives, the SA Framework and methods
  - Section 3 summarises the sustainability context and baseline characteristics with details available in the SA Scoping Report (March 2023)
  - Section 4 summarises the findings of the SA of the Strategic Options
  - Section 5 summarises the SA Findings for the Proposed Site Allocations
  - Section 6 presents the SA Findings for the draft Local Plan
  - Section 7 reports the SA Findings for the Implementation of the CLPR as a whole
  - Section 8 considers Monitoring and Section 9 sets out the Next Steps

<sup>11</sup> <https://www.coventry.gov.uk/onecoventryplan>

<sup>12</sup> <https://www.coventry.gov.uk/draftclimatechangestrategy>

- 1.17 Technical Appendices provide the detailed findings of the SA. Appendix I comprises the Statement of Compliance with the SEA Directive and provides signposting to where key aspects of the SA/SEA are located in the SA Report. Appendix II is the SA Scoping Report (available separately) and including the details of the baseline evidence and the development of the SA Framework for assessment. Appendix III details the SA of the Strategic Options; Appendix IV reports the consultation comments to the SA at the Regulation 18 stage; and Appendix V details the SA of the Proposed Site Allocations.

## 2.0 APPROACH & METHODS

### The SA/SEA Process & Approach Taken

- 2.1 Sustainability Appraisal incorporating Strategic Environmental Assessment is an iterative and ongoing process that aims to provide a high level of protection for the environment and to promote sustainable development for plan-making. The role of SA is to inform the Coventry Council as the planning authority; the SA findings do not form the sole basis for decision-making – this is informed also by other studies, feasibility and feedback comments from consultation. SA is a criteria-based assessment process with objectives aligned to the issues for sustainable development that are relevant to the plan and the characteristics of the plan area.
- 2.2 There is a tiering of appraisal/assessment processes that aligns with the hierarchy of plans – from international, national and through to local. This tiering is acknowledged by the NPPF (updated December 2023) in paragraph 32 that states that evidence should be proportionate. Planning guidance advises<sup>13</sup> that the SA should focus on what is needed to assess the likely significant effects of the plan. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the plan .

### Scoping & the SA Framework

- 2.3 Through the scoping process, the relevant policy context was reviewed, and baseline information was identified, collated and analysed to ensure that key issues and opportunities for the Coventry Local Plan area and relevant for a Local Plan Review were identified. The details of this analysis are presented in the SA Scoping Report (March 2023 and as Appendix II of this Initial SA Report) and a summary is provided in the following Section 3 of this SA Report.
- 2.4 The use of an SA Framework of objectives is an established method through which the sustainability and environmental effects of a plan can be described, evaluated and any options compared. SA objectives have been identified through the SA scoping process from the information collated in the policy context, baseline analysis, identification of sustainability issues and opportunities, and consultation with the statutory bodies. Each SA objective was further clarified through a number of decision-aiding criteria/questions to aid the appraisal process.
- 2.5 The SA Framework is, as follows:

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<sup>13</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>



**Table 2.1 SA Framework**

SA Objective	Decision-aiding criteria (will the option/proposal...)
<b>SA No 1: To enable vibrant and inclusive communities</b>	Reduce the potential for social isolation by encouraging safe social connectivity Have particular regard for potentially disadvantaged groups (cultural, ethnic, poor, ageing, physical & mentally disabled, single parents, carers, travellers, migrants/refugees) Encourage/support community participation in activities & democratic decision-making
<b>SA No 2: To provide accessible essential services and facilities for all residents</b>	Maintain & improve social & community facilities – meet needs of facilities that support new housing Support the provision of and access to education & training opportunities Encourage facilities that are adaptable to future changes in technology Encourage & support people to live healthy, active lives Ensure facilities are accessible to all, including those with physical or mental disabilities Enable & encourage accessibility to green infrastructure network
<b>SA No 3: To improve health and promote active living</b>	Reduce health inequalities Reduce deprivation with particular regard to deprivation pockets in Coventry Promote active living by facilitating active travel & encouraging healthy lifestyles  Improve physical health & mental wellbeing for the ageing with better resilience (both physical & cognitive reserve) Create safe neighbourhoods & help reduce crime, including violence especially against women & girls
<b>SA No 4: To provide decent and affordable housing for all</b>	Provide suitable mix & tenure of housing, with particular regard to affordable homes and for younger people including Coliving & HMOs Provide suitable housing for the ageing, including for adaptability & resilience (physical & cognitive) Ensure that the best use is made of existing housing stock Meet the needs of potentially disadvantaged groups, including Travellers, single parents, carers
<b>SA No 5: To support sustainable inclusive economic growth</b>	Promote jobs & skills development Provide access to a range of employment opportunities Renew vitality and viability of local centres Support the retail & leisure sectors to recover/renew after Covid 19
<b>SA No 6: To help achieve the Council's ambition to reach net zero carbon emissions</b>	Promote energy hierarchy – fabric first, reducing energy use, then mitigating residual emissions Incorporated consideration of embodied carbon Support retrofitting of existing development Promote/deliver renewable or low carbon energy generation Proximity of development to sustainable transport see also SA No 8

<p><b>SA No 7:</b> <b>To build resilience to climate change</b></p>	<p>Take the long term risk of flooding into account Reduce risks from overheating &amp; extreme weather events Provide adaptive techniques in building design such as passive heating/cooling Incorporation of GI measures such as green space &amp; tree planting to support urban cooling see also SA Nos 11 &amp; 13</p>
<p><b>SA No 8:</b> <b>To reduce traffic &amp; improve sustainable transport choices</b></p>	<p>Reduce the need to travel by private vehicle Discourage car travel Support &amp; improve a strong, inclusive sustainable transport network, including cycling &amp; walking opportunities &amp; buses/taxis with increased uptake for low/zero emission vehicles</p>
<p><b>SA No 9:</b> <b>To reduce air, noise &amp; light pollution</b></p>	<p>Help to improve air quality – outdoors and indoors Help to reduce noise pollution &amp; avoid noise disturbance Help to reduce light pollution &amp; avoid light disturbance</p>
<p><b>SA No 10:</b> <b>To protect &amp; conserve natural resources - soil, water, minerals &amp; waste</b></p>	<p>Make use of previously developed, degraded or under-used land Minimise the loss of best &amp; most versatile (BMV) agricultural land Encourage local food through allotments &amp; urban farming Promote efficient use of water resources Avoid loss or sterilisation of mineral resources Maximise the reuse, recycling &amp; composting of waste</p>
<p><b>SA No 11:</b> <b>To protect and enhance nature &amp; biodiversity</b></p>	<p>Protect, maintain or enhance features of biological importance Contribute to the positive management of local biodiversity &amp; geodiversity sites Contribute to the wider GI networks – green and blue Contribute to opportunities for wildlife to adapt to a changing climate Deliver measurable biodiversity net gain Address any issues from Transport &amp; Air Quality for nitrogen deposition &amp; designated sites &amp; sites of local importance (see also SA No 8)</p>
<p><b>SA No 12:</b> <b>To protect and enhance the historic environment, and its setting</b></p>	<p>Conserve and/or enhance heritage assets &amp; their setting Respect &amp; strengthen local character, distinctiveness &amp; sense of place Sustain &amp; enhance the significance of heritage assets by encouraging new viable uses Support public accessibility and/or encourage cultural/tourist use consistent with conservation Identify opportunities to focus on heritage assets at risk</p>
<p><b>SA No 13:</b> <b>To protect and enhance the quality and character of townscapes and landscapes</b></p>	<p>Protect &amp; enhance local character, distinctiveness &amp; sense of place Protect &amp; enhance visual amenity Restore degraded townscapes &amp; landscapes Affect the purposes of the Green Belt</p>

2.7 The SA objectives are aligned with suggested indicators to help guide assessment and potentially for future monitoring purposes, as follows:

**Table 2.2 SA Objectives & Suggested Indicators**

SA Objective	Suggested Indicators
<b>SA No 1: To enable vibrant and inclusive communities</b>	Indices of Multiple Deprivation (IMD) Provision for potentially disadvantaged people Community participation
<b>SA No 2: To provide accessible essential services &amp; facilities for all residents</b>	Proximity to, and capacity of, GPs, dentists, healthcare services Proximity to, and capacity of, nurseries, primary & secondary schools Proximity to range of retail, leisure, sports & cultural facilities Proximity to, and availability of, green infrastructure
<b>SA No 3: To improve health and promote active living</b>	Health Index for England Reduction in health inequality Increase in active living Independent living & resilience for the ageing Reduction in crime
<b>SA No 4: To provide decent and affordable housing for all</b>	Provision of housing mix Provision of affordable housing Provision of HMOs, Coliving Provision of student accommodation; PBSAs Meeting Gypsies & Travellers' needs
<b>SA No 5: To support sustainable inclusive economic growth</b>	Delivery of employment space Support for centres & revitalisation/regeneration Number of vacant units Number of unemployed
<b>SA No 6: To help achieve the Council's ambition to reach net zero carbon emissions</b>	GHG emissions Embodied carbon Energy generation/use from renewable or low carbon sources Incorporation of GI
<b>SA No 7: To build resilience to climate change</b>	Location in areas of risk from flooding Provision of sustainable drainage systems Provision of, & connectivity to, GI & Blue Infrastructure Provision of adaptive techniques in building design
<b>SA No 8: To reduce traffic &amp; improve sustainable transport choices</b>	Connectivity & proximity to sustainable transport options – bus, rail, cycle, walking Uptake of parking restrictions to discourage car use
<b>SA No 9: To reduce air, noise &amp; light pollution</b>	NO <sub>2</sub> & PM monitoring data Number of complaints – noise; light
<b>SA No 10: Protect &amp; conserve natural resources - soil, water, minerals &amp; waste</b>	Area of BMV agricultural land Reuse of previously developed or brownfield land Remediation of contaminated land Quality & quantity of water resources Mineral safeguarding areas (MSAs) Waste generation – household, commercial Rates of recycling & composting Capacities of waste management facilities
<b>SA No 11:</b>	% biodiversity net gain (NE draft metric) Provision of, & connectivity to, GI/BI networks Enhancement & provision of long term management

<b>To protect and enhance nature &amp; biodiversity</b>	
<b>SA No 12: To protect and enhance the historic environment, and its setting</b>	Potential impacts on heritage assets & their setting Historic assets on HE's Heritage at Risk Register
<b>SA No 13: To protect and enhance the quality and character of townscapes and landscapes</b>	Reuse of derelict/abandoned buildings Quality of streetscapes & the public realm Sensitivity & visual amenity studies Development in the Green Belt

- 2.8 The nature of the likely sustainability effects (including positive/negative, duration (short, medium or long term), permanent/ temporary, secondary<sup>14</sup>, cumulative<sup>15</sup> and synergistic<sup>16</sup>) were described where possible and reported in the appraisal commentary, together with any assumptions or uncertainties, such as information gaps. Where necessary, the SA made suggestions and recommendations to mitigate any potential negative effects or promote opportunities for enhancement. The appraisal was undertaken using professional judgment, supported by the baseline information and the wider Local Plan evidence base.
- 2.9 A qualitative approach was established for investigating policy areas/topics, for testing reasonable alternatives, and for assessing the implementation of the plan as a whole. Significance was estimated according to the categories as set out below:

<sup>14</sup> Any aspect of a plan that may have an impact (positive or negative), but that is not a direct result of the proposed plan.

<sup>15</sup> Incremental effects resulting from a combination of two or more individual effects, or from an interaction between individual effects – which may lead to a synergistic effect (i.e. greater than the sum of individual effects), or any progressive effect likely to emerge over time.

<sup>16</sup> These arise from the interaction of a number of impacts so that their combined effects are greater than the sum of their individual impacts.

**Table 2.3: Significance Key**

Key: Categories of Significance		
Symbol	Meaning	Sustainability Effect
--	Major Negative	Problematical & improbable due to known sustainability issues; mitigation difficult and/or expensive
-	Minor Negative	Potential sustainability issues: mitigation and/or negotiation possible
+	Minor Positive	No sustainability constraints and development acceptable
++	Major Positive	Development encouraged as would resolve existing sustainability problem
?	Uncertain	Uncertain or Unknown Effects
0	Neutral Negligible	Negligible effects or not applicable
SA No 10 split cell – first symbol refers to land/soil & water resources; second symbol refers to minerals & waste		

## Options in Plan-Making & Reasonable Alternatives in SA/SEA

- 2.10 The SEA Regulations require that the SEA should consider the effects of “reasonable alternatives”. Planning Policy Guidance<sup>17</sup> advises that the SA “needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted.” “Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.”
- 2.11 At the earlier and higher levels of strategic planning, options assessment is proportionate and may have a criteria-based approach and/or expert judgment; the focus is on the key differences between possibilities for scale, distribution and quality of development. At this early stage, the options presented may constitute a range of potential measures (which could variously and/or collectively constitute a policy or aspiration) rather than a clear expression of quantity and quality. Each option is not mutually exclusive and elements of each may be further developed into a preferred option. At the later and lower levels of development planning for site allocations, options assessment tends to be more specific - often focused on criteria and defined thresholds, such as walking/cycling distances to services/facilities.
- 2.12 During the progression of technical studies and early development of issues and options for plan-making, certain strategic options were identified for initial testing through SA, as follows:

<sup>17</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

- a. Quantum of Housing
  - b. Residential Density
  - c. Climate Change & Standards for Building Regulations
  - d. Standards for Biodiversity Net Gain (BNG) & Green Infrastructure (GI)
- 2.13 The SA made suggestions for mitigating likely negative effects and for enhancing any likely positive effects to inform the plan-making. It should be noted that there can be much uncertainty of the significance of effects at the strategic level, particularly for issues associated with climate change.
- 2.14 The Council considered the comments made during the initial consultation of the Issues & Options, further evidence studies, and the findings of the SA in order to identify and refine any further strategic options that should be tested through SA. The amended and additional strategic options that were tested through SA are, as follows:
- Quantum of Housing
  - Density of Housing
  - Development in the Green Belt
  - Amount of Employment Land
  - Amount & Distribution of Office Development
  - Purpose Built Student Accommodation (PBSA)
- 2.15 These strategic options were tested through SA using the SA framework of objectives and in a comparable and consistent manner. The findings of the SA, the comments made during consultation, and the findings of further technical studies informed the Council in its selection and rejection of options. The draft Local Plan includes those strategic options that have been tested and then identified as the preferred approaches to plan-making.
- 2.16 The adopted Local Plan includes site allocations that were previously subject to the SA. The LP review process has investigated the extant allocations (some built, some being developed, some consented, some not started) to determine which are still relevant and suitable. The Council identified that 25 extant housing sites plus 7 extant employment sites remained suitable and would be retained in the CLPR. From the calls for sites, the Council assessed various development sites that were being promoted and they identified 12 new housing and mixed use sites that were considered to be suitable and deliverable. These have all been taken forward into the updated Local Plan as proposed site allocations. There were no other site options found through the assessment process to be reasonable and thus needing testing through SA. One new employment site option was subject to SA.

## 3.0 SUSTAINABILITY CONTEXT & SUMMARY BASELINE CHARACTERISATION

### Introduction

- 3.1 In order to establish a clear scope for the SA of the CLPR, it is necessary and a requirement of SEA, to review and develop an understanding of the baseline characteristics and conditions of the plan area and the wider range of plans and objectives that are relevant to the CLPR. The SA Scoping Report (March 2023) for the Local Plan Review considered the baseline conditions and policy context for the plan area that may affect or be affected by the development to be proposed in the emerging draft CLPR. Analysis of this information enabled the SA to identify the key issues and opportunities for sustainable development in the Coventry city area and create sustainability objectives to address these key issues. Full details can be found in the SA Scoping Report<sup>18</sup> (draft January 2023; final March 2023) that comprises Appendix II of this SA Report, and summary baseline characterisations are set out in the Section 3, as follows:

### Policy Context

- 3.2 A comprehensive range of relevant plans and strategies were investigated according to sustainability themes, as follows: Communities, Health & Wellbeing; Housing; Economy; Climate Change; Transport & Air Quality; Natural Resources (Soil, Water, Waste, Minerals); Nature & Biodiversity; Historic Environment; and Townscape & Landscape. Key documents investigated including the following:

#### National:

**National Planning Policy Framework** (NPPF, updated 2021, July & December 2023)

**Public Health Strategy England 2020-2025**

**Public Health England (PHE) Health Impact Assessment in Spatial Planning** (2020)

**Healthy Ageing: applying all our health** (2021)

**Health Equity in England: The Marmot Review 10 Years On** (February 2020) highlights that people can expect to spend more of their lives in poor health; the health gap between wealthy and deprived areas has grown; and place matters. Build Back Fairer: The **Covid-19 Marmot Review** (2022)

**Active Travel England** (DfT, July 2022)

**UK Net Zero Strategy: Build Back Greener** (2021) sets out approaches to keep the UK on the path to achieving net zero carbon by 2050

**Heat and Buildings Strategy** (2021)

**Severn River Basin District Flood Risk Management Plan** (2015-2021, updated 2022)

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<sup>18</sup> Available on the Council's website

**A Green Future: Our 25 Year Plan to Improve the Environment** (2018, updated 2021) includes actions to reduce pollution by tackling air pollution

**Clean Air Strategy** (2019) recognises that vehicles are not the only source of harmful emissions and aims for better cleaner technology and changes in behaviour

**Environment Act (2021)** provides the UK's new framework for environmental protection with new powers to set new binding targets, including for air quality water, biodiversity, and waste reduction/resource efficiency;

establishes **Local Nature Recovery Strategies** and a new system for **Biodiversity Net Gain** (BNG, 2023, updated 2024) from development projects **Environmental Improvement Plan** (January, 2023) for England includes a commitment that the public should be able to access green space or water, such as woodlands, wetlands, parks and rivers, within a 15-minute walk from their home.

**Natural England's Green Infrastructure (GI) Framework** (Feb 2023) provides a structure to analyse where greenspace in urban environments is needed most.

**Historic England (HE) Championing Heritage Improving Lives Future Strategy** (2021) and **Historic England Climate Change Strategy to 2040** (March 2022)

**National Design Guide** (2019, updated 2021) sets out the characteristics of well-designed places and demonstrates what good design means in practice

**Building for a Healthy Life (BHL)** updates and refines the BHL12 design code with its 12 considerations to help people improve the design of new & growing neighbourhoods

### Regional & Local:

**One Coventry Plan** (CCC, 2022-2030)

**Coventry Joint Needs Assessment** (JNSA, 2019)

**Coventry Health and Wellbeing Strategy** 2019-2023

**Health Inequalities Strategic Plan** 2022-2027 (Coventry & Warwickshire Health & Care Partnership)

**Coventry Cultural Strategy** 2017-2027

**Coventry Housing & Homelessness Strategy** 2019-2024 (2019) focuses on 4 key areas: Preventing & Supporting Homeless Households; Support for People & Communities; Improving the Use of Existing Homes; and Housing Development

**West Midlands Combined Authority Strategic Economic Plan** is focusing on digital innovation; building a net-zero economy and creating thousands of green manufacturing jobs; building better digital and transport links

**Coventry & Warwickshire Strategic Reset Framework** Local Enterprise Partnership (CWLEP) aims to reset the economy following the impacts of Covid-19

**Economic Growth & Prosperity Strategy for Coventry** 2018-2022

**West Midlands Combined Authority** has set a priority for the region to become net zero by 2041, and Coventry Council is working on a **revised Climate**

**Change Strategy** 2022-2030 setting out how Coventry will remain within its carbon budget

**Warwickshire Local Transport Plan** 2011-2026 and **Coventry Transport Strategy** (2022/23-2036/37)

**Coventry City Council Local Air Quality Plan** (LAQP, 2020-2024) is focused on transport and behaviour change around travel



**Warwickshire County Council Minerals Plan (2018)**  
**Severn Trent Water Resource Management Plan (2019) (& draft 2024)**  
**Warwickshire Wildlife Trust Strategy 2030**  
**Warwickshire, Coventry & Solihull Green Infrastructure (GI) Strategy**

## Summary Baseline Conditions

- 3.3 **Communities, Health & Wellbeing:** The total population of Coventry City Council was 345,300 (ONS 2021) an 8.9% growth from 2011 to 2021, and this is higher than the rate of 6.2% in the West Midlands. The population has growth particularly amongst younger adults, particularly aged 20-24. In 2020/21 academic years there were 67,255 students in Coventry universities. As with the population of England & Wales, census data confirm that there are more people in older age groups. The population of Coventry is predicted to increase to 422,919 by the year 2031 and to 454,534 by the year 2042.
- 3.4 The Index of Multiple Deprivation data (2019) for Coventry City indicate a range of deprivation (from least to most deprived) throughout the wards with the most deprived tending to be found in the city centre and radiating out towards the north/north-east, to the south-east and with a grouping of wards located near the boundary to the south-west. For the period 2015-2018, the Health Index for Coventry was 97.8, less than 100 average for England.
- 3.5 There is a need to plan for a growing, changing and increasingly diverse population that will need increasing participation and involvement to help maintain social cohesion and reduce risks for radicalisation and social exclusion. As communities grow and change, the provision of, and access to community and social facilities and services, needs to be maintained and improved for social and health wellbeing. As life expectancy is below average and health outcomes are worse in the more deprived areas of Coventry, a targeted approach has been identified. There is also a shift to focus on to prevention that will need a community-informed and culturally competent approach. Further work is needed at the local level through the place-based profiles to understand the city's avoidable outcomes, particularly around issues such as alcohol use and obesity/physical activity.
- 3.6 **Housing:** Housing delivery in the latest monitored period (AMR 2021/22) indicates that the cumulative delivery of 16,182 dwellings is 25% above the requirement of 12,900 at this stage of the Local Plan trajectory. This can be largely attributed to the recent growth of Purpose Built Student Accommodation (PBSA), reflecting Coventry's rising reputation as a leading university city that attracts students from around the world. The delivery of affordable housing was below the annualised need.
- 3.7 New demographic projections have been modelled (HEDNA, November 2022) and subsequently confirmed (HEDNA Addendum, 2024 to estimate the amount and type of housing that will be needed over the period to 2041 and 2050. The analysis indicates that the need for social or affordable rented properties should be focused on smaller properties. The older person population is projected to increase notably in the future and an ageing

population means that the number of people with disabilities is likely to increase substantially.. Coventry's housing stock is typically small and old; a lot of houses are not to modern efficiency standards. In 2021, 20% of Coventry households live in low-income low energy efficiency households, compared to just 13% nationally. It is necessary to consider a range of market and affordable housing to suit different needs. Co-living, especially for the younger demographic, can provide accommodation for younger professionals and help with graduate retention in the city once they qualify and seek local jobs.

- 3.8 **Economy:** The strengths of the city's economy, where Coventry has a competitive advantage, include advanced manufacturing and engineering; energy and low carbon; connected autonomous vehicles; business, professional and financial services; and digital, creative, and gaming. Before the pandemic hit, the Coventry & Warwickshire economy had grown at a rate higher than other Local Economic Partnership areas at that time in the country. Since Covid-19, the issues for the retail sector, and town centre retail in particular, are well known. Many hospitality and other businesses depend on the success of major tourist attractions. Overall delivery of employment land remained comfortably above the cumulative requirement of 70.40 ha at this stage of the Local Plan trajectory.
- 3.9 **Climate Change:** Coventry was one of the first cities to produce a Climate Change Strategy in 2012 with a target to reduce carbon dioxide emissions by 27.5% by the year 2020. Coventry achieved this in 2014 – six years early. The Strategy is currently under review and will set targets to reflect the current urgency of the climate crisis that is recognised by the City Council. The overall aim of the Strategy is to achieve a dramatic reduction in carbon emissions. 47% of all UK CO<sub>2</sub> emissions are linked to the construction and operation of buildings – both housing and commercial.
- 3.10 **Transport & Air Quality:** A Coventry City-Wide AQMA was declared for nitrogen dioxide in 2009 and emissions from road transport are the principal source of NO<sub>2</sub>. The main transport corridors to the north and north-east (linked to the M6) are most likely to exceed the NO<sub>2</sub> standard. Indoor air pollution is becoming an increasing proportion of the problem as improvements in outdoor air pollution occur.
- 3.11 **Natural Resources (Soil, Water, Minerals, Waste):** The vast majority of development completions (90%) in 2021/22 were on former brownfield or previously developed land, with just 10% built on greenfield sites. In the English part of the Severn River Basin District, the majority of water bodies have an objective of good ecological status. For many of the water bodies, there is low confidence of meeting their objective by 2027 and pollution from wastewater remains one of the main reasons. There are no active working collieries in the area. Sand and gravel are required for minerals planning. Around 92% of residual municipal solid waste from the Coventry area is incinerated within an Energy from Waste facility and this heats eight major buildings in the city centre.

- 3.12 **Nature & Biodiversity:** There are no internationally designated nature conservation sites (European Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), and Ramsar sites) located within 20 km of the Coventry city centre – with the exception of the somewhat isolated Ensor’s Pool SAC approximately 7.4 km to the north of the local plan boundary. There are 16 Local Nature Reserves (LNRs), and 21 designated areas of ancient woodland. The Warwickshire, Coventry & Solihull Local Biodiversity Plan (LBAP) comprises 52 action plans for species and habitats, ranging from wetlands and woodlands to urban and rural settlements. The Coventry area contains, and is in close proximity to, a number of both designated and non-designated natural habitats and biodiversity. The overall ecological network is also important for biodiversity helping to support the condition of designated sites and also enabling species to migrate in response to climate change.
- 3.13 **Historic Environment:** Coventry has a range of unique historic assets that give the area its distinctive characters and cultural identity. Coventry has over 400 Listed Buildings of national importance, together with over 280 buildings selected by the Council for Local Listing. The city has 18 Conservation Areas, 20 Scheduled Monuments, 4 Registered Parks and Gardens, and thousands of other archaeological sites, historic structures and features recorded on the Coventry Historic Environment Record. The Coventry Historic Landscape study (2011) identified 45 historic landscape character areas throughout the administrative area of the City Council. Coventry has benefited from two Heritage Action Zones.
- 3.14 **Townscape & Landscape:** Coventry is located within the Arden National Character Area (NCA) as profiled by Natural England. The NCA comprises farmland and former wood-pasture lying to the south and east of Birmingham; the eastern part abuts and surrounds Coventry. The Coventry Historic Landscape study (2011) identified 45 historic landscape character areas throughout the administrative area of the City Council. The Ancient Arden is an area of ancient countryside that stretches from just south of Atherstone in the North, running to the west of Coventry to Balsall Common in the south, and is especially important as an area of ancient countryside. The Coventry Green Belt remains an important mechanism to prevent urban sprawl, prevent towns merging; safeguard countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration.

## Key Issues & Opportunities for Sustainable Development

- 3.15 From the policy context and analysis of the baseline information, the following key sustainability issues and opportunities were identified for the Coventry Local Plan Review area:

**Table 3.1: Key Sustainability Issues & Opportunities**

Topic	Key Issue for Sustainable Development
<b>Communities, Health &amp; Wellbeing</b>	<ul style="list-style-type: none"> <li>▪ Increasing population, especially in older age groups</li> <li>▪ Need to plan for a growing, changing and increasingly diverse population</li> </ul>

	<ul style="list-style-type: none"> <li>■ As communities grow and change, the provision of, and access to community and social facilities and services, needs to be maintained and improved for social and health wellbeing</li> <li>■ Need to focus on prevention to improve health &amp; reduce inequalities - will need a community-informed and culturally competent approach</li> <li>■ Further work needed at the local level through the place-based profiles, particularly around issues such as alcohol use and obesity/physical activity</li> </ul>
<b>Housing</b>	<ul style="list-style-type: none"> <li>■ The need to maintain a mix of new homes continues into to the 2040s</li> <li>■ Housing for the increase in the ageing group that will require resilience and adaptability to enable independent living for a longer time, and then increased care &amp; support</li> <li>■ Self-build and custom housebuilding, as well as Coliving, are growing elements of the housing market</li> <li>■ High number of young people – need affordable homes</li> <li>■ Significant student population predicted to increase; as more PBSA schemes become built, other housing will be released into wider housing market</li> <li>■ need to improve the quality of the existing housing stock remains, especially with regard to damp and poorly insulated homes</li> <li>■ Climate change commitments will require, amongst other things, retrofitting existing homes to ensure that they are up to modern insulation standards</li> </ul>
<b>Economy</b>	<ul style="list-style-type: none"> <li>■ Dramatic changes, accelerated by Covid-19, are likely with the shift from retail to other uses and a change in character of the city and local centres</li> <li>■ Employment and education/training uses may be able to fill gaps, including with coworking spaces and/or encouraging start-ups</li> <li>■ Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people</li> </ul>
<b>Climate Change</b>	<ul style="list-style-type: none"> <li>■ Planning for climate change adaption should be a part of every new development</li> <li>■ Significant shifts in energy efficiency will be needed for new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure</li> <li>■ Retrofitting existing buildings will be a very significant challenge</li> <li>■ Consideration of embodied carbon is an ongoing challenge for the construction industry</li> <li>■ Planning for climate change mitigation means building resilience, including reducing risks from overheating,</li> </ul>

	<p>flooding and the resultant detriment to wellbeing, the economy and the environment</p> <ul style="list-style-type: none"> <li>■ Increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK</li> </ul>
<p><b>Transport &amp; Air Quality</b></p>	<ul style="list-style-type: none"> <li>■ Improve the sustainability of the transport system, improve integration with walking and cycling routes and green infrastructure networks, and promote more active travel</li> <li>■ Reducing vehicle emissions will continue to improve air quality; Indoor air pollution is becoming an increasing proportion of the problem</li> <li>■ Transport policies need to both encourage sustainable modes and also to discourage car use– for example, through restricted parking, zero emission zones, and reallocation of some road space to sustainable movement options</li> <li>■ Improvements in renewable transport provision and restrictions on car use in the city centre will help the city achieve zero carbon objectives</li> <li>■ Improvements to walking and cycling infrastructure need to be inclusive, for all residents and visitors, and to link within a wider network that aims to connect with the Family Hub priority areas identified for poor health</li> <li>■ Improving sustainable transport networks and associated green infrastructure (GI) will also benefit nature and wellbeing for people</li> <li>■ Encouraging active travel will help at the local level towards improving some of the city's health issues such as those associated with obesity and physical activity</li> </ul>
<p><b>Natural Resources</b></p>	<ul style="list-style-type: none"> <li>■ Continue to build on previously developed land where effectively located; minimise the use of water and minerals as natural resources; and the need to reduce waste and reuse/recycle</li> <li>■ The effective use of land could consider whether an uplift in minimum housing density requirements might be possible where sufficient infrastructure is in place</li> <li>■ This would require careful consideration of reduced car ownership/parking but would further promote the Council's objectives towards zero carbon</li> <li>■ The best agricultural land must be conserved and effects of climate change may affect food security</li> </ul>
<p><b>Nature &amp; Biodiversity</b></p>	<ul style="list-style-type: none"> <li>■ Need to consider the new requirements from the Environment Act including emerging metrics for calculating biodiversity net gain</li> <li>■ Unequal distribution, and access to, green infrastructure across the city can exacerbate health inequalities</li> <li>■ There are priority areas that would benefit particularly from greening</li> <li>■ Off-site areas for biodiversity net gain may be needed</li> <li>■ Climate change is likely to affect changes to habitats and species distribution</li> </ul>

	<ul style="list-style-type: none"> <li>▪ There may be opportunities to enhance blue infrastructure and update requirements taking into account recent legislation on nature and biodiversity</li> </ul>
<b>Historic Environment</b>	<ul style="list-style-type: none"> <li>▪ Development pressures may continue to have potential negative effects on historic assets and their setting, especially through cumulative effects</li> <li>▪ It is important to understand heritage value and local design guidance can be informed by local communities</li> <li>▪ Mitigation of, and adaptation to, the effects of climate change are a particular challenge for heritage assets and their setting</li> </ul>
<b>Townscape &amp; Landscape</b>	<ul style="list-style-type: none"> <li>▪ Townscape is closely interwoven with the historic environment</li> <li>▪ It is important to promote good sustainable urban design and this should reflect the special characteristics and needs of different parts of the city and countryside</li> <li>▪ Green, blue and open spaces should be woven into the urban design</li> <li>▪ Green Belt remains an important mechanism to prevent towns merging and safeguard countryside from encroachment</li> </ul>

## Likely Evolution of Area without the Local Plan

- 3.16 There are likely to be some changes in sustainability characteristics of the Coventry area even without the review of the Local Plan to 2041. For example, the increasing use of electric cars, revised Building Regulations, and at least 10% biodiversity net gain with new standards for green infrastructure will lead to reduced greenhouse gas (GHG) emissions, improvements in air quality, more energy-efficient homes, and some recovery for the loss of nature and biodiversity.
- 3.17 However, the ongoing impacts of Brexit, Covid-19 and the continuing challenging circumstances are likely to have negative effects on socioeconomic factors. The economic outlook for Coventry<sup>19</sup> remains challenging and uncertain, exacerbated by the rapid inflation in 2022 that threatens the city's recovery, with rapidly increasing energy prices and cost-of-living impacting on the finances of households and businesses. The predicted increase in population, with changing demographics, will challenge the ability of the Council and its partners to accommodate such changes for the quality of life of its citizens.
- 3.18 Without the Local Plan, there would be no local guidance on housing such that the particular needs of tenure and mix in the right places are unlikely to be met. This could exacerbate existing problems, particularly for affordability, overcrowding and quality, with concomitant negative effects for health and wellbeing. There is a risk that communities would become unbalanced with

<sup>19</sup> <https://www.coventry.gov.uk/facts-coventry/coventry-72>

issues for the capacities of services and facilities in some areas, and perhaps challenging those areas that are already deprived. It is less likely that objectives for social inclusivity and vibrant communities would be achieved. Active living would be less encouraged. It is possible that neighbourhoods could become less safe and crime reduction would not be enabled in the absence of spatial planning.

- 3.19 Buildings contribute a significant proportion of GHG emissions and without the Plan, there would be less progression towards aims for addressing the climate change crisis. Whilst national policy would still guide mitigation measures such as flood risk management and building regulations for building resilience to climate change, without the Plan there would be no cohesion or strategic coordination such that mitigation may not be optimised and opportunities may not be realised.
- 3.20 Increasing demands from development on green spaces and nature/biodiversity and natural resources, especially air, soil and water, will continue to have negative effects on the urban environment and people's quality of life. Without the Plan, there will be less effective use of land and this will affect other factors such as biodiversity and food security. There are priority areas that would benefit particularly from greening. The sustainable management of water is increasingly an issue with demands from new development and the needs of nature/biodiversity. Without the Plan, there is likely to be less integration of the different uses and needs of the water environment when considering new development.
- 3.21 Overall, mitigation measures of new development would not be coordinated to best avoid or reduce the adverse effects from development, including cumulative effects. Opportunities from new development, such as improving accessibility to green space and enhancing townscape quality/character, would not be realised or optimised – including contributing towards reducing health inequities.

## 4.0 SA OF STRATEGIC OPTIONS FOR THE COVENTRY LOCAL PLAN REVIEW 2021-2041

### Identifying & Refining the Strategic Options: Initial SA at Regulation 18 consultation

- 4.1 During the progression of initial technical studies and early development of issues and options for plan-making, certain strategic options were identified that should be tested through the SA process, as follows:
- 4.2 **Strategic Options for Quantum of Housing Needs:** Coventry Council, together with local authority Partners across Coventry & Warwickshire published a new Housing & Economic Needs Assessment (HEDNA, November 2022) that sets out the amount and type of housing and employment growth that will need to be planned for up to the year 2041. The Housing Topic Paper<sup>20</sup> sets out the potential housing scenarios and explains how these were identified.
- Scenario 1 is the Government's Standard Method calculation. This uses the 2014 Population Projections which have been shown to be erroneous for Coventry. This method indicates a total minimum need of 63,760 new homes over the plan period.
  - Scenario 2 is the amount identified through the HEDNA. This uses the more accurate 2021 Census data rather than the erroneous 2014. It indicates a need of 39,280 new homes over the plan period.
  - Scenario 3 is the HEDNA figure but with the 35% uplift removed (Government has applied this uplift to England's largest cities). It indicates a need of 29,100 new homes over the plan period.

Table 4.1a: Options for Quantum of Housing Needs 2022-2041	
<b>1</b>	63,760 dwellings (3,188 per annum) – Government standard method <sup>21</sup> (with ONS population projections from 2014) <sup>22</sup>
<b>2</b>	39,280 dwellings (1,964 per annum) – HEDNA method <sup>23</sup> (with census population data from 2021)
<b>3</b>	29,100 dwellings (1,455 per annum) – HEDNA method as per Option 2 but minus 35% uplift for largest urban authorities <sup>24</sup>

<sup>20</sup> Coventry City Council (May 2023) Housing Topic Paper

<sup>21</sup> <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

<sup>22</sup> The ONS population data for Coventry has been found to be erroneous & overestimated. For example, please see: <https://osr.statisticsauthority.gov.uk/correspondence/sir-andrew-watson-to-ed-humpherson-and-sir-david-norgrove-population-projections-and-mid-year-population-estimates-for-coventry/> and <https://osr.statisticsauthority.gov.uk/wp-content/uploads/2021/05/Review-of-population-estimates-and-projections-produced-by-the-Office-for-National-Statistics.pdf>

<sup>23</sup> Housing & Economic Development Needs Assessment (HEDNA, November 2022)

<https://www.coventry.gov.uk/downloads/download/7374/coventry-and-warwickshire-housing-and-economic-development-needs-assessment-hedna>

<sup>24</sup> Government changes (rev December 2020) to the planning system include a 35% uplift to the housing number generated by the standard method for the 20 most populated cities & urban centres in England – and Coventry is on the list of 20 <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>



4.3 **Strategic Options for Residential Density:** It is important that the Council accommodates as much of its identified housing need as possible, including consideration of whether parts of the city can accommodate increased densification. In particular, there could be suitable possibilities for increasing densities to 200 dwellings per hectare (dph) at certain locations adjacent to, and outside of, the ring road. Therefore, the initial SA investigated through high level assessment two scenarios, as follows:

<b>Table 4.1b: Options for Residential Density</b>	
<b>1</b>	Greenfield 30 dph <sup>25</sup> ; outside ring road minimum 35 dph; inside ring road minimum 200 dph. Current CLP Policy H9
<b>2</b>	As Option 1 but with >35 dph outside ring road – in certain locations

4.4 **Strategic Options for Progressing the Coventry Climate Change Strategy<sup>26</sup>:** At the time of preparing the initial SA, responses to the consultation draft were being analysed. The Climate Change Strategy 2023-2030 A Green Future for a Changing City was published in summer 2023. The Vision aims “*To make Coventry the UK’s leading City for environmental change, improving the quality of life for all.*” The Strategy recognises that “Achieving net zero will require changes that are unprecedented in their scale and scope, including changes to the way electricity is generated, how people travel, how land is used, and how buildings are heated.

4.5 The Strategy confirms the aims for a dramatic reduction of carbon emissions and sets out five development pathways to sustainability:

- Low emissions – new economic opportunities
- Circular economy – new models of production & consumption
- Equitable and people centred – inclusive urban communities & addressing poverty
- Nature-based – enhance biodiversity & urban ecosystems
- Resilient -anticipate, prevent, absorb, and recover from shocks

4.6 For the Local Plan Review, this means particular opportunities for energy efficiencies and renewables; enhancing biodiversity; high quality design that promotes active travel; accessibility to public transport and minimising need for private vehicles; reduce flood risk and heat gain, and addressing inequalities. At the early stages of the plan review, it was considered that there were possibilities for requiring standards for buildings and homes higher than is likely to be required nationally – in order to better support the ambitions of the Coventry Climate Change Strategy. Therefore, the initial SA investigated through high level assessment two scenarios, as follows:

<sup>25</sup> Dwellings per hectare

<sup>26</sup> Coventry Climate Change Strategy 2022-2030 <https://www.coventry.gov.uk/draftclimatechangestrategy>

<b>Table 4.1c: Options for progressing Coventry's Climate Change<sup>27</sup> that aims for "The dramatic reduction of carbon emissions to achieve carbon neutrality with a 100% reduction to 1990 levels by 2050 at the very latest"</b>	
<b>1</b>	Planning policy requirements in line with national Future Homes Standard <sup>28</sup> & Future Buildings Standard <sup>29</sup> covering energy efficiency, ventilation and overheating through Building Regulations
<b>2</b>	Planning policy requirements that are over and above proposed Building Regulations to better progress Coventry's aspirational ambitions for addressing climate change effects

4.7 **Strategic Options for Nature & Biodiversity:** There have been significant recent changes in requirements nationally that aim to ameliorate the critical losses of nature and biodiversity. It is considered that the Local Plan Review has strong opportunities to strengthen the importance of nature and biodiversity in the general wellbeing of a city to improve health and support climate change resilience. The details were set out in the Green Infrastructure & Biodiversity Topic Paper<sup>30</sup>, and the initial SA investigated through high level assessment two scenarios, as follows:

<b>Table 4.1d: Options for Nature &amp; Biodiversity</b>	
<b>1</b>	Planning policy requirements in line with national requirements & standards, including 10% Biodiversity Net Gain (BNG) <sup>31</sup> , and Green Infrastructure (GI) standards <sup>32</sup>
<b>2</b>	Planning policy requirements that are over and above national requirements for BNG & GI standards

4.8 **Overall Approach:** The plan-making and SA teams worked in an iterative way to identify the meaningful strategic options for investigation. These initial strategic options were tested with high level appraisal through SA using the SA framework of objectives, the baseline information, and professional judgment. The high level assessment aimed to investigate the strategic options in a comparable and consistent manner. However, it should be noted that there is much uncertainty of significance of effects at the strategic level, including in the medium to longer term, and particularly with topics such as climate change. The SA made suggestions for the plan-making (to mitigate potential negative effects and to enhance potential opportunities) to consider to help inform decision-making as the preparation of the plan review develops further.

<sup>27</sup> Coventry's draft Climate Change Strategy 2023-2030  
<https://www.coventry.gov.uk/downloads/download/7434/coventry-s-draft-climate-change-strategy>

<sup>28</sup> For example, please see: <https://www.futurehomes.org.uk/delivery-at-scale>  
<sup>29</sup> <https://www.gov.uk/government/consultations/the-future-buildings-standard>

<sup>30</sup> Coventry City Council (May 2023) Green Infrastructure & Biodiversity Topic Paper

<sup>31</sup> Environment Act 2021, and for example, please see <https://consult.defra.gov.uk/defra-net-gain-consultation-team/consultation-on-biodiversity-net-gain-regulations/>

<sup>32</sup> <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx>

## Consultation Representations to the Initial SA Report (May 2023) at Regulation 18

- 4.9 The Regulation 18 consultation on the CLPR Issues & Options<sup>33</sup> was undertaken from 18 July 2023 to 29 September 2023. There were limited representations at this Issues & Options stage for the SA and these are detailed in Appendix IV of this SA Report. Historic England suggested that there should be uncertainty of effects on the historic environment for Options 2 and 3 regarding quantum and for the options for densities of development. This was agreed. Natural England commented that plan-making should be informed by SA/SEA and HRA. The SA incorporates SEA and includes suggestions for plan-making. An HRA Report has been prepared and summary findings incorporated into the SA/SEA.
- 4.10 A developer commented that the Council had not fully identified the housing needs of the City by an apparent willingness to forgo meeting the City's market and affordable housing needs and exacerbate the socio-economic consequences of the housing crisis in favour of protecting sites in the Green Belt that would otherwise be entirely appropriate for sustainable residential development. It was agreed that the potential for housing development in the Green Belt should be tested through the SA process, and compared with the strategic option for some potential development in the Green Belt.

## Identifying & Refining the Strategic Options: Developing the Options for Regulation 19 Consultation

- 4.11 As technical studies evolved and taking into consideration the findings of the initial SA, the comments received during the public consultation in summer 2023, further evidence and changes in national requirements, certain strategic options were further developed iteratively and additional strategic options identified that should be tested through the SA process.
- 4.12 **Strategic Options for Quantum of Housing Needs:** The Council has carefully considered the relevant evidence, the comments from consultations, and the findings of the assessment studies for sites that had been potentially identified for development. The Housing & Economic Development Needs Assessment (HEDNA, Nov 2022)<sup>34</sup> studies informed the three options that were tested through SA and reported in the Initial SA Report (May 2023). The HEDNA Addendum (2024) has considered the implications of more recent data post the 2021 census and has concluded that the HEDNA figures remain robust. The Housing & Economic Land Availability Assessment (HELAA, 2024)<sup>35</sup> reports a site assessment and selection process that has identified the availability, suitability and achievability of potential sites for housing in the Coventry Local Plan area. It has enabled the calculations of housing and employment land

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<sup>33</sup> <https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

<sup>34</sup> Coventry City Council (Nov 2022) Housing & Economic Development Needs Assessment (HEDNA) & HEDNA Addendum (2024) <https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

<sup>35</sup> Coventry City Council (2024) Housing & Economic Land Availability Assessment (HELAA) <https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

for identifying the quanta that can be accommodated. A Density Paper (2024) has also been prepared to inform decision-making with regard to the densities of housing that would be suitable in specific areas.

- 4.13 From these studies, and taking into account the preferred approaches for other strategic options, including residential densities and development out of the Green Belt, the Council identified from supply figures that the quantum of housing development that can be accommodated on brownfield land is approximately 31,500 dwellings (around 1,575 per annum). This thus constitutes a further option that needs to be tested through the SA in a comparable manner.
- 4.14 As the SA studies were progressing, the new Labour Government published (30 July 2024) for consultation proposed reforms to the NPPF<sup>36</sup>, including a revision to the standard method for calculating housing needs. Using the new proposed method, the Council has calculated that the housing needs for the Coventry area over the plan period would be 30,540 dwellings (1,527 per annum)<sup>37</sup>. Whilst the proposal is under consultation until 24 September 2024, it was decided to test such housing need through SA.
- 4.15 Good practice SA has established through examination and legal challenge that it is important for the strategic options to be assessed in a consistent and comparable manner. Therefore, the options that had been assessed in the initial SA have been refreshed and the additional options (No 4 & No 5) tested in the same way, as in the Table 4.1e, as follows:

<b>Table 4.1e: Options for Quantum of Housing Needs 2022-2041</b>	
<b>1</b>	63,760 dwellings (3,188 per annum) – Government standard method (with ONS population projections from 2014)
<b>2</b>	39,280 dwellings (1,964 per annum) – HEDNA method (with census population data from 2021)
<b>3</b>	29,100 dwellings (1,455 per annum) – HEDNA method as per Option 2 but minus 35% uplift for largest urban authorities
<b>4</b>	Approx. 31,500 dwellings (1,575 per annum) – HEDNA method as per Option 2 with housing numbers that can be accommodated based on supply figures
<b>5</b>	30,500 dwellings (1, 527 per annum) – calculated through proposed new standard method for assessing housing needs (July 2024)

- 4.16 **Strategic Options for Residential Density:** In their review of the Local Plan, the Council has subsumed the previous separate City Centre Area Action Plan (AAP) into the new plan. This includes the definition of the City Centre boundary as being the area previously defined within the AAP. This has enabled development of a further option (No 3) that identifies densification possibilities a city centre transition zone. Therefore, the SA of options 1 and 2

<sup>36</sup> <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system>

<sup>37</sup> Icen for Coventry City Council (July 2024) <https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

has been refreshed and a further option 3 has been tested through SA in a consistent and comparable way, as in the Table 4.1f, as follows.

<b>Table 4.1f: Options for Residential Density</b>	
<b>1</b>	Greenfield 30 dph <sup>38</sup> ; outside ring road minimum 35 dph; inside ring road minimum 200 dph. Current CLP Policy H9
<b>2</b>	As Option 1 but with >35 dph outside ring road – in certain locations
<b>3</b>	Greenfield 30 dph; Brownfield 45 dph; 125 dph in defined city centre transition zone; 250 dph in city centre

- 4.17 **Strategic Options for Progressing Coventry’s Climate Change Strategy:** There were no refinements or further options identified; the SA findings from the Regulation 18 stage informed the ongoing plan-making.
- 4.18 **Strategic Options for Nature & Biodiversity:** There were no refinements or further options identified; the SA findings from the Regulation 18 stage informed the ongoing plan-making.
- 4.19 **Strategic Options for Development in the Green Belt:** There was some concern raised through the Regulation 18 consultation that the implications of including development sites in the Green Belt had not been investigated through the SA. Nationally, there has been renewed discussion recently around development in the Green Belt and the new Labour Government has confirmed its intention to introduce a new definition of grey belt land and development in the Green Belt with proposals in the revision of the NPPF.
- 4.20 Therefore, it was clear that the strategic options for the Council's approach should be tested through SA. The technical update<sup>39</sup> to the Green Belt Review identified that all the green belt land within the Council's area is of good quality that serves the five purposes of Green Belt. However, consideration of grey belt in the NPPF is only at the consultation stage and the CLPR is being submitted under the current NPPF which does not specify requirements concerning grey belt. Therefore, there are only two options that are necessary to be tested through SA, as in Table 4.1g, as follows:

<b>Table 4.1g: Options for Development in the Green Belt</b>	
<b>1</b>	Potential for development within the Green Belt
<b>2</b>	No potential development within the Green Belt

- 4.21 **Strategic Options for Employment Land:** The HEDNA (2024) studies identified the likely employment land needs and the HELAA (2024) reports the availability, suitability and achievability of potential sites for employment in the Coventry Local Plan area. The HEDNA concluded that 147.6 general industrial land was needed for the Coventry LP area to 2041. However, capacity studies (HELAA 2024) and the employment land review (ELR 2024) indicate that this quantum of land may not be possible within the constrained nature of the Coventry area.

<sup>38</sup> Dwellings per hectare

<sup>39</sup> Coventry City Council (August 2024) Green Belt Review Technical Update

- 4.22 It has been calculated that 60 hectares for general industrial development could be accommodated within the CLP area. It was further identified that an additional site (Site North of A45 & West of Brick Hill Lane - 11.81 hectares developable area) was being promoted. However, this is located in the Green Belt, and thus needs to be tested through SA. Therefore, three reasonable approaches to allocating such land and requiring testing through SA were determined, as follows:

<b>Table 4.1h: Options for General Industrial Employment Land</b>	
<b>1</b>	156.1 hectares – HEDNA (2022) – 8.5 ha office; 147.6 ha general industrial (excluding strategic B8)
<b>2</b>	As per HEDNA 147.6 ha general industrial but with office land reduced by 30% to 5.95 ha (hybrid working reduces floorspace needs)
<b>3</b>	60 ha plus an additional 11.81 ha located in the Green Belt (Site North of A45 & West of Brick Hill Lane)

- 4.23 For Coventry, the office land needs have been calculated to be 8.5 ha to 2041 (HEDNA 2022). The Employment Land Review (ELR, May 2024) further studied existing employment land and needs. A recent Office Market Study (June 2024)<sup>40</sup> focuses on the changes and trends in the office market since the HEDNA and ELR and to identify if the conclusions and recommendations are still valid. The Study raises issues for suitability and deliverability of existing allocations, potential over-supply, growing demands for flexible leases and workspaces, together with on-site parking, and continuing flexible and hybrid working patterns.

- 4.24 The ELR Office Market Study confirmed that the 2022 HEDNA included an oversupply for office space. It also confirmed that the density of space allowed for each full-time employee could be reduced to better reflect changes in working patterns and thus better allow future flexibility and hybrid working. Therefore, three reasonable alternatives were identified for testing through SA, as follows:

<b>Table 4.1i: Options for Quantum of Office Development</b>	
<b>1</b>	8.5 hectares offices (HEDNA), assume 85,000 sq m
<b>2</b>	5.8 hectares offices (HEDNA less 2.7 hectares oversupply as per the ELR office market addendum) assume 58,000 sq m
<b>3</b>	4.12 hectares offices (reduced land take for offices as per the ELR office market addendum based on allowance of 10sqm per full time employee instead of 14sqm assumed previously, to allow for increased flexible and hybrid working patterns. This broadly equates to the more high level 30% reduction assumed by the HEDNA) assume 41,200 sq m

- 4.25 The adopted CLP (2017) took a city centre approach to allocating land for office development. However, since the Covid-19 epidemic working patterns have changed and the findings of the ELR and Office Market Study confirm the need for more flexibility and adaptability. Taking into account the over-

<sup>40</sup> DLP Planning Ltd for Coventry City council (June 2024) Coventry Office Market Study: An Addendum to the Coventry Employment Land Review

supply and changing needs, the three strategic approaches to distributing land for office development were identified, as follows:

<b>Table 4.1j: Options for Distribution of Office Development</b>	
<b>1</b>	City Centre focus including Friargate
<b>2</b>	A more dispersed approach
<b>3</b>	City Centre focus to include 39,549 sqm floorspace at Friargate <sup>41</sup> and the rest distributed to other defined centres (overall, 41,000 sq m minimum)

- 4.26 The PBSA Market Study (2024) has identified the housing needs for students. It was recognised that a significant amount of the windfall delivery has been through the provision of Purpose Built Student Accommodation (PBSA). As such, the windfall expectation has been tempered to 200 dwellings pa to take account of the reduced expectation of further PBSA schemes to come forward. Therefore, it was determined that there were two strategic approaches to student accommodation and that these should be tested through SA, as in Table 4.1k, as follows:

<b>Table 4.1k: Options for Purpose Built Student Accommodation (PBSA)</b>	
<b>1</b>	Retain Policy H10 Student Accommodation as adopted Plan (2017)
<b>2</b>	PBSA to be located at campus/city university area unless evidence demonstrates otherwise on a case by case basis

## SA Findings for Strategic Options

- 4.27 The detailed findings of the SA of the strategic options are presented in Appendix III of this SA Report. The following sections of this Chapter 4 present the findings of these SAs summarised by sustainability topic. The reasoning for why the Council has chosen to reject certain strategic options and progress other strategic options is then outlined (and as in accordance with the requirements of the SEA Regulations).

## SA of Strategic Options: Quantum of Housing

- 4.28 The summary findings of the initial and updated high level SA of strategic options for the quantum of new housing development are presented in Table 4.2a, as follows:

<sup>41</sup> An office block was constructed in 2022 (12,449 sq m) leaving 27,100 sq m at Friargate & 1,451 sq m elsewhere

<b>Table 4.2a: Strategic Options for Quantum of Housing Development</b>	<b>1. Standard Method (2014) – 63,760 dwellings</b>	<b>2. Standard Method (2022) – 39,280 dwellings</b>	<b>3. Standard Method less 35% 29,100 dwellings</b>	<b>4. Can be Accommodated approx. 31,500 dwellings</b>	<b>5. Proposed Standard Method (2024) 30,540 dwellings</b>
<b>Sustainability Objective</b>					
1: To enable vibrant and inclusive communities	+	+	+	+	+
2: To provide accessible essential services and facilities for all residents	+	+	++	++	++
3: To improve health & promote active living	+	+	+	+	+
4: To provide decent and affordable housing for all	+	++	++	++	++
5: To support sustainable inclusive economic growth	--?	-?	+	+	+
6: To help achieve the Council's ambition to reach net zero carbon emissions	+	+	+	+	+
7: To build resilience to climate change	-?	-?	+	+	+
8: To reduce traffic & improve sustainable transport choices	--?	-?	0?	0?	0?
9: To reduce air, noise & light pollution	0?	0?	0?	0?	0?
10: To protect & conserve natural resources – soil, water, minerals & waste <sup>42</sup>	-	-?	0	0	0
11: To protect and enhance nature & biodiversity	--?	-?	+	+	+
12: To protect and enhance the historic environment, and its setting	-?	-?	0?	0?	0?
13: To protect and enhance the quality and character of townscapes & landscapes	--?	-?	+	+	+

<sup>42</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste



- 4.29 **Vibrant Communities:** There is a need to plan for a growing, changing, ageing and increasingly diverse population that will need increasing participation and involvement to help maintain social cohesion and reduce risks for radicalisation and social exclusion. The provision of new good quality homes will have positive effects for people, and higher numbers of new homes could have positive effects for more people. However, the higher quantum of new development is likely to overload the capacity of existing communities to absorb new people and some uncertainty of effects for Options 1 & 2.
- 4.30 Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies, rather than the overall quantum of housing. The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical and mental disability, single parents, carers, travellers, but not explicitly ethnic or cultural housing needs. Overall, likely minor positive effects for all five options.
- 4.31 **Services & Facilities:** The location of new development is guided by specific policies – and these consider accessibility to physical, social and green infrastructure – including appropriate mitigation measures to ensure that services and facilities are sufficient. It is considered that the lower quantum of new housing in Options 3, 4 and 5 is less likely to overload the capacity of services and facilities – and has been found to be able to be accommodated (HELAA 2024)<sup>43</sup> - with less negative effects and therefore, overall more likely positive effects.
- 4.32 **Health & Active Living:** Coventry became a Marmot City<sup>44</sup> in 2013 and is committed to reducing inequality and improving health outcomes for all. Since 2019, the key focus is on children and young people, and following the impact of Covid19 on the city, also prioritising the effect on ethnic minority group communities. Healthy ageing is a challenge throughout England. Provision of good quality housing and access to employment is well established as contributing to better health and wellbeing – physical and mental – therefore, positive effects for all five options.
- 4.33 The effectiveness of reducing health inequalities is likely to be associated with the location of new development. In consideration of the land constraints in Coventry, the higher quanta of housing are likely to be difficult to accommodate - homes may need to be small, more densely located and thus less able to meet the variety and adaptability of needs. Such quanta would also place pressures on the capacities of the open/green spaces in the city – and thus, limit the health and wellbeing associated with such spaces. Therefore, some uncertainty of the significance of the positive effects for Options 1 and 2.

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<sup>43</sup> Coventry Housing and Economic Land Availability Assessment (HELAA, 2024)

<https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

<sup>44</sup> <https://www.coventry.gov.uk/marmot-monitoring-tool/coventry-marmot-city-story-far>

- 4.34 **Housing for All:** It may be asserted that opportunities to provide decent and affordable housing for all is more likely with the higher quanta of housing in Options 1 and 2 – if such numbers of homes could be accommodated within the constraints of the city area. Homes may need to be small, more densely located and thus less able to meet the variety and adaptability of needs – therefore, some uncertainties for significance of positive effects. Options 3, 4 and 5 have been found to be able to be accommodated (HELAA 2024) and therefore, could deliver the identified need for housing and indicating major positive effects for housing objectives.
- 4.35 Whilst delivery has not been an issue for the Council, there must be some uncertainty about availability of suitable land in sustainable locations to accommodate the higher quanta of housing in Options 1 and 2, and to meet with other objectives, particularly for climate change and biodiversity. It remains important to address any imbalance in the distribution of particularly affordable/social housing, and the need to improve the quality of the existing housing stock.
- 4.36 **Economy:** Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people. The HEDNA (2022) considered population, housing growth and the economy in tandem based on the 2021 census figures; the Addendum Report (2024) investigated post 2021 census data and confirmed the robustness of identified needs calculations. Options 3, 4 and 5 have been found to be able to be accommodated (HELAA, 2024), indicating minor positive effects for employment objectives through delivery of identified housing needs to support the economy.
- 4.37 The highest quanta in Options 1 and 2 could require re-allocation of some employment land and/or result in increased commuting for work, indicating likely negative effects. It remains uncertain how the effects of Covid-19 on changing patterns of working, such as home working, co-working and hybrid working, will affect requirements for employment land during the plan period. However, recent studies (Employment Land Review & Office Market Study June 2024) confirmed that there is a requirement for flexibility and adaptability to support sustainable economic growth.
- 4.38 **Climate Change – Carbon Emissions:** The Council recognises the climate crisis with its Strategy (2022-2030)<sup>45</sup> that aims to make Coventry the UK's leading City for environmental change. This will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure. All new housing development will need to meet updated national policy requirements, indicating minor positive effects for all five options in the longer term - assuming that the zero carbon trajectory can be achieved. However, there is some uncertainty that the higher quanta of housing in Options 1 and 2 would be able to meet with the enhanced requirements to meet with net zero

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<sup>45</sup> <https://www.coventry.gov.uk/draftclimatechangestrategy>

carbon – particularly in the shorter term. Viability and costs may also be an issue in the shorter term as the construction industry develops new methods.

- 4.39 **Climate Change – Resilience:** There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK. Therefore, it is vital to build resilience, including reducing risks from overheating, flooding and the resultant detriment to wellbeing, the economy and the environment. All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change.
- 4.40 There is some uncertainty that the higher quanta of housing in Options 1 and 2 would be able to meet with the enhanced requirements to build resilience – suitable land and viability (and particularly in the shorter term until technology catches up with requirements). Overall, provision of green spaces and sustainable drainage are key elements to progress objectives for climate change. The higher quanta of housing is likely to place greater pressures on these resources with minor negative effects for Options 1 and 2, that will be cumulative in the longer term.
- 4.41 **Transport & Movement:** A key objective remains for the review of the CLP - to improve the sustainability of the transport system in Coventry, improving integration with walking and cycling routes and green infrastructure networks, and promoting more active travel. Due to the predicted increase in population, transport policies need to both encourage sustainable modes and also to discourage car use – for example, through restricted parking, zero emission zones, and reallocation of some road space to sustainable movement options. It is uncertain whether such approaches could mitigate sufficiently for the higher quantum of housing in Option 1, due to boundary constraints.
- 4.42 The quantum of housing in Option 2 indicates a reduction in potential negative effects on transport objectives but with uncertainty at this stage as significance will vary with locations. The lower quanta of housing in Options 3, 4 and 5 have been found to be able to be accommodated and are less likely to be associated with significant cumulative negative effects and therefore, negligible or neutral effects are indicated. There may be some positive effects – especially in the longer term as walking/cycling/GI networks become better linked and more extensive.
- 4.43 **Reduce Pollution:** In the UK, air pollution has been recently reported (2022) as being the largest environmental risk to public health. Reducing vehicle emissions will continue to improve air quality. Indoor air pollution is becoming an increasing proportion of the problem. Noise pollution is an acknowledged issue for human health and wellbeing – physical and mental - (see SA No 3 and also certain biodiversity see SA No 11), and particularly road traffic noise (see also SA No 8) remains a major problem. Light pollution disturbance can adversely affect health & wellbeing, including fatigue, insomnia, stress and anxiety (and also certain biodiversity – see SA No 11). Environmental management and mitigation for pollution is guided by specific policies that will be updated providing mitigation measures such that there will be no

significant negative effects and overall indicating likely neutral or negligible effects for all five options.

- 4.44 **Natural Resources:** The vast majority of development completions (90%) in 2021/22 were on former brownfield or previously developed land, with just 10% built on greenfield sites. The review of the CLP has sought to give priority for continuing to build on previously developed land (PDL) where effectively located. The HELAA (2024) has identified that Options 3, 4 and 5 could be accommodated on PDL and thus indicating neutral/negligible effects for soil resources. Climate change, particularly incidences of hotter, drier, summers may exacerbate water supply issues; wetter and more flooding may overload wastewater systems. The cumulative effects of the higher quanta of housing in Options 1 and 2 may incur minor negative effects but with some uncertainty at this stage. The recent Water Cycle Study Stage 1 (June 2024)<sup>46</sup> indicates that there is water capacity for the quanta in Options 3, 4 and 5 – with potential neutral effects.
- 4.45 It is assumed that policies on minerals and waste management will be updated to address any capacity issues such that neutral effects would be indicated. However, there may be some uncertainty associated with the higher quantum of housing in Option 1.
- 4.46 **Nature & Biodiversity:** It will be necessary to consider the new requirements from the Environment Act and including emerging metrics for calculating biodiversity net gain. Unequal distribution, and access to, green infrastructure (GI) across the city can exacerbate health inequalities. There are priority areas that would benefit particularly from greening. Off-site areas for biodiversity net gain may be needed. Increased recreational pressures and water quality impacts (such as road run-off) as a result of new development can put pressure on GI and biodiversity. Climate change is likely to affect changes to habitats and species distribution.
- 4.47 The higher quanta of housing in Options 1 and 2 will challenge mitigation possibilities for Coventry – even with new development being required to provide biodiversity net gain. Land constraints will limit availability for provision of such biodiversity mitigation measures – and therefore, negative effects are indicated. The HELAA studies (2024) have indicated that the quanta of development in Options 3, 4 and 5 could be accommodated and therefore, likely negligible effects. However, all development will have to meet with the national Biodiversity Net Gain requirements, indicating positive effects. Overall, some uncertainties of significance of effects as dependent upon locations, densities, and any possibilities for sufficient offsite measures.
- 4.48 **Historic Environment:** Coventry has a range of unique historic assets that give the area its distinctive characters and cultural identity. Development pressures may continue to have potential negative effects on historic assets and their setting, especially through cumulative effects. As the population changes, local communities may change with different understandings of heritage value and importance. Mitigation of, and adaptation to, the effects

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<sup>46</sup> JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

of climate change are a particular challenge for heritage assets and their setting.

- 4.49 CLP policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment with neutral effects for Options 3, 4, and 5 but some uncertainty as depends upon details and precise locations. However, the quantum of housing in Option 1 and 2 is likely to have cumulative effects overall that will be difficult to mitigate due to the constraints within the City – therefore, minor negative effects but with some uncertainty at this stage. The historic environment is closely interwoven with townscape and good design (SA No 13). It may also be noted that new development can resolve existing sustainability problems with the historic environment, for example, by removing extant unsightliness of the setting of an asset, improving accessibility, and enhancing the asset with its context and setting.
- 4.50 **Townscape & Landscape:** It is important to promote good sustainable urban design and this should reflect the special characteristics and needs of different parts of the city. Good design should focus on people within the spaces, how they move, interact and socialise, and should ensure feelings of safety and security. Green and open spaces should be woven into the urban design, and consideration given to opportunities to enhance the blue infrastructure assets for Coventry. The administrative boundary of Coventry is tightly defined with many parts of the existing urban area abutting the Green Belt. Climate change and population growth are exacerbating environmental issues in urban areas. It is vital that space for green and blue infrastructure is retained and enhanced, including improvements to linkages and networks that will further benefit people and nature.
- 4.51 Significant negative effects are likely for Options 1 and 2, and particularly for cumulative effects, as such high quanta of development are likely to compromise the possibilities for embedded and other mitigation measures in the design process. New development that is high quality, creative and proportional to the receiving townscape and local environment can have very positive effects, and also act as a catalyst for further enhancement of quality and human wellbeing to the built environment. Positive effects are likely for Options 3, 4 and 5 as it has been indicated by the HELAA studies (2024) that such housing numbers can be accommodated within the urban area but some uncertainty remains as depends upon details and location.

### Reasons for Selection/Rejection of Options for Quantum of Housing

4.52 **Table 4.2b: Outline Reasons for Selection/Rejection of Options for Quantum of Housing**

Strategic Option		Outline Reasons for Selection/Rejection
1	63,760 dwellings (3,188 per annum)	<ul style="list-style-type: none"> <li>▪ Homes would need to be small, more densely located &amp; thus unable to meet variety &amp; adaptability of needs</li> <li>▪ Quantum could limit land for open/green space with negative effects for health &amp; wellbeing</li> </ul>

		<ul style="list-style-type: none"> <li>Quantum would compromise ability to meet with other objectives, especially for climate change &amp; nature</li> <li>Pressure on infrastructure &amp; other services</li> </ul>
2	39,280 dwellings (1,964 per annum)	<ul style="list-style-type: none"> <li>Homes would need to be small, more densely located &amp; thus unable to meet variety &amp; adaptability of needs</li> <li>Quantum could limit land for open/green space with negative effects for health &amp; wellbeing</li> <li>Quantum would compromise ability to meet with other objectives, especially for climate change &amp; nature</li> <li>Pressure on infrastructure &amp; other services</li> </ul>
3	29,100 dwellings (1,455 per annum)	<ul style="list-style-type: none"> <li>Quantum could be accommodated &amp; aligns with the Local Need figure set out in the HEDNA (minus the 35% cities uplift), enables flexibility &amp; provides a buffer</li> </ul> <p><b>Preferred Option</b></p>
4	Approx. 31,500 dwellings (1,575 per annum)	<ul style="list-style-type: none"> <li>Quantum calculated as being able to be accommodated &amp; aligns with the identified need (Option 3) but provides no or very limiting buffer</li> </ul>
5	30,540 dwellings (1,527 per annum)	<ul style="list-style-type: none"> <li>Quantum could be accommodated but provides only a limited buffer</li> </ul>

### SA of Strategic Options: Residential Density

4.53 The summary findings of the initial and updated high level SA of strategic options for the density of residential development are presented in Table 4.3a, as follows:

<b>Table 4.3a: Options for Residential Density</b>		<b>1_Greenfield 30 dph; Outside ring road min 35 dph; Inside min 200 dph</b>	<b>2_As Option 1 but Outside ring road &gt;35 dph in certain locations</b>	<b>3_Greenfield 35 dph; Brownfield 45 dph; 125 dph in Transition zone 125 dph; City Centre 250 dph</b>
<b>Sustainability Objective</b>				
1: To enable vibrant and inclusive communities		0?	+	++

2: To provide accessible essential services and facilities for all residents	0?	0?	+
3: To improve health & promote active living	0?	+	+
4: To provide decent and affordable housing for all	+	++	++
5: To support sustainable inclusive economic growth	0	0	0
6: To help achieve the Council's ambition to reach net zero carbon emissions	0	0	0
7: To build resilience to climate change	0	0	0
8: To reduce traffic & improve sustainable transport choices	0	0	+
9: To reduced air, noise & light pollution	0	0	0
10: To protect & conserve natural resources – soil, water, minerals & waste <sup>47</sup>	-	0	++ ?
11: To protect and enhance nature & biodiversity	-?	+++	++
12: To protect and enhance the historic environment, and its setting	0	0	0
13: To protect and enhance the quality and character of townscapes & landscapes	0?	+	+

- 4.54 The current CLP approach set out in Policy H9 provides mitigation measures to avoid or minimise likely potential negative effects by defining standards for residential densities according to the characteristics and capacity of the different receiving environments within the Coventry area. The need to protect greenfield land from development pressures and recognise the more rural context is recognised with a lower density of 30 dph. The opportunities for effective use of previously developed land, particularly in a central urban context, is understood and policy allows for a minimum density of 200 dph inside the ring road, which defines a separation between inside and outside. A slightly higher density of 35 dph is permissible outside the ring road on non-greenfield land. Currently housing development does not need its own parking for that land inside the ring road.
- 4.55 The Council has investigated possibilities for increasing residential density towards the city centre in certain locations. The City Centre is to be defined as the area currently covered by the City Centre Area Action Plan. The

<sup>47</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

Density study<sup>48</sup> has identified development opportunities in the vicinity of the city centre boundary, thus defining a city centre transition zone where 125 dph is appropriate. This study has also found that there could be intensification of density within the city centre boundary to 250 dph due to its urban character and the proximity of city centre services and facilities; densification possibilities are also indicated with regard to green and brownfield land.

- 4.56 **Vibrant Communities:** It is considered that there is evidence to support higher density residential developments, taking into account housing needs type and mix with local character and appropriate building forms such that there could be positive effects to enable vibrant and inclusive communities in certain locations outside the ring road. There could be synergistic and cumulative effects with other SA objectives, such as those for active travel (SA No 3), enabling provision of identified housing need (SA No 4), and promoting higher densities will better protect and conserve natural resources (SA No 10 soils). The extant density arrangements will not be able to accommodate the increased housing requirements on brownfield land. Major positive effects are indicated by Option 3 that comprises the identified densification possibilities in defined areas of the CLPR area.
- 4.57 **Services & Facilities:** The current approach to residential densities would not be able to accommodate the identified housing needs on brownfield land. The refinement of densities to more specifically acknowledge the character and ability to accommodate different types of development as set out in Option 3 makes best use of accessibility to services and facilities with positive effects.
- 4.58 **Health & Active Living:** Overcrowding, poor housing conditions, and affordability problems have increased in recent years, as well as health inequalities. CLP Policy HW1 Health Impact Assessments (HIAs) that requires major development to ensure that it has no adverse effects on health and wellbeing, and the Health SPD<sup>49</sup>, will be updated and thus there will be no significant negative effects through the current approach to densities. Since the provision of good quality housing is known to have positive effects on health & wellbeing, then ensuring that needs can be met through appropriate increases in density in certain locations is likely to have positive effects. The density studies confirm that housing needs can be met through the approach in Option 3 with more certainty of positive effects.
- 4.59 **Housing for All:** The current approach to residential densities would not be able to accommodate all the identified housing needs but it would progress provision such that some positive effects are indicated for Option 1, with uncertainty of significance at this stage of assessment. If ensuring that needs, including suitable mix and tenure for all identified groups, can be met through appropriate increases in density in certain locations, there are likely to be major positive effects for Option 2. The density study confirms that housing

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<sup>48</sup> Coventry City Council (August 2024) Housing Density Paper

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[https://www.coventry.gov.uk/downloads/download/5408/health\\_impact\\_assessment\\_supplementary\\_planning\\_documents\\_spd](https://www.coventry.gov.uk/downloads/download/5408/health_impact_assessment_supplementary_planning_documents_spd)



needs can be met through the approach in Option 3 with more certainty of positive effects.

- 4.60 **Economy:** Options for housing densities will not directly affect objectives for economic growth and therefore, neutral effects for SA No 5.
- 4.61 **Climate Change – Carbon Emissions & Resilience:** All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve dramatic reduction of carbon emissions. Therefore, neutral effects for SA No 6 and No 7.
- 4.62 **Transport & Movement:** The Coventry urban area is well connected with sustainable transport modes. Increasing housing densities in certain locations outside the ring road and where there is good accessibility and capacity to encourage sustainable and active travel will mitigate any potential negative effects. There may be possibilities to enhance sustainable travel through new development; proactive mechanisms to discourage car travel may be needed. The intensification of densities in the city centre and the transition zone could better discourage car travel and improve sustainable transport choices with positive effects, although some uncertainty as might depend on specific developments. No parking is needed in the city centre and a reduction of 50% of normal standards would be applied in the transition zone.
- 4.63 **Reduce Pollution:** Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan and these policies will be updated and improved in the review, including taking account of advances in building design and materials resources uses such that mitigation measures could be ensured to enable promotion of appropriately increased residential densities in certain locations. Therefore, likely negligible effects for all three options.
- 4.64 **Natural Resources:** Some uncertainty of effectiveness of policy mitigation measures to protect natural resources from the scale of development; therefore potential minor negative effects for Option 1. Consideration of higher density residential developments will have positive effects for more effective use of land, particularly in the Coventry area that is so constrained, with possibilities for major significance but uncertain. These effects are more certain for Option 3 where different densities have been identified according to the characteristics of the receiving communities and environment.
- 4.65 **Nature & Biodiversity:** The scale of new development needed is likely to have strong pressures on green infrastructure (GI) and biodiversity with likely significant negative effects, even with the new requirements for biodiversity net gain. Consideration of higher density residential developments will have positive effects for more effective use of land, particularly in the Coventry area that is so constrained and with such importance for protecting spaces for GI and biodiversity. There are possibilities for major significance but uncertain at this stage of assessment. These effects are more certain for Option 3 where different densities have been identified according to the characteristics of the receiving communities and environment.

- 4.66 **Historic Environment:** The adopted Plan includes policies to protect the historic environment and these policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment – regardless of residential densities with negligible effects for all three options.
- 4.67 **Townscape & Landscape:** It is important to promote good sustainable urban design and this should reflect the special characteristics and needs of different parts of the city. The approach to residential densities already recognises the different characteristics and different possibilities for accommodating changes through increased development. High quality and proportionate new development can enhance the townscape and local character. By focusing the housing needs in certain locations with appropriate densification, pressures may be taken from other places; with high quality design, positive effects could be indicated but with uncertainty. These positive effects are more certain for Option 3 where different densities have been identified according to the characteristics of the receiving communities & environment.
- 4.68 The summary findings of the initial high level SA of strategic options for residential density presented in Table 4.3a, as follows:

### Reasons for Selection/Rejection of Options for Residential Density

4.69 **Table 4.3b: Outline Reasons for Selection/Rejection of Options for Residential Density**

Strategic Option		Outline Reasons for Selection/Rejection
1	Greenfield 30 dph; outside ring road minimum 35 dph; inside ring road minimum 200 dph. Current adopted CLP Policy H9	<ul style="list-style-type: none"> <li>Identified quantum need could not be accommodated</li> </ul>
2	As Option 1 but with >35 dph outside ring road – in certain locations	<ul style="list-style-type: none"> <li>Identified quantum need could not be accommodated</li> </ul>
3	Greenfield 35 dph; Brownfield 45 dph; 125 dph in defined transition zone; 250 dph within City Centre boundary	<ul style="list-style-type: none"> <li>Identified quantum need could be accommodated</li> </ul> <p><b>Preferred Option</b></p>

### SA of Strategic Options: Climate Change – Building Regulations Standards

- 4.70 The summary findings of the initial high level SA of strategic options for building regulations standards are presented in Table 4.4a, as follows:

<b>Table 4.4a: Options for Coventry's Climate Change Strategy – Building Regulations Standards</b>	<b>1_In line with FHS &amp; FBS</b>		<b>2_Over &amp; above Building Regulations</b>	
<b>Sustainability Objective</b>				
1: To enable vibrant and inclusive communities	0		0	
2: To provide accessible essential services and facilities for all residents	0		0	
3: To improve health & promote active living	0?		++?	
SA No 4: To provide decent and affordable housing for all	0?		?	
5: To support sustainable inclusive economic growth	0?		+?	
6: To help achieve the Council's ambition to reach net zero carbon emissions	0?		++?	
7: To build resilience to climate change	0?		+?	
8: To reduce traffic & improve sustainable transport choices	0		0	
9: To reduce air, noise & light pollution	0		0	
10: To protect & conserve natural resources – soil, water, minerals & waste <sup>50</sup>	-	0	0?	+?
11: To protect and enhance nature & biodiversity	+?		++?	
12: To protect and enhance the historic environment, and its setting	0		+?	
13: To protect and enhance the quality and character of townscapes & landscapes	0		0?	

4.71 **Vibrant Communities; Services & Facilities:** Other factors are more likely to have potential effects on objectives for inclusive communities and services/facilities than requirements in line or above Building Regulations. Therefore, likely negligible or neutral effects for SA numbers 1 and 2.

<sup>50</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

- 4.72 **Health & Active Living:** An approach that progresses aspirations for adapting to climate change more promptly by requiring standards above national Building Regulations is likely to have positive effects for health and wellbeing by better reducing the risks to health. Climate change affects the social and environmental determinants of health - clean air, safe drinking water, sufficient food and secure shelter. Any consequence of climate change that can bring physical ill health can also have mental health implications and climate change can negatively impact on mental health, including depression and anxiety.
- 4.73 Aligning with Government requirements may be considered to have negligible but uncertain effects for health and wellbeing. However, by requiring standards over and above Building Regulations, aspirations for reducing carbon emissions will be achieved sooner and will better support the aspirations for Coventry City with regard to building resilience to climate change effects, including those for health. By making a clear proactive commitment, such action could influence both physical and mental health with potential major positive effects. As climate change effects are global, considerable uncertainties indicated.
- 4.74 **Housing:** There is a perceived concern from the construction industry in being able to meet national net zero carbon targets because of various issues – and most notably with the embedded carbon in materials. Therefore, there is a risk that requiring higher standards than national Building Regulations will pose greater challenges for new development design and building – and particularly construction – such that costs and viability for house building may be compromised with potential negative effects, especially in the shorter term. However, the development sector has embraced sustainability with the need to achieve net zero carbon and implementation of the circular economy with design for durability, reuse, remanufacturing, and recycling. With commitment and creativity in design, higher standards may be more readily achievable; however, the effects on the delivery of the required housing is uncertain and unknown at this stage.
- 4.75 **Economy:** It is unclear whether any requirement for higher standards through Building Regulations would have any significant effects on economic growth. It could be asserted that higher standards might equate to higher costs & thus limit growth. However, Government has advised that the transition to net zero carbon is the growth opportunity of the 21<sup>st</sup> century. Coventry has strong commitments for innovation, research and development in new technology such that higher standards could be a catalyst to promote progress in the green economy and support the city's aspirations. Some research has indicated that it is cheaper to reduce greenhouse gas emissions than it is to deal with climate change impacts - and thus, this would support progressing higher standards sooner with some positive effects indicated for the economy.
- 4.76 **Climate Change – Carbon Emissions & Resilience:** Implementation of planning policy requiring higher standards to reduce GHG emissions and contribute to building resilience sooner than national requirements will have positive effects towards helping the Council achieve its ambitions but with uncertainties.

- 4.77 **Transport & Movement; Reduce Pollution:** Changes to Building Regulations will not affect these SA objectives numbers 8 and 9 - therefore, neutral effects.
- 4.78 **Natural Resources:** Soil has been recognised as an essential national asset. Climate change, particularly incidences of hotter, drier, summers may exacerbate water supply issues; wetter weather and more flooding may overload wastewater systems. The cumulative effects of increased development on soil and water resources is uncertain, particularly in the shorter-medium term before the effects of net zero carbon actions are implemented and become effective. Therefore, uncertain negative effects for Option 1.
- 4.79 Planning policy requirements in Option 2 that are over and above national building regulations requirements are likely to reduce carbon emissions earlier, thus mitigating negative effects on soils and water sooner, and thus indicating at least neutral effects – but uncertainty of significance at this stage of assessment. It is assumed that policies for minerals and waste management will be updated to address any capacity issues such that at least neutral effects would be indicated for both options.
- 4.80 **Nature & Biodiversity:** Climate change can contribute to biodiversity loss and biodiversity loss can make climate change and its effects worse. Government has recently reiterated that we cannot mitigate and adapt to climate change without Nature-Based Solutions. It could be considered that meeting the proposed national standards for building regulations and reducing GHG emissions could approach negligible effects – but uncertainty as depends upon quantum of new development. Progressing more rigorous standards would reduce GHG emissions and sooner such that mitigation measures are earlier and more effective. Therefore, there could be some positive effects for nature and biodiversity. However, this is uncertain as it depends upon the quantum of new development and the extent of associated biodiversity gain. It is noted that all development will have to meet with national requirements for 10% BNG indicating some positive effects from all development, assuming it can be delivered.
- 4.81 **Historic Environment:** Relevant policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. It could be assumed that progressing more rigorous standards would reduce GHG emissions and sooner such that mitigation measures are earlier and more effective so that there could be less risk of negative effects on the historic environment. However, some uncertainty as it depends upon the extent of development and precise location.
- 4.82 **Townscape & Landscape:** Relevant policies will be updated in the CLP review, and therefore, likely negligible effects with regard to the proposed changes to Building Regulations. There may be challenges to design and construction, particularly in the shorter term, if requirements over and above such standards are proposed and thus with some uncertainty of significance.

## Reasons for Selection/Rejection of Options for Climate Change & Building Regulations Standards

4.83 **Table 4.4b: Outline Reasons for Selection/Rejection of Options for Building Regulations Standards**

Strategic Option		Outline Reasons for Selection/Rejection
1	National Future Homes & Buildings Standards	<ul style="list-style-type: none"> <li>Viability and land values can support national standards</li> <li>Can help support investment and development in the city that would otherwise be located in areas outside the city</li> <li>Option will be progressed through mandatory requirements to meet national net zero ambitions</li> </ul>
2	Over and above proposed Building Regulations	<ul style="list-style-type: none"> <li>Can help Coventry meet its local and national net zero ambitions</li> </ul> <p><b>Preferred Option</b> if no adverse effects on viability and land values that might deter developers investing/building in the city</p>

## SA of Strategic Options: Nature & Biodiversity Standards

4.84 The summary findings of the initial high level SA of strategic options for Nature & Biodiversity standards are presented in Table 4.5a, as follows:

Table 4.5a: Options for Nature & Biodiversity – Standards for Biodiversity Net Gain (BNG) & Green infrastructure (GI)	Sustainability Objective	
	1_In line with national requirements & standards	2_Over & above national standards
1: To enable vibrant and inclusive communities	0	0
2: To provide accessible essential services and facilities for all residents	+	++
3: To improve health & promote active living	+	++
4: To provide decent and affordable housing for all	+?	+?
5: To support sustainable inclusive economic growth	0?	0?

6: To help achieve the Council's ambition to reach net zero carbon emissions	+		++?	
7: To build resilience to climate change	+		++?	
8: To reduce traffic & improve sustainable transport choices	0		0	
9: To reduce air, noise & light pollution	+		++?	
10: To protect & conserve natural resources – soil, water, minerals & waste <sup>51</sup>	+	0	++?	0
11: To protect and enhance nature & biodiversity	+		++?	
12: To protect and enhance the historic environment, and its setting	0		0	
13: To protect and enhance the quality and character of townscapes & landscapes	+		++?	

- 4.85 **Vibrant Communities:** The provision and accessibility of GI can encourage safe social connectivity and help reduce social isolation. It could be considered that provision of GI in line with proposed national standards would meet with objectives and that higher standards would not necessarily significantly affect inclusivity. There are other factors, including for building design and locations, that are more likely to have effects on vibrant and inclusive neighbourhoods. Therefore, negligible effects for both options.
- 4.86 **Services & Facilities; Health & Active Living:** It is likely that implementation of the proposed national standards for GI will increase provision of, and accessibility to, green infrastructure – with positive effects, including for health and wellbeing. It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision and accessibility of GI with further positive effects – that are likely to be synergistic and cumulative, particularly in the longer term. The visible greening of the urban areas could further encourage people towards more active living with positive effects for health and wellbeing.
- 4.87 **Housing:** Provision of, and accessibility to, enhanced GI will improve the overall quality of residential development, supporting positive effects from housing provision for all. It is vital that the appropriate mix and tenure of housing, suitable for different housing needs of different people and at different times of their lives, is planned according to identified needs. Nonetheless, it is important to retain sufficient space to accommodate GI and in locations where it may better support nature and people. It is unclear at this stage what quantum of housing could be accommodated together with aspirational GI for nature, people and climate change. This is a particular

<sup>51</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

challenge for Coventry with its boundary and other constraints. It is difficult to predict the effects of increasing requirements for GI above national standards on housing as it depends upon quantum and location of development with uncertainties at this stage of assessment.

- 4.88 **Economy:** The economic valuation of urban natural capital demonstrates multiple social, environmental and economic benefits and the importance of urban green and blue spaces and blue-green infrastructure. Whilst improvements to GI will enhance the local environment for residents, workers and visitors, it is unclear how this will directly affect sustainable economic objectives and therefore, uncertainties.
- 4.89 **Climate Change – Carbon Emissions & Resilience:** The GI Standards aim to improve resilience to and mitigation of climate change, including increasing carbon capture, preventing flooding, and reducing temperatures during heatwaves - all with positive effects. It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision and accessibility of GI with further positive effects for resilience – that are likely to be synergistic and cumulative, particularly in the longer term. The more extensive greening of the urban environment would visually demonstrate a strong commitment to GI and progressing towards a dramatic reduction of carbon emissions that may further engage people in helping to achieve the Council's ambition. Uncertainties for significance at this stage of assessment.
- 4.90 **Transport & Movement:** Improving the sustainable transport network for cycling and walking can be integrated with the GI network for mutual benefits for nature and people. It is not clear how differences in GI standards will directly affect sustainable transport objectives – likely negligible effects for both options.
- 4.91 **Reduce Pollution:** Good quality GI has an important role to play in improving air quality in urban areas, including reducing particulate matter – and thus improving health/wellbeing – with positive effects. GI can reduce noise pollution – trees can act as sound barriers as they can either absorb or deflect noise (or both) and vegetation, including green roofs and wall systems act as sound insulation. It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision and accessibility of GI with further positive effects for reducing air and noise pollution – that are likely to be synergistic and cumulative, particularly in the longer term, but with some uncertainty at this stage.
- 4.92 **Natural Resources:** Provision of GI – both green and blue – will contribute to protecting & conserving the natural resources of soils and water with positive effects. It seems reasonable to assume that higher GI standards will achieve better protection of such natural resources but there is uncertainty for the significance of the further positive effects. It is not clear how differences in GI standards will directly affect sustainability objectives for waste and minerals – likely negligible effects for both options.
- 4.93 **Nature & Biodiversity:** Provision of GI – both green and blue – will contribute to protecting and enhancing nature and biodiversity with positive effects. It



seems reasonable to assume that higher GI standards will achieve better protection and enhancement of nature and biodiversity but there is uncertainty for the significance of the further positive effects.

- 4.94 **Historic Environment:** It is not clear how differences in GI standards will directly affect sustainability objectives for the historic environment, although for example, improvements in air quality through greening will reduce polluting effects on historic buildings – likely negligible effects for both options.
- 4.95 **Townscape & Landscape:** Provision of GI – both green and blue – will contribute to protecting and enhancing the quality and character of townscapes and landscapes with positive effects. It seems reasonable to assume that higher GI standards will achieve better protection and enhancement of townscapes and landscapes but there is uncertainty for the significance of the further positive effects.

### Reasons for Selection/Rejection of Options for Nature & Biodiversity Standards

- 4.96 **Table 4.5b: Outline Reasons for Selection/Rejection of Options for Nature & Biodiversity Standards**

Strategic Option		Outline Reasons for Selection/Rejection
1	National BNG & GI standards	<ul style="list-style-type: none"> <li>Coventry City Council has been applying 10% BNG for some time, the principle is already well established and is being delivered in tandem with a range of other initiatives which is felt to work well, especially as a proposed updated biodiversity SPD will help to provide flexibility of choice depending upon the local context</li> </ul> <p><b>Preferred Option</b></p>
2	Over and above national BNG & GI standards	<ul style="list-style-type: none"> <li>There is much other work ongoing across Coventry and beyond eg Local Nature Recovery Strategy and it is considered a flexible approach to this is needed to achieve the most effective impact rather than simply mandating an enhanced quantified approach</li> </ul>

### SA of Strategic Options: Development in the Green Belt

- 4.97 The summary findings of the high level SA of strategic options for development in the Green Belt are presented in Table 4.6a, as follows:

<b>Table 4.6a: Options for Development in the Green Belt</b>  <b>Sustainability Objective</b>	<b>1_ Development within the Green Belt</b>	<b>2_ No development in the Green Belt</b>
1: To enable vibrant and inclusive communities	-?	0
2: To provide accessible essential services and facilities for all residents	0	0
3: To improve health & promote active living	+?	++?
4: To provide decent and affordable housing for all	0	0
5: To support sustainable inclusive economic growth	+?	-?
6: To help achieve the Council's ambition to reach net zero carbon emissions	0	0
7: To build resilience to climate change	0	0
8: To reduce traffic & improve sustainable transport choices	0?	+?
9: To reduce air, noise & light pollution	0	0
10: To protect & conserve natural resources – soil, water, minerals & waste <sup>52</sup>	0	0
11: To protect and enhance nature & biodiversity	+?	+?
12: To protect and enhance the historic environment, and its setting	0	+?
13: To protect and enhance the quality and character of townscapes & landscapes	--	++

<sup>52</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

- 4.98 **Vibrant Communities:** Other factors are more likely to have potential effects on objectives for inclusive communities than locations in or out of the Green Belt with negligible effects for both options. However, urban sprawl and encroachment of the countryside can affect the vibrancy of communities and some uncertainty of effects for potential development in the Green Belt. There is also the risk of unintended consequences of producing isolated communities – depends on location.
- 4.99 **Services & Facilities; Health & Active Living:** Other factors are more likely to have potential effects on objectives for accessibility to essential services and facilities than locations in or out of the Green Belt (GB). Provision of good quality housing will have positive effects on health and wellbeing regardless of whether it is in or out of the Green Belt. Protecting the openness of GB land, including for nature and recreation, is likely to have major positive effects for health and wellbeing with Option 2, although some uncertainty of the precise significance at this stage of assessment. Urban sprawl and encroachment of the countryside can affect residents' wellbeing and such development can evoke strong feelings – positive effects reduced for Option 1 with potential for some uncertainty of significance as depends on locational specificity.
- 4.100 **Housing:** The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence (NPPF). Coventry has two distinctive types of Green Belt – the open countryside of Ancient Arden to the west; and GB corridors of open land tracts that extend through the built-up area of the city, to and from the countryside beyond. Of greatest significance is the wider GB that encircles the city, helping prevent urban sprawl.
- 4.101 Existing LP Policy GB1 Green Belt & Local Green Space provides detailed explanation of the difficulties facing the Council, particularly with such a tight administrative boundary. For the adopted 2017 LP, the Council considered the Joint Green Belt Review<sup>53</sup>, together with other evidence to explore Coventry's exceptional circumstances regarding development pressures and release of some suitable land from the GB. Thus, at that time, the Council investigated any opportunities for GB land that would not be urban sprawl, retaining openness by avoiding/minimising any negative effects & optimising the positive effects for development land.
- 4.102 Coventry City Council has produced a Technical Update (July 2024)<sup>54</sup> to the Green Belt Review which informed its adopted Local Plan to assess whether the context to any of the assessed parcels of land have changed since the Plan was adopted. This has confirmed that the limited remaining GB land in the Coventry area continues to serve GB purposes. LP Policies GB1 Green Belt and GB2 Safeguarded Land in the Green Belt will be updated for the CLPR. Capacity (HELAA 2024) studies have determined that approx. 31,500 new dwellings can be accommodated within the urban areas to meet identified need and without needing to consider potential residential locations in the Green Belt. Therefore, neutral effects for both options.

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<sup>53</sup> Coventry & Warwickshire Joint Green Belt Review (2015)

<sup>54</sup> Coventry City Council (July 2024) Green Belt Technical Update Study

- 4.103 **Economy:** Supporting the right balance of employment growth is fundamental for the communities of Coventry and to ensure that jobs are accessible to local people. The Council has identified a shortfall of employment sites within its own administrative area, against its identified quantum of local need. A particular site in the Green Belt (Site North of A45 & West of Brick Hill Lane) is being promoted for employment purposes. Therefore, potential minor positive effects for limited employment land in the GB but with some uncertainty at this stage as impact significance and mitigation possibilities depend upon locational and development details. Minor negative effects for the economy if the Council cannot meet its employment land identified need through avoiding suitable land in the GB – some uncertainty of significance as depends on development type and jobs details.
- 4.104 **Climate Change – Carbon Emissions & Resilience:** The Council's Climate Change Strategy will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure. Direct greenhouse gas (GHG) emissions from buildings accounted for 17% of UK GHG emissions in 2019. It has been reported that the construction industry needs to decarbonise more urgently and building design needs to progress principles in the circular economy. All development will have to reduce GHG emissions and build resilience to climate change in line with updated planning policy – regardless of whether in or out of the GB – therefore, neutral effects for both options.
- 4.105 **Transport & Movement:** Transport produced 24% of the UK's total emissions in 2020 and remains the largest emitting sector in the UK, with the majority of emissions from road vehicles. Development in the Green Belt might not reduce traffic, whilst development focused on PDL might improve sustainable transport choices and therefore, neutral effects for Option 1 and minor positive effects for Option 2 – but uncertainty at this stage, as depends upon proposals and locations.
- 4.106 **Reduce Pollution:** Development in or out of the Green Belt will not affect this SA objective and no direct effects likely – neutral/not applicable.
- 4.107 **Natural Resources:** The review of the CLP will continue to build on previously developed land (PDL) where effectively located and thus contribute towards protecting agricultural land – and Green Belt land – with positive effects for Option 2, including by encouraging “*the recycling of derelict and other urban land*” and thus, supporting one of the five purposes of GB land. The recent Water Cycle Study Stage 1 (June 2024)<sup>55</sup> indicates that there is water capacity for the preferred residential quantum and therefore, likely neutral effects with regard to GB land for both options. The current CLP Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures – they will be updated and at least neutral effects indicated for both options.

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<sup>55</sup> JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

- 4.108 **Nature & Biodiversity:** The fragmentation and erosion of habitats remains a threat, and the need to secure biodiversity gain and improve the wider ecological network remain important objectives for plan making in the Coventry area. The current adopted Plan has policies to protect nature and biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These will be updated and should provide sufficient mitigation such that effects from new development will be at least neutral with regard to GB land for both options. All development will have to meet with the national requirements for BNG indicating positive effects.
- 4.109 **Historic Environment:** The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment – with neutral effects for GB land. However, avoiding development in the Green Belt supports one of the 5 purposes – “to preserve the setting and special character of historic towns” – therefore, potential positive effects for Option 2 and the historic environment; uncertainty of significance at this stage as depends upon location.
- 4.110 **Townscape & Landscape:** Green Belt serves five purposes (NPPF)<sup>56</sup>:
- (a) to check the unrestricted sprawl of large built-up areas;
  - (b) to prevent neighbouring towns merging into one another;
  - (c) to assist in safeguarding the countryside from encroachment;
  - (d) to preserve the setting and special character of historic towns; and
  - (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 4.111 It is for LPAs to define and maintain GB land in their local areas. Coventry has two distinctive types of Green Belt – the open countryside of Ancient Arden to the west and north west; and GB corridors of open land tracts that extend through the built-up area of the city, to and from the countryside beyond. Of greatest significance is the wider GB that encircles the city, helping prevent urban sprawl and coalescence.
- 4.112 The adopted Coventry LP was informed by a sub-regional GB study (2015), and since the CLP removed 16% of GB to accommodate identified development needs at that time, there is now limited GB land in the CLP area (Technical Review of GB, 2024). Existing LP Policy GB1 Green Belt & Local Green Space provides detailed explanation of the difficulties facing the Council, particularly with such a tight administrative boundary.
- 4.113 Coventry City Council has undertaken a technical update<sup>57</sup> to the original GB Review using the same methods that had been undertaken previously. The study has concluded that any potential releases of land from the GB for built

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<sup>56</sup> The new Labour Government has set out plans for delivering homes in the Green Belt and confirmed through recent proposals for reform of the NPPF (July 2024). However, the CLPR is being submitted under the extant NPPF that does not have any requirements regarding grey belt land.

<sup>57</sup> Coventry City Council (July 2024) Green Belt Technical Update Study

development will have visual or other impact, and that the GB areas continue to serve GB purposes. The study recommends the areas to remain as GB in their entirety; also in respect of safeguarded land in the GB with a note that further technical study is required regarding the extant allocations set out in the Warwick DC LP and the proposed Warwickshire JLP. LP Policies GB1 Green Belt and GB2 Safeguarded Land in the Green Belt will be updated for the CLPR.

- 4.114 Since there is strong updated evidence that the limited GB in the Coventry area continues to serve GB purposes, it is considered that any proposals for development in the GB could have major negative effects. Protecting the limited GB in the Coventry area is likely to have major positive effects for GB purposes and the SA objectives.

### Reasons for Selection/Rejection of Options for Development in the Green Belt

4.115 **Table 4.6b: Outline Reasons for Selection/Rejection of Options for Development in the Green Belt**

Strategic Option		Outline Reasons for Selection/Rejection
1	Development in Green Belt	<ul style="list-style-type: none"> <li>▪ Adverse effects on GB purposes</li> <li>▪ Adverse effects on landscape</li> <li>▪ Risk of isolated communities</li> </ul>
2	No development in Green Belt	<ul style="list-style-type: none"> <li>▪ Identified quantum need could be accommodated without GB land</li> <li>▪ Retains openness &amp; protects townscapes/landscapes</li> </ul> <p><b>Preferred Option</b></p>

### SA of Strategic Options: Quantum of Employment Land

- 4.116 The summary findings of the initial high level SA of strategic options for development in the Green Belt are presented in Table 4.7a, as follows:

<p><b>Table 4.7a: Options for Quantum of General Industrial Employment Land</b></p> <p><b>Sustainability Objective</b></p>	<p><b>1. 147.6 hectares</b></p>	<p><b>2. 60 hectares calculated that can be accommodated</b></p>	<p><b>3. 60 ha + 11.81 ha located in Green Belt</b></p>
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1: To enable vibrant and inclusive communities	-?	+	+				
2: To provide accessible essential services and facilities for all residents	0	0	0				
3: To improve health & promote active living	-?	+	+				
4: To provide decent and affordable housing for all	-?	0	0				
5: To support sustainable inclusive economic growth	+	++	++				
6: To help achieve the Council's ambition to reach net zero carbon emissions	0	0	0				
7: To build resilience to climate change	0	0	0				
8: To reduce traffic & improve sustainable transport choices	0	0	0				
9: To reduce air, noise & light pollution	0	0	0				
10: To protect & conserve natural resources – soil, water, minerals & waste <sup>58</sup>	0?	0	+	0	+	-	0
11: To protect and enhance nature & biodiversity	+	+	+				
12: To protect and enhance the historic environment, and its setting	0?	0?	0?				
13: To protect and enhance the quality and character of townscapes & landscapes	-?	0	0	--			

4.117 **Vibrant Communities:** Provision of the identified need of 147.6 ha general industrial employment land in Option 1 as indicated by the HEDNA (2022)<sup>59</sup> would suggest that the role of employment contributing to vibrant communities would be satisfied with positive effects. However, capacity studies (HELAA 2024)<sup>60</sup> and review studies (ELR 2024)<sup>61</sup> indicate that this quantum of land may not be possible within the constrained nature of the Coventry area and therefore, negative effects but uncertainty of significance. Uncertainty of positive effects is indicated with Option 2 that is less than identified need but has been found that can be accommodated.

<sup>58</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

<sup>59</sup> Housing & Economic Development Needs Assessment (HEDNA, November 2022) Iceni Projects Ltd on behalf of Coventry & Warwickshire Local Authorities

<sup>60</sup> Coventry Housing and Economic Land Availability Assessment (HELAA, 2023)

<https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

<sup>61</sup> DLP Planning Ltd for Coventry City Council (May 2024) Coventry Employment Land Review

Option 3 includes one additional site that is in the Green Belt. If potential negative effects on GB purposes can be mitigated, then with this additional site the quantum approaches the identified need and can be accommodated with more certainty of positive effects.

- 4.118 **Services & Facilities:** Other factors are more likely to have potential effects on objectives for accessibility to essential services and facilities than the quantum of employment land – neutral effects for all three options.
- 4.119 **Health & Active Living:** The relationship between fair employment, good work and health has been recognised for many years. Whilst employment rates have increased nationally since 2010, there has been an increase in poor quality work, including part-time, insecure employment (Marmot Review 10 years on, 2020)<sup>62</sup>. Since 2010 there have been profound shifts in many aspects of the labour market and employment practices in England. Rates of unemployment have decreased but increases in employment have often been in low-paid, unskilled, self-employed, short-term or zero hours contract jobs –which have seen a steady growth. Rates of pay have not increased and, notably, more people in poverty are now in work than out of work. The rise of automation in the labour market also has implications for health inequalities. Unemployment and poor quality work are major drivers of inequalities in physical and mental health.
- 4.120 Provision of the identified need of 147.6 ha general industrial employment land in Option 1 would suggest that employment needs would be met with concomitant positive effects for health. However, capacity and review studies indicate that this quantum of land may not be possible within the constrained nature of the Coventry area and therefore, some negative effects but uncertainty of significance. Uncertainty of positive effects is indicated with Option 2 that is less than identified need but has been found that can be accommodated. Option 3 includes one additional site that is in the Green Belt. If potential negative effects on GB purposes can be mitigated, then with this additional site the quantum approaches the identified need and can be accommodated with more certainty of effects.
- 4.121 **Housing:** Provision of good quality new homes will support the ambitions for sustainable economic growth and neutral effects suggested for Options 2 & 3. Studies have indicated that Option 1 cannot be accommodated. There is a risk that continuing to progress this option could compromise the availability of certain land for residential/mixed-use development and other uses, and limit the opportunities for ensuring that general industrial land is located in the most sustainable locations.
- 4.122 **Economy:** Coventry has seen strong economic growth over the past few years and is recognised as a national centre for a number of growing business sectors. These have all resulted in the creation of high-quality jobs for in growth sectors. However, there are a number of challenges, Coventry's economic growth and prosperity lags behind the England average and the city has fewer people in work compared to both regional and national

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<sup>62</sup> The Health Foundation (Feb 2020) Health Equity in England: The Marmot Review 10 Years On  
<https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>



figures. It is notable that many of Coventry's private sectors businesses are small or micro-businesses and the Council has an important priority to support such SMEs.

- 4.123 With regard to employment land needs, the HEDNA (Nov 2022) concluded that whilst the demand for B8 land use (storage/warehousing) is strong, there is a need for separate allocations for B1c/B2 (general industrial) where land is delineated from sites going for B8 in order to support the manufacturing sector. However, capacity studies (HELAA 2024) and land review studies (ELR 2024) indicate that this quantum of land may not be possible within the constrained nature of the Coventry area and therefore, uncertainty of significance for positive effects for Option 1.
- 4.124 Some uncertainty of positive effects is indicated with Option 2 that is less than identified need but has been found that can be accommodated. Option 3 includes one additional site that is in the Green Belt. If potential negative effects on GB purposes can be mitigated, then with this additional site the quantum approaches the identified need and can be accommodated with more certainty of effects. The Council is also reassessing whether the existing employment allocations are still suitable and deliverable and align with the overall strategy.
- 4.125 **Climate Change – Carbon Emissions & Resilience:** All development will have to reduce GHG emissions and build resilience to climate change in line with updated planning policy – regardless of quantum – therefore, neutral effects for all options.
- 4.126 **Transport & Movement:** The Council will seek to select employment development land that best supports objectives for sustainable transport – and it is indicated that Options 2 and 3 could be accommodated; Option 1 cannot be accommodated. CLP Policies AC1 Accessible Transport Network and AC2-AC6 will be updated to better support sustainable movement and active travel. Therefore, neutral effects for all three options.
- 4.127 **Reduce Pollution:** No direct effects likely – neutral/not applicable – as all development will be required to meet with EM Policies.
- 4.128 **Natural Resources:** Many of the existing sites are on PDL indicating positive effects for conserving soil but Option 1 does not use land as effectively as Options 2 and 3 such that the positive/negative effects indicate overall neutral with some uncertainty of significance of effects. Option 3 has most effectively used land but includes the additional site by the A45 and this is located in Grade 3 agricultural land indicating negative effects for loss of such land and the important soil resource. Therefore, both positive and negative effects for Option 3. CLP Policies EM1-EM6 and EM8-9 will be updated and thus provide sufficient mitigation for all development.
- 4.129 **Nature & Biodiversity:** The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide further mitigation measures such

that there will be no major significant negative effects. The Council will continue to allocate employment development sites to PDL and new development can create opportunities for enhancing GI and biodiversity with potential positive effects but uncertainty as depends upon locational specificity. All development will need to meet with the national requirements for BNG, indicating positive effects. .

- 4.130 **Historic Environment:** The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide sufficient mitigation measures to avoid significant negative effects on the historic environment – but some uncertainty as depends upon locational specificity. Overall, likely neutral/negligible effects for all options.
- 4.131 **Townscape & Landscape:** The current CLP includes policies to protect townscapes/landscapes, especially Policy DE1 Ensuring High Quality Design, and these will be updated in the CLP review. This indicates that sufficient mitigation measures will be provided through plan policies and thus, likely effect at least neutral for Options 2 and 3. However, Option 3 includes the site by the A45 and located within the Green Belt. This area of the Green Belt makes a significant contribution to the GB purposes and any development on the western extremity of the built up area would be extremely sensitive – indicating major negative effects. Therefore, both positive and negative effects for Option 3. The less than efficient use of land indicated by the quantum in Option 1 suggests that opportunities for enhancing the quality of townscape/landscape would not be progressed such that potential negative effects – uncertain as depends on locational specificity.

### Reasons for Selection/Rejection of Options for Quantum of General Industrial Employment Land

4.132 **Table 4.7b: Outline Reasons for Selection/Rejection of Options for Quantum of General Industrial Employment Land**

Strategic Option		Outline Reasons for Selection/Rejection
1	147.6 ha	<ul style="list-style-type: none"> <li>Rejected as this level of growth cannot be accommodated within Coventry's constrained boundaries</li> </ul>
2	60 ha – can be accommodated	<ul style="list-style-type: none"> <li>This amount can be accommodated with discussions across the FEMA with neighbouring authorities being explored to deliver the remainder which is consistent with the approach in the adopted Local Plan</li> <li>Potential to address shortfall with partner authorities without resorting to Green Belt release</li> </ul> <p><b>Preferred Option</b></p>

3	60 ha plus an additional 11.81 ha located in the Green Belt	▪ Rejected as option includes a site in the Green Belt
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## SA of Strategic Options: Quantum of Office Development

4.133 The summary findings of the initial high level SA of strategic options for quantum of office development are presented in Table 4.8a, as follows:

<b>Table 4.8a: Options for Quantum of Office Development</b>						
<b>Sustainability Objective</b>	<b>1. 8.5 ha</b>		<b>2. 5.8 ha</b>		<b>3. 4.12 ha</b>	
1: To enable vibrant and inclusive communities	-?		0?		+	
2: To provide accessible essential services and facilities for all residents	0		0		0	
3: To improve health & promote active living	-?		0?		+	
4: To provide decent and affordable housing for all	-?		-?		+	
5: To support sustainable inclusive economic growth	+		++		++	
6: To help achieve the Council's ambition to reach net zero carbon emissions	0		0		0	
7: To build resilience to climate change	0		0		0	
8: To reduce traffic & improve sustainable transport choices	0		0		0	
9: To reduce air, noise & light pollution	0		0		0	
10: To protect & conserve natural resources – soil, water, minerals & waste <sup>63</sup>	0?	0	+	0	+	0
11: To protect and enhance nature & biodiversity	+		+		+	
12: To protect and enhance the historic environment, and its setting	0		0		0?	

<sup>63</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

13: To protect and enhance the quality and character of townscapes & landscapes	-?	0	0
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- 4.134 **Vibrant Communities:** Other factors are more likely to have potential significant effects on objectives for inclusive communities than the quantum of land for office development. However, provision of sufficient land for office development will support the economy and a diversity of jobs will overall contribute to vibrant and inclusive communities.
- 4.135 Option 1 reflects an earlier office development need. Updated evidence indicates that this quantum would be an over-supply and thus, would restrict possibilities for repurposing surplus office development land with potential negative effects for less than efficient use of land – uncertainty as depends on precise locations.
- 4.136 Option 2 reflects the office development need updated to remove the oversupply. This indicates positive effects for the contribution that office land makes to vibrant communities but also some negative effects since use of land may not have been optimised – overall neutral effects. However, Option 3 reflects the updated office land needed and takes into account increased flexibility and hybrid working patterns – thus providing more certainty of significance of positive effects overall for communities
- 4.137 **Services & Facilities:** Other factors are more likely to have potential effects on objectives for accessibility to essential services and facilities than the quantum of office land – neutral/not applicable effects for all three options.
- 4.138 **Health & Active Living:** The relationship between fair employment, good work and health has been recognised for many years. Option 3 reflects the updated office land needed and takes into account increased flexibility and hybrid working patterns with positive effects for health & wellbeing. Options 1 and 2 reflect earlier evidence indicating a higher requirement for office development land than is needed. This would restrict possibilities for repurposing surplus office development land with potential negative effects for less than efficient use of land for Option 1; the lesser quantum in Option 2 suggests less negative effects and overall neutral – uncertainty for both as depends on precise locations.
- 4.139 **Housing:** The provision of good quality new homes will support the ambitions for sustainable economic growth. There is a risk that continuing to progress Options 1 and 2 is not the most efficient use of land and could compromise the availability of certain land for residential/mixed-use development and other uses. The opportunities for ensuring that office development land is located in the most sustainable locations could also be limited as other sites away from the centres may need to be sought – therefore, some potential negative effects indicated but uncertainty at this stage as depends on locational specificity. Positive effects for Option 3 as the repurposing of some previously allocated office land can release housing in suitable and sustainable locations.

- 4.140 **Economy:** Option 1 reflects an earlier office development need. Updated evidence indicates that this quantum would be an over-supply and thus, would restrict possibilities for repurposing surplus office development land with potential negative effects for less than efficient use of land – uncertainty as depends on precise locations. Option 2 reflects the office development need updated to remove the oversupply, thus indicating potential positive effects for the contribution that office land makes to sustainable economic growth.
- 4.141 However, Option 3 reflects the updated office land needed and takes into account increased flexibility and hybrid working patterns – thus providing more certainty of significance of effects. It also enables further positive effects for other SA objectives, such as for housing, by reducing the landtake for offices and releasing some land for repurposing. The Office Market Study (June 2024) confirmed the recommendations from the ELR (May 2024) that there is a need to reconsider the suitability and deliverability of existing allocations without permission. CLP Policies will be updated to reflect the needs for more flexible office spaces, including adaptable internal arrangements and shared facilities – especially relevant to support the needs of start-up businesses and SMEs that are so important to Coventry.
- 4.142 **Climate Change – Carbon Emissions & Resilience:** The All development will have to reduce GHG emissions and build resilience to climate change in line with updated planning policy – regardless of quantum – therefore, neutral effects for all options.
- 4.143 **Transport & Movement; Reduce Pollution:** The Council will seek to select development that best support objectives for sustainable transport – therefore, neutral effects overall for all three options. All development will be required to meet with EM Policies to reduce pollution – neutral for all options.
- 4.144 **Natural Resources:** Many of the existing sites are on PDL indicating positive effects for conserving soil but Option 1 does not use land as effectively as Options 2 and 3 such that the positive/negative effects indicate overall neutral. Some uncertainty of effects for Options 1 and 2 whilst for Option 3 that has most effectively used land, positive effects are more certain.
- 4.145 **Nature & Biodiversity:** Overall, likely minor positive effects for all options as all development will need to comply with plan policies on nature and biodiversity and national requirements for BNG.
- 4.146 **Historic Environment:** Overall, likely neutral/negligible effects for all options as all development will need to comply with plan policies on the historic environment but some uncertainty at this stage as depends upon locational specificity.
- 4.147 **Townscape & Landscape:** The current CLP includes policies to protect townscapes/landscapes, especially Policy DE1 Ensuring High Quality Design, and these will be updated in the CLP review. This indicates that sufficient mitigation measures will be provided through plan policies and thus, likely effect at least neutral for Options 2 and 3. The less than efficient use of land

indicated by the quantum in Option 1 suggests that opportunities for enhancing the quality of townscape/landscape would not be progressed such that potential negative effects – uncertain as depends on locational specificity.

### Reasons for Selection/Rejection of Options for Quantum of Office Development Land

4.148 **Table 4.8b: Outline Reasons for Selection/Rejection of Options for Quantum of Office Development Land**

Strategic Option		Outline Reasons for Selection/Rejection
1	8.5 ha	<ul style="list-style-type: none"> <li>Initial quantum proposed by the HEDNA has been superseded by the ELR Office Market addendum which demonstrates an oversupply</li> </ul>
2	5.8 ha	<ul style="list-style-type: none"> <li>Reduced HEDNA figure to take account of the oversupply, but still does not reflect optimisation of land usage as new patterns of working (hybrid / flexible) now use few sqm per person (10sqm rather than previous 14sqm as shown in the ELR office market addendum</li> </ul>
3	4.12 ha	<ul style="list-style-type: none"> <li>Most effective use of land, taking into account oversupply and reduced floorspace requirements of changed patterns of working</li> </ul> <p><b>Preferred Option</b></p>

### SA of Strategic Options: Distribution of Office Development

4.149 The summary findings of the initial high level SA of strategic options for distribution of office development are presented in Table 4.9a, as follows:

Table 4.9a: Options for Distribution of Office Development	1. City Centre focus	2. More Dispersed Approach	3. City Centre focus (Friargate) & rest to local centres
<b>Sustainability Objective</b>			
1: To enable vibrant and inclusive communities	+	+	+
2: To provide accessible essential services and facilities for all residents	0	0	0

3: To improve health & promote active living	+?		+?		+	
4: To provide decent and affordable housing for all	0		0		0	
5: To support sustainable inclusive economic growth	+?		+?		++	
6: To help achieve the Council's ambition to reach net zero carbon emissions	0		0		0	
7: To build resilience to climate change	0		0		0	
8: To reduce traffic & improve sustainable transport choices	0		-?		0	
9: To reduce air, noise & light pollution	0		0		0	
10: To protect & conserve natural resources – soil, water, minerals & waste <sup>64</sup>	0	0	0	0	0	0
11: To protect and enhance nature & biodiversity	+?		+?		+?	
12: To protect and enhance the historic environment, and its setting	0?		0?		0?	
13: To protect and enhance the quality and character of townscapes & landscapes	0		0		0	

4.150 **Vibrant Communities:** Other factors are likely to have more significant effects on objectives for inclusive communities; however, distribution of sufficient land for offices to support the economy and a diversity of jobs will overall contribute to vibrant and inclusive communities. Option 1 and Option 2 have some uncertainty of positive effects whilst Option 3 that incorporates both city centre and distribution to the identified centres indicates more certainty as more likely to address future type & locational needs for office working – and throughout the CLP area.

4.151 **Services & Facilities:** Other factors are more likely to have potential effects on objectives for accessibility to essential services and facilities than the quantum of employment land – neutral effects for all three options.

4.152 **Health & Active Living:** Option 1 and Option 2 have uncertainty of positive effects whilst Option 3 that incorporates both city centre and distribution to the identified centres indicates more certainty as more likely to address future type & locational needs for office working.

<sup>64</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

- 4.153 **Housing:** The provision of good quality new homes will support the ambitions for sustainable economic growth. Neutral/not applicable effects for all three options.
- 4.154 **Economy:** Options 1 and 3 include opportunities for innovating with the multi-user development of Friargate, and better enabling the city to be cleaner and greener with GI and renewable energy since such developments are better able to incorporate enhanced levels of quality and energy efficiencies. Options 2 and 3 may better support smaller start-ups & SMEs for all through a dispersed approach but Option 2 does not necessarily align office land with strong accessibility to sustainable services/facilities and travel, such that some uncertainty of positive effects. Option 3 supports the needs for flexibility and adaptability, support for smaller start-ups and SMEs, and with both a city centre focus and dispersion to the local centres, provides office land throughout the CLP area and aligned with sustainable locations such that more positive effects are more certain.
- 4.155 **Climate Change – Carbon Emissions & Resilience:** All development will have to reduce GHG emissions and build resilience to climate change in line with updated planning policy – regardless of quantum – therefore, neutral effects for all options.
- 4.156 **Transport & Movement:** Options 1 and 3 comprise office land located in the city centre and local centres, thus confirming that workplaces will be allocated with sustainable travel; Option 2 dispersed throughout the CLP indicates the potential for some negative effects but uncertainty as depends on locational specificity.
- 4.157 **Reduce Pollution; Natural Resources; Nature & Biodiversity; Historic Environment; Townscape & Landscape:** All development will be required to meet with relevant updated Plan Policies indicating that any potential negative effects will be mitigated and overall, likely neutral effects for all three options; minor positive effects for biodiversity with some uncertainty of significance.

### Reasons for Selection/Rejection of Options for Distribution of Office Development Land

4.158 **Table 4.9b: Outline Reasons for Selection/Rejection of Options for Distribution of Office Development Land**

Strategic Option		Outline Reasons for Selection/Rejection
1	City Centre focus	<ul style="list-style-type: none"> <li>Whilst the city centre is a sustainable and key location for offices, a range of other options should also be available to suit the needs of different sectors of the economy including SMEs and start ups</li> </ul>
2	More Dispersed Approach	<ul style="list-style-type: none"> <li>Does not optimise updated opportunities for City Centre &amp; Friargate</li> <li>Potential for accessing through less sustainable travel choice</li> </ul>



3	City Centre including 27,000 sqm Friargate & rest to local centres	<ul style="list-style-type: none"> <li>▪ Most effective use of land which supports a range of needs including smaller businesses</li> </ul> <p><b>Preferred Option</b></p>
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## SA of Strategic Options: Purpose Built Student Accommodation (PBSA)

4.159 The summary findings of the initial high level SA of strategic options for distribution of office development are presented in Table 4.10a, as follows:

Table 4.10a: Options for Purpose Built Student Accommodation (PBSA)	1. Retain existing Policy H10	2. PBSA at campus, city university area
Sustainability Objective		
1: To enable vibrant and inclusive communities	-?	0
2: To provide accessible essential services and facilities for all residents	0	0
3: To improve health & promote active living	+?	+
4: To provide decent and affordable housing for all	-	+
5: To support sustainable inclusive economic growth	0?	0
6: To help achieve the Council's ambition to reach net zero carbon emissions	0	0
7: To build resilience to climate change	0	0
8: To reduce traffic & improve sustainable transport choices	0	+
9: To reduce air, noise & light pollution	0	0
10: To protect & conserve natural resources – soil, water, minerals & waste <sup>65</sup>	0   0	0   0

<sup>65</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

11: To protect and enhance nature & biodiversity	+?	+?
12: To protect and enhance the historic environment, and its setting	0?	0
13: To protect and enhance the quality and character of townscapes & landscapes	0	0

- 4.160 **Vibrant Communities; Services & Facilities:** A concentration of student accommodation in a particular neighbourhood could result in an imbalance that might adversely affect the vibrancy and inclusivity of communities, such that some negative effects indicated for Option 1 and retaining the existing policy H10. Significant concentrations in particular streets and neighbourhoods have already had negative impacts on local communities. The Council has prepared an HMO DPD<sup>66</sup> and this addresses issues such as effects on communities and the housing stock.
- 4.161 **Health & Active Living; Housing:** The HELAA (2024) recognised that a significant amount of the windfall delivery has been through the provision of PBSA. The PBSA Study (July 2024)<sup>67</sup> indicates that poorer quality student accommodation has been delivered and that this poorer quality stock is concentrated in the city centre. The overdevelopment of PBSA has implications for wider strategy in terms of development site availability, potential underoccupation of PBSA developments, and future change of use for alternative occupation. Over the longer term, this could be potentially damaging to the attractiveness of Coventry as a student destination and would stifle innovation.
- 4.162 Retaining the existing Policy H10 could result in HMOs/PBSA not being used most effectively and with negative effects for housing objectives as could take up land that is needed for other essential housing needs – Option 1. By limiting PBSA to the campus and city university area, the student population is more focused and very easily accessible to learning and other services in the city centre – positive effects for Option 2.
- 4.163 **Economy:** Likely neutral effects but some uncertainty for Option 1 as poorer quality student accommodation may adversely affect choice of university and thus, support for economic growth objectives.
- 4.164 **Climate Change – Carbon Emissions & Resilience:** All development will have to reduce GHG emissions and build resilience to climate change in line with updated planning policy – regardless of quantum – therefore, neutral effects for both options.
- 4.165 **Transport & Movement:** By focusing PBSA in the campus/city university area, sustainable transport will be more certain with positive effects for Option 2; neutral effects for Option 1.

<sup>66</sup> <https://www.coventry.gov.uk/planning-policy/homes-multiple-occupation-development-plan-document>

<sup>67</sup> Cushman & Wakefield (July 2024) for Coventry CC Purpose Built Student Accommodation Market Study

4.166 **Reduce Pollution; Natural Resources; Nature & Biodiversity; Historic Environment; Townscape & Landscape:** All development will be required to meet with relevant updated Plan Policies indicating that any potential negative effects should be mitigated and overall, likely neutral effects for both options with some uncertainty for Option 1 and the historic and townscape objectives; minor positive effects for biodiversity with some uncertainty of significance for both options.

### Reasons for Selection/Rejection of Options for PBSA

4.167 **Table 4.10b: Outline Reasons for Selection/Rejection of Options for PBSA**

Strategic Option		Outline Reasons for Selection/Rejection
1	Retain existing Policy H10	<ul style="list-style-type: none"> <li>▪ Risks continuing with poorer quality accommodation</li> <li>▪ Potential underoccupation of PBSA &amp; limits future change of use for alternative occupation</li> </ul>
2	PBSA located at campus, city university area	<ul style="list-style-type: none"> <li>▪ Student population more focused in more sustainable locations</li> <li>▪ More effective use of land for other essential housing needs</li> </ul> <p><b>Preferred Option</b></p>

### SA Findings & Plan-Making

4.168 The findings of the SA of the strategic options identified a number of suggestions and recommendations for plan-making to consider – particularly at the Regulation 18 Issues & Options stage. These were taken into account during the refinement and further development of the plan, together with emerging evidence and the comments from the Regulation 18 consultation.

## 5.0 SA FINDINGS FOR THE SITE OPTIONS & PROPOSED ALLOCATIONS

### Context & Site Options

- 5.1 It should be remembered that the Coventry Local Plan to 2041 is a review of the adopted Local Plan (2017) which includes site options and allocations that were subject to SA, consultation and examination. This review of the Plan allows the Council to review, reassess and update the situation with regard to development needs, site options and proposed allocations. The particular characteristics of the Coventry Local Plan area must also be recognised – the administrative area is heavily built-up, comprising a city centre that is rich with cultural and historical assets, surrounded by an urban area which is then defined by the encircling Green Belt land that is so important to prevent urban sprawl and coalescence. These characteristics constrain the opportunities for new development.
- 5.2 The Coventry<sup>68</sup> Housing & Economic Land Availability Assessment (HELAA, 2024) identifies land which is suitable, available and achievable for housing and economic development over the Local Plan period. It includes consideration of sites submitted to the Council through various “Calls for Sites”, the most recent ending 20 September 2024. The HELAA builds upon the recommendations in the Housing & Economic Development Needs Assessment (HEDNA, 2023). The Council considered a site to be available for development if they were in one of the categories, as follows: Under construction; with outline/detailed planning permission; with permission in principle; identified on the brownfield register; submitted through the Call for Sites. Subsequently, viability studies were undertaken in line with national guidance to confirm achievability within the plan period by using a range of typologies to reflect likely development over the plan period.
- 5.3 The HELAA and viability studies confirmed that 25 of the existing housing site allocations and 7 of the employment land site allocations had not been built out, are still suitable and achievable, and should be carried forward into the CLP to 2041. Three of the existing allocations were found to be still suitable and achievable with some changes, and this included the Friargate Mixed Use Scheme in the City Centre. There were 12 new housing sites that were found to be suitable and achievable, and therefore, were taken forward as proposed site allocations in the CLPR.
- 5.4 The 25 plus 7 extant sites and the 12 comprise all the identified suitable and achievable site options for housing/mixed use. There were no other reasonable alternative site options that were identified and could be considered any further. Thus, all the site options that were found to be reasonable (suitable & achievable) have been taken forward as proposed site allocations in the CLPR. One employment site option was subject to SA.

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<sup>68</sup> <https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

## SA of Proposed Site Allocations

**Table 5.1: Summary of SA Findings for Proposed Site Allocations**

Proposed Site Allocations	Capacity (no. of dwellings)	1. Communities	2. Services & Facilities	3. Health & Active Living	4. Housing	5. Economic Growth	6. Net Zero Carbon	7. Resilience to Climate Change	8. Sustainable Transport	9. Reduce Pollution	10. Natural Resources <sup>69</sup>	11. Nature & Biodiversity	12. Historic Environment	13. Townscapes & Landscapes	
<b>New Housing Allocations</b> (proposed minimum density 250 dph)															
Central Police Station, Little Park Street	600	+	++	+	++	0	0	0	++	0	+	0	+?	0?	0?
New Union Street	170	+	++	+	++	0	0	0	++	0	+	0	+?	0?	+
Former Vintage House, St Nicholas Street/Leicester Row	100	+	++	+	++	0	0	0	++	0	+	0	+?	0?	+
Whitefriars Street Car Park	185	+	++	+	++	0	0	0	++	0	+	0	+?	0?	+
Paybody Building, Stoney Stanton Road	280	+	++	+	++	0	0	0	++	0	+	0	+?	0?	+
Dale Buildings, Tower Street	200	+	++	+	++	0	0	0	++	0	+	0	+?	0?	+
City Centre South	1,575	+++?	++	+	++	++	0	0	++	0	+	0	+?	0?	++

<sup>69</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

<b>New Housing Allocations</b> (proposed density at 45 dph)															
New Gate Court Business Park, Paradise Street	303	+	++	+	++	0	0	0	++	0	+	0	??	0?	+
Allesley Hotel, Birmingham Road	48	+	+	+	++	0	0	0	+	0	+	0	??	0?	+
Former Chace School, Willenhall	60	+	+	+	++	0	0	0	+	0	+	0	??	0	+
Former School Site, New Century Park	93	+	+	+	++	0	0	0	+	0	+	0	??	0	+
<b>New Housing Allocations</b> (proposed density at 125 dph)															
Land at Spon End	750	+++?	+	+	++	0	0	0	+	0	+	0	??	0?	++
<b>Existing Allocations with Changes</b>															
H2:3 Walsgrave Hill Farm	900	+++?	+	+	++	0	0	0	??	0	+	0	+++?	0	+
H2:15 Sandy Lane	250	+	+	+	++	0	0	0	+	0	+	0	??	0	+
JE2:1 Friargate Mixed Use Scheme, City Centre	1,350	+++?	++	+	++	++	0	0	++	0	+	0	??	0?	++
<b>New Employment Site Option</b>															
Land North of A45 at Pickford Green	4.72 hectares	??	??	+	0	++	0	0	+	0	-	0	??	0	--

- 5.5 The summary findings from the SA of the proposed site allocations are presented in the previous Table 5.1, and the details of the assessments are provided in Appendix V of this SA Report. There were no significant negative effects identified for any of the proposed new and changed housing site allocations. Such sites have been assessed and carefully selected to avoid significant negative effects and to optimise potential positive effects. The proposed site allocations will be subject to other plan policies, including updating, such that the cumulative effects of the proposed development (as guided by allocations and policies) are assessed and reported later in this SA Report in Section 7.
- 5.6 The one new site option being promoted for employment land was tested through SA and found to have major negative effects for development in the Green Belt; also, found to have minor negative effects for loss of Grade 3 agricultural land and the soil resource. Therefore, this site option was not taken forward because of negative effects on soils, agricultural land, and major negative effects on Green Belt purposes. This is especially with regard to avoiding urban sprawl and coalescence at the western edge of the urban area that has been shown to be very sensitive.

## Vibrant & Healthy Communities

- 1: To enable vibrant and inclusive communities**
- 2: To provide accessible essential services and facilities for all residents**
- 3: To improve health & promote active living**
- 4: To provide decent and affordable housing for all**
- 5: To support sustainable inclusive economic growth**

- 5.7 The provision and delivery of the identified needs for housing through the proposed site allocations will have major positive effects for housing objectives. Policies in the adopted Local Plan (Policies H1-H11) address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix and tenure of housing, with particular regard to affordable homes, for younger people and the potential for coliving. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups - poor, ageing, physical and mental disability, single parents, carers, and travellers. The Affordable Housing SPD (March 2022)<sup>70</sup> provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built. This SPD will be updated to reflect the new Local Plan.
- 5.8 Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by the specific housing policies. The extant policies do not explicitly mention ethnic or cultural housing needs but it is unclear how the Local Plan can help

<sup>70</sup> <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

specifically in this respect. Nonetheless, the intention with the review of housing policies is to provide a range of housing types aimed at meeting a variety of needs for all sections of the community. The Density Study (August 2024)<sup>71</sup> has found possibilities for densification of residential development in and around the vicinity of the city centre boundary. Taking into account local character and appropriate building forms, a city centre transition zone with 125 dph has been identified. Within the city centre boundary, densification to 250 dph is possible due to its urban character and the proximity of a wide range of city centre services and facilities. Within the urban area and on brownfield land, an increase from 35 to 45 dph has been found to be suitable.

- 5.9 High density places have been associated with sustainable outcomes but there is a risk of less interaction and building fewer relationships in such environments. However, for example, recent research<sup>72</sup> has investigated the delivery of award winning high density (250 dph) development in London and identified design factors that influence social interactions. Therefore, it is considered that there is evidence to support higher density residential developments, such that there can be positive effects to enable vibrant and inclusive communities for all the proposed site allocations.
- 5.10 The proposed sites in the city centre locations have easy, walking access to a wide range of services, including schools, nurseries, shops, community and faith centres, shops, diverse cultural and entertainment facilities. Also, a range of health centres, dentists, fitness centres and gyms, together with access to open/green spaces – all supportive of active living, health and wellbeing with positive effects.
- 5.11 Whilst provision of new homes is not directly attributable to economic growth, good quality homes in a city centre location will support working people. The amended Friargate Mixed Use Scheme offers vital employment land in the city centre that has major positive effects for both Coventry and the wider sub-regional area.
- 5.12 The four new allocations at 45 dph close to the urban areas have been carefully selected at existing local centres with essential services and facilities and proposed housing numbers that can be accommodated – all confirming positive effects for vibrant communities. The three existing allocations (H2:3, H2:15 & JE2:1) that have been amended to reflect updating and optimising opportunities for revised proposed numbers of dwellings – all with positive effects for housing, health and communities.
- 5.13 **SA Suggestions:**
- Creative building design to support inclusivity and social interactions – especially for the larger developments City Centre South & Friargate Mixed Use Scheme

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<sup>71</sup> <https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

<sup>72</sup> Mellan H & M Short (UCL, 30 January 2023) Designing for social interaction in high density housing; a multiple case analysis of recently completed design-led developments in London  
<https://www.frontiersin.org/articles/10.3389/frsc.2022.1043701/full>



- Creative design to encourage flexible and adaptable housing to support mix and tenure with changing needs - especially for the larger developments City Centre South & Friargate Mixed Use Scheme

## Sustainable Transport & Active Living

### **8: To reduce traffic & improve sustainable transport choices**

- 5.14 The urban environment for Coventry is well connected and with a good transport system. The proposed sites in the city centre locations have easy, walking access to a wide range of services, facilities, work and entertainment – all with major positive effects for sustainable transport objectives. There is nearby open/green space with city parks, the Coventry Canal Towpath for more distance walking, and a variety of walking around the urban areas, for example, A Coventry Way: 21 Circular Walks.<sup>73</sup> The four new allocations at 45 dph close to the urban areas have been carefully selected at existing local centres with essential services and facilities and good sustainable access into the city centre and various nearby green/open spaces.
- 5.15 The major mixed use site Friargate is in the city centre with major positive effects for working and sustainable transport. The new option for a possible employment site is in a good location on the strategic highway network A45 at Pickford and close to local services at Pickford and Allesley.
- 5.16 **SA Suggestions:**
- Walsgrave Hill Farm - Incorporate a safe walking/cycling network through the new development and linking to urban area to west and country area to east to encourage more active transport and active living locally
  - City Centre South and Friargate Mixed Use Scheme – creative design that encourages safe walking/cycling, linking to wider sustainable and green networks, and discourages private car ownership; consider possibilities for supporting shared vehicle uses

## Environmental Quality

- 6: To help achieve the Council's ambition to reach net zero carbon emissions**
- 7: To build resilience to climate change**
- 9: To reduce air, noise & light pollution**
- 10: To protect & conserve natural resources – soil, water, minerals & waste**
- 11: To protect and enhance nature & biodiversity**
- 12: To protect and enhance the historic environment, and its setting**
- 13: To protect and enhance the quality and character of townscapes & landscapes**

<sup>73</sup> <https://www.coventryrocks.co.uk/things-to-do/a-coventry-way-21-circular-walks>

- 5.17 All new development will need to meet updated plan policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions, build resilience to climate change, and avoid any significant negative effects. Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects for all the sites.
- 5.18 Development on previously developed land has positive effects for all proposed sites. The new option for a possible employment site is located in agricultural land classed Grade 3 good quality – and therefore, minor negative effects for this site through loss of best & most versatile land and the important soils resource. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)<sup>74</sup> indicates that there is water capacity for the identified development need – indicating neutral effects. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development to neutral. Thus, mitigation measures are in place to protect and conserve natural resources.
- 5.19 The current adopted Plan has policies to protect nature and biodiversity, including GB1 Green Belt and Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements<sup>75</sup> for Biodiversity Net Gain (BNG) – and Coventry has established practice through such an approach with its BNG SPD (2022)<sup>76</sup>. Therefore, positive effects but uncertainty of precise significance as this depends on detailed project design.
- 5.20 The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation and Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. Many of the proposed sites are within the Three Spires View Cone area of the Tall Buildings Design Guide SPD (2022)<sup>77</sup>, some are within archaeological constraint areas, and some are within or partly within Conservation Areas. These sites will be subject to the requirements of other plan policies and the SPDS such that negative effects should be mitigated to neutral/negligible but some uncertainty at this stage as this depends on design and project level studies.

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<sup>74</sup> JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

<sup>75</sup> <https://www.gov.uk/guidance/biodiversity-net-gain>

<sup>76</sup> <https://www.coventry.gov.uk/downloads/file/39624/biodiversity-net-gain-spd>

<sup>77</sup> <https://www.coventry.gov.uk/downloads/download/7391/tall-buildings-design-guide-and-view-management-framework-spd>

- 5.21 The proposed site allocations are mostly in the city centre or within the urban areas such that if they are designed in accordance with the plan policies HE1, HE2, DE1 and GE1 (and to be updated), there should be effective mitigation measures in place to reduce any negative effects to neutral. Further positive effects are indicated through redevelopment of urban spaces, some vacant and some poor quality. Major positive effects on the townscape objectives were found for the major development proposals at City Centre South and the Friargate Mixed Use Scheme, as such regeneration of the city centre core will significantly improve the quality and character of the townscape with the potential to inspire wider enhancements beyond the sites themselves. Major positive effects for the site at Spon End as this is the regeneration of an area with dwellings not considered fit for habitation (currently vacant).
- 5.22 One new possible employment site Land North of A45 at Pickford Green has been put forward for consideration and was tested through SA - this is located within the Green Belt (GB) and thus, indicating negative effects. Green Belt is important to prevent urban sprawl and coalescence and the recent Technical Update (July 2024) by the Council confirmed that the GB parcels of land around Coventry continue to serve the five purposes of GB as set out in the NPPF<sup>78</sup>.
- 5.23 The site is located in Area 1 of the Green Belt – it is the largest area and considered to make a significant contribution to the GB purposes. It forms part of the wider Meriden Gap and Coundon wedge, and any built development on the western extremity of the built-up area would be extremely sensitive. Further development in this area would therefore have the effect of substantially reducing its open character leading to the appearance of urban sprawl and very significant encroachment of the open countryside in this strategically important area of Green Belt between Coventry and Birmingham. Therefore, likely major negative effects for landscape and Green Belt objectives. This site is also located on Grade 3 good quality agricultural land and thus, negative effects for loss of such land and the soil resource. This site option was not taken forward into the Proposed Submission CLPR due to negative effects on landscape and Green Belt objectives.

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<sup>78</sup> <https://www.gov.uk/guidance/national-planning-policy-framework/13-protecting-green-belt-land>

## 6 SA FINDINGS FOR THE DRAFT COVENTRY LOCAL PLAN: Regulation 19

### The Vision & Objectives for the Local Plan

6.1 The One Coventry Plan (2022-2030)<sup>79</sup> sets out the following Vision:

*‘One Coventry – working together to improve our city and the lives of those who live, work and study here.*

*We will create:*

- *A city with a strong and resilient economy, where inclusive growth is promoted and delivered, businesses are enabled to innovate and grow, and new local jobs are created*
- *A city where our residents get the best possible start in life, experience good health and age well, in a city that embraces diversity, protects the most vulnerable and values its residents and communities*
- *A city that leads the way and invests in the green industrial revolution. Ensuring the future well-being of our residents by embedding environmentally friendly behaviours and exploring opportunities to lessen the pressures caused by climate change’*

6.2 The Vision includes three interconnected priorities:

- *Increasing the economic prosperity of the city and region*
- *Improving outcomes and tackling inequalities within our communities*
- *Tackling the causes and consequences of climate change*

6.3 The Local Plan has taken the key objectives from the One Coventry Plan list of commitments for each priority, where applicable to the planning system, and lists the planning policies that can help deliver the vision and priorities. Plan policies can be cross-cutting and, for example, Green & Blue Infrastructure Policies GE1-4 can contribute to all three priority objectives. In general, the Vision and the key objectives are likely to have positive effects for SA objectives, since they are aspirational and seek to address the future sustainable development of the Coventry area; there are no significant incompatibility issues between the two sets of objectives.

### Overall Development Needs

6.4 **Policy DS1: Overall Development Needs** sets out that over the Plan period 2021-2041 significant levels of housing and employment will be planned for and provided along with supporting infrastructure and environmental

<sup>79</sup> <https://www.coventry.gov.uk/onecoventryplan>

enhancements – a minimum of 29,100 additional homes and a minimum of 60 hectares of employment land within the city's administrative boundary. The identified need for employment land is 147 hectares but it is not possible to deliver all the additional employment land within the city boundary. The Council will continue to work proactively with neighbouring Councils through Duty to Cooperate to ensure that appropriate provision is made elsewhere within the Housing Market Area. Retail need for the plan period is considered to be met by existing provision and therefore, no new retail floorspace is allocated.

- 6.5 **Policy DS2: Duty to Cooperate & Partnership Working** and **Policy DS3: Sustainable Development** - both these policies are still relevant and have only had minor updating.  
**Policy DS4: General Masterplan Principles** – considered to be up to date and remains fit for purpose, particularly as this has been used to inform the development of key allocations some of which are underway at the time of the review.
- 6.6 These four strategic policies provide the overall approach to development needs. Policy DS1 reflects the review of development needs with the updating of predicted population change and associated needs for housing and employment land. The Council has investigated strategic options and selected a preferred approach for the quantum of development. This has been assessed as being able to be accommodated together with some buffer over the plan period. Therefore, overall, no significant negative effects indicated and major positive effects indicated for SA objectives for housing and economic growth, with further positive effects indicated for SA objectives for health and communities. Policy DS4 sets out key requirements relating to land use, densities, community facilities, transport, green/open spaces, phasing, local character, historic environment, energy and environmental management. Thus, this provides an overarching context for strategic mitigation measures to avoid or minimise potential negative effects from major new development.
- 6.7 **Policy HW1: Health & Health Impact Assessment (HIA)** – updating and broadening of scope to provide guidance for where the threshold has not been met for requiring a full HIA, for major applications of 10 dwellings or more, applicants will be required to demonstrate that they have taken health matters into account in line with the principles in the updated Health SPD. This broadening of the scope will extend the significance of the positive effects associated with provision of new development, including cumulative effects.

## Jobs & Economy

- 6.8 **Policies JE1 – JE8 Economy & Employment:** - Strategic Policies **JE1: Economy & Employment Strategy** and **JE2: provision of Employment Land & Premises** have been updated to reflect national changes and to align with the One Coventry Plan, including the need to support sustainable and green technology – with additional positive effects that could support SA objectives for net zero carbon and resilience to climate change. The Council reviewed the existing site allocations for employment and found that seven

employment sites were still suitable and should be retained in the Local Plan Review. These had been previously tested through the SA process. One new site was proposed for employment and this option was tested through SA but the site has not been progressed further by the Council as it is located in the Green Belt and with concern about negative effects. Details about the sites and SAs are presented in Section 5 and Appendix V of this SA Report.

- 6.9 The updating of Policies JE3-JE7 and the separation of research & development into a new policy JE8 confirms the location, type and access to employment. Overall with major positive effects for SA objectives on economic growth, including for supporting local centres and providing access to a range of employment opportunities. Provision of employment land supports health and communities with further positive effects.

## Housing

- 6.10 **Policies H1-H13 Housing** – significant updating to reflect changes in population and housing needs, and changes in national standards and legislation. The Council investigated strategic options and identified the preferred approach, as set out in Strategic Policy DS1, for a minimum of 29,100 additional dwellings between 2021 and 2041 that can be accommodated and as confirmed in **Strategic Policy H1: Housing Land Requirements**.
- 6.11 The Council reviewed the status of the existing site allocations (some built out, some being developed, some consented, some not started). It was identified that 25 housing and mixed use sites were still suitable and should be retained in the Local Plan Review to 2041. The Council assessed the site options that had been proposed through the calls for sites and found 12 new sites that were suitable and deliverable. All these sites were subject to SA and taken forward as proposed site allocations for housing and mixed use development in **Strategic Policy H2: Housing Allocations**. Details about the sites and SAs are presented in Section 5 and Appendix V of this SA Report. Overall, major positive effects for SA objectives for housing.
- 6.12 **Policy H3: Provision of New Housing** has significant updating to require all new dwellings to comply with Nationally Described Space Standards (NDSS), including increasing the supply of accessible and adaptable dwellings and wheelchair user dwellings with further positive effects for SA objectives for communities and health. The inclusion of policy wording for compliance with specific requirements for affordable housing, self/custom build and community led housing, build to rent, and co-living (set out in Policies H6, H12 & H13 will all have major positive effects for SA objectives for suitable mix and tenure, affordable, and ageing. The additional requirements regarding accessibility and sustainable/livable neighbourhoods indicate likely positive effects for SA objectives on services and facilities, and sustainable transport.
- 6.13 Requirements to avoid negative impacts on existing residential amenity and existing businesses provide mitigation measures. The additional policy text and cross-referencing to specific Environmental Management Policies provides further guidance and strengthens mitigation measures to help

ensure that there are no significant negative effects on SA objectives for environmental topics.

- 6.14 **Policy H4: Securing a Mix of Housing** has been updated to ensure that the required mix of housing that contributes to a balance of house types and sizes across the city is in accordance with the latest evidence, ensuring that positive effects will continue through the plan period.
- 6.15 **Policy H5: Managing Existing Housing Stock** has been updated in line with the Council's climate change strategy and as set out in the new Environmental Management Policies EM1, EM11, EM13 & EM14 – all with positive effects for SA objectives on net zero carbon and resilience to climate change.
- 6.16 **Policy H6: Affordable Housing, Policy H7: Gypsy & Traveller Accommodation, Policy H8: Specialist Housing, Older Persons Accommodation & Hostels, H10: Student Accommodation, and H11: Homes in Multiple Occupation** have been updated and strengthened. This confirms the major positive effects for SA objectives for affordable, younger people, travellers, and older people including adaptability and resilience. It will also confirm positive effects towards SA objectives for reducing health inequalities and having particular regard to potentially disadvantaged groups. The updating of Policy H10 focuses the student population at the universities and resolves an existing sustainability problem of poorer quality student housing in less sustainable locations. It also facilitates opportunities for release of housing for other people's needs in other parts of the city.
- 6.17 The Council has undertaken a Residential Density Study<sup>80</sup> in consideration of the constraints to new development by the tight boundary of the Coventry Local Plan area, and changing local circumstances. This has informed the updating of **Policy H9: Residential Density**. The study investigated the distinct local context, precedents of residential developments that have been delivered, and national examples of high quality developments at high densities. A range of character areas in the city were identified that reflect construction of homes in different time periods and planning contexts and establishing residential densities for each area. Higher densities for residential development with careful and creative design that enables social interactions can have strong sustainable outcomes including positive effects for sustainable transport, accessibility to services and facilities, communities, and health and wellbeing.
- 6.18 The study concluded that local character and context are more suitably reflected such that four densities were proposed – greenfield (30dph)<sup>81</sup>, brownfield (45 dph), City Centre transition zone (125dph), and the defined City Centre boundary (250 dph). This makes more effective use of available land and helps enable that the identified needs for new housing can be accommodated within the urban areas of the Coventry administrative area, all with positive effects.

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<sup>80</sup> Coventry City Council (2024) Residential Density Study

<sup>81</sup> Dph dwellings per hectare

- 6.19 **Policy H12: Build to Rent** and **Policy H13: Co-living** – two new policies that reflect changing needs. Build to rent developments will be expected to contribute towards meeting the city's identified need for affordable housing with positive effects. Co-living proposals will be supported in sustainable locations and of good quality and design – policy requirements provide mitigation measures to help ensure that there are no significant negative effects. The policy specifically requires that design should not contribute to car dependency with positive effects for SA objectives on sustainable travel. It also specifically requires adequate safety and security indicating positive effects for SA objectives on communities and health/wellbeing.

## Retail & Centres

- 6.20 **Policy R1: Delivering Retail Growth, Policy R2: City Centre, Policy R3: Network of Centres, Policy R4: Out of Centre Proposals, Policy R5: Retail Frontages & Ground Floor Units, and Policy R6: Restaurants, Bars & Hot Food Takeaways** – these policies are mostly still relevant and up to date. Therefore, minor updating and reflecting changes in shopping patterns with a reduced need for retail locations. Positive effects remain for supporting SA objectives for communities, services & facilities, health/wellbeing, and economic growth.

## Communities

- 6.21 **Policy CO1: New or Improved Social Community & Leisure Premises, Policy CO2: Re-Use of or Redevelopment of Facilities, and Policy CO3: Neighbourhood & Community Planning** – no changes and minor updating for Policy CO2. These policies continue to protect community facilities and support community planning with positive effects for SA objectives on communities and services & facilities. Particular positive effects are indicated for supporting community participation and democratic decision-making through Policy CO3, and this is likely to have potential further positive effects on health and wellbeing.

## Green Belt & Green Environment

- 6.22 Strategic Policy on the Green Belt and Local Green Space has been updated and split into two policies to better reflect that such land is covered by entirely different national policy. **Strategic Policy GB1: Green Belt** identifies the up to date boundaries for the Green Belt and retains that inappropriate development will not be permitted in the Coventry Green Belt unless very exceptional circumstances exist. The Council has prepared a Technical Update to the Green Belt Review (2024) and this has confirmed that all the Green Belt in the Coventry area still performs well against the five purposes of Green Belt.
- 6.23 The Council investigated strategic options and the preferred approach is for no development in the Green Belt as the Coventry area boundary is so constrained. Therefore, this policy continues to provide strong mitigation measures to avoid/minimise any negative effects for communities, health/wellbeing, previously developed land, biodiversity, the historic



environment, visual amenity and local character – all with positive effects for SA objectives. **Strategic Policy GB2: Safeguarded Land in the Green Belt** required only minor updating to align with the emerging South Warwickshire Local Plan – it was considered appropriate to retain the safeguarded status of the listed sites.

- 6.24 **Policy GB3: Local Green Space** – new policy separating text from previous GB1. The policy continues to provide strong mitigation measures to avoid and minimise any negative effects for communities, services/facilities, health/wellbeing, nature/biodiversity, and landscapes/townscapes – all with positive effects for SA objectives.
- 6.25 **Policy GE1: Green & Blue Infrastructure** has been updated, including the addition of “Blue”, making explicit the requirement to consider the water environment and its wider multifunctionality, and the requirement to “enhance” as well as protect. Policy wording has been refined to provide more guidance and clarification, and including references to relevant Strategies and Plans. This updating and clarification will strengthen the mitigation provided by the policy. It will also strengthen the positive effects for communities, services/facilities, health/wellbeing, nature/biodiversity, and landscapes/townscapes, as well as contributing to SA objectives for sustainable water management and building resilience to climate change.
- 6.26 **Policy GE2: Green Space** has been updated and to ensure resilience in meeting local need for playing field provision – confirming positive effects, including for health and wellbeing.
- 6.27 **Policy GE3: Biodiversity, Geological, Landscape & Archaeological Conservation** has been updated essentially to reflect the new national requirements for new development to provide a minimum of 10% net gain in biodiversity. The requirement from the Environment Act (2021) for at least 10% Biodiversity Net Gain (BNG) from all new development became mandatory on 12 February 2024<sup>82</sup> (BNG is required for small sites from 2 April 2024). In accordance with national guidance, the policy requires development proposals to ensure that they lead to a minimum 10% net gain of biodiversity and provides further guidance on ecologic assessments. Requirements regarding on-site and off-site BNG and compensatory measures involving biodiversity offsetting including purchasing of biodiversity credits must be agreed in line with the Coventry Biodiversity Net Gain SPD (December 2022)<sup>83</sup>. This provides more detailed information and guidance, thus helping ensure that there will be implementation of the policy requirements – all with major positive effects for SA objectives on biodiversity.
- 6.28 The updated policy includes a requirement to seek opportunities for contributing to the delivery of the Local Nature Recovery Strategy and the Green & Blue Infrastructure Strategy and Action Plan or its future equivalent. This strengthens the policy and the positive effects for nature and biodiversity, and indicates further associated positive effects for health/wellbeing and building resilience to climate change – and these positive effects may be

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<sup>82</sup> <https://www.gov.uk/guidance/biodiversity-net-gain-what-local-planning-authorities-should-do>

<sup>83</sup> <https://www.coventry.gov.uk/downloads/download/7393/biodiversity-net-gain-spd>

synergistic and cumulative in the longer term as they contribute to the wider networks.

6.29 **Habitats Regulations Assessment (HRA) Screening:** An HRA screening (August, 2024) was undertaken for the emerging draft CLPR and carried out in accordance with Government guidance<sup>84</sup>. The previous HRA (2015) had been carried out with extant guidance and methods applicable at that time. It was considered that the European/internationally designated sites<sup>85</sup> for nature conservation that needed to be scoped into the screening of the draft CLPR for Likely Significant Effects (LSEs) and any requirement for subsequent appropriate assessment (AA), were as follows:

- The Ensor's Pool SAC is located about 6km to the north of the CLPR area boundary
- The Severn Estuary SAC/SPA/Ramsar is located some 86km to the south west of the CLPR area boundary

6.30 The HRA screening considered the potential for LSEs on habitats' conservation objectives from: atmospheric pollution (nitrogen deposition); loss or damage to habitats and functionally linked land; disturbance from noise, vibration or light to sensitive species; and recreational pressures. The screening found that there were no impact pathways identified due to the distances from the CLPR area boundary. The screening also considered LSEs associated with changes to water quality and water quantity/levels/flow and there were no impact pathways identified. The draft Coventry & Warwickshire Sub-Regional Water Cycle Study (WCS) Stage 1 (June 2024)<sup>86</sup> indicates that there is the capacity for the proposed development in the CPLR. Therefore, this further confirms that the habitats sites are screened out for appropriate assessment with regard to water quality and quantity/flow/levels – in consideration of the capacities for proposed development and the distances of the proposed development from the habitats sites.

6.31 The HRA screening has found that there are no impact pathways and therefore, it is concluded that there are no adverse effects alone from the Coventry Local Plan Review on the integrity of the SAC, SPA and Ramsar sites that have been investigated as potentially relevant to the plan and its proposed development. In the absence of any adverse effects alone, there will be no adverse effects in combination with other plans and projects. This confirms the findings of the previous HRA and that there is no requirement for the Coventry Local Plan to include any policy regarding European/internationally designated sites for nature conservation.

6.32 **Policy GE4: Tree Protection** has been updated to provide additional clarification and a link to the Coventry Trees & Development Guidelines SPD

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<sup>84</sup> <https://www.gov.uk/guidance/appropriate-assessment>

<sup>85</sup> Distances measured (direct nearest boundary to nearest boundary) using Magic Map (Defra) application <https://magic.defra.gov.uk/magicmap.aspx>

<sup>86</sup> JBA Consulting (June 2024) for Coventry CC, north Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford-on-Avon DC, and Warwick DC

(October 2020)<sup>87</sup>. This strengthening of the policy strengthens the mitigation measures with more certainty of avoidance of any potential negative effects for trees.

## Design

- 6.33 **Policy DE1: Ensuring High Quality Design** – major revision requiring that all development proposals should follow a design-led approach to deliver sustainable high quality place-making. Development is required to contribute positively to the wellbeing of existing and new communities, and the quality of the surrounding built and natural environment. This all indicates positive effects for SA objectives on communities, health, reducing pollution, protecting natural resources, nature, and townscapes/landscapes. [The setting, integrity and character of heritage assets is already protected in accordance with Policy HE2.] All development must accord with Coventry's emerging City Wide Design Codes, demonstrating compliance with its key design principles. This provides further mitigation for any negative effects and strengthens the significance of positive effects.
- 6.34 New development is required to be planned and designed with reference to climate change mitigation and adaptation. This indicates further positive effects for SA objectives on net zero carbon and resilience to climate change. The policy also now includes reference to the Coventry Tall Buildings SPD, and specific reference to views of the city's three spires with regard to development in and around the city centre. A new policy clause (h) requires new development to consider that safety and security of new and existing users, indicating strengthening of mitigation measures and further positive effects for SA objectives on health and communities.
- 6.35 Additional requirements for car parking to be integrated, convenient and safe without detriment strengthens the policy and provides strengthened mitigation of any potential negative effects. Additional specific requirements for safe, secure, convenient and accessible cycle parking and storage and waste management facilities to be appropriately integrated within the overall development also provides strengthening of the policy with strong mitigation against any negative effects for amenity and health SA objectives.
- 6.36 **DE2: Delivering High Quality Places** – a new policy that includes specific requirements for public realm, public art, lighting, designing for healthy communities, and the City Centre and the City Centre Transition areas. This new policy retains elements from the City Centre AAP, notably with regard to public realm, public art, and lighting – and all with positive effects for communities and health/wellbeing across the CLP area. The requirement in designing for healthy communities to fully consider how physical and mental health and wellbeing for people of all abilities and ages has been considered and catered for provides strong mitigation for potential negative effects on SA objectives for inclusivity. The requirement to consider the local contexts within the City Centre and the City Centre Transition area strengthen the

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[https://www.coventry.gov.uk/downloads/download/5198/trees\\_and\\_development\\_guidance\\_draft\\_supplementary\\_planning\\_document\\_spd](https://www.coventry.gov.uk/downloads/download/5198/trees_and_development_guidance_draft_supplementary_planning_document_spd)

mitigation measures against any potential negative effects; requirements to demonstrate how proposals contribute to the vision for the City Centre will strengthen the opportunities for enhancement with positive effects.

## Heritage

- 6.37 **Policy HE1: Conservation Areas, Policy HE2: Conservation & Heritage Assets, Policy HE3: Heritage Park Charterhouse** – updating, including requirement in Policy HE2 to demonstrate how the relevant Historic England good practice guidance has been taken into account, and clarification regarding the consideration of exceptional cases, where harm cannot be outweighed by public benefit. **Policy HE4: Archaeology** – new policy created by extracting the relevant parts of the previous Policy HE2 for clarity and to provide some more detail. With such strengthening, these policies will continue to conserve the historic environment providing mitigation measures to avoid or limit potential negative effects.

## Accessibility

- 6.38 **Policy AC1: Accessible Transport Network** – significant updating of this policy to reflect latest policy and guidance and the Council's emphasis on prioritising sustainable travel. Additional policy text requires sustainable transport modes to be fully integrated into the design and place-making. This requires an improvement in the proportion of trips made by walking, cycling and public transport, and a reduction in car dominance – all with positive effects for SA objectives on sustainable transport. The specific requirements for streets and the public realm for improvement in quality and resilience will have positive effects for health and wellbeing, together with the improvements for air quality, green and blue infrastructure – with further positive effects for SA objectives for communities, biodiversity and townscapes/landscapes. This requirement could include consideration of noise too. The Policy also allows for emerging and future intelligent mobility infrastructure.
- 6.39 **Policy AC2: Road Network** – updating, including requiring development to actively support intelligent mobility infrastructure and positively integrate with the sustainable transport network. Proposals should not negatively impact road safety, thus providing mitigation measures for SA objectives on health.
- 6.40 **Policy AC3: Demand Management** – updated and including a requirement for proposals to encourage and incentivise sustainable travel, such as through the provision of Mobility Credits – with further positive effects indicated for SA objectives on health and sustainable transport. Parking standards have been reviewed and updated with the details in Appendix 5 of the Local Plan seeking to reduce car dependency and make any parking need more relevant to local characteristics, development type and distance from the services and facilities of the City Centre.
- 6.41 CLP Appendix 5 recognises three distinct zones – City Centre, Transition Zone, Outer City – acknowledging the variances in car usage and accessibility across the city. Details and guidance are provided for cars, including electric

vehicles, goods vehicles, drop-off and loading areas, and for people with disabilities. Details and guidance are also provided with regard to cycle parking. The detailed guidance will help ensure implementation of policy requirements indicating more certainty of significance of effects. Overall, this will contribute towards a modal shift, further enhancing positive effects for health, resilience to climate change, and sustainable transport.

- 6.42 **Policy AC4: Active Transport Provision including Walking, Cycling & Micro Mobility** – updating includes new policy text for access to walking and cycling routes to be appropriate for all abilities and needs, including wheelchairs, indicating positive effects for SA objectives on accessibility and inclusivity. Further details are set out regrading cycling facilities, and the Council will promote walking and cycling by delivering a wide range of walking and cycling schemes – all with positive effects for SA objectives for communities, health and sustainable transport.
- 6.43 **Policy AC5: Bus, Demand Response Transit & Rapid Transit** – updating and to reflect the Council's emphasis on prioritising bus use and support for demand response transit – all promoting positive effects for SA objectives on health and sustainable transport. **Policy AC6: Rail** - updated to include support for electrification of rail lines and improved routes to the East Midlands. **Policy AC7: Freight** – updated requiring applicants to have more consideration of HGV movements and facilities on site, particularly regarding big warehouse and distribution centres – providing stronger mitigation measures to limit potential negative effects on health and amenity.

## Environmental Management, Minerals & Waste

- 6.44 **Policy EM1: Planning for Climate Change Adaptation** – significant updating to strengthen the strategic approach, including addressing overheating in new buildings, achieving a water efficiency target of 100l/person/day, and considering making connections available to the Coventry Heat Network. All development must meet net zero (regulated operational carbon) for residential and non-domestic development, including embodied carbon and waste – all with major positive effects towards SA objectives for reaching net zero carbon emissions. All development must consider water neutrality in regard to improving resilience to climate change and enabling waterbodies to be brought up to Good status – indicating positive effects for SA objectives for climate change and water resources (quantity and quality). Policies EM2-3 deleted and replaced by Policies EM11-EM14 (and please see later in this section).
- 6.45 **Policy EM4: Flood Risk Management** – updating to reflect changes in national legislation and policy. Additional policy text seeking to restore natural river form and remove culverting where possible with positive effects for SA objectives on green/blue infrastructure. Additional text concerning the safety of those sleeping in any ground floor accommodation in areas at risk of flooding provides stronger mitigation measures to reduce potential negative effects on health and wellbeing. **Policy EM5: Sustainable Drainage Systems SuDS** - updating with national legislation and policy. Separate guidance will detail how SuDS schemes will be designed, adopted and maintained in

accordance with technical standards – and this will support the implementation of the mitigation measures ensuring certainty of effects.

**Policy EM6: Redevelopment of Previously Developed Land** – updating and in line with the Water Cycle Study (2024) for relevant standards on water efficiencies.

- 6.46 **Policy EM7: Air Quality** – minor updating to confirm that requirements should be in line with the Air Quality SPD. **Policy EM8: Waste Management; Policy EM9: Safeguarding Mineral Resources; Policy EM10: Non Mineral Development in Mineral Safeguarding Areas** – no changes to these policies and they continue to support SA objectives for protection of natural resources, waste and minerals.
- 6.47 **Policy EM11: Energy Infrastructure and Policy EM12: Net Zero (regulated operational carbon) New Build Non-Domestic Development** – new policies addressing operational carbon to ensure that buildings are fit for the future through the updated national Building Regulations and local requirements with major positive effects for SA objectives on net zero carbon and building resilience to climate change. Information is provided on energy metrics and guidance for no fossil fuels, on and off site renewable energy, offsetting, smart energy systems, and post occupancy evaluation – all supporting the implementation of the policies. The policies have considered the potential adverse effects on viability, land values and developers' investment and mitigation measures are provided with flexibility of application. These policies extend beyond national standards in Building Regulations that aim for net zero carbon in 2050 throughout the UK. Thus, these policies with their wider approach will better enable progress towards the Council's ambitions for net zero carbon locally in 2030 with positive effects sooner.
- 6.48 **Policy EM13: Overheating in New Buildings** – new policy recognising that meeting ambitious space heating demands in new buildings will be at increased risk of overheating due to the ability of the building to retain heat well. The policy provides mitigation measures to avoid potential negative effects on health and wellbeing. Such overheating mitigation measures align well with green and blue infrastructure policies since measures such as green roofs, walls and trees are effective for cooling/shading and improving nature and biodiversity.
- 6.49 **Policy EM14: Embodied Carbon & Waste** – new policy that addresses the shift in proportion from operational carbon to embodied carbon over a building's lifetime carbon emissions and ensures that embodied carbon is considered in working towards a wholly net zero carbon building. Positive effects for SA objectives on net zero carbon and resilience to climate change. The policy provides guidance on reporting, limiting embodied carbon, building end of life, and demolition audits.
- 6.50 **Policy EM15: Noise** – new policy since noise issues associated with new development had not been addressed in the adopted Local Plan (2017). Noise pollution is an acknowledged issue for human health and wellbeing, and can also affect sensitive animal, bird or insect species. The policy applies to noise pollution and/or disturbance on amenity and biodiversity/surrounding

environment and thus, provides mitigation measures to support Sa objectives to reduce noise pollution.

- 6.51 **Policy IM1: Developer Contributions for Infrastructure** – minor updating, including the addition of “blue” to green infrastructure. This policy continues to support the overall development in the Plan and helps ensure that the likely effects from new development on infrastructure is mitigated, and including consideration of cumulative effects.

## City Centre

- 6.52 **Policy CC1: Coventry City Centre – Part A Development Strategy** remains relevant with updating and provides an overarching framework for development in the City Centre. Policy wording aligns with the Tall Buildings Design Guide & View Management Framework SPD (2022)<sup>88</sup> prepared and adopted since the extant Local Plan (2017). The retained and updated policy aims for the city centre to continue to be developed and regenerated to ensure a truly world class city centre. The policy clauses align with many of the SA objectives indicating positive effects, especially significant for supporting inclusive economic growth and enhancing the quality and character of townscapes. Positive effects are predicted for SA objectives on communities, services and facilities, health, housing, sustainable transport, soils, and protecting the historic environment.
- 6.53 Previous Policy CC2 on heritage has been deleted and incorporated into Core Policies HE2 and HE4. Previous Policy CC3 on building design has been deleted as it is covered within Core Policy DE1. Previous Policies CC5-7 have been deleted as they are now addressed within Core Policy DE2 as such matters are applicable city wide, not just the city centre. Previous Policy CC7 on tall buildings has been deleted as this matter is now addressed within Core Policy DE1. Plan Policies – DE1, DE2, HE2 & HE4 are now applicable to the whole Coventry area, not just the city centre – and thus, with wider positive effects.
- 6.54 Previous Policy CC8 on blue and green infrastructure is now Policy CCI Part B. Previous Policy CC9 on drainage and flood risk is now Policy CC1 Part C. Previous Policy CC10 on environmental management is now Policy CC1 Part D. Previous Policy CC11 on accessibility is incorporated into other AC CLP policies and referenced in Policy CC1 Part E. Previous Policies CC12 to CC26 now all incorporated into Policy CC1 Part E Character Areas.
- 6.56 **Policy CC1: Coventry City Centre – Part B Green and Blue Infrastructure** sets out requirements specific to the City Centre and requires consideration of the emerging Green and Blue Infrastructure Strategy that will provide further details and guidance. Thus, the policy provides strong mitigation measures to protect blue and green infrastructure. Opportunities to add greenery to areas adjacent to the Ring Road will be encouraged, together with new accessible green spaces – indicating further mitigation and possibilities for positive

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<sup>88</sup> <https://www.coventry.gov.uk/downloads/download/7391/tall-buildings-design-guide-and-view-management-framework-spd>

effects that may be synergistic and cumulative, especially in the longer term and linking to the wider nature networks.

- 6.57 **Policy CC1: Coventry City Centre – Part C Drainage & Flood Risk** sets out requirements to be in line with requirements of Policy EM4. This recognises that there could be higher levels of impermeable areas within the city centre and by retaining specific policy, mitigation measures are strengthened.
- 6.58 **Policy CC1: Coventry City Centre – Part D Environmental Management** is retained with such mitigation measures strengthened since clause (g) requires proposals to have regard to all other relevant policies within the Local Plan (and not just within the city centre).
- 6.59 **Policy CC1: Part E City Centre Character Areas** – new policy that requires all development in the City Centre to reference the relevant character area of its location and to deliver high quality contextually responsive proposals. The policy identifies eleven character areas as follows: Friargate Area; Cathedral & Cultural Area; Civic Area; Far Gosford Street Area; Stoney Stanton Road Area; Corporation Street Area; Mixed Use Retail Core; Parkside Area; University & Enterprise Area; Northern Regeneration Area; and Warwick Row Area. This updated identification of character areas better describes the receiving communities and environments such that the design of new development may better mitigate potential negative effects and enhance potential positive effects. No significant negative effects and overall positive effects for many SA objectives, especially significant for supporting sustainable inclusive economic growth, housing for all, inclusive communities, and sustainable transport.
- 6.60 The policy requires all development to preserve and enhance the historic environment of the area and in accordance with Conservation Area Appraisals and Plan. This ensures that there are adequate mitigation measures in place for SA objectives on the historic environment. High quality development guided by the local character areas will help ensure further positive effects for SA objectives on townscape character, sense of place, and visual amenity. It will also help resolve existing sustainability problems by continuing to encourage high quality regeneration that will not only have positive effects on townscape but also other interrelated SA objectives on the economy and people's health and wellbeing.
- 6.61 The summary findings of the SA are presented in the Table 6.1, as follows:



## SA of CLPR Policies

Table 6.1: Summary of SA Findings for CLPR Policies

SA Objectives Local Plan Policies	1. Communities	2. Services & Facilities	3. Health & Active Living	4. Housing	5. Economic Growth	6. Net Zero Carbon	7. Resilience to Climate Change	8. Sustainable Transport	9. Reduce Pollution	10. Natural Resources <sup>89</sup>	11. Nature & Biodiversity	12. Historic Environment	13. Townscapes & Landscapes	
DS1-DS4 Overall Development Needs & Sustainable Development	+	++	+	++	++	+	+	0	0	0	0	+	0?	+
HW1 Health & Health Impact Assessment	+	+	++	+	+	0	0	0	0	0	0	0	0	0
JE1-JE8 Economy & Employment	+	0	+	0	++	+	+	0	0	0	0	0	0	0
H1-H13 Housing	++	++	++	++	0	+	+	+	0	0	0	0	0	0
R1-R6 Retail	+	++	+	0	++	0	0	0	0	0	0	0	0	0
CO1-CO3 Communities	++	++	+	0	0	0	0	0	0	0	0	0	0	0
GB1-GB2 Green Belt	+	0	+	0	0	0	0	0	0	+	0	+	+	++
LGS1 LGS, GE1 Green Infrastructure, GE2 Green Space, GE3 Biodiversity, GE4 Trees	+	+	++	0	0	0	+	0	0	+	0	++	0	++

<sup>89</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

DE1 Ensuring High Quality Design DE2 Delivering High Quality Places	++	0	++	0	0	0	0	0	0	0	0	0	0	++
HE1 Conservation Areas, HE2 Assets, HE3 Charterhouse, HE4 Archaeology	+	0	+	0	0	0	0	0	0	0	0	0	++	+
AC1-AC7 Transport	+	0	+	0	0	0	+	++	+	0	0	0	0	+
EM1-EM15 Environmental Management	+	0	++	0	0	++	++	0	++	+	+	+	0	+
CC1 (Parts A-E) City Centre	++	+	+	++	++	0	0	++	0	+	0	+	++	++

## 7.0 SA FINDINGS FOR THE IMPLEMENTATION OF THE COVENTRY LOCAL PLAN REVIEW TO 2041 AS A WHOLE

### Introduction

- 7.1 This section presents an assessment of the likely significant effects of the pre-submission draft Coventry Local Plan (to 2041) as a whole. It considers the plan objectives, strategic approach, policies and site allocations - and the likely cumulative effects on each of the SA objectives. Many of the likely effects of the draft plan as a whole are interconnected. The Local Plan recognises the interconnectedness of sustainable development topics. The key objectives of the One Coventry Plan that are relevant to development planning are aligned with the Local Plan policies to show how the plan can help deliver its vision and priorities – increasing economic prosperity; improving outcomes and tackling inequalities within communities; and tackling causes and consequences of climate change.

### To enable vibrant & inclusive communities

- 7.2 Significant positive effects are predicted through the housing policies H1-H13 that will overall provide the identified needs for housing, thus supporting communities. Policy H3 reflects updated standards and requires adaptable and accessible buildings, indicating positive effects. Policy H4 seeks to secure a mix of housing and Policy H6 addresses specific requirements for affordable housing, resulting overall in dwellings of varying tenures, sizes and types being delivered over the plan period. Policies DE1 and DE2 seek to promote diverse, viable places with high quality design, good environmental quality and healthy communities – all contributing to positive effects for vibrant communities. Policy AC4 requires safe, comfortable and convenient access to cycling and walking routes – appropriate for all abilities and needs, including wheelchair accessible routes – further positive effects for inclusivity.
- 7.3 Policy H7 addresses the needs of gypsy and traveller communities. Policy H8 supports those needing care, nursing, or for older persons and Policy H10 addresses the specific needs of students. Policy H9 requires that proposed development density should relate to local character and context, thus with likely positive effects for social connectivity. In order to promote social inclusivity it will be important that residents can benefit from good access to a range of services and facilities. Policies CO1-3 consider social, community and leisure facilities, together with neighbourhood and community planning. Overall, cumulative minor positive effects for inclusivity and communities.

### To provide accessible essential services & facilities for all residents

- 7.4 Policy DS4 sets out general masterplan principles that includes consideration of social and community facilities. Policies CO1-2 address social, community and leisure facilities. Policy GE1 promotes protection and enhancement of green and blue infrastructure. Overall, minor positive effects.

### To improve health & promote active living

- 7.5 Overall, most of the Local Plan policies are expected to contribute to improving health as provision of good quality housing, support for employment and communities, together with good environmental quality will contribute to health and wellbeing. The importance of promoting health improvements is evidenced specifically through policy HW1 that requires all major developments to undertake a Health Impact Assessment in line with the HIA SPD. Other policy requirements for good quality housing and accessibility to open/green space will contribute to health and wellbeing.
- 7.6 The proposed site allocations are close to healthcare facilities, and also open space, green and blue infrastructure, recreation and leisure facilities, and sustainable transport modes. Policies LGS1 and GE14 protect and enhance nature and green space with its importance for health. This will be cumulative in the longer term as networks are enhanced and recovery strategies implemented. Policy AC4 presents the Council's emphasis on prioritising walking and cycling and includes a requirement for accessibility for all abilities and needs, supporting active transport with positive effects for health. This is all supported by environmental management policies to reduce pollution and improve quality – Policies EM1-EM15. Over time, this should result in cumulative effects that may be synergistic and will help towards reducing an existing sustainability problem of health inequalities in the Coventry area.

### To provide decent and affordable housing for all

- 7.7 The Local Plan makes provision to deliver at least 29,100 new dwellings during the period up to 2041 and supports delivering a mix of homes through a range of policies H1-H13 with major positive effects for SA objectives. Policy H4 seeks to secure a mix of housing and Policies H6, H7, H8, and H10 address the needs of specific people, including the young, affordable needs, and gypsy/travellers. Policy H8 addresses the needs for older people and supported housing/care. Policy H11, H12 and H13 consider the specific requirements for homes in multiple occupation, build to rent, and co-living housing.
- 7.8 The residential site allocations will contribute to the provision of housing within the Coventry area, including significant proposals such as City Centre South and the Friargate mixed use scheme in the City Centre. Policy H5 helps ensure that the best use is made of existing housing stock, including an emphasis on re-use and support for retrofitting – with further positive effects. Overall, major positive effects for SA housing objectives and that will be cumulative, particularly in the longer term.

### To support sustainable inclusive economic growth

- 7.9 Strategic Policy JE1 sets out the overall strategy for economy and employment and Policy JE2 has reviewed and updated the provision of employment land and premises. Policies JE3-8 provide further details and information for different types of employment use, with particular significant positive effects indicated for the differentiation between industrial

storage/distribution and R&D uses into two policies JE5&JE8. The review of the plan has updated employment land need particularly taking into account the changes for office requirements. Policy JE4 includes a new requirement for flexibility and adaptability to changing needs with positive effects for SA objectives.

- 7.10 Site allocations are retained from the adopted plan and one new site option was considered but found to be unsuitable. The Council is able to find suitable land for employment within the Coventry area approaching its identified need, and it will continue to discuss and cooperate with neighbouring Councils as well as considering any sites that may be proposed in the future. Overall, the Plan will have significant positive effects for SA objectives to support inclusive economic growth; further positive effects are indicated for health and wellbeing and communities.

### **To help achieve the Council's ambition to reach net zero carbon emissions**

- 7.11 A key emphasis of the new Coventry Local Plan is to support the One Coventry Plan priority regarding climate change and to support the draft Climate Change Strategy<sup>90</sup>. The new Policies EM11-EM14 address operational carbon to ensure that buildings are fit for purpose with regard to reduced energy consumption and integration of design to address climate change adaptation through the revised national Building Regulations and local requirements. Overall, likely to be significant positive effects for SA objectives to reach net zero carbon emissions – especially in the longer term as new methods in the construction industry become established.

### **To build resilience to climate change**

- 7.12 Policy EM1 Planning for Climate Change Adaptation has been updated to address overheating in new buildings, enhance water efficiencies, consider water neutrality and greywater recycling, and all development must meet net zero (regulated operational carbon). Together with the retained details for sustainable water management in Policies EM4-5, significant positive effects are indicated, particularly in the longer term as the effects become cumulative.

### **To reduce traffic and improve sustainable transport choices**

- 7.13 The Council has assessed possibilities for allocating suitable sites for new development and carefully selected and retained those sites that are close to services and facilities. The City is well connected with accessible options such that this approach indicates positive effects for SA objectives on improving sustainable transport and reducing car travel. Policies AC1-AC4 have had considerable updating to reflect latest national policy and guidance, and support the Council's emphasis on prioritising sustainable travel. Overall, the approach to site allocations and transport policies will have likely positive effects for SA objectives on sustainable transport. These

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<sup>90</sup> <https://www.coventry.gov.uk/draftclimatechangestrategy>

may become synergistic and cumulative in the medium to longer term as the modal shift becomes established – and with further positive effects for health and wellbeing, nature, and climate change.

### **To reduce air, noise and light pollution**

- 7.14 Policy EM7 is retained for air quality and the Plan includes the new Policy EM15 on noise; light pollution is addressed in Policy H3 Housing and Policy DE2 Delivering High Quality Places. Therefore, overall, there are sufficient mitigation measures to ensure no significant negative effects on SA objectives for air, noise or light pollution.

### **To protect and conserve natural resources – soil, water, minerals and waste**

- 7.15 Policy EM6 on redevelopment of previously developed land is retained and updated to align with water efficiency targets. This will continue to provide sufficient mitigation to support sustainable water management. Policies EM 8&9 continue to guide waste and minerals planning such that SA objectives are supported with no significant negative effects overall.

### **To protect and enhance nature and biodiversity**

- 7.16 A Habitats Regulations Assessment (HRA) Screening (August 2024) concluded that there is no requirement for the Coventry Local Plan to include any policy regarding European and internationally designated sites for nature conservation. Policy GE3 continues to protect national and locally important biodiversity and has been updated to incorporate the new national minimum requirement for 10% net gain in biodiversity for all new development. Policies GE2-3 with minor updating continue to provide information and guidance such that the green/blue infrastructure network in the plan area should be enhanced, particularly in the longer term and networks are linked, widened and become more established with overall positive effects for SA objectives for nature and biodiversity.

### **To protect and enhance the historic environment, and its setting**

- 7.17 Policies HE1-4 continue to provide strong mitigation measures to protect the historic environment such that there should be no significant negative effects and there are possibilities for enhancement, for example, through the refinement of character areas in the City Centre and support for high quality regeneration.

### **To protect and enhance the quality and character of townscapes and landscapes**

- 7.18 Policy GB1 Green Belt has been strengthened through confirmation of the quality and importance of the Green Belt for Coventry (Technical update, 2024) and by differentiating between Green Belt and Local Green Space. This

updated evidence and policy has guided other policies, including site allocations, in the Plan such that positive effects are indicated for SA objectives for the Green Belt and to retain its five purposes.

- 7.19 The updating of Policies on design and high quality places DE1-2, together with Policies LGS1 and GE1-4 will overall interact and indicate positive effects for SA objectives on protecting and enhancing local character, visual amenity, and restoration of degraded townscapes/landscapes – likely to be cumulative, especially in the longer term.

## 8.0 MONITORING

- 8.1 The SEA Directive and Regulations require that the significant effects (positive and negative) of implementing the plan should be monitored in order to identify at an early stage any unforeseen effects and to be able to take appropriate remedial action. Government guidance<sup>91</sup> on SA/SEA advises that existing monitoring arrangements should be used where possible in order to avoid duplication. Details of monitoring arrangements may be included in the sustainability appraisal report, the post-adoption statement or in the local plan itself. Government requires local planning authorities to produce Monitoring Reports (AMRs), and the Coventry Authority Monitoring Report (AMR)<sup>92</sup> (produced annually) is considered sufficient to ensure appropriate monitoring takes place.

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<sup>91</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

<sup>92</sup> [https://www.coventry.gov.uk/downloads/download/2678/annual\\_monitoring\\_reports](https://www.coventry.gov.uk/downloads/download/2678/annual_monitoring_reports)



## 9.0 CONSULTATION & NEXT STEPS

- 9.1 This SA Report is being published alongside the Proposed Submission draft Coventry Local Plan Review for Regulation 19 consultation during autumn 2024. Any comments on the SA will be taken into consideration at the next stage when the Council will submit the draft Coventry Local Plan for examination by an independent planning inspector.

**APPENDICES:  
Available as a separate document**

- I Statement of Compliance** (August 2024)
- II SA Scoping Report** (March 2023, available on Council's website)
- III SA of Strategic Options** (May 2023 & August 2024)
- IV Consultation Representations on the Initial SA Report** (May 2023)
- V SA of Proposed Site Allocations** (August 2024)



**Coventry Local Plan Review  
2021-2041:  
Proposed Submission  
Regulation 19 Consultation**

**Sustainability Appraisal (SA)/  
Strategic Environmental Assessment (SEA)**

**SA Report:  
APPENDICES**

**September 2024**



**APPENDICES:**

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## Appendix I: Statement on Compliance with SEA Directive & Regulations

The EU SEA Directive<sup>1</sup> (Annex 1) requires certain information to be provided in the Environmental Report. This requirement is implemented into UK legislation through the SEA Regulations (2004)<sup>2</sup>. This is Appendix 1 of the Sustainability Appraisal Report that constitutes the Environmental Report as required by the SEA Directive and the UK SEA Regulations.

This Appendix 1 sets out how the requirements for SEA have been met and signposts where this information is found in the Sustainability Appraisal Report (August 2024) – and in accordance with paragraph 32 of the National Planning Policy Framework (updated, 2023)<sup>3</sup>.

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
<i>An outline of the contents, main objectives of the plan and relationship with other relevant plans</i>	Section 1 Introduction	Sets out the Vision and main Objectives of the Coventry Local Plan Review
	Section 3 Context & Baseline	Summarises the relationship with other plans and references the detailed review provided in the SA Scoping Report (2023)
<i>The relevant aspects of the current state of the environment and the likely evolution thereof without the implementation of the plan</i>	Section 3 Context & Baseline	Summarises the relevant baseline conditions for sustainability (including the state of relevant environmental aspects) in the Coventry LP area. The information is set out in more detail in the SA Scoping Report (2023) that also indicates the likely evolution of current conditions and trends where available
<i>The environmental characteristics of the area likely to be affected</i>	Section 3 Context & Baseline	Summarised in Section 3 of Main SA Report; where relevant and available this information is detailed in the SA Scoping Report
<i>Any existing environmental problems which are relevant to the plan including, in particular, those relation to any areas</i>	Section 3 Context & Baseline	Summarises existing sustainability (including environmental problems) for the Coventry LP area. This section also summarises information for

<sup>1</sup> <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

<sup>2</sup> <http://www.parliament.uk/documents/post/postpn223.pdf>

<sup>3</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
<i>of a particular environmental importance</i>		Natura 2000 sites in line with Habitats Regulations Assessment requirements (HRA Screening Report available separately, July 2024).
<i>The environmental protection objectives relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation</i>	Section 2 SA Methods Section 3 Context & Baseline	Provides the summary of objectives for sustainability in the Coventry LP area (including environmental objectives) and the implications of these objectives for the CLPR (refers to details in the SA Scoping Report 2023); explains how the environmental considerations have been taken into account.
<i>The likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects</i>	Section 2 SA Methods Table 2.1	Presents the SA Framework of objectives that shows which of the issues listed by the SEA Regulations are progressed by which SA objectives. This ensures that all the issues are considered during the assessment of each element of the emerging CLPR since each policy & proposal is assessed against each SA objective.
	Sections 4, 5, 6 & 7 Appendices III & V	Summarises the likely significant effects of implementing the CLPR (including environmental effects) with details provided in the appendices. Where possible, an indication is given of whether the effect is likely to be cumulative, short, medium and long term
<i>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan</i>	Sections 4, 5, 6 & 7 Appendices III & V	Where potential significant negative effects are predicted the SA has sought to provide suggestions for mitigation possibilities. These are summarised in the main report, and detailed in the appraisal matrices that comprise the appendices.
<i>An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information</i>	Sections 4 & 5  Tables 4.2b – 4.10b	Strategic Options for Quantum of Housing, Residential Density, Building Regulations Standards, & Biodiversity Net Gain were appraised through initial SA (March 2023). Subsequently, additional options & refinements of options were appraised – explained & findings reported in Section 4. Options for site allocations are discussed in Section 5. The reasons for progressing options and not taking others forward is set out in Tables 4.2b to 4.10b.

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
	Sections 2 & 3 Methods & Context, Baseline	Outlines how the assessment was undertaken – the appraisal methodology and difficulties encountered in compiling information are noted.
<i>A description of the measures envisaged concerning monitoring</i>	Section 8	Provides measures proposed for monitoring the sustainability (and environmental) effects of the implementation of the Coventry LP.
<i>A non-technical summary of the information provided under the above headings</i>	Report preface (available separately)	Provides a non-technical summary.

**Coventry Local Plan Review: Sustainability Appraisal (SA) Appendix III: SA of Strategic Options**

<b>IIIa: Options for Quantum of Housing Needs 2022-2041</b>	
<b>1</b>	63,760 dwellings (3,188 per annum) – Government standard method <sup>4</sup> (with ONS population projections from 2014) <sup>5</sup>
<b>2</b>	39,280 dwellings (1,964 per annum) – HEDNA method <sup>6</sup> (with census population data from 2021)
<b>3</b>	29,100 dwellings (1,455 per annum) – HEDNA method as per Option 2 but minus 35% uplift for largest urban authorities <sup>7</sup>
<b>4</b>	Approx. 31,500 dwellings (1, 575 per annum) – calculated as quantum that can be accommodated based on supply figures
<b>5</b>	30,500 dwellings (1, 527 per annum) – calculated through proposed new standard method for assessing housing needs (July 2024) <sup>8</sup>

<b>IIIb: Options for Residential Density</b>	
<b>1</b>	Greenfield 30 dph <sup>9</sup> ; outside ring road minimum 35 dph; inside ring road minimum 200 dph. Current CLP Policy H9
<b>2</b>	As Option 1 but with >35 dph outside ring road – in certain locations
<b>3</b>	Greenfield 35 dph; Brownfield 45 dph; 125 dph in defined transition zone; 250 dph within City Centre boundary

<b>IIIc: Options for progressing Coventry's Climate Change Strategy<sup>10</sup></b>	
<b>1</b>	Planning policy requirements in line with national Future Homes Standard <sup>11</sup> & Future Buildings Standard <sup>12</sup> covering energy efficiency, ventilation and overheating through Building Regulations
<b>2</b>	Planning policy requirements that are over and above proposed Building Regulations to better progress Coventry's aspirational ambitions for addressing climate change effects

<sup>4</sup> <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

<sup>5</sup> The ONS population data for Coventry has been found to be erroneous & overestimated. For example, please see: <https://osr.statisticsauthority.gov.uk/correspondence/sir-andrew-watson-to-ed-humpherson-and-sir-david-norgrove-population-projections-and-mid-year-population-estimates-for-coventry/> and <https://osr.statisticsauthority.gov.uk/wp-content/uploads/2021/05/Review-of-population-estimates-and-projections-produced-by-the-Office-for-National-Statistics.pdf>

<sup>6</sup> Housing & Economic Development Needs Assessment (HEDNA, November 2022) Iceni Projects Ltd on behalf of Coventry & Warwickshire Local Authorities <https://www.coventry.gov.uk/downloads/download/7374/coventry-and-warwickshire-housing-and-economic-development-needs-assessment-hedna>

<sup>7</sup> Government changes (rev December 2020) to the planning system include a 35% uplift to the housing number generated by the standard method for the 20 most populated cities & urban centres in England – and Coventry is on the list of 20 <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

<sup>8</sup> <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system#chapter-4--a-new-standard-method-for-assessing-housing-needs>

<sup>9</sup> Dwellings per hectare

<sup>10</sup> Coventry's draft Climate Change Strategy 2023-2030 <https://www.coventry.gov.uk/downloads/download/7434/coventry-s-draft-climate-change-strategy-that-aims-for-“The-dramatic-reduction-of-carbon-emissions-to-achieve-carbon-neutrality-with-a-100%reduction-to-1990-levels-by-2050-at-the-very-latest”>

<sup>11</sup> For example, please see: <https://www.futurehomes.org.uk/delivery-at-scale>

<sup>12</sup> <https://www.gov.uk/government/consultations/the-future-buildings-standard>



<b>III d: Options for Nature &amp; Biodiversity</b>	
<b>1</b>	Planning policy requirements in line with national requirements & standards, including 10% Biodiversity Net Gain (BNG) <sup>13</sup> , and Green Infrastructure (GI) standards <sup>14</sup>
<b>2</b>	Planning policy requirements that are over and above national requirements for BNG & GI standards

<b>III e: Options for Development in the Green Belt</b>	
<b>1</b>	Potential for development within the Green Belt
<b>2</b>	No potential development within the Green Belt

<b>III f: Options for Quantum of Employment Land</b>	
<b>1</b>	147.6 ha general industrial (excluding strategic B8) – HEDNA (2024)
<b>2</b>	60 ha general industrial calculated as quantum that can be accommodated
<b>3</b>	60 ha plus an additional 11.81 ha being promoted & located in the Green Belt (Site North of A45 & West of Brick Hill Lane)

<b>III g: Options for Quantum of Office Development</b>	
<b>1</b>	8.5 hectares offices (HEDNA), assume 85,000 sq m
<b>2</b>	5.8 hectares offices (HEDNA less 2.7 hectares oversupply as per the ELR office market addendum) assume 58,000 sq m
<b>3</b>	4.12 hectares offices (reduced land take for offices as per the ELR office market addendum based on allowance of 10sqm per full time employee instead of 14sqm assumed previously, to allow for increased flexible and hybrid working patterns. This broadly equates to the more high level 30% reduction assumed by the HEDNA) (overall, 41,200 sq m)

<b>III h: Options for Distribution of Office Development</b>	
<b>1</b>	City Centre focus including Friargate
<b>2</b>	A more dispersed approach
<b>3</b>	City centre focus to include 39,549 sqm floorspace at Friargate <sup>15</sup> and the rest distributed to other defined centres (overall, 41,200 sq m)

<sup>13</sup> Environment Act 2021, and for example, please see <https://consult.defra.gov.uk/defra-net-gain-consultation-team/consultation-on-biodiversity-net-gain-regulations/>

<sup>14</sup> <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx>

<sup>15</sup> An office block was constructed in 2022 (12,449 sq m) leaving 27,100 sq m at Friargate & 1,451 sq m elsewhere

<b>IIIi: Options for Purpose Built Student Accommodation (PBSA)</b>	
<b>1</b>	Retain Policy H10 Student Accommodation as adopted Plan (2017)
<b>2</b>	PBSA to be located at campus/city university area unless evidence demonstrates otherwise on a case by case basis

<b>Key: Categories of Significance</b>		
<b>Symbol</b>	<b>Meaning</b>	<b>Sustainability Effect</b>
- -	Major Negative	Problematical & improbable due to known sustainability issues; mitigation difficult and/or expensive
-	Minor Negative	Potential sustainability issues: mitigation and/or negotiation possible
+	Minor Positive	No sustainability constraints and development acceptable
++	Major Positive	Development encouraged as would resolve existing sustainability problem
?	Uncertain	Uncertain or Unknown Effects
0	Neutral/Neutral	Negligible effects or not applicable
SA No 10 split cell – first symbol refers to land/soil & water resources; second symbol refers to minerals & waste		

IIIa: Options for Quantum of Housing Needs 2022-2041	
1	63,760 dwellings (3,188 per annum) – Government standard method (with ONS population projections from 2014)
2	39,280 dwellings (1,964 per annum) – HEDNA method (with census population data from 2021)
3	29,100 dwellings (1,455 per annum) – HEDNA method as per Option 2 but minus 35% uplift for largest urban authorities
4	Approx. 31,500 dwellings (1, 575 per annum) – calculated as can be accommodated based on supply figures
5	30,500 dwellings (1, 527 per annum) – calculated through proposed new standard method for assessing housing needs (July 2024) <sup>16</sup>

		Options for Quantum of Housing				
Sustainability Objective	Assessment of Effects  Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	1. Standard Method (2014)	2. Standard Method (HEDNA 2022) –	3. Standard Method less 35% Uplift (2022) –	4. Quantum that can be accommodated –	5. Proposed Standard Method (2024) –
		63,760 dwellings	39,280 dwellings	29,100 dwellings	approx. 31,500 dwellings	30, 540 dwellings
<b>1: To enable vibrant and inclusive communities</b>	There is a need to plan for a growing, changing, ageing and increasingly diverse population that will need increasing participation and involvement to help maintain social cohesion and reduce risks for radicalisation and social exclusion. The total population of Coventry City Council <sup>17</sup> administrative area was 345,300 with an 8.9% growth in population from 2011 to 2021 – and this is higher than the rate in the West Midlands 6.2% and England 6.6% - and with a high	+	+	+	+	+

<sup>16</sup> <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system#chapter-4--a-new-standard-method-for-assessing-housing-needs>

<sup>17</sup> <https://www.coventry.gov.uk/facts-coventry/population-demographics>

	<p>number of young people aged 20-24. It is predicted to increase to 422,919 by the year 2031 and to 454,534 by the year 2042. In line with the rest of England, this is an ageing population.</p> <p>The provision of new good quality homes will have positive effects for people. It could be asserted that higher figures of new homes, as in Option 1, could have more positive effects as more new homes could be available to more people – but the higher quantum of new development could overload the capacity of existing communities to absorb new people.</p> <p>Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies, rather than the overall quantum of housing. For example, extant Policy H7 covers Gypsy &amp; Travellers, Policy H8 covers the needs of an ageing population, and Policy H10 covers student accommodation. Policy H4 secures a mix of housing and Policy H6 covers affordable housing – the encouragement of mixing should support a wider range of social connectivity and community interaction – all with positive effects for all five options.</p> <p>The Housing Topic Paper &amp; the HEDNA discuss the possibilities for a new Policy on Co-Living – and this is likely to encourage safe social connectivity and could encourage community participation – all particularly for the younger people who would be interested in this form of housing – positive effects for all five options.</p> <p>Thus extant policies address many of the potentially disadvantaged groups – poor, ageing, physical &amp; mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period.</p> <p>The extant policies do not explicitly mention ethnic or cultural housing needs. The majority (66.6%) of Coventry's total population is White British, such that Coventry has a notably higher percentage of ethnic</p>					
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	<p>minority groups compared to the regional and national averages<sup>18</sup>. However, over the past decade, the city has become increasingly ethnically diverse with just under half of its school-aged population from an ethnic minority background in 2021. There are many factors that may be contributing to the changing ethnic composition, such as differing patterns of ageing, fertility, mortality, and migration – and it is not clear how policies for new homes can support inclusivity for such groups in communities.</p> <p><b>SA Suggestion at Regulation 18:</b> Is there any scope for considering any particular housing needs from cultural, ethnic or migrants/refugees groups and can the new development plan contribute to encouraging more social inclusivity for these groups?</p>					
<p><b>2: To provide accessible essential services and facilities for all residents</b></p>	<p>As communities grow and change, the provision of, and access to, community and social facilities and services, needs to be maintained and improved for social and health wellbeing. This includes access for all to Green Infrastructure [and this is discussed further in SA No 11 Nature &amp; Biodiversity].</p> <p>It could be asserted that the higher figures of new homes, as in Option 1, could have more negative effects as the higher quantum of new development could overload the capacity of services &amp; facilities for residents. However, larger scale developments may be better able to support provision of new services &amp; facilities. It is likely that the lower quantum of new housing in Options 3, 4 &amp; 5 are less likely to overload the capacity of services &amp; facilities with less negative effects and overall more likely positive effects.</p> <p>The location of new development is guided by specific policies – and these consider accessibility to physical, social &amp; green infrastructure – including sufficient mitigation measures to ensure that services &amp; facilities are sufficient, for example, Policy IM1 Developer Contributions. Policy H2 lists housing allocations that have been</p>	+	+	++	++	++

<sup>18</sup> (ONS, 2021) <https://www.coventry.gov.uk/facts-coventry/population-demographics>

	<p>assessed &amp; identified to be in suitable locations, including for provision of, and accessible, services &amp; facilities, including sustainable/active transport, social &amp; community facilities, education &amp; training, and green infrastructure. The review will update these policies. Policies C1-3 specifically address communities.</p> <p><b>SA Suggestion at Regulation 18:</b> Policy review could consider encouraging facilities that are adaptable to future changes in population demographics and technology. It could encourage &amp; support people to lead healthy &amp; active lives, and ensure that facilities are accessible to all groups, including those with physical or mental disabilities.</p>					
<p><b>3: To improve health &amp; promote active living</b></p>	<p>As life expectancy is below average and health outcomes are worse in the more deprived areas of Coventry, a targeted approach has been identified by the JSNA<sup>19</sup> to give appropriate support to each group to improve health and wellbeing for all rates. There is also a shift to focus on to prevention that will need a community-informed and culturally competent approach. The Index of Multiple Deprivation (IMD) data (2019)<sup>20</sup> for Coventry City indicates a range of deprivation (from least to most deprived) throughout the wards with the most deprived tending to be found in the city centre and radiating out towards the north/north-east, to the south-east and with a grouping of wards located near the boundary to the south-west. Inequalities in health arise out of inequalities in society.</p> <p>Coventry became a Marmot City<sup>21</sup> in 2013 and is committed to reducing inequality and improving health outcomes for all. In 2019, the key focus is on children and young people, and following the impact of Covid19 on the city, also prioritising the effect on ethnic minority group communities. Healthy ageing is a challenge throughout England. There are complexities of planning for health due to the multiple determinants and the need for cross-sectoral understanding and collaboration with linkages between the global</p>	<p>+?</p>	<p>+?</p>	<p>+</p>	<p>+</p>	<p>+</p>

<sup>19</sup> <https://www.coventry.gov.uk/facts-coventry/joint-strategic-needs-assessment-jsna>

<sup>20</sup> <https://coventry-city-council.github.io/imd/2019/>

<sup>21</sup> <https://www.coventry.gov.uk/policy-1/coventry-marmot-city>

	<p>ecosystem, the natural and built environments, the local economy with communities, people, and their lifestyles.</p> <p>Provision of good quality housing &amp; access to employment is well established as contributing to better health and wellbeing – physical &amp; mental<sup>22</sup>. These factors are covered by the following SA Nos 4 &amp; 5.</p> <p>Overcrowding is more likely to be experienced by minority ethnic groups<sup>23</sup> – and this might occur as a result of multiple generations of a family living in one home. There can be reduced isolation but there are health risks associated with overcrowding. Provision of identified need through appropriate density &amp; quality can help resolve such an existing sustainability problem.</p> <p>It could be asserted that higher figures of new homes could have more positive effects as more new homes could be available to more people. However, the effectiveness of reducing health inequalities is likely to be associated with the location of new development. In consideration of the land constraints in Coventry, the higher quanta of housing are likely to be difficult to accommodate - homes may need to be small, more densely located and thus less able to meet the variety and adaptability of needs. Such quanta would also place pressures on the capacities of the open/green spaces in the city – and thus, limit the health and wellbeing associated with such spaces. Overall, some uncertainties of significance of effects for Options 1 &amp; 2; positive effects more certain for development that can be accommodated – Options 3, 4 &amp; 5.</p> <p>The extant Local Plan includes site allocations (H2 Housing; JE2 Employment Land) and other policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have</p>					
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<sup>22</sup> For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

<sup>23</sup> The Marmot Review 10 Years On (February 2020) <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

	<p>negative effects for health and wellbeing. The review will update policies.</p> <p>Through Policy HW1 of the current Plan, applicants are required to mitigate against potentially negative health impacts. The Health Impact Assessment SPD<sup>24</sup> provides information and guidance on completing the relevant health toolkit and HIA. This is a proactive approach in plan-making and provides mitigation to ensure that there are no negative effects on health from new development.</p> <p><b>SA Suggestions at Regulation 18:</b> Can the Plan consider reducing deprivation with particular regard to deprivation pockets in Coventry, thus supporting the targeted approach identified by the JSNA? Policies addressing the ageing population could consider adaptability &amp; improving resilience (both physical &amp; cognitive) for housing the elderly. Can design principles or requirements create safer neighbourhoods &amp; help reduce crime, including violence – especially against women and girls? Are there particular issues for health &amp; overcrowding, perhaps associated with ethnic minority groups?</p>					
<p><b>4: To provide decent and affordable housing for all</b></p>	<p>New demographic projections have been modelled (HEDNA 2022)<sup>25</sup> to estimate the amount and type of housing that will be needed over the period to 2041. The older person population is projected to increase notably in the future and an ageing population means that the number of people with disabilities is likely to increase substantially. Self-build and custom housebuilding<sup>26</sup> is a growing sector of the housing market, and one which has potential to contribute to housing delivery. There is also the potential for co-living<sup>27</sup> to be considered. It is understood that there is a sizeable amount of student</p>	<p>+</p>	<p>++</p>	<p>++</p>	<p>++</p>	<p>++</p>

<sup>24</sup> Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

<sup>25</sup> <https://www.coventry.gov.uk/downloads/download/7374/coventry-and-warwickshire-housing-and-economic-development-needs-assessment-hedna>

<sup>26</sup> <https://www.gov.uk/guidance/self-build-and-custom-housebuilding>

<sup>27</sup> For example, please see <https://coliving.com/what-is-coliving>



	<p>accommodation in Coventry and, if delivered, provides the potential to reduce the number of students in the wider housing market.</p> <p>It may be asserted that opportunities to provide decent and affordable housing for all is more likely with the higher quanta of housing in Options 1 &amp; 2 – if such numbers of homes could be accommodated within the constraints of the city area. Homes may need to be small, more densely located and thus less able to meet the variety and adaptability of needs – and therefore, uncertainties for significance of effects for Options 1 &amp; 2.</p> <p>However, capacity (HELAA 2024<sup>28</sup>) and viability studies have indicated that Options 3, 4 &amp; 5 could deliver the identified need for housing indicating major positive effects for housing objectives. Therefore, positive effects likely for all five options but uncertainties of significance for the higher quanta of housing numbers.</p> <p>Whilst delivery has not been an issue for the Council<sup>29</sup>, there must be some uncertainty about availability of suitable land in sustainable locations to accommodate the higher quanta of housing in Options 1 &amp; 2, and to meet with other objectives, particularly for climate change &amp; biodiversity. The city has tight boundaries and constrained opportunities to grow within them, such that the Council will continue to work closely with its neighbouring authorities for shared opportunities. Therefore, uncertainty of significance of positive effects for Options 1 &amp; 2.</p> <p>In 2020/21<sup>30</sup> the delivery of affordable housing was below the annualised need (although an increase in percentage from 7 to 13 % on 2019/20), and the updated policies will need to take this into account. As PBSA schemes are built, Homes in Multiple Occupation (HMOs) will become available for the wider housing market. It is</p>					
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<sup>28</sup> Coventry City Council (2024) Housing & Economic Land Availability <https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

<sup>29</sup> See AMR 2021/22 <https://www.coventry.gov.uk/downloads/file/39439/authority-monitoring-report-2021-22>

<sup>30</sup> <https://www.coventry.gov.uk/downloads/file/37391/authority-monitoring-report-2020-2021>

	<p>important to address any imbalance in the distribution of affordable housing.</p> <p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix &amp; tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups.</p> <p>The Affordable Housing SPD (March 2022)<sup>31</sup> provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built – all with likely major positive effects.</p> <p>The need to improve the quality of the existing housing stock remains, especially with regard to damp and poorly insulated homes. Climate change commitments will require, amongst other things, retrofitting existing homes to ensure that they are up to modern insulation standards (and see later SA No 6 Net Zero Carbon &amp; SA No 7 Resilience to Climate change).</p> <p><b>SA Suggestion at Regulation 18:</b></p> <ul style="list-style-type: none"> <li>■ Is there any scope for considering any particular housing needs from cultural, ethnic or migrants/refugees groups?</li> </ul>					
<p><b>5: To support sustainable</b></p>	<p>Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people. The</p>	<p>--?</p>	<p>-?</p>	<p>+?</p>	<p>+?</p>	<p>+</p>

<sup>31</sup> <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

<p><b>inclusive economic growth</b></p>	<p>initial evidence indicated that employment need could be met from renewal of existing sites and redevelopment<sup>32</sup>.</p> <p>The HEDNA (Nov 2022) considered population, housing growth and the economy in tandem based on the 2021 census figures. Capacity (HELAA 2024) and viability studies have indicated that Options 3, 4 &amp; 5 may be able to be accommodated, indicating minor positive effects for employment objectives but with some uncertainty of significance at this stage until more studies are undertaken. It is unlikely that the higher quanta of housing in Options 1 &amp; 2 could be accommodated due to the constraints within the Coventry boundary. The higher quanta in Options 1 &amp; 2 could require re-allocation of some employment land and/or result in increased commuting for work (with further implications for other SA objectives, such as transport). It remains uncertain how the effects of Covid-19 on changing patterns of working, such as home working, co-working &amp; hybrid working, will affect requirements for employment land during the plan period.</p>					
<p><b>6: To help achieve the Council's ambition to reach net zero carbon emissions</b></p>	<p>The Council recognises the climate crisis and is currently reviewing its Strategy<sup>33</sup>. This will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure.</p> <p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions. Following consultation in 2023, Government intended to publish the Future Homes &amp; Buildings Standards (FHBS) in 2024<sup>34</sup> and then bring it into force in 2025. All new homes will then be 'zero carbon-ready', meaning that they will be zero carbon - once the electricity grid has</p>	<p>+?</p>	<p>+?</p>	<p>+</p>	<p>+</p>	<p>+</p>

<sup>32</sup> <https://www.coventry.gov.uk/downloads/download/7374/coventry-and-warwickshire-housing-and-economic-development-needs-assessment-hedna>

<sup>33</sup>A Green Future for a Changing City(2022 – 2030) <https://www.coventry.gov.uk/draftclimatechangepolicy>

<sup>34</sup> <https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation/the-future-homes-and-buildings-standards-2023-consultation>

	<p>been decarbonised<sup>35,36</sup>. The UK has committed to decarbonise the electricity system by 2035<sup>37</sup> and the updated policies in the CLPR will reflect this commitment in consideration of the plan period to 2041.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, as well as those that encourage active travel through location of new development in sustainable locations with sustainable transport – Policy AC1 Accessible Transport &amp; Policy H1 Allocations, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan)</p> <p>Since all new development will need to meet requirements from updated policies, it is likely that there will be no significant negative effects for all five housing options – in the longer term, after 2035. Assuming that the required zero carbon trajectory can be achieved, positive effects for climate change objectives are indicated in the longer term. However, there is some uncertainty that the higher quanta of housing in Options 1 &amp; 2 would be able to meet with the enhanced requirements to meet with net zero carbon – particularly in the shorter term. Viability/costs may also be an issue in the shorter term as the construction industry develops new methods.</p> <p>The Council's Energy SPD<sup>38</sup> currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements. The Council is also investigating how it could establish challenging new targets/standards, including consideration of standards higher than Building Regulations, in order to support Coventry's aspirations for addressing the climate change crisis.</p>					
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<sup>35</sup> <https://www.futurehomes.org.uk/delivery-at-scale>

<sup>36</sup> <https://www.benuk.net/Decarbonising-the-Grid.html>

<sup>37</sup> <https://www.gov.uk/government/news/plans-unveiled-to-decarbonise-uk-power-system-by-2035>

<sup>38</sup>Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) <https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

	<p>There is a perception that new building reduces carbon emissions when operational compared to an existing building. However, new buildings incur high carbon emissions from embodied carbon associated with the extraction of raw materials, transport &amp; construction. The VAT levy on new builds at 0-5% compared to 20% for refurbishment is a disincentive for refurbishment. However, refurbishment of buildings is likely to be delivered in a shorter time than new build. High quality refurbishments can inspire as much as new buildings with appropriate design and reuse of buildings can include historic assets – a particular issue for Coventry and with positive effects.</p> <p><b>SA Suggestion at Regulation 18:</b> Circular economy principles<sup>39</sup> for buildings should be considered for inclusion in the updating of policies so that embodied carbon and whole life assessment are requirements for development proposals.</p>					
<p><b>7: To build resilience to climate change</b></p>	<p>There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK.<sup>40</sup> Therefore, it is vital to build resilience, including reducing risks from overheating, flooding and the resultant detriment to wellbeing, the economy and the environment.</p> <p>All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. Relevant current policies in the adopted Local Plan include, Policy EM1 Planning for Climate Change Adaptation, Policy EM2 Building Standards, Policy GE1 Green Infrastructure, Policy EM4 Flood Risk Management, and Policy EM5 Sustainable Drainage Systems – and all these will be reviewed &amp; updated.</p> <p>There is some uncertainty that the higher quanta of housing in Options 1 &amp; 2 would be able to meet with the enhanced</p>	<p>-?</p>	<p>-?</p>	<p>+</p>	<p>+</p>	<p>+</p>

<sup>39</sup> For example, please see RIBA, 2021 <https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy> 9781859469545

<sup>40</sup> For example, see <https://earth.org/climate-change-in-the-uk/>

	<p>requirements to build resilience from overheating, flood risk, and extreme weather effects due to the constraints – suitable land &amp; viability (and particularly in the shorter term until technology catches up with requirements &amp; the construction sector can meet with increased needs). Overall, provision of green spaces and sustainable drainage are key elements to progress objectives for climate change. The higher quanta of housing is likely to place greater pressures on these resources with negative effects – therefore, minor negative effects for Options 1 &amp; 2 that will be cumulative in the longer term, but uncertainties of significance at this stage of assessment.</p>					
<p><b>8: To reduce traffic &amp; improve sustainable transport choices</b></p>	<p>A key objective remains for the review of the CLP - to improve the sustainability of the transport system in Coventry, improving integration with walking and cycling routes and green infrastructure networks, and promoting more active travel. The Council has aimed to locate new development in sustainable locations – identified through their proximity and accessibility to sustainable transport choices – and reflected in the site allocations in the adopted Plan.</p> <p>This principle will be retained in the review of the policies and will apply to all new development. Due to the predicted increase in population, transport policies need to both encourage sustainable modes and also to discourage car use – for example, through restricted parking, zero emission zones, and reallocation of some road space to sustainable movement options.</p> <p>The Environment Improvement Plan<sup>41</sup> for England includes an aim for half of all journeys in cities to be cycled or walked by 2030 and Coventry's Transport Strategy<sup>42</sup> aims to significantly improve conditions to encourage more people to walk and cycle.</p>	<p>--?</p>	<p>-?</p>	<p>0?</p>	<p>0?</p>	<p>0?</p>

<sup>41</sup> <https://www.gov.uk/government/publications/environmental-improvement-plan>

<sup>42</sup> <https://www.coventry.gov.uk/transport-strategy-2/transport-strategy>

	<p>It is uncertain whether such approaches could mitigate sufficiently for the higher quantum of housing in Option 1. There is considerable uncertainty about the delivery of the higher quantum of housing in Option 1 due to the boundary constraints and limited amount of sustainable transport locations, albeit that the urban parts of Coventry are generally well connected. Therefore, potential for major negative effects with Option 1. The quantum of housing in Option 2 indicates a reduction in potential negative effects on transport objectives but with uncertainty at this stage as significance will vary with locations. The lower quanta of housing in Options 3, 4 &amp; 5 are less likely to be associated with significant cumulative negative effects and therefore, negligible or neutral effects are indicated.</p> <p>Where there is a deficiency in public &amp; sustainable transport, it is generally considered that larger developments, particularly in rural areas, are able to provide &amp; encourage sustainable transport choices as part of an overall package of masterplanning &amp; developer contributions. Coventry is constrained by boundaries and various other factors, including Green Belt (and see SA No 13); however, the urban environment is well connected and with a good transport system. Nonetheless, it is considered that the higher quanta of housing with such overall development pressures could challenge the capacity of public &amp; sustainable transport, and open/green spaces, with potential negative effects. The lower quantum of housing that has been calculated (HELAA, 2024) with urban capacity may facilitate a shift in transport mode to more sustainable options with negligible or neutral effects. There may be some positive effects – especially in the longer term as walking/cycling/GI networks become better linked &amp; more extensive. However, uncertainties of significance at this stage of assessment.</p> <p>It may be noted that facilitating active travel has further positive effects for air quality &amp; noise (SA No 9), health &amp; wellbeing (SA No 3) and GI (SA No 11).</p>					
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	<p>There may also be an issue from transport and air quality for nitrogen deposition and negative effects on biodiversity and nature sites (see SA No 11) and HRA Report (August 2024).</p> <p><b>SA Suggestions at Regulation 18:</b>          Consider revision of policy to include restricted parking &amp; zero emission zones          Consider whether more areas of road space would be safe &amp; appropriate for reallocation to cycling &amp; walking – particularly in areas that would link/extend sustainable transport networks.          Reuse/refurbishment of existing buildings, including historic assets (and see SA No 12)          Consider higher densities in key sustainable locations that meet other Plan objectives</p>					
<p><b>9: To reduce air, noise &amp; light pollution</b></p>	<p>In the UK, air pollution has been recently reported (2022) as being the largest environmental risk to public health<sup>43</sup>. Reducing vehicle emissions will continue to improve air quality. Indoor air pollution is becoming an increasing proportion of the problem<sup>44</sup>.</p> <p>Noise pollution is an acknowledged issue for human health &amp; wellbeing – physical &amp; mental - (see SA No 3 and also certain biodiversity see SA No 11), and particularly road traffic noise (see also SA No 8) remains a major problem in Europe<sup>45</sup> &amp; the UK<sup>46</sup>. Significant health impacts are likely to be underestimated, and exposure to environmental noise does not affect everyone equally. Socially deprived groups &amp; groups with increased susceptibility to noise may suffer more pronounced health related impacts of noise. Future urban growth and increased demand for mobility is likely to increase the numbers of people exposed to high levels of noise.</p>	<p>0?</p>	<p>0?</p>	<p>0?</p>	<p>0?</p>	<p>0?</p>

<sup>43</sup> OHID (updated Feb 2022) Air Pollution: applying All Our Health <https://www.gov.uk/government/publications/air-pollution-applying-all-our-health/air-pollution-applying-all-our-health>

<sup>44</sup> Chief Medical Officers' annual report 2022: air pollution <https://www.sciencemediacentre.org/chief-medical-officers-annual-report-2022-air-pollution/>

<sup>45</sup> EEA, 2020 <https://www.eea.europa.eu/publications/environmental-noise-in-europe>

<sup>46</sup> For example, please see Karen Bakker (January 2023) Noise Pollution is a menace to humanity <https://www.theguardian.com/commentisfree/2023/jan/03/noise-pollution-is-a-menace-to-humanity-and-a-deadly-threat-to-animals>



	<p>Light pollution disturbance can adversely affect health &amp; wellbeing, including fatigue, insomnia, stress &amp; anxiety<sup>47</sup> (and also certain biodiversity – see SA No 11).</p> <p>Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects. Some uncertainty at this stage of assessment about the effectiveness of mitigation for potential cumulative effects.</p> <p><b>SA Suggestions at Regulation 18:</b> Continue to focus on reducing vehicle use to help reduce air pollution Consider the implications of environmental noise Consider the implications of light pollution explicitly in building design &amp; including the indoor environment Consider cumulative effects Consider the implications of air, noise &amp; light pollution for nature &amp; biodiversity</p>										
<p><b>10: To protect &amp; conserve natural resources – soil, water, minerals &amp; waste<sup>48</sup></b></p>	<p>The vast majority of development completions (90%) in 2021/22<sup>49</sup> were on former brownfield or previously developed land, with just 10% built on greenfield sites. The review of the CLP will recommend that priority is given to continuing to build on PDL where effectively located. Policy EM6 Redevelopment of Previously Developed Land provides mitigation to conserve natural resources indicating negligible effects for all five options. However, with the updating of policies to meet with new requirements, especially those for climate change &amp; sustainable movement, there may be insufficient suitable PDL to meet with the higher quanta in Options 1 &amp; 2 – indicating</p>	-	0?	-?	0	0	0	0	0	0	0

<sup>47</sup> For example, please see <https://www.darksky.org/light-pollution/human-health/>

<sup>48</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

<sup>49</sup> <https://www.coventry.gov.uk/downloads/file/39439/authority-monitoring-report-2021-22>

	<p>potential minor negative effects for Option 1 and for Option 2, although with some uncertainty at this stage. The best agricultural land must be conserved and effects of climate change may affect food security.</p> <p>Climate change, particularly incidences of hotter, drier, summers may exacerbate water supply issues; wetter and more flooding may overload wastewater systems. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The cumulative effects of the higher quanta of housing may incur minor negative effects but with some uncertainty at this stage. The recent Water Cycle Study Stage 1 (June 2024)<sup>50</sup> indicates that there is water capacity for the quanta in Options 3, 4 &amp; 5 – with potential neutral effects.</p> <p>Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development. It is assumed that they will be updated to address any capacity issues such that neutral effects would be indicated. However, there may be some uncertainty associated with the higher quantum of housing in Option 1.</p> <p><b>SA Suggestions at Regulation 18:</b> The effective use of land could consider whether an uplift in minimum housing density requirements might be possible where sufficient infrastructure is in place Are there sufficient allotments for any increasing need? Are there sufficient facilities that recycle and recover value from waste?</p>					
<p><b>11: To protect and enhance</b></p>	<p>It will be necessary to consider the new requirements from the Environment Act and including emerging metrics for calculating</p>	<p>--?</p>	<p>-?</p>	<p>+</p>	<p>+</p>	<p>+</p>

<sup>50</sup> JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

<p><b>nature &amp; biodiversity</b></p>	<p>biodiversity net gain (BNG)<sup>51</sup>. Unequal distribution, and access to, green infrastructure across the city can exacerbate health inequalities. There are priority areas that would benefit particularly from greening. Off-site areas for biodiversity net gain may be needed. Increased recreational pressures and water quality impacts (such as road run-off) as a result of new development can put pressure on GI and biodiversity. Climate change is likely to affect changes to habitats and species distribution.</p> <p>The fragmentation and erosion of habitats remains a threat, and the need to secure biodiversity gain and improve the wider ecological network remain objectives for plan making in the Coventry area. The current adopted Plan has policies to protect nature &amp; biodiversity, including GB1 Green Belt &amp; Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide further mitigation measures aiming for no major significant negative effects. However, the higher quanta of housing in Options 1 &amp; 2 will challenge mitigation possibilities for Coventry – even with new development being required to provide biodiversity net gain as land constraints will limit availability for provision of such biodiversity mitigation measures – and therefore, negative effects indicated. The HELAA (2024) studies have found that the quanta in Options 3, 4 &amp; 5 could be accommodated and therefore, likely minor positive effects as all development will need to meet with 10% BNG. Overall, some uncertainties of significance of effects as depend upon locations, densities and any possibilities for sufficient offsite measures.</p> <p><b>SA Suggestions at Regulation 18:</b> Need to consider any issues from transport &amp; air quality for nitrogen deposition on nature sites Increasing density of housing in suitable locations could take the loading off land availability</p>					
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<sup>51</sup> Biodiversity Metric 4.0 (JP039) 2021 <https://publications.naturalengland.org.uk/publication/6049804846366720>

	Need to consider wider water network for quality, flows and any functionally linked watercourses with a longer term aspiration to restore connectivity by removing barriers					
<p><b>12: To protect and enhance the historic environment, and its setting</b></p>	<p>Coventry has a range of unique historic assets that give the area its distinctive characters and cultural identity. Development pressures may continue to have potential negative effects on historic assets and their setting, especially through cumulative effects. As the population changes, local communities may change with different understandings of heritage value and importance. Mitigation of, and adaptation to, the effects of climate change are a particular challenge for heritage assets and their setting.</p> <p>The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation &amp; Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. However, the quantum of housing in Options 1 &amp; 2 is likely to have cumulative effects overall that will be difficult to mitigate due to the constraints within the City – therefore, minor negative effects but with some uncertainty at this stage. The lower quanta of housing in Options 3, 4 &amp; 5 indicate that there is more capacity in the City to accommodate the change and with strong policies in place, likely effects will be reduced to neutral/negligible – but still some uncertainty as depends on precise details &amp; location.</p> <p>The historic environment is closely interwoven with townscape &amp; good design (SA No 13). It may also be noted that new development can resolve existing sustainability problems with the historic environment, for example, by removing extant unsightliness of the setting of an asset, improving accessibility, and enhancing the asset with its context/setting.</p> <p>Historic England recognises the need for urgent action &amp; is committed to achieving net zero carbon; HE suggests that reusing</p>	-?	-?	0?	0?	0?

	<p>the current homes built before 1919 (about 20% in England) with appropriate energy improvement solutions is key to cutting carbon emissions<sup>52</sup>.</p> <p><b>SA Suggestions at Regulation 18:</b> Increasing density of housing in suitable locations could take the loading off land availability &amp; risks of negative effects for historic environment Reuse/refurbishment of older buildings is indicated as being more likely to progress to net zero carbon – but energy efficiency during operation may be an issue Are there areas of the city that have changed significantly with changing population such that the local value &amp; importance has changed? Are there opportunities with the review to focus on protecting heritage assets at risk? Are there opportunities to resolve existing problems with the historic environment &amp; enhancing access/context/setting? Consider proactive support for reuse of buildings pre 1919 with suitable energy improvements</p>					
<p><b>13: To protect and enhance the quality and character of townscapes &amp; landscapes</b></p>	<p>It is important to promote good sustainable urban design and this should reflect the special characteristics and needs of different parts of the city. Good design should focus on people within the spaces, how they move, interact and socialise, and should ensure feelings of safety and security. Green and open spaces should be woven into the urban design, and consideration given to opportunities to enhance the blue infrastructure assets for Coventry. The Coventry Green Belt<sup>53</sup> remains an important mechanism to prevent urban sprawl, safeguard countryside, and preserve the setting and special character of historic towns – such as Coventry. The administrative boundary of Coventry is tightly defined with many parts of the existing urban area abutting the Green Belt. This was a significant issue during preparation of the current Plan &amp; Coventry's exceptional</p>	<p>--?</p>	<p>-?</p>	<p>+</p>	<p>+</p>	<p>+</p>

<sup>52</sup> Historic England (March 2022) <https://historicengland.org.uk/whats-new/features/climate-change/our-strategy/>

<sup>53</sup> <https://www.coventry.gov.uk/directory-record/45418/green-belt-land> and see also: [https://www.coventry.gov.uk/downloads/download/4073/evidence\\_base\\_-\\_coventry\\_and\\_warwickshire\\_joint\\_green\\_belt\\_review\\_2015](https://www.coventry.gov.uk/downloads/download/4073/evidence_base_-_coventry_and_warwickshire_joint_green_belt_review_2015)

	<p>circumstances were acknowledged. Policy GB1 Green Belt will be updated but the issue of constraints to high levels of new development remain and with particular adverse effects on Green Belt and the quality and character of town and countryside areas, including the closely woven historic environment.</p> <p>The recent technical update to the GB Study (July 2024)<sup>54</sup> has confirmed that Coventry's GB continues to serve GB purposes and it will continue to do so, noting that there remain some significant areas of PDL in the urban areas of Coventry.</p> <p>Climate change and population growth are exacerbating environmental issues in urban areas. The economic valuation of urban natural capital demonstrates multiple social, environmental and economic benefits and the importance of urban green and blue spaces and blue-green infrastructure<sup>55</sup>. Therefore, it is vital that space for green &amp; blue infrastructure is retained &amp; enhanced, including improvements to linkages &amp; networks that will further benefit people &amp; nature.</p> <p>Significant negative effects are likely for Options 1 &amp; 2, and particularly for cumulative effects, as such high quanta of development are likely to compromise the possibilities for embedded &amp; other mitigation measures in the design process.</p> <p>Mitigation measures, such as for design, location and offsetting, are likely to be effective for the lowest quanta of housing as capacity has been indicated in Options 3, 4 &amp; 5. New development that is high quality, creative &amp; proportional to the receiving townscape &amp; local environment can have very positive effects, and also act as a catalyst for further enhancement of quality and human wellbeing to the built environment. Therefore, positive effects are likely for Options 3, 4 &amp; 5 as it has been indicated by the HELAA studies that such housing numbers can be accommodated within the urban area.</p>					
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<sup>54</sup> Coventry city Council (July 2024) Green Belt Technical Update Study

<sup>55</sup> Environment Agency 2021 The State of the Environment: the urban environment <https://www.gov.uk/government/publications/state-of-the-environment/the-state-of-the-environment-the-urban-environment>

	<p>Some uncertainty at this stage as significance will depend on location &amp; extent of design mitigation possibilities.</p> <p><b>SA Suggestions at Regulation 18:</b>                  Consider highest design &amp; for reuse/refurbishment to avoid landtake &amp; new build                  Consider higher densities in suitable, sustainable locations                  Require highest quality design principles &amp; approach consistent with Coventry aspirations</p>					
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<b>Appendix IIIb: Options for Residential Density</b>	
<b>1</b>	Greenfield 30 dph <sup>56</sup> ; outside ring road minimum 35 dph; inside ring road minimum 200 dph. Current adopted CLP Policy H9
<b>2</b>	As Option 1 but with >35 dph outside ring road – in certain locations
<b>3</b>	Greenfield 35 dph; Brownfield 45 dph; 125 dph in defined transition zone; 250 dph within City Centre boundary

		<b>Options for Density</b>		
<b>Sustainability Objective</b>	<b>Assessment of Effects</b>  <b>Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</b>	<b>1. Greenfield 30 dph; Outside ring road min 35 dph; inside min 200dph</b>	<b>2. As Option 1 but Outside ring road &gt;35 dph in certain locations</b>	<b>3. Greenfield 35 dph; Brownfield 45 dph; Transition Zone 125 dph; City Centre 250 dph</b>
<b>1: To enable vibrant and inclusive communities</b>	The current CLP approach set out in Policy H9 provides mitigation measures to avoid or minimise likely potential negative effects by defining standards for residential densities according to the characteristics and capacity of the different receiving environments within the Coventry area. The need to protect greenfield land from development pressures and recognise the more rural context is recognised with a lower density of 30 dph. The opportunities for effective use of previously developed land, particularly in a central urban context, is understood and policy allows for a minimum density of 200 dph inside the ring road, which defines a separation between inside and outside. A slightly higher density of 35 dph is permissible outside the ring road on non-greenfield land.	<b>0?</b>	<b>+</b>	<b>++</b>

<sup>56</sup> Dwellings per hectare



	<p>The Council is investigating possibilities for increasing residential density outside the ring road in certain locations – to help meet with the increased need identified for housing development. It may be noted that there has been both praise and criticism for the ring road and its role in facilitating traffic movement, its complexity and being difficult to navigate, and forming a barrier between the city centre and its suburbs<sup>57</sup>. However, a series of poetry films<sup>58</sup> was used as part of Coventry's successful bid for status as UK city of Culture 2021. Thus, there are particular functions and characteristics associated with the ring road and these may influence nearby communities.</p> <p>High density places have been associated with sustainable outcomes but there is a risk of less interaction and building fewer relationships in such environments. However, for example, recent research<sup>59</sup> has investigated the delivery of award winning high density (250 dph) development in London and identified design factors that influence social interactions. Therefore, it is considered that there is evidence to support higher density residential developments, taking into account housing needs type and mix with local character and appropriate building forms such that there could be positive effects to enable vibrant and inclusive communities in certain locations outside the ring road.</p> <p>There could be synergistic and cumulative effects with other SA objectives, such as those for active travel (SA No 3), enabling provision of identified housing need (SA No 4), &amp; promoting higher densities will better protect &amp; conserve natural resources (SA No 10 soils).</p> <p>There is some uncertainty about whether the extant density arrangements will be able to accommodate the increased housing requirements. The density study<sup>60</sup> has identified development opportunities in the vicinity of the city centre boundary, thus defining a city centre transition zone where 125 dph is considered appropriate. This</p>			
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<sup>57</sup> For example, please see Beanland, Christopher (The Guardian, 4 March 2017) <https://www.theguardian.com/cities/2017/mar/14/brutal-inspiration-why-poets-are-writing-about-coventrys-ring-road>, and Jenny Scott (BBC News, 5 April 2014) Are these the worst ring roads in England? <https://www.bbc.co.uk/news/uk-england-26036572> and (BBC News, 16 March 2017) Coventry ring road inspires verse amid city of culture bid <https://www.bbc.co.uk/news/av/uk-england-birmingham-39298399>

<sup>58</sup> *Disappear Here* project funded with grants from Coventry City Council & Arts Council England

<sup>59</sup> Mellan H & M Short (UCL, 30 January 2023) Designing for social interaction in high density housing; a multiple case analysis of recently completed design-led developments in London <https://www.frontiersin.org/articles/10.3389/frsc.2022.1043701/full>

<sup>60</sup> Coventry City Council (July 2024) <https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

	<p>study has also found that there could be intensification of density within the city centre boundary due to its urban character and the proximity of city centre services and facilities. Capacity and viability studies have indicated that approx. 31,500 dwellings can be accommodated using this refinement of density thresholds that better consider the social &amp; environmental characters and capacities – with major positive effects.</p> <p><b>SA suggestions at Regulation 18:</b> Identify locations outside ring road where connectivity to the city centre could be optimised Consider recent experiences &amp; research in England on the social implications of higher density development to inform potentially suitable dph &amp; likely building design that would be appropriate for Coventry. Is there scope to consider 250 dph inside the ring road and as has been implemented through planning policy in London &amp; where sustainable deliverables have been reported<sup>61</sup>?</p>			
<p><b>2: To provide accessible essential services and facilities for all residents</b></p>	<p>It is unclear whether the current approach to residential densities would actually be able to accommodate the identified housing needs. Capacity studies will inform the implications for provision of services &amp; facilities - and mitigation measures will be proposed through updating of relevant policies (current CLP Policies AC1-7) such that there should be no significant adverse effects.</p> <p>If locations are identified outside the ring road where accessible essential services &amp; facilities are available &amp; with capacity, there will be negligible or neutral effects for Option 2. Some uncertainties as effects will depend on overall quantum of housing confirmed and locations.</p> <p>The refinement of densities to more specifically acknowledge the character &amp; ability to accommodate different types of development as set out in Option 3 makes best use of accessibility to services &amp; facilities with positive effects.</p>	<p>0?</p>	<p>0?</p>	<p>+</p>

<sup>61</sup> For example, please see Lessons from Higher Density Development [https://www.london.gov.uk/sites/default/files/project\\_2\\_3\\_lessons\\_from\\_higher\\_density\\_development.pdf](https://www.london.gov.uk/sites/default/files/project_2_3_lessons_from_higher_density_development.pdf) and LSE (2020) Living in a Denser London <https://www.lse.ac.uk/geography-and-environment/research/lse-london/documents/Reports/2020-LSE-Density-Report-digital.pdf>

<p><b>3: To improve health &amp; promote active living</b></p>	<p>Overcrowding, poor housing conditions, and affordability problems have increased in recent years, as well as health inequalities<sup>62</sup>.</p> <p>It is unclear whether the current approach to residential densities would be able to accommodate the identified housing needs. However, capacity studies and mitigation measures provided through other policies, including in particular CLP Policy HW1 Health Impact Assessments (HIAs) that requires major development to ensure that it has no adverse effects on health and wellbeing, indicate that there will be no significant negative effects through the current approach to densities.</p> <p>Since the provision of good quality housing is known to have positive effects on health &amp; wellbeing, then ensuring that needs can be met through appropriate increases in density in certain locations is likely to have positive effects. These effects are more certain for Option 3 where different densities have been identified according to the characteristics of the receiving communities &amp; environment.</p> <p><b>SA Suggestions:</b> Identify the relevant &amp; appropriate densities for Coventry, seeking to reduce health inequalities by aligning housing with regard to areas of deprivation Ensure that proposed densities have taken into account building design requirements that create safety &amp; help reduce crime; promote active living Higher densities may be suitable for the ageing population &amp; design requirements will need to consider physical health &amp; mental wellbeing to improve resilience Higher densities may be suitable for coliving</p>	<p>0?</p>	<p>+</p>	<p>+</p>
<p><b>4: To provide decent and affordable housing for all</b></p>	<p>Overcrowding, poor housing conditions, and affordability problems have increased in recent years<sup>63</sup>. Taking into account the current approach to residential densities, it would not be possible to accommodate all the identified housing needs on brownfield (necessitating going to the Green Belt with associated likely negative</p>	<p>+</p>	<p>++</p>	<p>++</p>

<sup>62</sup> For example, see Tinson A & A Clair December 2020 Better Housing is crucial for our health & the Covid-19 recovery <https://www.health.org.uk/publications/long-reads/better-housing-is-crucial-for-our-health-and-the-covid-19-recovery> and The Marmot Review 10 Years On (February 2020) <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

<sup>63</sup> For example, see Tinson A & A Clair December 2020 Better Housing is crucial for our health & the Covid-19 recovery <https://www.health.org.uk/publications/long-reads/better-housing-is-crucial-for-our-health-and-the-covid-19-recovery> and The Marmot Review 10 Years On (February 2020) <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

	<p>effects), but it would progress some provision such that some positive effects are indicated for Option 1, with uncertainty of significance.</p> <p>If ensuring that needs, including suitable mix &amp; tenure for all identified groups, can be met through appropriate increases in density in certain locations, there are likely to be major positive effects for Option 2. These effects are more certain for Option 3 where different densities have been identified according to the characteristics of the receiving communities &amp; environment.</p>			
<b>5: To support sustainable inclusive economic growth</b>	Options for housing densities will not directly affect objectives for economic growth and therefore, at least neutral effects for SA No 5.	0	0	0
<b>6: To help achieve the Council's ambition to reach net zero carbon emissions</b>	All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve dramatic reduction of carbon emissions. Therefore, at least neutral effects for SA No 6.	0	0	0
<b>7: To build resilience to climate change</b>	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. Therefore, at least neutral effects for SA No 7.	0	0	0
<b>8: To reduce traffic &amp; improve sustainable transport choices</b>	<p>The Coventry urban area is well connected with sustainable transport modes. Increasing housing densities in certain locations outside the ring road &amp; where there is good accessibility &amp; capacity to encourage sustainable and active travel will mitigate any potential negative effects. There may be possibilities to enhance sustainable travel through new development; proactive mechanisms to discourage car travel may be needed.</p> <p>The intensification of densities in the city centre &amp; the transition zone could better discourage car travel &amp; improve sustainable transport choices with positive effects, although some uncertainty as might depend on specific developments.</p>	0	0	+
<b>9: To reduce air, noise &amp; light pollution</b>		0	0	0

	<p>In the UK, air pollution has been recently reported as being the largest environmental risk to public health<sup>64</sup>. Reducing vehicle emissions will continue to improve air quality. Indoor air pollution is becoming an increasing proportion of the problem<sup>65</sup>. The Coventry Air Quality Action Plan<sup>66</sup> includes commitments to improve air quality that involve improvements for pedestrians and cyclists to and from the city centre – and this will improve sustainable connectivity through the ring road. For example, this might help identify those locations near the ring road where a higher residential density could be appropriate and help facilitate further connectivity between the city centre and suburban communities – with positive effects – and helping to resolve an existing sustainability problem.</p> <p>Noise pollution is an acknowledged issue for human health &amp; wellbeing – physical &amp; mental - (and also certain biodiversity see SA No 11), and particularly road traffic noise remains a major problem in Europe<sup>67</sup>. Significant health impacts are likely to be underestimated, and exposure to environmental noise does not affect everyone equally. As housing density increases, potential risks to health and wellbeing by noise from neighbouring activities and the wider environment (especially road traffic) is likely to increase. However, building design requirements<sup>68</sup> with acoustic separation &amp; sound insulation can ensure that mitigation measures are implemented to acceptable levels/effects.</p> <p>Similarly, good quality design of buildings &amp; their location can reduce the implications for light pollution on health &amp; wellbeing. Light pollution disturbance can adversely affect health &amp; wellbeing, including fatigue, insomnia stress &amp; anxiety<sup>69</sup> (and also certain biodiversity – see SA No 11).</p> <p>Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan and these policies will be updated and improved in the review, including taking account of advances in building design &amp; materials</p>			
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<sup>64</sup> OHID (updated Feb 2022) Air Pollution: applying All Our Health <https://www.gov.uk/government/publications/air-pollution-applying-all-our-health/air-pollution-applying-all-our-health>

<sup>65</sup> Chief Medical Officers' annual report 2022: air pollution <https://www.sciencemediacentre.org/chief-medical-officers-annual-report-2022-air-pollution/>

<sup>66</sup> <https://letstalk.coventry.gov.uk/improvingaq> Ring Road Junction 7

<sup>67</sup> EEA, 2020 <https://www.eea.europa.eu/publications/environmental-noise-in-europe>

<sup>68</sup> For example, please see <https://www.bregroup.com/bretrust/wp-content/uploads/sites/12/2019/02/Acoustic-design-and-testing-Trust-report-online-version-1.pdf>

<sup>69</sup> For example, please see <https://www.darksky.org/light-pollution/human-health/>

	<p>resources uses such that mitigation measures could be ensured to enable promotion of appropriately increased residential densities in certain locations. Therefore, likely negligible effects for all three options.</p> <p><b>SA Suggestions at Regulation 18:</b> Ensure that updating of environmental management policies considers highest design requirements to reduce potential air, noise &amp; light pollution Continue to reduce the need to travel by vehicles &amp; discourage car use</p>						
<p><b>10: To protect &amp; conserve natural resources – soil, water, minerals &amp; waste<sup>70</sup></b></p>	<p>Some uncertainty of effectiveness of policy mitigation measures to protect natural resources from the scale of development; therefore potential minor negative effects for Option 1.</p> <p>Consideration of higher density residential developments will have positive effects for more effective use of land, particularly in the Coventry area that is so constrained, with possibilities for major significance but uncertain at this stage of assessment as depends on extent of quantum of housing, extent of densification &amp; location.</p> <p>These effects are more certain for Option 3 where different densities have been identified according to the characteristics of the receiving communities &amp; environment.</p>	-	0	++?	0	++	0
<p><b>11: To protect and enhance nature &amp; biodiversity</b></p>	<p>The scale of new development needed is likely to have strong pressures on green infrastructure (GI) &amp; biodiversity with likely significant negative effects, even with the new requirements for biodiversity net gain.</p> <p>Consideration of higher density residential developments will have positive effects for more effective use of land, particularly in the Coventry area that is so constrained &amp; with such importance for protecting spaces for GI &amp; biodiversity. Possibilities for major significance but uncertain at this stage of assessment as depends on extent of quantum of housing, extent of densification &amp; location.</p>	-?		++?	++		

<sup>70</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

	These effects are more certain for Option 3 where different densities have been identified according to the characteristics of the receiving communities & environment.			
<b>12: To protect and enhance the historic environment, and its setting</b>	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment – regardless of residential densities.	0	0	0
<b>13: To protect and enhance the quality and character of townscapes &amp; landscapes</b>	<p>It is important to promote good sustainable urban design and this should reflect the special characteristics and needs of different parts of the city. The approach to residential densities already recognises the different characteristics &amp; different possibilities for accommodating changes through increased development.</p> <p>High quality &amp; proportionate new development can enhance the townscape &amp; local character. By focusing the housing needs in certain locations with appropriate densification, pressures may be taken from other places; with high quality design, positive effects could be indicated but with uncertainty at this stage of assessment.</p> <p>These effects are more certain for Option 3 where different densities have been identified according to the characteristics of the receiving communities &amp; environment.</p> <p><b>SA Suggestions at Regulation 18:</b> Consider highest design possibilities &amp; including for reuse/refurbishment to resolve existing sustainability/townscape issues</p>	0?	+?	+

<b>IIIc: Options for progressing Coventry's Climate Change Strategy<sup>71</sup></b>	
<b>1</b>	Planning policy requirements in line with national Future Homes Standard <sup>72</sup> & Future Buildings Standard <sup>73</sup> covering energy efficiency, ventilation and overheating through Building Regulations
<b>2</b>	Planning policy requirements that are over and above proposed Building Regulations to better progress Coventry's aspirational ambitions for addressing climate change effects

		<b>Options for Climate Change</b>	
<b>Sustainability Objective</b>	<b>Assessment of Effects</b> <b>Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</b>	<b>1. In line with FHS &amp; FBS</b>	<b>2. Over &amp; above Building Regulations</b>
<b>1: To enable vibrant and inclusive communities</b>	Other factors are more likely to have potential effects on objectives for inclusive communities than requirements in line or above Building Regulations.	<b>0</b>	<b>0</b>

<sup>71</sup> Coventry's draft Climate Change Strategy 2023-2030 <https://www.coventry.gov.uk/downloads/download/7434/coventry-s-draft-climate-change-strategy>

<sup>72</sup> For example, please see: <https://www.futurehomes.org.uk/delivery-at-scale>

<sup>73</sup> <https://www.gov.uk/government/consultations/the-future-buildings-standard>



<b>2: To provide accessible essential services and facilities for all residents</b>	Other factors are more likely to have potential effects on objectives for accessibility to essential services & facilities than requirements in line or above Building Regulations.	0	0
<b>3: To improve health &amp; promote active living</b>	<p>An approach that progresses aspirations for adapting to climate change more promptly by requiring standards above national Building Regulations is likely to have positive effects for health &amp; wellbeing by better reducing the risks to health.</p> <p>Climate change affects the social &amp; environmental determinants of health - clean air, safe drinking water, sufficient food &amp; secure shelter<sup>74</sup>. Reducing emissions of greenhouse gases through better transport, food and energy-use choices can result in improved health, particularly through reduced air pollution. There is some interpretation of data suggesting that achieving net zero emissions by 2050 <i>will not be enough to ensure a safe future for humanity</i><sup>75</sup>. Any consequence of climate change that can bring physical ill health can also have mental health implications &amp; climate change can negatively impact on mental health, including depression and anxiety. These factors may need more consideration in the future, but clear actions to mitigate climate change can positively influence mental health<sup>76</sup>.</p> <p>Aligning with Government requirements may be considered to have negligible but uncertain effects for health &amp; wellbeing. However, by requiring standards over &amp; above Building Regulations, aspirations for reducing carbon emissions will be achieved sooner &amp; will better support the aspirations for Coventry City with regard to building resilience to climate change effects, including those for health. By making a clear proactive commitment, such action could influence both physical &amp; mental health with potential major positive effects. As climate change effects are global, considerable uncertainties indicated.</p>	0?	++?
<b>SA No 4: To provide decent</b>	There is a perceived concern from the construction industry in being able to meet national net zero carbon targets because of various issues – and most notably with the embedded carbon in materials <sup>77</sup> .	0?	?

<sup>74</sup> WHO (October 2021) <https://www.who.int/news-room/fact-sheets/detail/climate-change-and-health>

<sup>75</sup> For example, please see CCAG as reported by IEMA (August 2021) <https://www.iema.net/articles/net-zero-by-2050-too-little-too-late-scientists-warn>

<sup>76</sup> UCL (July 2021) <https://www.ucl.ac.uk/bartlett/news/2021/jul/climate-change-and-mental-health>

<sup>77</sup> For example, please see <https://www.environmentalleader.com/2022/02/uk-construction-industry-cites-these-barriers-to-net-zero-emissions/>

<p><b>and affordable housing for all</b></p>	<p>Therefore, there is a risk that requiring higher standards than national Building Regulations will pose greater challenges for new development design &amp; building – and particularly construction – such that costs &amp; viability for house building may be compromised with potential negative effects, especially in the shorter term. However, the development sector has embraced sustainability with the need to achieve net zero carbon &amp; implementation of the circular economy with design for durability, reuse, remanufacturing, and recycling.<sup>78</sup> With commitment &amp; creativity in design, higher standards may be more readily achievable; however, the effects on the delivery of the required housing is uncertain &amp; unknown at this stage.</p>		
<p><b>5: To support sustainable inclusive economic growth</b></p>	<p>Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people.</p> <p>It is unclear whether any requirement for higher standards through Building Regulations would have any significant effects on economic growth. It could be asserted that higher standards might equate to higher costs &amp; thus limit growth. However, Government has advised that the transition to net zero carbon is the growth opportunity of the 21<sup>st</sup> century<sup>79</sup>, and the recently published Net Zero Growth Plan (March, 2023)<sup>80</sup> continues to claim new opportunities to grow green jobs. Coventry has strong commitments for innovation, research &amp; development in new technology such that higher standards could be a catalyst to promote progress in the green economy and support the city's aspirations.</p> <p>Some research has indicated that it is cheaper to reduce greenhouse gas emissions than it is to deal with climate change impacts<sup>81</sup> - and thus, this would support progressing higher standards sooner with some positive effects indicated for the economy.</p>	<p>0?</p>	<p>++?</p>
<p><b>6: To help achieve the</b></p>		<p>0?</p>	<p>+++?</p>

<sup>78</sup> For example, please see RIBA [https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy\\_9781859469545](https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy_9781859469545) and BRE <https://bregroup.com/products/breeam/breeam-solutions/breeam-circularity-and-resilience/>  
<sup>79</sup> <https://www.gov.uk/government/news/net-zero-review-uk-could-do-more-to-reap-economic-benefits-of-green-growth>  
<sup>80</sup> DESNZ (March, 2023) <https://www.gov.uk/government/publications/powering-up-britain>  
<sup>81</sup> <https://www.ucl.ac.uk/news/2021/sep/economic-cost-climate-change-could-be-six-times-higher-previously-thought>

<p><b>Council's ambition to reach net zero carbon emissions</b></p>	<p>The Council recognises the climate crisis and is currently reviewing its Strategy<sup>82</sup>. This will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure.</p> <p>Direct greenhouse gas (GHG) emissions from buildings accounted for 17% of UK GHG emissions in 2019<sup>83</sup>. It has been reported that the construction industry needs to decarbonise more urgently<sup>84</sup> and building design needs to progress principles in the circular economy. There is some interpretation of data suggesting that achieving net zero emissions by 2050 “<i>will not be enough to ensure a safe future for humanity</i>”<sup>85</sup>.</p> <p>Implementation of planning policy requiring higher standards to reduce GHG emissions sooner than national requirements will have major positive effects towards helping the Council achieve its ambition for dramatic reduction of carbon emissions, as set out in the Coventry draft Climate Change Strategy but with uncertainties of significance at this stage.</p>		
<p><b>7: To build resilience to climate change</b></p>	<p>There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK.<sup>86</sup> Therefore, it is vital to build resilience, including reducing risks from overheating, flooding and the resultant detriment to health &amp; wellbeing, the economy, and the environment. All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change.</p> <p>Implementation of planning policy requiring higher standards, including reducing GHG emissions sooner than national requirements, will contribute to building resilience to climate change sooner with likely positive effects but some uncertainty of significance.</p>	<p>0?</p>	<p>+?</p>
<p><b>8: To reduce traffic &amp; improve</b></p>	<p>Transport produced 24% of the UK's total emissions in 2020 &amp; remains the largest emitting sector in the UK, with the majority of emissions from road vehicles<sup>87</sup>.</p>	<p>0</p>	<p>0</p>

<sup>82</sup>A Green Future for a Changing City(2022 – 2030) <https://www.coventry.gov.uk/draftclimatechangestrategy>

<sup>83</sup> UK Climate Change Committee <https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Buildings.pdf>

<sup>84</sup> For example, please see RAEng 2021 <https://raeng.org.uk/news/construction-sector-must-move-further-and-faster-to-curb-carbon-emissions-say-engineers>

<sup>85</sup> For example, please see CCAG as reported by IEMA (August 2021) <https://www.iema.net/articles/net-zero-by-2050-too-little-too-late-scientists-warn>

<sup>86</sup> For example, see <https://earth.org/climate-change-in-the-uk/>

<sup>87</sup> <https://www.gov.uk/government/statistics/transport-and-environment-statistics-2022/transport-and-environment-statistics-2022>

<b>sustainable transport choices</b>	Changes to Building Regulations will not affect this SA objective and therefore, neutral/not applicable effects.				
<b>9: To reduce air, noise &amp; light pollution</b>	No direct effects likely – neutral/not applicable	0		0	
<b>10: To protect &amp; conserve natural resources – soil, water, minerals &amp; waste<sup>88</sup></b>	<p>With climate change, temperate soils are forecast to experience a high degree of variability in moisture conditions; restoring lost carbon through conventional approaches may take decades; and food security is an increasing issue. Soil has been recognised as an essential national asset &amp; government has indicated that managing soil carbon could form a part of net zero plans<sup>89</sup>. The review of the CLP will continue to build on previously developed land (PDL) where effectively located &amp; thus contribute towards protecting agricultural land.</p> <p>Climate change, particularly incidences of hotter, drier, summers may exacerbate water supply issues; wetter weather and more flooding may overload wastewater systems. The cumulative effects of increased development on soil &amp; water resources is uncertain, particularly in the shorter-medium term before the effects of net zero carbon actions are implemented &amp; become effective. Therefore, uncertain negative effects for Option 1. Planning policy requirements that are over &amp; above national building regulations requirements are likely to reduce carbon emissions earlier, thus mitigating negative effects on soils &amp; water sooner, and thus indicating at least neutral effects – but uncertainty of significance at this stage of assessment.</p> <p>The current CLP Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development. It is assumed that they will be updated to address any capacity issues such that at least neutral effects would be indicated for both options.</p> <p>Progressions with the circular economy, driven by the need to reduce carbon emissions &amp; encouraged through higher standards as in Option 2, will conserve minerals &amp; reduce/minimise/reuse waste with some potential further positive effects in the longer term but with uncertainty of significance.</p>	-?	0	0?	+?

<sup>88</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

<sup>89</sup> UK Horizon scanning (April 2021) <https://post.parliament.uk/soil-as-an-essential-national-asset/>

<p><b>11: To protect and enhance nature &amp; biodiversity</b></p>	<p>The need for addressing biodiversity loss &amp; climate change issues together is being increasingly recognised<sup>90</sup>. Climate change can contribute to biodiversity loss &amp; biodiversity loss can make climate change and its effects worse. Government has recently reiterated that we cannot mitigate &amp; adapt to climate change without Nature-Based Solutions<sup>91</sup>. It could be considered that meeting the proposed national standards for building regulations &amp; reducing GHG emissions could approach negligible effects – but uncertainty as depends upon quantum of new development. All development will have to meet with new requirements for Biodiversity Net Gain &amp; therefore, positive effects indicated for all options. It could be assumed that progressing more rigorous standards would reduce GHG emissions &amp; sooner such that mitigation measures are earlier &amp; more effective such that there could be some positive effects for nature &amp; biodiversity – but uncertainty as depends upon quantum of new development &amp; extent of associated biodiversity gain.</p>	<p>+</p>	<p>++</p>
<p><b>12: To protect and enhance the historic environment, and its setting</b></p>	<p>Historic England recognises the need for urgent action &amp; is committed to achieving net zero carbon; HE suggests that reusing the current homes built before 1919 (about 20% in England) with appropriate energy improvement solutions is key to cutting carbon emissions<sup>92</sup>.  The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation &amp; Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. It could be assumed that progressing more rigorous standards would reduce GHG emissions &amp; sooner such that mitigation measures are earlier &amp; more effective such that there could be less risk of negative effects on the historic environment – but uncertainty as depends upon extent of development &amp; location.</p>	<p>0</p>	<p>+</p>
<p><b>13: To protect and enhance the</b></p>	<p>The national design guide (2019)<sup>93</sup> sets out the characteristics of well-designed places &amp; includes consideration of minimising carbon emissions. Circular economy principles in building design<sup>94</sup> will</p>	<p>0</p>	<p>0?</p>

<sup>90</sup> For example, please see UK Parliament Post (Feb 2020) <https://researchbriefings.files.parliament.uk/documents/POST-PN-0617/POST-PN-0617.pdf> and NE (April 2020) Climate Change Adaptation Manual (NE751) <https://publications.naturalengland.org.uk/publication/5679197848862720>

<sup>91</sup> Defra (January 2023) Environmental Improvement Plan 2023 <https://www.gov.uk/government/publications/environmental-improvement-plan>

<sup>92</sup> Historic England (March 2022) <https://historicengland.org.uk/whats-new/features/climate-change/our-strategy/>

<sup>93</sup> <https://www.gov.uk/government/publications/national-design-guide>

<sup>94</sup> For example, please see RIBA [https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy\\_9781859469545](https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy_9781859469545) and BRE <https://bregroup.com/products/breem/breem-solutions/breem-circularity-and-resilience/>

<p><b>quality and character of townscapes &amp; landscapes</b></p>	<p>contribute towards mitigating effects of climate change. It is also acknowledged that new proportional &amp; high quality development can enhance the townscape.</p> <p>The current CLP includes policies to protect townscapes/landscapes, especially Policy DE1 Ensuring High Quality Design, including consideration of climate change. These will be updated in the CLP review, and therefore, likely negligible effects with regard to the proposed changes to Building Regulations. There may be challenges to design &amp; construction, particularly in the shorter term, if requirements over &amp; above such standards are proposed and thus with some uncertainty of significance.</p>		
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IIIId: Options for Nature & Biodiversity	
<b>1</b>	Planning policy requirements in line with national requirements & standards, including 10% Biodiversity Net Gain (BNG) <sup>95</sup> , and Green Infrastructure (GI) <sup>96</sup> standards <sup>97</sup>
<b>2</b>	Planning policy requirements that are over and above national requirements for BNG & GI standards
<p>The recent Environmental Improvement Plan (January, 2023)<sup>98</sup> for England includes a commitment that the public should be able to access green space or water, such as woodlands, wetlands, parks and rivers, within a 15-minute walk from their home. The Green Infrastructure Framework (GIF, Feb 2023)<sup>99</sup> provides a structure to analyse where greenspace in urban environments is needed most. It aims to support equitable access to greenspace across England. The framework integrates green infrastructure tools, principles, standards and design guidance. It is structured by five key standards:</p> <ul style="list-style-type: none"> <li>▪ Urban Nature Recovery Standard – including trees &amp; wildflowers to increase carbon capture, prevent flooding, &amp; reduce temperatures during heatwaves</li> <li>▪ Urban Greening Factor (UGF) – approximately 40% of residential developments to have green &amp; blue spaces, green roofs or green walls</li> <li>▪ Urban Tree Canopy Cover Standard – increase tree canopy cover in urban environments</li> <li>▪ Accessible Greenspace Standards - promote access to good quality green and blue space within 15 minutes' walk from home</li> <li>▪ Green Infrastructure Strategy - delivery plans to support creation and enhancement of new and existing greenspace</li> </ul>	

<sup>95</sup> Environment Act 2021, and for example, please see <https://consult.defra.gov.uk/defra-net-gain-consultation-team/consultation-on-biodiversity-net-gain-regulations/>

<sup>96</sup> Includes both green and blue (water-related) infrastructure

<sup>97</sup> <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx>

<sup>98</sup> Defra (January 2023) Environmental Improvement Plan 2023 <https://www.gov.uk/government/publications/environmental-improvement-plan>

<sup>99</sup> Natural England, Feb 2023 <https://www.gov.uk/government/news/natural-england-unveils-new-green-infrastructure-framework>

		Options for Nature & Biodiversity	
Sustainability Objective	Assessment of Effects  Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	1. In line with national requirements & standards for BNG & GI	2. Over & above national requirements for BNG & GI
		<b>1: To enable vibrant and inclusive communities</b>	The provision & accessibility of GI can encourage safe social connectivity & help reduce social isolation. It could be considered that provision of GI in line with proposed national standards would meet with objectives & that higher standards would not necessarily significantly affect inclusivity. There are other factors, including for building design and locations, that are more likely to have effects on vibrant and inclusive neighbourhoods. Therefore, negligible effects for both options.
<b>2: To provide accessible essential services and facilities for all residents</b>	It is likely that implementation of the proposed national standards for GI will increase provision of, and accessibility to, green infrastructure – with positive effects.  It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision & accessibility of GI with further positive effects – that are likely to be synergistic & cumulative, particularly in the longer term.	+	++
<b>3: To improve health &amp; promote active living</b>	It is likely that implementation of the proposed national standards for GI will increase provision of, and accessibility to, green infrastructure – with positive effects for health & wellbeing, both physical & mental.  It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision & accessibility of GI with further positive effects for health & wellbeing – that are likely to be synergistic & cumulative, particularly in the longer term.	+	++



	<p>Coventry has been a Marmot City<sup>100</sup> since 2013 &amp; there has been progress in outcomes across health &amp; society. The Marmot Review<sup>101</sup> in 2020 on health equity in England highlighted that the health gap has grown between wealthy &amp; deprived areas, people can expect to spend more of their lives in poor health, improvements to life expectancy have stalled, and that place matters. Enhancing GI is only one factor that contributes to improving health &amp; wellbeing. However, a requirement to meet standards for GI over &amp; above national proposals would demonstrate further strong commitment to Marmot principles &amp; support for the multisectoral &amp; partnership approach in the city. The visible greening of the urban areas could further encourage people in active living with positive effects for health &amp; wellbeing.</p> <p><b>SA Suggestions:</b> Align opportunities for enhancing GI network in most deprived areas &amp; where health inequity could be most reduced</p>		
<p><b>4: To provide decent and affordable housing for all</b></p>	<p>Provision of, and accessibility to, enhanced GI will improve the overall quality of residential development, supporting positive effects from housing provision for all.</p> <p>It is vital that the appropriate mix &amp; tenure of housing, suitable for different housing needs of different people &amp; at different times of their lives, is planned according to identified needs. Nonetheless, it is important to retain sufficient space to accommodate GI &amp; in locations where it may better support nature &amp; people. It is unclear at this stage what quantum of housing could be accommodated together with aspirational GI for nature, people &amp; climate change. This is a particular challenge for Coventry with its boundary &amp; other constraints.</p> <p>It is difficult to predict the effects of increasing requirements for GI above national standards on housing as it depends upon quantum &amp; location of development with uncertainties at this stage of assessment.</p>	<p>+?</p>	<p>+?</p>
<p><b>5: To support sustainable inclusive economic growth</b></p>	<p>Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people.</p> <p>The economic valuation of urban natural capital demonstrates multiple social, environmental and economic benefits and the importance of urban green and blue spaces and blue-green</p>	<p>0?</p>	<p>0?</p>

<sup>100</sup> <https://www.coventry.gov.uk/policy-1/coventry-marmot-city>

<sup>101</sup> <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

	infrastructure <sup>102</sup> . Whilst improvements to GI will enhance the local environment for residents, workers & visitors, it is unclear how this will directly affect sustainable economic objectives and therefore, uncertainties.		
<b>6: To help achieve the Council's ambition to reach net zero carbon emissions</b>	The GI Standards aim to improve resilience to & mitigation of climate change, including increasing carbon capture, and with positive effects towards reaching dramatic reduction of carbon emissions, as set out in Coventry's draft Climate Change Strategy.	+	++?
	It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision & accessibility of GI with further positive effects for reducing GHG emissions – that are likely to be synergistic & cumulative, particularly in the longer term. The more extensive greening of the urban environment would visually demonstrate a strong commitment to GI & progressing towards a dramatic reduction of carbon emissions that may further engage people in helping to achieve the Council's ambition. Uncertainties for significance at this stage of assessment.		
<b>7: To build resilience to climate change</b>	The GI Standards aim to improve resilience to & mitigation of climate change, including preventing flooding, and reducing temperatures during heatwaves, and with positive effects towards building resilience to climate change.	+	++?
	It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision & accessibility of GI with further positive effects for resilience – that are likely to be synergistic & cumulative, particularly in the longer term. The more extensive greening of the urban environment would visually demonstrate a strong commitment to GI & progressing towards a dramatic reduction of carbon emissions that may further engage people in helping to achieve the Council's ambition. Uncertainties for significance at this stage of assessment.		
<b>8: To reduce traffic &amp; improve sustainable transport choices</b>	Improving the sustainable transport network for cycling & walking can be integrated with the GI network for mutual benefits for nature & people. It is not clear how differences in GI standards will directly affect sustainable transport objectives – likely negligible effects for both options.	0	0
<b>9: To reduce air, noise &amp; light pollution</b>	Good quality GI has an important role to play in improving air quality in urban areas, including reducing particulate matter – and thus improving health/wellbeing – with positive effects. GI can	+	++?

<sup>102</sup> Environment Agency 2021 The State of the Environment: the urban environment <https://www.gov.uk/government/publications/state-of-the-environment/the-state-of-the-environment-the-urban-environment>

	<p>reduce noise pollution – trees can act as sound barriers as they can either absorb or deflect noise (or both) &amp; vegetation, including green roofs &amp; wall systems act as sound insulation.</p> <p>It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision &amp; accessibility of GI with further positive effects for reducing air &amp; noise pollution – that are likely to be synergistic &amp; cumulative, particularly in the longer term. Uncertainties for significance at this stage of assessment.</p>					
<b>10: To protect &amp; conserve natural resources – soil, water, minerals &amp; waste<sup>103</sup></b>	<p>Provision of GI – both green &amp; blue – will contribute to protecting &amp; conserving the natural resources of soils &amp; water with positive effects. It seems reasonable to assume that higher GI standards will achieve better protection of such natural resources but there is uncertainty for the significance of the further positive effects.</p> <p>It is not clear how differences in GI standards will directly affect sustainability objectives for waste &amp; minerals – likely negligible effects for both options.</p>	+	0	++	?	0
<b>11: To protect and enhance nature &amp; biodiversity</b>	<p>Provision of GI – both green &amp; blue – will contribute to protecting &amp; enhancing nature &amp; biodiversity with positive effects. It seems reasonable to assume that higher GI standards will achieve better protection &amp; enhancement of nature &amp; biodiversity but there is uncertainty for the significance of the further positive effects.</p>			+		++?
<b>12: To protect and enhance the historic environment, and its setting</b>	<p>It is not clear how differences in GI standards will directly affect sustainability objectives for the historic environment, although for example, improvements in air quality through greening will reduce polluting effects on historic buildings – likely negligible effects for both options.</p>			0		0
<b>13: To protect and enhance the quality and character of townscapes &amp; landscapes</b>	<p>Provision of GI – both green &amp; blue – will contribute to protecting &amp; enhancing the quality &amp; character of townscapes &amp; landscapes with positive effects. It seems reasonable to assume that higher GI standards will achieve better protection &amp; enhancement of townscapes &amp; landscapes but there is uncertainty for the significance of the further positive effects.</p>			+		++?

<sup>103</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

IIIe: Options for Development in the Green Belt	
1	Potential for development within the Green Belt
2	No potential development within the Green Belt

		Options for Green Belt	
Sustainability Objective	Assessment of Effects  Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	1. Development in Green Belt	2. No Development within the Green Belt
		<b>1: To enable vibrant and inclusive communities</b>	Other factors are more likely to have potential effects on objectives for inclusive communities than locations in or out of the Green Belt. However, urban sprawl & encroachment of the countryside can affect the vibrancy of communities & some uncertainty of effects for Option 1; and development in the GB could have the unintended consequences of producing isolated communities <sup>104</sup> .
<b>2: To provide accessible essential services and facilities for all residents</b>	Other factors are more likely to have potential effects on objectives for accessibility to essential services & facilities than locations in or out of the Green Belt.	0	0

<sup>104</sup> <https://www.theguardian.com/society/article/2024/aug/02/labours-grey-belt-plans-could-result-in-isolated-communities-warns-leading-architect>

<p><b>3: To improve health &amp; promote active living</b></p>	<p>Provision of good quality housing will have positive effects on health &amp; wellbeing regardless of whether it is in or out of the Green Belt. Protecting the openness of GB land, including for nature &amp; recreation, is likely to have major positive effects for health &amp; wellbeing with Option 2, although some uncertainty of the precise significance at this stage of assessment. Urban sprawl &amp; encroachment of the countryside can affect residents' wellbeing &amp; such development can evoke strong feelings – minor positive effects for Option 1 with potential for some uncertainty of significance as depends on locational specificity.</p>	<p>+</p>	<p>++</p>
<p><b>SA No 4: To provide decent and affordable housing for all</b></p>	<p>The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence (NPPF). Protecting the Green Belt is useful for urban regeneration as it encourages the use of brownfield rather than greenfield land, and is an efficient use of land. The GB prevents urban sprawl – limiting air pollution, loss of open/green spaces, &amp; pressures on services/facilities; and preserves the countryside for nature, farming, recreation &amp; related open uses, including protection of historic settlements &amp; landscapes. In some areas for GB, it may be asserted that as urban areas become restricted to new housing, there is a lack of developable land with concomitant increases in house prices<sup>105</sup>, and it can also lead to leapfrog development on the outer edge of the GB; consideration of the GB can be controversial<sup>106</sup>.</p> <p>In some areas, the actual land designated by such planning policy may not have any ecological value &amp; has not been based on its natural beauty. These poor quality GB areas have been identified as grey belt areas by the Labour Government &amp; likely definitions are set out in the proposed revisions to the NPPF (July 2024)<sup>107</sup>. However, the Coventry Local Plan to 2041 will be submitted under the current NPPF which does not mention any requirements regarding grey belt land.</p> <p>Coventry has two distinctive types of Green Belt – the open countryside of Ancient Arden to the west; and GB corridors of open land tracts that extend through the built-up area of the city, to and from the countryside beyond. Of greatest significance is the wider GB that encircles the city, helping prevent urban sprawl. Existing LP Policy GB1 Green Belt &amp; Local Green Space provides detailed</p>	<p>0</p>	<p>0</p>

<sup>105</sup> <https://www.ons.gov.uk/economy/environmentalaccounts/articles/urbangreenspacesraisenearbyhousepricesbyanaverageof2500/2019-10-14>

<sup>106</sup> For example, please see <https://www.cbre.co.uk/insights/articles/should-we-build-more-homes-on-the-green-belt>  
<https://www.centreforcities.org/reader/benefits-challenges-green-belt/>  
<https://theweek.com/arts-life/property/960970/pros-and-cons-of-building-on-the-green-belt>  
<https://www.theguardian.com/society/2023/nov/24/building-on-the-green-belt-is-no-solution-to-the-housing-crisis>  
<https://www.cpre.org.uk/explainer/all-you-need-to-know-about-the-green-belt/>

<sup>107</sup> <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system#chapter-5--brownfield-grey-belt-and-the-green-belt>

	<p>explanation of the difficulties facing the Council, particularly with such a tight administrative boundary. For the adopted 2017 LP, the Council considered the Joint Green Belt Review<sup>108</sup>, together with other evidence to explore Coventry's exceptional circumstances regarding development pressures and release of some suitable land from the GB. Thus, at that time, the Council investigated any opportunities for GB land that would not be urban sprawl, retaining openness by avoiding/minimising any negative effects &amp; optimising the positive effects for development land.</p> <p>Coventry City Council has updated its technical review<sup>109</sup> of the GB and this has confirmed that the limited remaining GB land in the Coventry area continues to serve GB purposes. LP Policies GB1 Green Belt and GB2 Safeguarded Land in the Green Belt will be updated for the CLPR.</p> <p>Capacity (HELAA 2024)<sup>110</sup> &amp; the viability study have determined that identified needs of approx. 31,500 new dwellings can be accommodated within the urban areas and without needing to consider residential locations in the Green Belt. Therefore, neutral effects for both options.</p>		
<p><b>5: To support sustainable inclusive economic growth</b></p>	<p>Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people.</p> <p>The Council has identified a shortfall of employment sites within its own administrative area, against its identified quantum of local need. A particular site in the Green Belt (Site North of A45 &amp; West of Brick Hill Lane) is being promoted for employment purposes. Therefore, potential minor positive effects for limited employment land in the GB but with some uncertainty at this stage as impact significance &amp; mitigation possibilities depend upon locational &amp; development details. Minor negative effects for the economy if the Council cannot meet its employment land identified need through avoiding suitable land in the GB – some uncertainty of significance as depends on development type &amp; jobs details.</p>	+?	-?
<p><b>6: To help achieve the Council's ambition to reach net zero carbon emissions</b></p>	<p>The Council recognises the climate crisis and is currently reviewing its Strategy<sup>111</sup>. This will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure.</p>	0	0

<sup>108</sup> Coventry & Warwickshire Joint Green Belt Review (2015)

<sup>109</sup> Coventry City Council (July 2024) Green Belt Technical Update Study

<sup>110</sup> Coventry City Council (2023) Housing & Economic Land Availability Assessment <https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

<sup>111</sup>A Green Future for a Changing City(2022 – 2030) <https://www.coventry.gov.uk/draftclimatechangestrategy>

	Direct greenhouse gas (GHG) emissions from buildings accounted for 17% of UK GHG emissions in 2019 <sup>112</sup> . It has been reported that the construction industry needs to decarbonise more urgently <sup>113</sup> and building design needs to progress principles in the circular economy. All development will have to reduce GHG emissions in line with updated planning policy – regardless of whether in or out of the GB – therefore, neutral effects.				
<b>7: To build resilience to climate change</b>	There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK. <sup>114</sup> Therefore, it is vital to build resilience, including reducing risks from overheating, flooding and the resultant detriment to health & wellbeing, the economy, and the environment. All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change – regardless of whether in or out of the GB – therefore, neutral effects.	0	0		
<b>8: To reduce traffic &amp; improve sustainable transport choices</b>	Transport produced 24% of the UK's total emissions in 2020 & remains the largest emitting sector in the UK, with the majority of emissions from road vehicles <sup>115</sup> .  Development in the Green Belt might not reduce traffic, whilst development focused on PDL might improve sustainable transport choices and therefore, neutral effects for Option 1 and minor positive effects for Option 2 – but uncertainty at this stage, as depends upon proposals and locations.	0?	+?		
<b>9: To reduce air, noise &amp; light pollution</b>	Development in or out of the Green Belt will not affect this SA objective and no direct effects likely – neutral/not applicable	0	0		
<b>10: To protect &amp; conserve natural resources – soil, water, minerals &amp; waste<sup>116</sup></b>	The review of the CLP will continue to build on previously developed land (PDL) where effectively located & thus contribute towards protecting agricultural land – and Green Belt land – with positive effects for Option 2, including by encouraging <i>the recycling of derelict and other urban land</i> & thus, supporting one of the five purposes of GB land.  The recent Water Cycle Study Stage 1 (June 2024) <sup>117</sup> indicates that there is water capacity for the preferred residential quantum and therefore, likely neutral effects with regard to GB land for both options.	0	0	+	0

<sup>112</sup> UK Climate Change Committee <https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Buildings.pdf>

<sup>113</sup> For example, please see RAEng 2021 <https://raeng.org.uk/news/construction-sector-must-move-further-and-faster-to-curb-carbon-emissions-say-engineers>

<sup>114</sup> For example, see <https://earth.org/climate-change-in-the-uk/>

<sup>115</sup> <https://www.gov.uk/government/statistics/transport-and-environment-statistics-2022/transport-and-environment-statistics-2022>

<sup>116</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

<sup>117</sup> JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

	The current CLP Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development. It is assumed that they will be updated to address any capacity issues such that at least neutral effects would be indicated for both options.		
<b>11: To protect and enhance nature &amp; biodiversity</b>	Grey belt land <sup>118</sup> may be visually unsatisfactory but could be supporting valuable biodiversity. The fragmentation and erosion of habitats remains a threat, and the need to secure biodiversity gain and improve the wider ecological network remain objectives for plan making in the Coventry area. The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These will be updated & should provide sufficient mitigation such that effects will be at least neutral with regard to GB land – all development will be required to meet with new requirements for Biodiversity Net Gain indicating positive effects for both options but some uncertainty of significance at this stage.	+	+
<b>12: To protect and enhance the historic environment, and its setting</b>	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment – with neutral effects for GB land.  However, avoiding development in the Green Belt supports one of the 5 purposes – to preserve the setting & special character of historic towns – therefore, potential positive effects for Option 2 and the historic environment; uncertainty at this stage as depends upon location.	0	+
<b>13: To protect and enhance the quality and character of townscapes &amp; landscapes</b>	The NPPF <sup>119</sup> sets out the importance of Green Belts. <i>The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Green Belt serves five purposes:</i> a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	--	++

<sup>118</sup> Proposed definition in NPPF consultation (July 2024) "ugly, disused land" including scrubland"

<sup>119</sup> <https://www.gov.uk/guidance/national-planning-policy-framework/13-protecting-green-belt-land>



	<p>The new Labour Government has set out plans for delivering homes in the Green Belt<sup>120</sup> and confirmed through recent proposals for reform of the NPPF (July 2024)<sup>121</sup>. The consultation draft advises that “We want this approach to protect land which makes a strong contribution to any Green Belt purposes, while allowing authorities to consider a range of Green Belt land based on its merits for potential development”. However, the review of the CLP to 2041 will be submitted under the current NPPF which does not make any requirements in respect of grey belt land.</p> <p>It is for LPAs to define and maintain GB land in their local areas. Coventry has two distinctive types of Green Belt – the open countryside of Ancient Arden to the west and north west; and GB corridors of open land tracts that extend through the built-up area of the city, to and from the countryside beyond. Of greatest significance is the wider GB that encircles the city, helping prevent urban sprawl and coalescence.</p> <p>The adopted Coventry LP was informed by a sub-regional GB study (2015), and since the CLP removed 16% of GB to accommodate identified development needs at that time, there is now limited GB land in the CLP area. Existing LP Policy GB1 Green Belt &amp; Local Green Space provides detailed explanation of the difficulties facing the Council, particularly with such a tight administrative boundary.</p> <p>Coventry City Council has undertaken a technical update<sup>122</sup> to the original GB Review &amp; using the same methods. The study has concluded that any potential releases of land from the GB for built development will have visual or other impact, and that the GB areas continue to serve GB purposes. The study recommends the areas to remain as GB in their entirety; also in respect of safeguarded land in the GB with a note that further technical study is required regarding the extant allocations set out in the Warwick DC LP and the proposed Warwickshire JLP.</p> <p>LP Policies GB1 Green Belt and GB2 Safeguarded Land in the Green Belt will be updated for the CLPR.</p> <p>Since there is strong updated evidence that the limited GB in the Coventry area continues to serve GB purposes (and thus is not likely to be defined as greybelt land), it is considered that any proposals for development in the GB could have major negative effects. Protecting the limited GB in the Coventry area is likely to have major positive effects for GB purposes &amp; the SA objectives.</p>		
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<sup>120</sup> <https://labour.org.uk/updates/stories/labours-housing-plan-how-well-protect-our-natural-spaces-and-free-up-grey-belt-land-for-building/>

<sup>121</sup> <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/>

<sup>122</sup> Coventry City Council (July 2024) Green Belt Technical Update Study

III f: Options for Quantum of General Industrial Employment Land	
1	147.6 ha general industrial (excluding strategic B8) – HEDNA (2022)
2	60 ha general industrial calculated as quantum that can be accommodated
3	60 ha plus an additional 11.81 ha being promoted & located in the Green Belt (Site North of A45 & West of Brick Hill Lane)

		Options for Quantum of General Industrial Employment Land		
Sustainability Objective	Assessment of Effects  Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	1. 147.6 hectares	2. 60 hectares calculated that can be accommodated	3. 60 ha + 11.81 ha located in Green Belt
<b>1: To enable vibrant and inclusive communities</b>	<p>Other factors are more likely to have potential significant effects on objectives for inclusive communities than the quantum of employment land. However, provision of sufficient employment land to support the economy and a diversity of jobs will overall contribute to vibrant &amp; inclusive communities.</p> <p>The HEDNA (Nov 2022)<sup>123</sup> considered employment land requirements across Coventry and Warwickshire looking to 2041 and 2050. For Coventry, the employment land needs were calculated to be 147.6 general industrial – and please see SA No 5 Economic</p>	-?	+	+

<sup>123</sup> Housing & Economic Development Needs Assessment (HEDNA, November 2022) Icen Projects Ltd on behalf of Coventry & Warwickshire Local Authorities  
<https://www.coventry.gov.uk/downloads/download/7374/coventry-and-warwickshire-housing-and-economic-development-needs-assessment-hedna>

	<p>Growth for more details. Recent studies (ELR, May 2024)<sup>124</sup> have considered the changes &amp; trends in the employment market since the current Local Plan was adopted, and investigated suitability of existing employment sites for continued use.</p> <p>Provision of the identified need of 147.6 ha general industrial employment land in Option 1 would suggest that the role of employment contributing to vibrant communities would be satisfied with positive effects. However, capacity studies (HELAA 2024)<sup>125</sup> &amp; review studies (ELR 2024) indicate that this quantum of land may not be possible within the constrained nature of the Coventry area &amp; therefore, negative effects but uncertainty of significance.</p> <p>Uncertainty of positive effects is indicated with Option 2 that is less than identified need but has been found that can be accommodated. Option 3 includes one additional site that is in the Green Belt. If potential negative effects on GB purposes can be mitigated, then with this additional site the quantum approaches the identified need and can be accommodated with more certainty of positive effects.</p>			
<p><b>2: To provide accessible essential services and facilities for all residents</b></p>	<p>Other factors are more likely to have potential effects on objectives for accessibility to essential services &amp; facilities than the quantum of employment land – neutral effects for all three options.</p>	0	0	0
<p><b>3: To improve health &amp; promote active living</b></p>	<p>The relationship between fair employment, good work and health has been recognised for many years. Whilst employment rates have increased nationally since 2010, there has been an increase in poor quality work, including part-time, insecure employment (Marmot Review 10 years on, 2020)<sup>126</sup>. Since 2010 there have been profound shifts in many aspects of the labour market and employment practices in England. Rates of unemployment have decreased but increases in employment have often been in low-paid, unskilled, self-employed, short-term or zero hours contract jobs –which have seen a steady growth. Rates of pay have not increased and, notably, more people in poverty are now in work than out of work. The rise of automation in the labour market also has</p>	-?	+?	+

<sup>124</sup> DLP Planning Ltd for Coventry City Council (May 2024) Coventry Employment Land Review

<sup>125</sup> Coventry Housing and Economic Land Availability Assessment (HELAA, 2024) <https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

<sup>126</sup> The Health Foundation (Feb 2020) Health Equity in England: The Marmot Review 10 Years On <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

	<p>implications for health inequalities. Unemployment and poor quality work are major drivers of inequalities in physical and mental health.</p> <p>Provision of the identified need of 147.6 ha general industrial employment land in Option 1 would suggest that employment needs would be met with concomitant positive effects for health. However, capacity &amp; review studies indicate that this quantum of land may not be possible within the constrained nature of the Coventry area &amp; therefore, some negative effects but uncertainty of significance.</p> <p>Uncertainty of positive effects is indicated with Option 2 that is less than identified need but has been found that can be accommodated. Option 3 includes one additional site that is in the Green Belt. If potential negative effects on GB purposes can be mitigated, then with this additional site the quantum approaches the identified need and can be accommodated with more certainty of effects.</p>			
<p><b>SA No 4: To provide decent and affordable housing for all</b></p>	<p>The provision of good quality new homes will support the ambitions for sustainable economic growth &amp; neutral effects suggested for Options 2 &amp; 3. Studies have indicated that Option 1 cannot be accommodated. There is a risk that continuing to progress this option could compromise the availability of certain land for residential/mixed-use development &amp; other uses, and limit the opportunities for ensuring that general industrial land is located in the most sustainable locations.</p>	<p>-?</p>	<p>0</p>	<p>0</p>
<p><b>5: To support sustainable inclusive economic growth</b></p>	<p>Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people. Coventry has seen strong economic growth over the past few years and is recognised as a national centre for a number of growing business sectors, including advanced manufacturing and engineering; energy and low carbon; connected autonomous vehicles; business, professional &amp; financial services; digital, creative, and gaming. These have all resulted in the creation of high-quality jobs for in growth sectors. However, there are a number of challenges, Coventry's economic growth and prosperity lags behind the England average and the city has fewer people in work compared to both regional and national figures<sup>127</sup>.</p>	<p>+</p>	<p>++?</p>	<p>++</p>

<sup>127</sup> One Coventry Plan 2022-2030 <https://www.coventry.gov.uk/downloads/download/7162/one-coventry-plan-2022-2030>

	<p>It is notable that many of Coventry's private sector businesses are small or micro-businesses &amp; the Council has an important priority to support SMEs<sup>128</sup>. Further priorities for creating the infrastructure to enable sustainable economic growth include innovating with multi-user developments (such as Friargate &amp; City Centre South), and enabling the city to be cleaner &amp; greener with GI &amp; renewable energy.</p> <p>With regard to employment land needs, the HEDNA (Nov 2022)<sup>129</sup> concluded that whilst the demand for B8 land use (storage/warehousing)<sup>130</sup> is strong, there is a need for separate allocations for B1c/B2 (general industrial) where land is delineated from sites going for B8 in order to support the manufacturing sector. Taking into account various sub-regional factors &amp; an adjustment for flexibility, the HEDNA concludes on 147.6 general industrial land need for the Coventry LP area to 2041.</p> <p>Provision of the identified need of 147.6 ha general industrial employment land in Option 1 would suggest that the contribution to sustainable economic growth objectives would be achieved with positive effects. However, capacity studies (HELAA 2024) &amp; land review studies (ELR 2024)<sup>131</sup> indicate that this quantum of land may not be possible within the constrained nature of the Coventry area &amp; therefore, uncertainty of significance.</p> <p>Some uncertainty of positive effects is indicated with Option 2 that is less than identified need but has been found that can be accommodated. Option 3 includes one additional site that is in the Green Belt. If potential negative effects on GB purposes can be mitigated, then with this additional site the quantum approaches the identified need and can be accommodated with more certainty of effects.</p> <p>Existing CLP Policies JE1-JE7 on employment will be updated &amp; revised, including a new policy that addresses R&amp;D employment, differentiating this from industrial &amp; storage/distribution development. The Council is also reassessing whether the existing employment allocations are still suitable &amp; deliverable &amp; align with the overall strategy.</p>			
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<sup>128</sup> Coventry City Council Economic Development Strategy 2022-2027 <https://www.coventry.gov.uk/council-democracy/economic-development-strategy-2022-2027/3>

<sup>129</sup> Housing & Economic Development Needs Assessment (HEDNA, November 2022) Icen Projects Ltd on behalf of Coventry & Warwickshire Local Authorities

<sup>130</sup> Discussions are ongoing on how to meet the separately identified strategic B8 needs to serve the wider Coventry & Warwickshire functional economic market area – and this is not considered further within this SA of the Coventry Local Plan Review

<sup>131</sup>

	<p>There may be other opportunities with employment sites to enhance objectives for GI, clean energy &amp; net zero carbon that would extend positive effects beyond SA No 5 - depends on locational &amp; industrial specificities.</p> <p><b>SA Suggestions:</b></p> <ul style="list-style-type: none"> <li>■ Is there scope to increase density of job numbers through creative building design that optimises footprinting?</li> <li>■ Maximising use of green roofs &amp; other GI to encourage greening of sustainable economic development</li> <li>■ Maximising use of renewable energy modes – to include neighbourhood provision?</li> </ul>			
<p><b>6: To help achieve the Council's ambition to reach net zero carbon emissions</b></p>	<p>The Council recognises the climate crisis and is currently reviewing its Strategy<sup>132</sup>. This will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure.</p> <p>Direct greenhouse gas (GHG) emissions from buildings accounted for 17% of UK GHG emissions in 2019<sup>133</sup>. It has been reported that the construction industry needs to decarbonise more urgently<sup>134</sup> and building design needs to progress principles in the circular economy.</p> <p>A major element of the review of the CLP is to address the Council's ambitions to reach net zero carbon emissions, including updates to Policy EM1 and replacement of Policies EM2 &amp; EM3 with EM11-EM14 incorporating building standard requirements for different typologies. All development will be required to meet with new policy – therefore, neutral effects for all three options.</p>	0	0	0
	<p>There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK.<sup>135</sup> Therefore, it is vital to</p>	0	0	0

<sup>132</sup>A Green Future for a Changing City(2022 – 2030) <https://www.coventry.gov.uk/draftclimatechangestrategy>

<sup>133</sup> UK Climate Change Committee <https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Buildings.pdf>

<sup>134</sup> For example, please see RAEng 2021 <https://raeng.org.uk/news/construction-sector-must-move-further-and-faster-to-curb-carbon-emissions-say-engineers>

<sup>135</sup> For example, see <https://earth.org/climate-change-in-the-uk/>

<p><b>7: To build resilience to climate change</b></p>	<p>build resilience, including reducing risks from overheating, flooding and the resultant detriment to health &amp; wellbeing, the economy, and the environment.</p> <p>A major element of the review of the CLP is to build resilience to climate change effects and all development will be required to meet with new and updated policies – therefore, neutral effects for all three options.</p>						
<p><b>8: To reduce traffic &amp; improve sustainable transport choices</b></p>	<p>Transport produced 24% of the UK's total emissions in 2020 &amp; remains the largest emitting sector in the UK, with the majority of emissions from road vehicles<sup>136</sup>.</p> <p>The Council will seek to select employment development land that best supports objectives for sustainable transport – and it is indicated that Options 2 &amp; 3 could be accommodated; Option 1 cannot be accommodated. CLP Policies AC1 Accessible Transport Network and AC2-AC6 will be updated to better support sustainable movement &amp; active travel. Therefore, neutral effects for all three options.</p>	0	0	0			
<p><b>9: To reduce air, noise &amp; light pollution</b></p>	<p>No direct effects likely – neutral/not applicable. All development will be required to meet with EM Policies.</p>	0	0	0			
<p><b>10: To protect &amp; conserve natural resources – soil, water, minerals &amp; waste<sup>137</sup></b></p>	<p>With climate change, temperate soils are forecast to experience a high degree of variability in moisture conditions; restoring lost carbon through conventional approaches may take decades; and food security is an increasing issue. Soil has been recognised as an essential national asset &amp; government has indicated that managing soil carbon could form a part of net zero plans<sup>138</sup>. The review of the CLP will continue to build on previously developed land (PDL) where effectively located &amp; thus contribute towards protecting agricultural land.</p> <p>Many of the existing sites are on PDL indicating positive effects for conserving soil but Option 1 does not use land as effectively as Options 2 &amp; 3 such that the positive/negative effects indicate overall neutral. Some uncertainty of effects for Options 1 &amp; 2 whilst for Option 3 that has most effectively used land, positive effects are more certain.</p>	0?	0	+?	0	+	0

<sup>136</sup> <https://www.gov.uk/government/statistics/transport-and-environment-statistics-2022/transport-and-environment-statistics-2022>

<sup>137</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

<sup>138</sup> UK Horizon scanning (April 2021) <https://post.parliament.uk/soil-as-an-essential-national-asset/>

	<p>CLP Policies EM1-EM6 will be updated &amp; thus provide sufficient mitigation for all development.</p> <p>The current CLP Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development. It is assumed that they will be updated to address any capacity issues such that at least neutral effects would be indicated for all three options. Progressions with the circular economy, driven by the need to reduce carbon emissions &amp; encouraged through higher standards, will conserve minerals &amp; reduce/minimise/reuse waste with some potential further positive effects in the longer term but with uncertainty of significance.</p>			
<p><b>11: To protect and enhance nature &amp; biodiversity</b></p>	<p>It will be necessary to consider the new requirements from the Environment Act and including emerging metrics for calculating biodiversity net gain<sup>139</sup>. Unequal distribution, and access to, green infrastructure across the city can exacerbate health inequalities. There are priority areas that would benefit particularly from greening. Off-site areas for biodiversity net gain may be needed. Increased recreational pressures and water quality impacts (such as road run-off) as a result of new development can put pressure on GI and biodiversity. Climate change is likely to affect changes to habitats and species distribution.</p> <p>The fragmentation and erosion of habitats remains a threat, and the need to secure biodiversity gain and improve the wider ecological network remain objectives for plan making in the Coventry area. The current adopted Plan has policies to protect nature &amp; biodiversity, including GB1 Green Belt &amp; Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide further mitigation measures such that there will be no major significant negative effects. All development will have to meet with new requirements for Biodiversity Net Gain &amp; therefore, positive effects indicated for all options but some uncertainty of significance at this stage.</p> <p>The Council will continue to allocate employment development sites to PDL &amp; new development can create opportunities for enhancing GI and biodiversity with potential positive effects but uncertainty at this stage as depends upon locational specificity.</p>	<p>+</p>	<p>+</p>	<p>+</p>

<sup>139</sup> Biodiversity Metric 4.0 (JP039) 2021 <https://publications.naturalengland.org.uk/publication/6049804846366720>



<b>12: To protect and enhance the historic environment, and its setting</b>	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide sufficient mitigation measures to avoid significant negative effects on the historic environment – but some uncertainty at this stage as depends upon locational specificity.	0?	0?	0?
<b>13: To protect and enhance the quality and character of townscapes &amp; landscapes</b>	<p>The national design guide (2019)<sup>140</sup> sets out the characteristics of well-designed places &amp; circular economy principles in building design<sup>141</sup> will contribute towards mitigating effects of climate change. It is also acknowledged that new proportional &amp; high quality development can enhance the townscape.</p> <p>The current CLP includes policies to protect townscapes/landscapes, especially Policy DE1 Ensuring High Quality Design, and these will be updated in the CLP review. This indicates that sufficient mitigation measures will be provided through plan policies and thus, likely effect at least neutral for Options 2 &amp; 3. The less than efficient use of land indicated by the quantum in Option 1 suggests that opportunities for enhancing the quality of townscape/landscape would not be progressed such that potential negative effects – uncertain as depends on locational specificity.</p>	-?	0	0

<sup>140</sup> <https://www.gov.uk/government/publications/national-design-guide>

<sup>141</sup> For example, please see RIBA [https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy\\_9781859469545](https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy_9781859469545) and BRE <https://bregroup.com/products/breem/breem-solutions/breem-circularity-and-resilience/>

IIIg: Options for Quantum of Office Development	
1	8.5 hectares offices (HEDNA), assume 85,000 sq m
2	5.8 hectares offices (HEDNA less 2.7 hectares oversupply as per the ELR office market addendum) assume 58,000 sq m
3	4.12 hectares offices (reduced land take for offices as per the ELR office market addendum based on allowance of 10sqm per full time employee instead of 14sqm assumed previously, to allow for increased flexible and hybrid working patterns. This broadly equates to the more high level 30% reduction assumed by the HEDNA) (overall, 41,200 sq m)

		Options for Quantum of Office Development		
Sustainability Objective	Assessment of Effects  Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	1. 8.5 ha	2. 5.8 ha	3. 4.12 ha
		1: To enable vibrant and inclusive communities	<p>Other factors are more likely to have potential significant effects on objectives for inclusive communities than the quantum of land for office development. However, provision of sufficient land for office development will support the economy and a diversity of jobs will overall contribute to vibrant &amp; inclusive communities.</p> <p>The HEDNA (Nov 2022)<sup>142</sup> has considered employment land requirements across Coventry and Warwickshire looking to 2041 and 2050. For Coventry, the office land needs were calculated to be 8.5 ha to 2041 – and please see SA No 5 Economic Growth for more details. The ELR (May 2024)<sup>143</sup> further studied existing employment land &amp; needs. A recent Office Market Study (June 2024)<sup>144</sup> focuses on the changes &amp; trends in the office market since the HEDNA &amp; ELR and to identify if the conclusions &amp; recommendations are still valid. The Study raises issues for suitability &amp; deliverability of existing allocations, potential over-supply, growing demands for flexible leases &amp;</p>	-?

<sup>142</sup> Housing & Economic Development Needs Assessment (HEDNA, November 2022) Icenl Projects Ltd on behalf of Coventry & Warwickshire Local Authorities  
<https://www.coventry.gov.uk/downloads/download/7374/coventry-and-warwickshire-housing-and-economic-development-needs-assessment-hedna>

<sup>143</sup> DLP Planning Ltd for Coventry City Council (May 2024) Coventry Employment Land Review

<sup>144</sup> DLP Planning Ltd for Coventry City Council (June 2024) Coventry Office Market Study: An Addendum to the Coventry Employment Land Review

	<p>workspaces, together with on-site parking, and continuing flexible &amp; hybrid working patterns.</p> <p>Option 1 reflects an earlier office development need. Updated evidence indicates that this quantum would be an over-supply &amp; thus, would restrict possibilities for repurposing surplus office development land with potential negative effects for less than efficient use of land – uncertainty as depends on precise locations.</p> <p>Option 2 reflects the office development need updated to remove the oversupply. This indicates positive effects for the contribution that office land makes to vibrant communities but also some negative effects since use of land may not have been optimised – overall neutral effects. However, Option 3 reflects the updated office land needed &amp; takes into account increased flexibility &amp; hybrid working patterns – thus providing more certainty of significance of positive effects overall for communities.</p>			
<p><b>2: To provide accessible essential services and facilities for all residents</b></p>	<p>Other factors are more likely to have potential effects on objectives for accessibility to essential services &amp; facilities than the quantum of office land – neutral/not applicable effects for all three options.</p>	0	0	0
<p><b>SA No 4: To provide decent and affordable housing for all</b></p>	<p>The provision of good quality new homes will support the ambitions for sustainable economic growth.</p> <p>There is a risk that continuing to progress Options 1 &amp; 2 is not the most efficient use of land &amp; could compromise the availability of certain land for residential/mixed-use development &amp; other uses. The opportunities for ensuring that office development land is located in the most sustainable locations could also be limited (other sites away from centres might need to be sought) – therefore, some potential negative effects indicated but uncertainty at this stage as depends on locational specificity. Positive effects for Option 3 as the repurposing of some previously allocated office land can release housing in suitable &amp; sustainable locations.</p>	-?	-?	+

<p><b>5: To support sustainable inclusive economic growth</b></p>	<p>Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people. Coventry has seen strong economic growth over the past few years and is recognised as a national centre for a number of growing business sectors, including advanced manufacturing and engineering; energy and low carbon; connected autonomous vehicles; business, professional &amp; financial services; digital, creative, and gaming. These have all resulted in the creation of high-quality jobs for in growth sectors. However, there are a number of challenges, Coventry's economic growth and prosperity lags behind the England average and the city has fewer people in work compared to both regional and national figures<sup>145</sup>.</p> <p>It is notable that many of Coventry's private sector businesses are small or micro-businesses &amp; the Council has an important priority to support SMEs<sup>146</sup>. Further priorities for creating the infrastructure to enable sustainable economic growth include innovating with multi-user developments (such as Friargate &amp; City Centre South), and enabling the city to be cleaner &amp; greener with GI &amp; renewable energy.</p> <p>Option 1 reflects an earlier office development need. Updated evidence indicates that this quantum would be an over-supply &amp; thus, would restrict possibilities for repurposing surplus office development land with potential negative effects for less than efficient use of land – uncertainty as depends on precise locations.</p> <p>Option 2 reflects the office development need updated to remove the oversupply, thus indicating potential positive effects for the contribution that office land makes to sustainable economic growth.</p> <p>However, Option 3 reflects the updated office land needed and takes into account increased flexibility &amp; hybrid working patterns – thus providing more certainty of significance of effects. It also enables further positive effects for other SA objectives, such as for housing, by reducing the landtake for offices &amp; releasing some land for repurposing.</p> <p>The Office Market Study (June 2024) confirmed the recommendations from the ELR (May 2024) that there is a need to reconsider the suitability &amp; deliverability of existing</p>	<p>+</p>	<p>++</p>	<p>++</p>
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<sup>145</sup> One Coventry Plan 2022-2030 <https://www.coventry.gov.uk/downloads/download/7162/one-coventry-plan-2022-2030>

<sup>146</sup> Coventry City Council Economic Development Strategy 2022-2027 <https://www.coventry.gov.uk/council-democracy/economic-development-strategy-2022-2027/3>

	allocations without permission. CLP Policies will be updated to reflect the needs for more flexible office spaces, including adaptable internal arrangements & shared facilities – especially relevant to support the needs of start-up businesses & SMEs that are so important to Coventry.			
<b>6: To help achieve the Council's ambition to reach net zero carbon emissions</b>	The Council recognises the climate crisis and is currently reviewing its Strategy <sup>147</sup> . This will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure.	0	0	0
	Direct greenhouse gas (GHG) emissions from buildings accounted for 17% of UK GHG emissions in 2019 <sup>148</sup> . It has been reported that the construction industry needs to decarbonise more urgently <sup>149</sup> and building design needs to progress principles in the circular economy.  A major element of the review of the CLP is to address the Council's ambitions to reach net zero carbon emissions and all development will be required to meet with new policies – therefore, neutral effects for all three options.			
<b>7: To build resilience to climate change</b>	There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK. <sup>150</sup> Therefore, it is vital to build resilience, including reducing risks from overheating, flooding and the resultant detriment to health & wellbeing, the economy, and the environment.	0	0	0
	A major element of the review of the CLP is to build resilience to climate change effects and all development will be required to meet with new and updated policies – therefore, neutral effects for all three options.			
<b>8: To reduce traffic &amp; improve</b>	Transport produced 24% of the UK's total emissions in 2020 & remains the largest emitting sector in the UK, with the majority of emissions from road vehicles <sup>151</sup> .	0	0	0

<sup>147</sup>A Green Future for a Changing City(2022 – 2030) <https://www.coventry.gov.uk/draftclimatechangestrategy>

<sup>148</sup> UK Climate Change Committee <https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Buildings.pdf>

<sup>149</sup> For example, please see RAEng 2021 <https://raeng.org.uk/news/construction-sector-must-move-further-and-faster-to-curb-carbon-emissions-say-engineers>

<sup>150</sup> For example, see <https://earth.org/climate-change-in-the-uk/>

<sup>151</sup> <https://www.gov.uk/government/statistics/transport-and-environment-statistics-2022/transport-and-environment-statistics-2022>

<b>sustainable transport choices</b>	The Council will seek to select development that best support objectives for sustainable transport – therefore, neutral effects overall for all three options.						
<b>9: To reduce air, noise &amp; light pollution</b>	No direct effects likely – neutral/not applicable. All development will be required to meet with EM Policies.	0		0		0	
<b>10: To protect &amp; conserve natural resources – soil, water, minerals &amp; waste<sup>152</sup></b>	<p>With climate change, temperate soils are forecast to experience a high degree of variability in moisture conditions; restoring lost carbon through conventional approaches may take decades; and food security is an increasing issue. Soil has been recognised as an essential national asset &amp; government has indicated that managing soil carbon could form a part of net zero plans<sup>153</sup>. The review of the CLP will continue to build on previously developed land (PDL) where effectively located &amp; thus contribute towards protecting agricultural land.</p> <p>Many of the existing sites are on PDL indicating positive effects for conserving soil but Option 1 does not use land as effectively as Options 2 &amp; 3 such that the positive/negative effects indicate overall neutral. Some uncertainty of effects for Options 1 &amp; 2 whilst for Option 3 that has most effectively used land, positive effects are more certain.</p> <p>Climate change, particularly incidences of hotter, drier, summers may exacerbate water supply issues; wetter weather and more flooding may overload wastewater systems. The cumulative effects of increased development on soil &amp; water resources is uncertain, particularly in the shorter-medium term before the effects of net zero carbon actions are implemented &amp; become effective.</p> <p>CLP Policies EM1-EM6 will be updated &amp; thus provide sufficient mitigation for all development – therefore, likely effects are neutral for all three options.</p> <p>The current CLP Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development. It is assumed that they will be updated to address any capacity issues such that at least neutral effects would be indicated for all three options.</p>	0?	0	+?	0	+	0

<sup>152</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

<sup>153</sup> UK Horizon scanning (April 2021) <https://post.parliament.uk/soil-as-an-essential-national-asset/>

	Progressions with the circular economy, driven by the need to reduce carbon emissions & encouraged through higher standards, will conserve minerals & reduce/minimise/reuse waste with some potential further positive effects in the longer term but with uncertainty of significance.			
<b>11: To protect and enhance nature &amp; biodiversity</b>	It will be necessary to consider the new requirements from the Environment Act and including emerging metrics for calculating biodiversity net gain <sup>154</sup> . Unequal distribution, and access to, green infrastructure across the city can exacerbate health inequalities. There are priority areas that would benefit particularly from greening. Off-site areas for biodiversity net gain may be needed. Increased recreational pressures and water quality impacts (such as road run-off) as a result of new development can put pressure on GI and biodiversity. Climate change is likely to affect changes to habitats and species distribution.	+	+	+
	<p>The fragmentation and erosion of habitats remains a threat, and the need to secure biodiversity gain and improve the wider ecological network remain objectives for plan making in the Coventry area. The current adopted Plan has policies to protect nature &amp; biodiversity, including GB1 Green Belt &amp; Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide further mitigation measures such that there will be no major significant negative effects. All development will have to meet with new requirements for Biodiversity Net Gain &amp; therefore, positive effects indicated for all options but some uncertainty of significance at this stage.</p> <p>The Council will continue to aim to allocate employment sites to PDL &amp; new development can create opportunities for enhancing GI and biodiversity with potential positive effects but uncertainty at this stage as depends upon locational specificity.</p>			
<b>12: To protect and enhance the historic environment, and its setting</b>	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide sufficient mitigation measures to avoid significant negative effects on the historic environment – but some uncertainty at this stage as depends upon locational specificity.	0?	0?	0?

<sup>154</sup> Biodiversity Metric 4.0 (JP039) 2021 <https://publications.naturalengland.org.uk/publication/6049804846366720>

<p><b>13: To protect and enhance the quality and character of townscapes &amp; landscapes</b></p>	<p>The national design guide (2019)<sup>155</sup> sets out the characteristics of well-designed places &amp; circular economy principles in building design<sup>156</sup> will contribute towards mitigating effects of climate change. It is also acknowledged that new proportional &amp; high quality development can enhance the townscape.</p> <p>The current CLP includes policies to protect townscapes/landscapes, especially Policy DE1 Ensuring High Quality Design, and these will be updated in the CLP review. This indicates that sufficient mitigation measures will be provided through plan policies and thus, likely effect at least neutral for Options 2 &amp; 3. The less than efficient use of land indicated by the quantum in Option 1 suggests that opportunities for enhancing the quality of townscape/landscape would not be progressed such that potential negative effects – uncertain as depends on locational specificity.</p>	<p>-?</p>	<p>0</p>	<p>0</p>

<sup>155</sup> <https://www.gov.uk/government/publications/national-design-guide>

<sup>156</sup> For example, please see RIBA [https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy\\_9781859469545](https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy_9781859469545) and BRE <https://bregroup.com/products/breem/breem-solutions/breem-circularity-and-resilience/>



<b>IIIh: Options for Distribution of Office Development</b>	
<b>1</b>	City Centre focus including Friargate
<b>2</b>	A more dispersed approach
<b>3</b>	City Centre focus to include 39,549 sqm floorspace at Friargate and the rest distributed to other defined centres (overall, 41,200 sq m)

		<b>Options for Distribution of Office Development</b>		
<b>Sustainability Objective</b>	<b>Assessment of Effects</b>  <b>Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</b>	<b>1. City Centre focus</b>	<b>2. More Dispersed Approach</b>	<b>3. City Centre focus (Friargate) &amp; rest to other defined centres</b>
<b>1: To enable vibrant and inclusive communities</b>	<p>Other factors are likely to have more significant effects on objectives for inclusive communities; however, distribution of sufficient land for offices to support the economy and a diversity of jobs will overall contribute to vibrant &amp; inclusive communities.</p> <p>Many of Coventry's businesses are small or micro-businesses &amp; the Council has an important priority to support such SMEs<sup>157</sup>. The Coventry Office Market Study (June 2024)<sup>158</sup> confirmed the need for flexibility &amp; adaptability for office spaces.</p>	<b>+</b> ?	<b>+</b> ?	<b>+</b>

<sup>157</sup> Coventry City Council Economic Development Strategy 2022-2027 <https://www.coventry.gov.uk/council-democracy/economic-development-strategy-2022-2027/3>

<sup>158</sup> DLP Planning Ltd for Coventry City council (June 2024) Coventry Office Market Study: An Addendum to the Coventry Employment Land Review

	Option 1 and Option 2 have some uncertainty of positive effects whilst Option 3 that incorporates both city centre & distribution to the identified centres indicates more certainty as more likely to address future type & locational needs for office working – and throughout the CLP area.			
<b>2: To provide accessible essential services and facilities for all residents</b>	Other factors are more likely to have potential effects on objectives for accessibility to essential services & facilities than the quantum of employment land – neutral effects for all three options.	0	0	0
<b>3: To improve health &amp; promote active living</b>	The relationship between fair employment, good work and health has been recognised for many years. Whilst employment rates have increased nationally since 2010, there has been an increase in poor quality work, including part-time, insecure employment (Marmot Review 10 years on, 2020) <sup>159</sup> . Unemployment and poor quality work are major drivers of inequalities in physical and mental health.  Option 1 and Option 2 have uncertainty of positive effects whilst Option 3 that incorporates both city centre and distribution to the identified centres indicates more certainty as more likely to address future type & locational needs for office working.	+	+	+
<b>SA No 4: To provide decent and affordable housing for all</b>	The provision of good quality new homes will support the ambitions for sustainable economic growth. Neutral/not applicable effects for all three options.	0	0	0
<b>5: To support sustainable inclusive economic growth</b>	It is notable that many of Coventry's private sector businesses are small or micro-businesses & the Council has an important priority to support such SMEs <sup>160</sup> .  Options 1 & 3 include opportunities for innovating with the multi-user development of Friargate, and better enabling the city to be cleaner & greener with GI & renewable energy since such developments are better able to incorporate enhanced levels of quality & energy efficiencies. Options 2 & 3 may better support smaller start-ups & SMEs for all through a dispersed approach but Option 2 does not necessarily align office land	+	+	++

<sup>159</sup> The Health Foundation (Feb 2020) Health Equity in England: The Marmot Review 10 Years On <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

<sup>160</sup> Coventry City Council Economic Development Strategy 2022-2027 <https://www.coventry.gov.uk/council-democracy/economic-development-strategy-2022-2027/3>

	with strong accessibility to sustainable services/facilities & travel, such that some uncertainty of positive effects. Option 3 supports the needs for flexibility & adaptability, support for smaller start-ups & SMEs, and with both a city centre focus & dispersion to the other defined centres, provides office land throughout the CLP area and aligned with sustainable locations such that more positive effects are more certain.			
<b>6: To help achieve the Council's ambition to reach net zero carbon emissions</b>	The Council recognises the climate crisis and is currently reviewing its Strategy <sup>161</sup> . This will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure.	0	0	0
	A major element of the review of the CLP is to address the Council's ambitions to reach net zero carbon emissions and all development will be required to meet with new policy – therefore, neutral effects for all three options.			
<b>7: To build resilience to climate change</b>	There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK. <sup>162</sup> Therefore, it is vital to build resilience, including reducing risks from overheating, flooding and the resultant detriment to health & wellbeing, the economy, and the environment.	0	0	0
	A major element of the review of the CLP is to build resilience to climate change effects and all development will be required to meet with new and updated policies – therefore, neutral effects for all three options.			
<b>8: To reduce traffic &amp; improve sustainable transport choices</b>	Transport produced 24% of the UK's total emissions in 2020 & remains the largest emitting sector in the UK, with the majority of emissions from road vehicles <sup>163</sup> .	0	-?	0
	Options 1 & 3 comprise office land located in the city centre & other defined centres, thus confirming that workplaces will be allocated with sustainable travel; Option 2 dispersed throughout the CLP indicates the potential for some negative effects but uncertainty as depends on locational specificity.			

<sup>161</sup>A Green Future for a Changing City(2022 – 2030) <https://www.coventry.gov.uk/draftclimatechangestrategy>

<sup>162</sup> For example, see <https://earth.org/climate-change-in-the-uk/>

<sup>163</sup> <https://www.gov.uk/government/statistics/transport-and-environment-statistics-2022/transport-and-environment-statistics-2022>

<b>9: To reduce air, noise &amp; light pollution</b>	No direct effects likely – neutral/not applicable. All development will be required to meet with EM Policies.	0		0		0	
<b>10: To protect &amp; conserve natural resources – soil, water, minerals &amp; waste<sup>164</sup></b>	CLP Policies EM1-EM6 will be updated & thus provide sufficient mitigation for all development – therefore, likely effects are neutral for all three options.	0		0		0	
	The current CLP Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.						
<b>11: To protect and enhance nature &amp; biodiversity</b>	The fragmentation and erosion of habitats remains a threat, and the need to secure biodiversity gain and improve the wider ecological network remain objectives for plan making in the Coventry area. The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide further mitigation measures aiming for no major significant negative effects. All development will have to meet with new requirements for Biodiversity Net Gain & therefore, positive effects indicated for all options but some uncertainty of significance at this stage.	+?		+?		+?	
	The Council will continue to aim to allocate office sites to PDL & new development can create opportunities for enhancing GI and biodiversity with potential positive effects but uncertainty at this stage as depends upon locational specificity.						
<b>12: To protect and enhance the historic environment, and its setting</b>	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide sufficient mitigation measures to avoid significant negative effects on the historic environment – but some uncertainty at this stage as depends upon locational specificity.	0?		0?		0?	
<b>13: To protect and enhance the</b>	The national design guide (2019) <sup>165</sup> sets out the characteristics of well-designed places & circular economy principles in building design <sup>166</sup> will contribute towards mitigating	0		0		0	

<sup>164</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

<sup>165</sup> <https://www.gov.uk/government/publications/national-design-guide>

<sup>166</sup> For example, please see RIBA [https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy\\_9781859469545](https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy_9781859469545) and BRE <https://bregroup.com/products/breem/breem-solutions/breem-circularity-and-resilience/>

<b>quality and character of townscapes &amp; landscapes</b>	<p>effects of climate change. It is also acknowledged that new proportional &amp; high quality development can enhance the townscape.</p> <p>The current CLP includes policies to protect townscapes/landscapes, especially Policy DE1 Ensuring High Quality Design, and these will be updated in the CLP review. This indicates that sufficient mitigation measures will be provided through plan policies and thus, likely effect at least neutral for all options.</p>			
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IIIi: Options for Purpose Built Student Accommodation (PBSA)	
1	Retain Policy H10 Student Accommodation as adopted Plan (2017)
2	PBSA to be located at campus/city university area unless evidence demonstrates otherwise on a case by case basis

		Options for PBSA	
Sustainability Objective	Assessment of Effects  Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	1. Retain existing Policy H10	2. PBSA located at campus, city university area
<b>1: To enable vibrant and inclusive communities</b>	<p>Other factors are more likely to have potential effects on objectives for inclusive communities than locations for PBSA. However, a concentration of PBSA in a particular neighbourhood could result in an imbalance that might adversely affect the vibrancy and inclusivity of communities, such that some negative effects indicated for Option – uncertain as depends on location.</p> <p>The level of student population in the city is also a factor affecting the amount and distribution of Homes in Multiple Occupation (HMO)s. The residential areas that tend to have high concentrations of student populations are the areas that surround or are accessible easily to the city's two universities. Significant concentrations in particular streets and neighbourhoods have already had negative impacts on local communities. The Council has prepared an HMO DPD<sup>167</sup> and this addresses issues such as effects on communities and the housing stock (please see SA No 4 later).</p>	-?	0

<sup>167</sup> <https://www.coventry.gov.uk/planning-policy/homes-multiple-occupation-development-plan-document>

<p><b>2: To provide accessible essential services and facilities for all residents</b></p>	<p>Existing Policy H10 requires that there should be no disadvantages to local services – neutral effects for both options.</p>	<p>0</p>	<p>0</p>
<p><b>3: To improve health &amp; promote active living</b></p>	<p>Provision of good quality housing will have positive effects on health &amp; wellbeing regardless of location. There is the potential for some uncertainty of significance for Option 1 as continued provision of PBSA throughout the LP area could result in concentrations of students in some areas that then could affect the wellbeing of local residents with different lifestyles. The PBSA Study (July 2024)<sup>168</sup> indicates that poorer quality student accommodation has been delivered and that this poorer quality stock is concentrated in the City Centre – therefore, some uncertainty about the significance of positive effects from continuing with H10 as set out in Option 1.</p> <p><b>SA Suggestion:</b></p> <ul style="list-style-type: none"> <li>Require sufficient standards of building quality and design in PBSA to ensure decent homes &amp; associated health &amp; wellbeing</li> </ul>	<p>+?</p>	<p>+</p>
<p><b>SA No 4: To provide decent and affordable housing for all</b></p>	<p>As the fastest growing higher education institution in the UK, Coventry University now teaches one in every seven higher education students in the West Midlands &amp; has more than 30,000 students across its UK campuses<sup>169</sup>. Coventry is the larger of the two universities located in the city; it is a public research university with two campuses – one in the centre of Coventry with the majority of operations and another in central London. The University of Warwick is a campus university (720 acres) on the outskirts of Coventry.</p> <p>Capacity (HELAA 2024)<sup>170</sup> studies have determined that identified needs of approx. 31,500 new dwellings can be accommodated within the urban areas - and including the needs of students. In these studies, it was recognised that a significant amount of the windfall delivery has been through the provision of PBSA. As such, the windfall expectation has been tempered to 200 dwellings pa to take account of the reduced expectation of further PBSA schemes to come forward.</p>	<p>-</p>	<p>+</p>

<sup>168</sup> Cushman & Wakefield (July 2024) for Coventry CC Purpose Built Student Accommodation Market Study

<sup>169</sup> <https://www.coventry.ac.uk/>

<sup>170</sup> Coventry City Council (2024) Housing & Economic Land Availability Assessment <https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

	<p>The PBSA Study (July 2024)<sup>171</sup> found that the student to bed ratio in the City has now fallen to an unhealthy level which is impacting occupancy and arguably the long-term sustainability of some developments. Too many beds (and beds of the wrong type) are being delivered to the market. The overdevelopment of PBSA has implications for wider strategy in terms of development site availability, potential underoccupation of PBSA developments, and future change of use for alternative occupation. Over the longer term, this could be potentially damaging to the attractiveness of Coventry as a student destination and would stifle innovation. It also found that poorer quality student accommodation has been delivered and that this poorer quality stock is concentrated in the City Centre – therefore, negative effects indicated for Option 1 that could become significant cumulative effects.</p> <p>By limiting PBSA to the campus &amp; city university area, the student population is more focused and very easily accessible to learning &amp; other services in the city centre – with positive effects. Retaining the existing Policy H10 could result in HMOs/PBSA not being used most effectively and with negative effects for housing objectives as could take up land that is needed for other essential housing needs.</p> <p><b>SA Suggestion:</b></p> <ul style="list-style-type: none"> <li>■ Require sufficient standards of building quality and design in PBSA to ensure decent homes</li> </ul>		
<p><b>5: To support sustainable inclusive economic growth</b></p>	<p>Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people. The university is one of the city's biggest employers bringing skills and education to the region and helping to continue the growth of staff and student spending, job creation and graduate success. Provision of PBSA will support the economy of the university but regardless of options for PBSA – neutral effects for both options but some uncertainty for Option 1 as poorer quality student accommodation may adversely affect choice of university and thus, support for economic growth objectives in this sector.</p>	0?	0
<p><b>6: To help achieve the Council's ambition to reach net zero carbon emissions</b></p>	<p>The Council recognises the climate crisis and is currently reviewing its Strategy<sup>172</sup>. This will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure.</p>	0	0

<sup>171</sup> Cushman & Wakefield (July 2024) for Coventry CC Purpose Built Student Accommodation Market Study

<sup>172</sup> A Green Future for a Changing City(2022 – 2030) <https://www.coventry.gov.uk/draftclimatechangestrategy>



	Direct greenhouse gas (GHG) emissions from buildings accounted for 17% of UK GHG emissions in 2019 <sup>173</sup> . It has been reported that the construction industry needs to decarbonise more urgently <sup>174</sup> and building design needs to progress principles in the circular economy. All development will have to reduce GHG emissions in line with updated planning policy – therefore, neutral effects.		
<b>7: To build resilience to climate change</b>	There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK. <sup>175</sup> Therefore, it is vital to build resilience, including reducing risks from overheating, flooding and the resultant detriment to health & wellbeing, the economy, and the environment. All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change – therefore, neutral effects.	0	0
<b>8: To reduce traffic &amp; improve sustainable transport choices</b>	Transport produced 24% of the UK's total emissions in 2020 & remains the largest emitting sector in the UK, with the majority of emissions from road vehicles <sup>176</sup> .  The current Policy H10 requires that PBSA should be “directly accessible” from the universities; however, by focusing PBSA in the campus/city university area, sustainable transport will be more certain with positive effects for Option 2.	0	+
<b>9: To reduce air, noise &amp; light pollution</b>	The current Policy H10 requires that any PBSA will not materially harm the amenities of occupiers of nearby properties & therefore, neutral effects for both options.	0	0
<b>10: To protect &amp; conserve natural resources – soil, water, minerals &amp; waste<sup>177</sup></b>	The review of the CLP will continue to build on previously developed land (PDL) where effectively located & thus contribute towards protecting agricultural land. The recent Water Cycle Study Stage 1 (June 2024) <sup>178</sup> indicates that there is water capacity for the preferred residential quantum and therefore, likely neutral effects for both options.  The current CLP Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development. It is assumed that they will be updated to address any capacity issues such that at least neutral effects would be indicated for both options.	0	0

<sup>173</sup> UK Climate Change Committee <https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Buildings.pdf>

<sup>174</sup> For example, please see RAEng 2021 <https://raeng.org.uk/news/construction-sector-must-move-further-and-faster-to-curb-carbon-emissions-say-engineers>

<sup>175</sup> For example, see <https://earth.org/climate-change-in-the-uk/>

<sup>176</sup> <https://www.gov.uk/government/statistics/transport-and-environment-statistics-2022/transport-and-environment-statistics-2022>

<sup>177</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

<sup>178</sup> JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

<p><b>11: To protect and enhance nature &amp; biodiversity</b></p>	<p>The fragmentation and erosion of habitats remains a threat, and the need to secure biodiversity gain and improve the wider ecological network remain objectives for plan making in the Coventry area. The current adopted Plan has policies to protect nature &amp; biodiversity, including GB1 Green Belt &amp; Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These will be updated &amp; should provide sufficient mitigation measures - all development will have to meet with new requirements for Biodiversity Net Gain &amp; therefore, positive effects indicated for all options but some uncertainty of significance at this stage.</p>	<p>+</p>	<p>+</p>
<p><b>12: To protect and enhance the historic environment, and its setting</b></p>	<p>The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation &amp; Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment – with likely neutral effects for both options but more certainty of mitigation measures for Option 2 as PBSA focused on campus/university area.</p>	<p>0?</p>	<p>0</p>
<p><b>13: To protect and enhance the quality and character of townscapes &amp; landscapes</b></p>	<p>The current Policy H10 requires that any PBSA will not materially harm the amenities of occupiers of nearby properties &amp; therefore, likely neutral effects for both options but more certainty of mitigation measures for Option 2 as PBSA focused on campus/university area.</p>	<p>0?</p>	<p>0</p>

## Appendix IV: SA Consultation Representations & Responses Consultation Representations to SA Initial Report (May 2023) at Regulation 18 Stage Issues & Options

Section of SA Report	Consultee & Comments	Enfusion Responses & Action Taken
<b>Environment Agency</b>		
	No specific comments on the SA at this stage	Noted
<b>Historic England</b>		
	Broadly welcome the changes proposed, however, in regard to options 2 and 3 for quantum of housing development these should be changed to show there is the potential for harm to the historic environment, dependent upon the location of development sites. When specific allocations are being considered, the methodology and its findings are set out within an updated Heritage topic paper. In regard to 'Options for Residential Density', this is uncertain at this stage of the local plan review and the SA should reflect this, not sat there are negligible effects.	Agreed, with thanks
<b>Natural England</b>		
	<p>An appropriate evidence base should be used to support the selection of sites and inform the policies for their delivery. This should include:</p> <ul style="list-style-type: none"> <li>• Landscape and Visual Impact Assessments, Landscape Sensitivity Assessments and Landscape Character Assessments.</li> <li>• Soil surveys and mapping (Agricultural Land Classification available on Magic maps) ecological surveys, green infrastructure and biodiversity opportunity mapping</li> </ul> <p>The Plan should contain policies to protect Best and Most Versatile (BMV) agricultural land (Grades 1, 2, 3a). Polices should avoid the loss of BMV land. Any development proposed on BMV land should be informed by a detailed soil survey.</p>	Noted & agreed.

Section of SA Report	Consultee & Comments	Enfusion Responses & Action Taken
	<p>(NPPF paragraph 174(b)) Site selection must also be informed by the relevant environmental assessments.</p> <p>These are:</p> <ul style="list-style-type: none"> <li>• Sustainability Appraisal incorporating Strategic Environmental Assessment with recommendations used to inform mitigation measures and design principles for the allocated sites.</li> <li>• Habitats Regulations Assessment: mitigation and avoidance measures identified through the HRA should be secured through policies in the Plan. Where mitigation or avoidance is not possible the site should not be allocated.</li> </ul>	
<b>William Davis Homes</b>		
	<p>It is clear that the “exceptional local circumstances” required by the NPPF in order to depart from the use of Standard Method (SM) have not been established and the SM should therefore provide the basis of calculating the Local Housing Need (LHN). The Issues and Options consultation proposes to ignore the 35% uplift to the LHN required without any reasoned justification. The housing requirement in the Local Plan should be identified based on the SM being “a minimum starting point in determining the number of homes needed in an area” as set out in the PPG, increase growth could be necessary as part of major infrastructure projects such as the NUCKLE rail improvements and A45 and A46 improvements; and that the city is part of the WMCA which has a growth agenda. Failure to do so will exacerbate the housing crisis and perpetrate its acute socio-economic consequences in the area.</p> <p>These matters do not appear to have been adequately assessed in the initial SA and WDH’s concerns in this respect are exacerbated by the overstated land supply position set out in the Issues and Options Consultation, which would suggest that the housing land supply strategy should include sustainable sites in the greenbelt around the city. It is clear that “exceptional circumstances” exist to justify the release of land from the Green Belt for development as set out in the NPPF.</p>	<p>Noted with thanks.</p> <p>Identification &amp; refinement of strategic options is an iterative process between the plan-making &amp; SA teams. Taking into account consultation responses and further evidence, additional strategic options for the CPLR were developed that required testing through SA – and this includes:</p> <ul style="list-style-type: none"> <li>▪ Potential for development in the Green Belt</li> <li>▪ No potential development in the Green Belt</li> </ul>

Section of SA Report	Consultee & Comments	Enfusion Responses & Action Taken
	<p>The SA Report (May 2023) only considers a very limited number of Strategic Options relating to the Quantum of Housing Needs, Residential Density, Climate Change and BNG. It completely fails to consider any spatial strategy options, the opportunity to allocate additional residential development sites, including sites that are currently within the designated Green Belt, or the implications of not fully addressing the identified housing needs in the City. This all indicates CCC's apparent willingness to forgo meeting the City's market and affordable housing needs and exacerbate the socio-economic consequences of the housing crisis in favour of protecting sites in the Green Belt that would otherwise be entirely appropriate for sustainable residential development.</p> <p>CCC must continue to plan on the basis of the current NPPF position, not the Governments proposed changes. The Labour Party have already said if they come to power they support the review of Green Belt land to facilitate housing delivery.</p>	<p>The SA Report (August 2024) has been able to take into account Government's proposals for revision to the NPPF, including for grey belt land in the Green Belt.</p>

## Coventry Local Plan Review: Sustainability Appraisal (SA) Appendix V: SA of Proposed New & Amended Site Allocations & Potential New Employment Site

Proposed Site Allocations					
Site Ref	Name & Location	Area (hectare)	Capacity (number of homes)		
			Existing density at 200dph	Proposed minimum 250 dph	Assessed capacity
	<b>New Allocations</b>				
STM009-24	Coventry Central Police Station, Little Park Street	1.19	238	298	600
STM011-24	New Union Street	0.35	70	88	170
R003-23	Former Vintage House, St Nicholas Street/Leicester Row CV1 4BN	0.23	46	57	100
STM012-24	Whitefriars Street Car Park	0.6	120	150	185
F008-24	Paybody Building, Stoney Stanton Road	0.73	146	182	280
STM013-24	Dale Buildings, Tower Street	0.37	74	92	200
STM18-24	City Centre South, Coventry	6.91	1,382	1,727	1,575
			At 35 dph	At 45 dph	Assessed capacity
STM001-23	New Gate Court Business Park, Paradise Street, CV1 2RU	0.57	20	26	303
BAB001-23	The Allesley Hotel, Birmingham Road	2.0	70	90	48
BW001-23	Former Chace School, Chace Avenue, Willenhall	1.4	49	63	60
LS001-23	Former School Site, New Century Park – Land to the south of Isadora Lea	2.58	90	116	93
			At 35 dph	At 125 dph	Assessed capacity
SH004-24	Land at Spon End	7.2	252	1,116	750
	<b>Existing Allocations with Changes</b>				
HE002-24	H2:3 Walsgrave Hill Farm	59			900
R004-24	H2:15 Sandy Lane	2.7			250
STM014-24	JE2:1 Friargate Mixed Use Scheme, City Centre	10.0			1,350
	<b>Employment</b>				
BAB016-24	Land North of A45 at Pickford Green	11.81			11.81 ha

<b>Key: Categories of Significance</b>		
<b>Symbol</b>	<b>Meaning</b>	<b>Sustainability Effect</b>
- -	Major Negative	Problematical & improbable due to known sustainability issues; mitigation difficult and/or expensive
-	Minor Negative	Potential sustainability issues: mitigation and/or negotiation possible
+	Minor Positive	No sustainability constraints and development acceptable
++	Major Positive	Development encouraged as would resolve existing sustainability problem
?	Uncertain	Uncertain or Unknown Effects
0	Neutral/Neutral	Negligible effects or not applicable
SA No 10 split cell – first symbol refers to land/soil & water resources; second symbol refers to minerals & waste		

STM009-24	<p><b>Coventry Central Police Station, Little Park Street</b> Area: 1.19 hectares <span style="float: right;"><b>Capacity: 600 dwellings</b></span></p>	
Sustainability Objective	<p style="text-align: center;"><b>Assessment of Effects</b></p> <p style="text-align: center;"><b>Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</b></p>	
<p><b>1: To enable vibrant and inclusive communities</b></p>	<p>The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site in the city centre.</p> <p>The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical &amp; mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.</p>	<p style="text-align: center; background-color: #92d050;">+</p>
<p><b>2: To provide accessible essential services and facilities for all residents</b></p>	<p>Major positive effects indicated for this city centre location close to a wide range of services &amp; facilities, including schools, nurseries, shops, community &amp; faith centres, and diverse cultural &amp; entertainment facilities. There is a range of open/green space nearby<sup>179</sup> such as Greyfriars Green &amp; St Michael's Fields, and within a mile, wider spaces such as Spencer Park &amp; Charterhouse Field.</p>	<p style="text-align: center; background-color: #4f7942;">++</p>
<p><b>3: To improve health &amp; promote active living</b></p>	<p>Provision of good quality housing &amp; access to employment is well established as contributing to better health and wellbeing – physical &amp; mental<sup>180</sup>. These factors are covered by the following SA Nos 4 &amp; 5. There are some 9 health centres/general practices and 9 dental practices within about a mile radius of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. Such a city centre location provides a potential variety of health services and within walking distances.</p> <p>With a city centre location, there is easy access to a range of health facilities, such as gyms, pools - the Wave Waterpark, and dance, yoga studios. There is also easy access to a wide range of food shopping with associated positive effects for health.</p>	<p style="text-align: center; background-color: #92d050;">+</p>

<sup>179</sup> Approximate measurements made using Google Maps  
<https://www.google.co.uk/maps/place/Coventry>

<sup>180</sup> For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>



	The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD <sup>181</sup> provides information and guidance on completing the relevant health toolkit and HIA.	
<b>4: To provide decent and affordable housing for all</b>	<p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix &amp; tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The indicative capacity &amp; city centre location are suitable for a flatted/high rise format &amp; should be able to offer a range of adaptable and affordable tenures– all with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)<sup>182</sup> provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	++
<b>5: To support sustainable inclusive economic growth</b>	Whilst provision of new homes is not directly attributable to economic growth, good quality homes in a city centre location will support working people. Overall – neutral/not applicable effects.	0
<b>6: To help achieve the Council's ambition to reach net zero carbon emissions</b>	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions &amp; avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD<sup>183</sup> currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.</p>	0
<b>7: To build resilience to</b>	All new housing development will need to meet updated policy requirements that seek to help the Council build	0

<sup>181</sup> Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

<sup>182</sup> <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

<sup>183</sup> Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) <https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

<b>climate change</b>	resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	
<b>8: To reduce traffic &amp; improve sustainable transport choices</b>	<p>The urban environment is well connected and with a good transport system; the location in the city centre will enable active travel &amp; should discourage car travel as most services &amp; facilities will be accessible by walking or public transport. The main railway station is less than 15 minutes' walk to the south-west of the site.</p> <p>It may be noted that facilitating active travel has further positive effects for air quality &amp; noise (SA No 9), health &amp; wellbeing (SA No 3) and GI (SA No 11).</p> <p><b>SA Suggestion:</b> Limit parking &amp; provide secure cycle storage/sharing</p>	++
<b>9: To reduce air, noise &amp; light pollution</b>	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	0
<b>10: To protect &amp; conserve natural resources – soil, water, minerals &amp; waste<sup>184</sup></b>	<p>Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)<sup>185</sup> indicates that there is water capacity for the identified development need – indicating neutral effects.</p> <p>Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.</p>	+ 0
<b>11: To protect and enhance nature &amp; biodiversity</b>	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	+?
<b>12: To protect and enhance the historic environment, and its setting</b>	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to	0?

<sup>184</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

<sup>185</sup> JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

	<p>avoid significant negative effects on the historic environment.</p> <p>The site is within the city centre &amp; within the Three Spires View Cone - The Tall Buildings Design Guide &amp; Three Spires View Framework SPD (2022)<sup>186</sup> provides further guidance to mitigate potential effects. It is also within an archaeological constraint area but other plan policies provide mitigation measures. Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies.</p>	
<b>13: To protect and enhance the quality and character of townscapes &amp; landscapes</b>	A tall building is suitable for such a city centre location and designed according to policies and guides as described for SA No 12 will ensure that potential negative effects are mitigated. Likely neutral effects but uncertain as depends upon project level studies.	<b>0?</b>

<b>STM011-24</b>	<b>New Union Street</b> Area: 0.35 hectares <b>dwelling</b>	<b>Capacity: 170</b>
	<b>Assessment of Effects</b>	
<b>Sustainability Objective</b>	<b>Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</b>	
<b>1: To enable vibrant and inclusive communities</b>	<p>The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site in the city centre.</p> <p>The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical &amp; mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.</p>	<b>+</b>
<b>2: To provide accessible essential</b>	Major positive effects indicated for this city centre location close to a wide range of services & facilities, including schools, nurseries, shops, community & faith	<b>++</b>

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<https://edemocracy.coventry.gov.uk/documents/s54726/Appendix%201%20Draft%20Tall%20Building%20View%20Management%20Framework%20Guide%20SPD.pdf>

<b>services and facilities for all residents</b>	centres, and diverse cultural & entertainment facilities. There is a range of open/green space nearby such as Greyfriars Green & St Michael's Fields, and within a mile, wider spaces such as Spencer Park & Charterhouse Field.	
<b>3: To improve health &amp; promote active living</b>	<p>Provision of good quality housing &amp; access to employment is well established as contributing to better health and wellbeing – physical &amp; mental<sup>187</sup>. These factors are covered by the following SA Nos 4 &amp; 5.</p> <p>There are some 9 health centres/general practices and 9 dental practices within about a mile radius of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. Such a city centre location provides a potential variety of health services and within walking distances.</p> <p>With a city centre location, there is easy access to a range of health facilities, such as gyms, pools - the Wave Waterpark, and dance, yoga studios. There is also easy access to a wide range of food shopping with associated positive effects for health.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD<sup>188</sup> provides information and guidance on completing the relevant health toolkit and HIA.</p>	+
<b>4: To provide decent and affordable housing for all</b>	<p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix &amp; tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The indicative capacity &amp; city centre location should be able to offer a range of adaptable and affordable tenures – all with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)<sup>189</sup> provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	++
<b>5: To support sustainable inclusive</b>	Whilst provision of new homes is not directly attributable to economic growth, good quality homes in a city centre	0

<sup>187</sup> For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

<sup>188</sup> Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

<sup>189</sup> <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

<b>economic growth</b>	location will support working people. Overall – neutral/not applicable effects.	
<b>6: To help achieve the Council's ambition to reach net zero carbon emissions</b>	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions &amp; avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD<sup>190</sup> currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.</p>	0
<b>7: To build resilience to climate change</b>	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	0
<b>8: To reduce traffic &amp; improve sustainable transport choices</b>	<p>The urban environment is well connected and with a good transport system; the location in the city centre will enable active travel &amp; should discourage car travel as most services &amp; facilities will be accessible by walking or public transport. The main railway station is less than 15 minutes' walk to the south-west of the site.</p> <p>It may be noted that facilitating active travel has further positive effects for air quality &amp; noise (SA No 9), health &amp; wellbeing (SA No 3) and GI (SA No 11).</p>	++
<b>9: To reduce air, noise &amp; light pollution</b>	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	0
<b>10: To protect &amp; conserve natural resources – soil, water, minerals &amp; waste<sup>191</sup></b>	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024) <sup>192</sup> indicates that there is water capacity for the identified development need – indicating neutral effects.	+ 0

<sup>190</sup>Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)  
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

<sup>191</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

<sup>192</sup> JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

	Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	
<b>11: To protect and enhance nature &amp; biodiversity</b>	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	+
<b>12: To protect and enhance the historic environment, and its setting</b>	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment.  The site is within the city centre & within the Three Spires View Cone - The Tall Buildings Design Guide & Three Spires View Framework SPD (2022) <sup>193</sup> provides further guidance to mitigate potential effects. It is also within an archaeological constraint area but other plan policies provide mitigation. Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies.	0?
<b>13: To protect and enhance the quality and character of townscapes &amp; landscapes</b>	A city centre location and designed according to policies and guides as described above for SA No 12 will ensure that potential negative effects are mitigated. Likely positive effects as the regeneration of vacant multistorey and surface car parks will improve the quality and character of the townscape.	+

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<https://edemocracy.coventry.gov.uk/documents/s54726/Appendix%201%20Draft%20Tall%20Building%20View%20Management%20Framework%20Guide%20SPD.pdf>

<b>R003-23</b>	<b>Former Vintage House, St Nicholas Street/Leicester Row</b> Area: 0.23 hectares <b>Capacity: 100 dwellings</b>	
<b>Sustainability Objective</b>	<b>Assessment of Effects</b>  <b>Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</b>	
<b>1: To enable vibrant and inclusive communities</b>	<p>The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site in the city centre.</p> <p>The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical &amp; mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.</p>	<b>+</b>
<b>2: To provide accessible essential services and facilities for all residents</b>	Major positive effects indicated for this location in the city centre and a wide range of services & facilities, including schools, nurseries, shops, community & faith centres, and diverse cultural & entertainment facilities. There is a range of open/green space nearby such as Lady Herbert's Gardens, Swanswell Park & Pool, and Naul's Mill Park – and within 5 minutes' walk of the historic Coventry Canal Basin with warehousing, barges, boat rides, shops & café.	<b>++</b>
<b>3: To improve health &amp; promote active living</b>	<p>Provision of good quality housing &amp; access to employment is well established as contributing to better health and wellbeing – physical &amp; mental<sup>194</sup>. These factors are covered by the following SA Nos 4 &amp; 5. There are some 9 health centres/general practices and 9 dental practices within about a mile radius of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. Such a city centre location provides a potential variety of health services and within walking distances.</p> <p>With a location in the city centre, there is easy access to a range of health facilities, such as gyms, pools - the Wave Waterpark, and dance, yoga studios - and the longer distance walking with the towpath. There is also easy access to a wide range of food shopping with associated positive effects for health.</p>	<b>+</b>

<sup>194</sup> For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

	The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD <sup>195</sup> provides information and guidance on completing the relevant health toolkit and HIA.	
<b>4: To provide decent and affordable housing for all</b>	<p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix &amp; tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is so close to the city centre &amp; with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)<sup>196</sup> provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	++
<b>5: To support sustainable inclusive economic growth</b>	Whilst provision of new homes is not directly attributable to economic growth, good quality homes in the city centre will support working people. Overall – neutral/not applicable effects.	0
<b>6: To help achieve the Council's ambition to reach net zero carbon emissions</b>	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions &amp; avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD<sup>197</sup> currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.</p>	0
<b>7: To build resilience to climate change</b>	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	0

<sup>195</sup> Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

<sup>196</sup> <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

<sup>197</sup> Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) <https://www.coventry.gov.uk/downloads/file/37976/energy-spd>



<p><b>8: To reduce traffic &amp; improve sustainable transport choices</b></p>	<p>The urban environment is well connected and with a good transport system; the location in the city centre will enable active travel &amp; should discourage car travel as most services &amp; facilities will be accessible by walking or public transport. The main railway station is some 25 minutes' walk to the south of the site.</p> <p>It may be noted that facilitating active travel has further positive effects for air quality &amp; noise (SA No 9), health &amp; wellbeing (SA No 3) and GI (SA No 11).</p>	<p>++</p>
<p><b>9: To reduce air, noise &amp; light pollution</b></p>	<p>Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.</p>	<p>0</p>
<p><b>10: To protect &amp; conserve natural resources – soil, water, minerals &amp; waste<sup>198</sup></b></p>	<p>Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)<sup>199</sup> indicates that there is water capacity for the identified development need – indicating neutral effects.</p> <p>Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.</p>	<p>+ 0</p>
<p><b>11: To protect and enhance nature &amp; biodiversity</b></p>	<p>The current adopted Plan has policies to protect nature &amp; biodiversity, including GB1 Green Belt &amp; Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.</p>	<p>+?</p>
<p><b>12: To protect and enhance the historic environment, and its setting</b></p>	<p>The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation &amp; Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment.</p> <p>The site is not within the Three Spires View Cone nor an archaeological constraint area; it is within the Coventry Canal Conservation Area &amp; will need sensitive design - other plan policies should provide mitigation measures.</p>	<p>0?</p>

<sup>198</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

<sup>199</sup> JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

	Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies & creative detailed design.	
<b>13: To protect and enhance the quality and character of townscapes &amp; landscapes</b>	A location in the city centre and designed according to other policy requirements as described above for SA No 12 should ensure that potential negative effects are mitigated.	+
	Likely positive effects as the regeneration of a vacant and cleared site will improve the quality and character of the townscape.	

<b>STM012-24</b>	<b>Whitefriars Street Car Park</b> Area: 0.6 hectares <span style="float: right;"><b>Capacity: 185</b></span> <b>dwelling</b>	
	<b>Assessment of Effects</b>	
<b>Sustainability Objective</b>	<b>Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</b>	
<b>1: To enable vibrant and inclusive communities</b>	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site in the city centre.  The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.	+
<b>2: To provide accessible essential services and facilities for all residents</b>	Major positive effects indicated for this location in the city centre and a wide range of services & facilities, including schools, nurseries, shops, community & faith centres, and diverse cultural & entertainment facilities. There is a range of open/green space nearby such as Lady Herbert's Gardens, Swanswell Park & Pool, and Charterhouse Field.	++
<b>3: To improve health &amp; promote active living</b>	Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental <sup>200</sup> . These factors are covered by the following SA Nos 4 & 5. There are some 9 health centres/general practices and 9	+

<sup>200</sup> For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

	<p>dent practices within about a mile radius of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. Such a city centre location provides a potential variety of health services and within walking distances.</p> <p>With a location in the city centre, there is easy access to a range of health facilities, such as gyms, pools - the Wave Waterpark, and dance, yoga studios - and the longer distance walking with the towpath. There is also easy access to a wide range of food shopping with associated positive effects for health.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD<sup>201</sup> provides information and guidance on completing the relevant health toolkit and HIA.</p>	
<p><b>4: To provide decent and affordable housing for all</b></p>	<p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix &amp; tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is so close to the city centre &amp; with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)<sup>202</sup> provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	<p>++</p>
<p><b>5: To support sustainable inclusive economic growth</b></p>	<p>Whilst provision of new homes is not directly attributable to economic growth, good quality homes in the city centre will support working people. Overall – neutral/not applicable effects.</p>	<p>0</p>
<p><b>6: To help achieve the Council's ambition to reach net zero carbon emissions</b></p>	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions &amp; avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality</p>	<p>0</p>

<sup>201</sup> Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

<sup>202</sup> <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

	Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD <sup>203</sup> currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.	
<b>7: To build resilience to climate change</b>	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	0
<b>8: To reduce traffic &amp; improve sustainable transport choices</b>	The urban environment is well connected and with a good transport system; the location in the city centre will enable active travel & should discourage car travel as most services & facilities will be accessible by walking or public transport. The main railway station is some 17 minutes' walk to the south-west of the site.  It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	++
<b>9: To reduce air, noise &amp; light pollution</b>	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	0
<b>10: To protect &amp; conserve natural resources – soil, water, minerals &amp; waste<sup>204</sup></b>	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024) <sup>205</sup> indicates that there is water capacity for the identified development need – indicating neutral effects.  Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	+ 0
<b>11: To protect and enhance nature &amp; biodiversity</b>	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects	+?

<sup>203</sup>Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)  
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

<sup>204</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

<sup>205</sup> JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

	but uncertainty of significance as depends on detailed project design.	
<b>12: To protect and enhance the historic environment, and its setting</b>	<p>The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation &amp; Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment.</p> <p>The site is within the city centre &amp; within the Three Spires View Cone and an archaeological constraint area - The Tall Buildings Design Guide &amp; Three Spires View Framework SPD (2022)<sup>206</sup> provides further guidance to mitigate potential effects - other plan policies should provide mitigation measures. Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies &amp; creative detailed design.</p>	0?
<b>13: To protect and enhance the quality and character of townscapes &amp; landscapes</b>	<p>A location in the city centre and designed according to policies as described above for SA No 12 should ensure that potential negative effects are mitigated.</p> <p>Likely positive effects as the regeneration of a car park site will improve the quality and character of the townscape.</p>	+

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<https://edemocracy.coventry.gov.uk/documents/s54726/Appendix%201%20Draft%20Tall%20Building%20View%20Management%20Framework%20Guide%20SPD.pdf>

<b>F008-24</b>	<b>Paybody Building, Stoney Stanton Road</b> Area: 0.73 hectares <span style="float: right;"><b>Capacity: 280 dwellings</b></span>	
<b>Sustainability Objective</b>	<b>Assessment of Effects</b>  <b>Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</b>	
<b>1: To enable vibrant and inclusive communities</b>	<p>The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site in the city centre.</p> <p>The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical &amp; mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.</p>	<b>+</b>
<b>2: To provide accessible essential services and facilities for all residents</b>	<p>Major positive effects indicated for this location in the city centre and a wide range of services &amp; facilities, including schools, nurseries, shops, community &amp; faith centres, and diverse cultural &amp; entertainment facilities. There is a range of open/green space nearby such as Lady Herbert's Gardens, Swanswell Park &amp; Pool, Radford Recreation Ground, and Naul's Mill Park – and the Coventry Canal towpath for wider walking is nearby within 5 mins walk.</p>	<b>++</b>
<b>3: To improve health &amp; promote active living</b>	<p>Provision of good quality housing &amp; access to employment is well established as contributing to better health and wellbeing – physical &amp; mental<sup>207</sup>. These factors are covered by the following SA Nos 4 &amp; 5. There are some 7 health centres/general practices and 5 dental practices within about a mile radius of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. Such a city centre location provides a potential variety of health services and within walking distances.</p> <p>With a location in the city centre, there is easy access to a range of health facilities, such as gyms, pools - the Wave Waterpark, and dance, yoga studios - and the longer distance walking with the towpath. There is also easy access to a wide range of food shopping with associated positive effects for health.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1</p>	<b>+</b>

<sup>207</sup> For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

	High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD <sup>208</sup> provides information and guidance on completing the relevant health toolkit and HIA.	
<b>4: To provide decent and affordable housing for all</b>	<p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix &amp; tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is so close to the city centre &amp; with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)<sup>209</sup> provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	++
<b>5: To support sustainable inclusive economic growth</b>	Whilst provision of new homes is not directly attributable to economic growth, good quality homes in the city centre will support working people. Overall – neutral/not applicable effects.	0
<b>6: To help achieve the Council's ambition to reach net zero carbon emissions</b>	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions &amp; avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD<sup>210</sup> currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.</p>	0
<b>7: To build resilience to climate change</b>	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	0

<sup>208</sup> Health Impact Assessment (HIA) Supplementary Planning Document

(SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

<sup>209</sup> <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

<sup>210</sup> Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) <https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

<p><b>8: To reduce traffic &amp; improve sustainable transport choices</b></p>	<p>The urban environment is well connected and with a good transport system; the location in the city centre will enable active travel &amp; should discourage car travel as most services &amp; facilities will be accessible by walking or public transport. The main railway station is some 27 minutes' walk to the south of the site.</p> <p>It may be noted that facilitating active travel has further positive effects for air quality &amp; noise (SA No 9), health &amp; wellbeing (SA No 3) and GI (SA No 11).</p>	<p>++</p>
<p><b>9: To reduce air, noise &amp; light pollution</b></p>	<p>Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.</p>	<p>0</p>
<p><b>10: To protect &amp; conserve natural resources – soil, water, minerals &amp; waste<sup>211</sup></b></p>	<p>Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)<sup>212</sup> indicates that there is water capacity for the identified development need – indicating neutral effects.</p> <p>Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.</p>	<p>+ 0</p>
<p><b>11: To protect and enhance nature &amp; biodiversity</b></p>	<p>The current adopted Plan has policies to protect nature &amp; biodiversity, including GB1 Green Belt &amp; Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.</p>	<p>+?</p>
<p><b>12: To protect and enhance the historic environment, and its setting</b></p>	<p>The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation &amp; Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment.</p> <p>The site is within the city centre &amp; within an archaeological constraint area - other plan policies should provide mitigation measures. Therefore, likely neutral effects on the historic environment but some</p>	<p>0?</p>

<sup>211</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

<sup>212</sup> JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC



	uncertainty as depends on project level studies & creative detailed design.	
<b>13: To protect and enhance the quality and character of townscapes &amp; landscapes</b>	A location in the city centre and designed according to policies as described above for SA No 12 should ensure that potential negative effects are mitigated.	+
	Likely positive effects as the regeneration of an existing NHS facility with large car park is likely to improve the quality and character of the townscape.	

<b>STM013-24</b>	<b>Dale Buildings, Tower Street</b> Area: 0.37 hectares <b>Capacity: 200 dwellings</b>	
	<b>Assessment of Effects</b>	
<b>Sustainability Objective</b>	<b>Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</b>	
<b>1: To enable vibrant and inclusive communities</b>	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site in the city centre.  The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.	+
<b>2: To provide accessible essential services and facilities for all residents</b>	Major positive effects indicated for this location in the city centre and a wide range of services & facilities, including schools, nurseries, shops, community & faith centres, and diverse cultural & entertainment facilities. There is a range of open/green space nearby such as Lady Herbert's Gardens, Swanswell Park & Pool, and Naul's Mill Park – and less than 10 minutes' walk of the historic Coventry Canal Basin with warehousing, barges, boat rides, shops & cafés.	++
<b>3: To improve health &amp;</b>	Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental <sup>213</sup> . There are	+

<sup>213</sup> For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

<p><b>promote active living</b></p>	<p>some 9 health centres/general practices and 10 dental practices within about a mile radius of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. Such a city centre location provides a potential variety of health services and within walking distances.</p> <p>These factors are covered by the following SA Nos 4 &amp; 5. With a location so close to the city centre, there is easy access to a range of health facilities, such as gyms, pools - the Wave Waterpark, and dance, yoga studios - and the longer distance walking with the canal towpath. There is also easy access to a wide range of food shopping with associated positive effects for health.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD<sup>214</sup> provides information and guidance on completing the relevant health toolkit and HIA.</p>	
<p><b>4: To provide decent and affordable housing for all</b></p>	<p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix &amp; tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is so close to the city centre &amp; with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)<sup>215</sup> provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	<p>++</p>
<p><b>5: To support sustainable inclusive economic growth</b></p>	<p>Whilst provision of new homes is not directly attributable to economic growth, good quality homes in the city centre will support working people. Overall – neutral/not applicable effects.</p>	<p>0</p>
<p><b>6: To help achieve the Council's ambition to reach net zero carbon emissions</b></p>	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions &amp; avoid any significant negative effects – neutral effects overall.</p>	<p>0</p>

<sup>214</sup> Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

<sup>215</sup> <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

	Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD <sup>216</sup> currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.	
<b>7: To build resilience to climate change</b>	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	0
<b>8: To reduce traffic &amp; improve sustainable transport choices</b>	The urban environment is well connected and with a good transport system; the location in the city centre will enable active travel & should discourage car travel as most services & facilities will be accessible by walking or public transport. The main railway station is some 20 minutes' walk to the south of the site.  It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	++
<b>9: To reduce air, noise &amp; light pollution</b>	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	0
<b>10: To protect &amp; conserve natural resources – soil, water, minerals &amp; waste<sup>217</sup></b>	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024) <sup>218</sup> indicates that there is water capacity for the identified development need – indicating neutral effects.  Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	+ 0
<b>11: To protect and enhance</b>	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity.	+?

<sup>216</sup>Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)  
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

<sup>217</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

<sup>218</sup> JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

<b>nature &amp; biodiversity</b>	These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	
<b>12: To protect and enhance the historic environment, and its setting</b>	<p>The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation &amp; Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment.</p> <p>The site is within the Three Spires View Cone &amp; an archaeological constraint area; it is near to the Lady Herbert's Garden &amp; Burgess Conservation Area &amp; will need sensitive design - other plan policies provide mitigation. Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies &amp; creative detailed design.</p>	0?
<b>13: To protect and enhance the quality and character of townscapes &amp; landscapes</b>	<p>A location in the city centre and designed according to other policy requirements as described above for SA No 12 should ensure that potential negative effects are mitigated.</p> <p>Likely positive effects as the regeneration of older style offices &amp; industrial/warehouse type units in poor condition will improve the quality and character of the townscape.</p>	+

<b>STM18-24</b>	<b>City Centre South</b> Area: 6.91 hectares <b>Capacity: 1,575 dwellings</b>
<b>Sustainability Objective</b>	<b>Assessment of Effects</b>  <b>Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</b>
<b>1: To enable vibrant and inclusive communities</b>	<p>The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by</p>

	<p>specific housing policies. Major positive effects indicated with such a capacity &amp; opportunities for inclusive communities for this site in the city centre. A range of public realm works are proposed &amp; these will contribute to social interactions.</p> <p>The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical &amp; mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.</p> <p><b>SA Suggestion:</b></p> <ul style="list-style-type: none"> <li>■ Creative design for inclusivity &amp; to encourage support social interaction</li> </ul>	
<p><b>2: To provide accessible essential services and facilities for all residents</b></p>	<p>Major positive effects indicated for this location in the city centre and a wide range of services &amp; facilities, including schools, nurseries, shops, community &amp; faith centres, and diverse cultural &amp; entertainment facilities. There is a range of open/green space nearby such as Lady Herbert's Gardens, Swanswell Park &amp; Pool, Greyfriars Green, Spencer Park, and Charterhouse Field.</p>	<p style="text-align: center;">++</p>
<p><b>3: To improve health &amp; promote active living</b></p>	<p>Provision of good quality housing &amp; access to employment is well established as contributing to better health and wellbeing – physical &amp; mental<sup>219</sup>. These factors are covered by the following SA Nos 4 &amp; 5. There are some 10 health centres/general practices and 11 dental practices within about a mile radius of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. Such a city centre location provides a potential variety of health services and within walking distances.</p> <p>With a location in the city centre, there is easy access to a range of health facilities, such as gyms, pools - the Wave Waterpark, and dance, yoga studios - and the longer distance walking with the towpath. There is also easy access to a wide range of food shopping with associated positive effects for health. A range of public realm works are proposed &amp; these will contribute to health &amp; wellbeing.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD<sup>220</sup> provides information</p>	<p style="text-align: center;">+</p>

<sup>219</sup> For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>  
<sup>220</sup> Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

	and guidance on completing the relevant health toolkit and HIA.	
<b>4: To provide decent and affordable housing for all</b>	<p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix &amp; tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is in the city centre &amp; with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)<sup>221</sup> provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p> <p><b>SA Suggestion:</b></p> <ul style="list-style-type: none"> <li>■ Creative design to encourage flexible &amp; adaptable housing to support mix &amp; tenure with changing needs</li> </ul>	++
<b>5: To support sustainable inclusive economic growth</b>	<p>Whilst provision of new homes is not directly attributable to economic growth, good quality homes in the city centre will support working people. Redevelopment for mixed uses proposed – residential, class E, learning &amp; community uses, sui generis uses including drinking establishments – regeneration of the urban city centre core will have major positive effects for economic growth objectives – and could inspire enhancement beyond the site itself.</p>	++
<b>6: To help achieve the Council's ambition to reach net zero carbon emissions</b>	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions &amp; avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD<sup>222</sup> currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.</p>	0
<b>7: To build resilience to</b>	All new housing development will need to meet updated policy requirements that seek to help the Council build	0

<sup>221</sup> <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

<sup>222</sup> Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)  
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

<b>climate change</b>	resilience to climate change. The site is within Flood Zone 1 & partly within FZ2 indicating low risk of flooding.	
<b>8: To reduce traffic &amp; improve sustainable transport choices</b>	The urban environment is well connected and with a good transport system; the location in the city centre will enable active travel & should discourage car travel as most services & facilities will be accessible by walking or public transport. The main railway station is some 17 minutes' walk to the south-west of the site.  It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	++
<b>9: To reduce air, noise &amp; light pollution</b>	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	0
<b>10: To protect &amp; conserve natural resources – soil, water, minerals &amp; waste<sup>223</sup></b>	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024) <sup>224</sup> indicates that there is water capacity for the identified development need – indicating neutral effects.  Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	+ 0
<b>11: To protect and enhance nature &amp; biodiversity</b>	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	+?
<b>12: To protect and enhance the historic environment, and its setting</b>	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment.	0?

<sup>223</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

<sup>224</sup> JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

	The site is within the city centre & within the Three Spires View Cone and partly within an archaeological constraint area - The Tall Buildings Design Guide & Three Spires View Framework SPD (2022) <sup>225</sup> provides further guidance to mitigate potential effects - other plan policies should provide mitigation measures. Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies & creative detailed design.	
<b>13: To protect and enhance the quality and character of townscapes &amp; landscapes</b>	A location in the city centre and designed according to policies as described above for SA No 12 should ensure that potential negative effects are mitigated.	<b>++</b>
	Likely major positive effects as the regeneration of the existing urban city centre core will significantly improve the quality and character of the townscape with the potential to inspire wider enhancements beyond the site itself.	

<b>STM001-23</b>	<b>New Gate Court Business Park, Paradise Street</b> Area: 0.57 hectares <span style="float: right;"><b>Capacity: 303</b></span> <b>dwelling</b>	
	<b>Assessment of Effects</b>	
<b>Sustainability Objective</b>	<b>Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</b>	
<b>1: To enable vibrant and inclusive communities</b>	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site very close to the city centre.	<b>+</b>
	The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental	

<sup>225</sup>

<https://edemocracy.coventry.gov.uk/documents/s54726/Appendix%201%20Draft%20Tall%20Building%20View%20Management%20Framework%20Guide%20SPD.pdf>



	disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.	
<b>2: To provide accessible essential services and facilities for all residents</b>	Major positive effects indicated for this location close to the city centre and a wide range of services & facilities, including schools, nurseries, shops, community & faith centres, and diverse cultural & entertainment facilities. There is a range of open/green space nearby including Charterhouse Field less than 10 minutes' walk to the south-east.	++
<b>3: To improve health &amp; promote active living</b>	<p>Provision of good quality housing &amp; access to employment is well established as contributing to better health and wellbeing – physical &amp; mental<sup>226</sup>. There are some 6 health centres/general practices and 6 dental practices within about a mile radius of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. Such a location near the city centre provides a potential variety of health services and within walking distances.</p> <p>These factors are covered by the following SA Nos 4 &amp; 5. With a location so close to the city centre, there is easy access to a range of health facilities, such as gyms, pools - the Wave Waterpark, and dance, yoga studios - and the longer distance walking with the canal towpath. There is also easy access to a wide range of food shopping with associated positive effects for health.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD<sup>227</sup> provides information and guidance on completing the relevant health toolkit and HIA.</p>	+
<b>4: To provide decent and affordable housing for all</b>	Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is so close to the city centre & with likely major positive effects.	++

<sup>226</sup> For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

<sup>227</sup> Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

	The Affordable Housing SPD (March 2022) <sup>228</sup> provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.	
<b>5: To support sustainable inclusive economic growth</b>	Whilst provision of new homes is not directly attributable to economic growth, good quality homes near to the city centre will support working people. Overall – neutral/not applicable effects.	0
<b>6: To help achieve the Council's ambition to reach net zero carbon emissions</b>	All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall.  Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD <sup>229</sup> currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.	0
<b>7: To build resilience to climate change</b>	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	0
<b>8: To reduce traffic &amp; improve sustainable transport choices</b>	The urban environment is well connected and with a good transport system; the location so close to the city centre will enable active travel & should discourage car travel as most services & facilities will be accessible by walking or public transport. The main railway station is only 15 minutes' walk to the south-west of the site.  It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	++
<b>9: To reduce air, noise &amp; light pollution</b>	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	0
<b>10: To protect &amp; conserve</b>	Development on previously developed land is positive effects. Water resources and quality are protected	+ 0

<sup>228</sup> <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

<sup>229</sup> Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)  
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

<p><b>natural resources – soil, water, minerals &amp; waste<sup>230</sup></b></p>	<p>through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)<sup>231</sup> indicates that there is water capacity for the identified development need – indicating neutral effects.</p> <p>Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.</p>	
<p><b>11: To protect and enhance nature &amp; biodiversity</b></p>	<p>The current adopted Plan has policies to protect nature &amp; biodiversity, including GB1 Green Belt &amp; Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.</p>	<p style="text-align: center;"><b>+?</b></p>
<p><b>12: To protect and enhance the historic environment, and its setting</b></p>	<p>The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation &amp; Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment.</p> <p>The site is partly within an archaeological constraint area &amp; the Old City Wall Scheduled Monument<sup>232</sup> is within the site boundary – therefore, development will need sensitive design - other plan policies provide mitigation. Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies &amp; creative detailed design.</p>	<p style="text-align: center;"><b>0?</b></p>
<p><b>13: To protect and enhance the quality and character of townscapes &amp; landscapes</b></p>	<p>A location so near to the city centre and designed according to other policy requirements as described above for SA No 12 should ensure that potential negative effects are mitigated.</p> <p>Likely positive effects as the regeneration of the existing underused commercial park will improve the quality and character of the townscape.</p>	<p style="text-align: center;"><b>+</b></p>

<sup>230</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

<sup>231</sup> JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

<sup>232</sup> <https://historicengland.org.uk/listing/the-list/list-entry/1002979> and <https://magic.defra.gov.uk/MagicMap.aspx>

<b>BAB01-23</b>	<b>The Allesley Hotel, Birmingham Road</b> Area: 2.0 hectares <span style="float: right;"><b>Capacity: 48</b></span> <b>dwellings</b>	
<b>Sustainability Objective</b>	<b>Assessment of Effects</b>  <b>Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</b>	
	<b>1: To enable vibrant and inclusive communities</b>	<p>The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site close to the city centre.</p> <p>The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical &amp; mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.</p>
<b>2: To provide accessible essential services and facilities for all residents</b>	Positive effects indicated for this location in Allesley and a range of essential services & facilities, including schools, a convenience shop, a village hall, a community centre, and pubs/restaurant. There is a range of open/green space around the village, particularly to the north and west. City centre facilities are within about 2.5 miles to the south-east	<div style="background-color: #92d050; padding: 5px; text-align: center; width: 20px; margin: 0 auto;">+</div>
<b>3: To improve health &amp; promote active living</b>	<p>Provision of good quality housing &amp; access to employment is well established as contributing to better health and wellbeing – physical &amp; mental<sup>233</sup>. There are 2 health centres and a dental practice within about a mile of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services.</p> <p>These factors are covered by the following SA Nos 4 &amp; 5. There is a fitness centre within 15 min walk to the north and others within about 2.5 miles towards the city centre.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD<sup>234</sup> provides information</p>	<div style="background-color: #92d050; padding: 5px; text-align: center; width: 20px; margin: 0 auto;">+</div>

<sup>233</sup> For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

<sup>234</sup> Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

	and guidance on completing the relevant health toolkit and HIA.	
<b>4: To provide decent and affordable housing for all</b>	<p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix &amp; tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is accessible to the city centre &amp; with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)<sup>235</sup> provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	++
<b>5: To support sustainable inclusive economic growth</b>	Whilst provision of new homes is not directly attributable to economic growth, good quality homes will support working people. Overall – neutral/not applicable effects.	0
<b>6: To help achieve the Council's ambition to reach net zero carbon emissions</b>	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions &amp; avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD<sup>236</sup> currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.</p>	0
<b>7: To build resilience to climate change</b>	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	0
<b>8: To reduce traffic &amp; improve sustainable transport choices</b>	<p>The urban environment is well connected and with a good transport system; the location is some 2.5 miles from the city centre.</p> <p>It may be noted that facilitating active travel has further positive effects for air quality &amp; noise (SA No 9), health &amp; wellbeing (SA No 3) and GI (SA No 11).</p>	+

<sup>235</sup> <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

<sup>236</sup> Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)  
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

<p><b>9: To reduce air, noise &amp; light pollution</b></p>	<p>Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.</p>	<p>0</p>	
<p><b>10: To protect &amp; conserve natural resources – soil, water, minerals &amp; waste<sup>237</sup></b></p>	<p>Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)<sup>238</sup> indicates that there is water capacity for the identified development need – indicating neutral effects.</p> <p>Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.</p>	<p>+</p>	<p>0</p>
<p><b>11: To protect and enhance nature &amp; biodiversity</b></p>	<p>The current adopted Plan has policies to protect nature &amp; biodiversity, including GB1 Green Belt &amp; Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.</p>	<p>+</p>	
<p><b>12: To protect and enhance the historic environment, and its setting</b></p>	<p>The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation &amp; Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment.</p> <p>The site is within the Allesley Village conservation Area &amp; within an archaeological constraint area – therefore, development will need sensitive design - other plan policies provide mitigation. Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies &amp; creative detailed design.</p>	<p>0?</p>	
<p><b>13: To protect and enhance the quality</b></p>	<p>A location accessible to the city centre &amp; designed according to other policy requirements as described</p>	<p>+</p>	

<sup>237</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

<sup>238</sup> JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

<b>and character of townscapes &amp; landscapes</b>	<p>above for SA No 12 should ensure that potential negative effects are mitigated.</p> <p>Likely positive effects as the regeneration of the existing former hotel and associated hardstanding car park will improve the quality and character of the townscape.</p>	
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<b>BW001-23</b>	<p><b>Former Chace School, Chace Avenue, Willenhall</b> Area: 1.4 hectares <span style="float: right;"><b>Capacity: 60</b></span> <b>dwellings</b></p>	
<b>Sustainability Objective</b>	<p><b>Assessment of Effects</b></p> <p><b>Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</b></p>	
<b>1: To enable vibrant and inclusive communities</b>	<p>The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site close to the city centre.</p> <p>The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical &amp; mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.</p>	+
<b>2: To provide accessible essential services and facilities for all residents</b>	<p>Positive effects indicated for this location in Willenhall and a range of essential services &amp; facilities, including schools, convenience shops/supermarket, a community centre, and cafes. There is a range of open/green space including the River Sowe with footpaths to the west and Binley Recreation Park about a mile to the east. City centre facilities are within about 2.5 miles to the north-west.</p>	+
<b>3: To improve health &amp; promote active living</b>	<p>Provision of good quality housing &amp; access to employment is well established as contributing to better health and wellbeing – physical &amp; mental<sup>239</sup>. There are 3 health centres and a dental practice within about 0.5 mile of the site. It is not known at this stage of assessment whether these practices are taking new patients but</p>	+

<sup>239</sup> For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

	<p>other LP policies should ensure that there is capacity for such essential services.</p> <p>These factors are covered by the following SA Nos 4 &amp; 5. There is a fitness centre within 15 min walk to the north and others within about 2.5 miles towards the city centre.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD<sup>240</sup> provides information and guidance on completing the relevant health toolkit and HIA.</p>	
<b>4: To provide decent and affordable housing for all</b>	<p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix &amp; tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is accessible to the city centre &amp; with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)<sup>241</sup> provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	++
<b>5: To support sustainable inclusive economic growth</b>	<p>Whilst provision of new homes is not directly attributable to economic growth, good quality homes will support working people. Overall – neutral/not applicable effects.</p>	0
<b>6: To help achieve the Council's ambition to reach net zero carbon emissions</b>	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions &amp; avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD<sup>242</sup> currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.</p>	0

<sup>240</sup> Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

<sup>241</sup> <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

<sup>242</sup> Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) <https://www.coventry.gov.uk/downloads/file/37976/energy-spd>



<b>7: To build resilience to climate change</b>	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	0
<b>8: To reduce traffic &amp; improve sustainable transport choices</b>	The urban environment is well connected and with a good transport system; the location is some 2.5 miles from the city centre.  It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	+
<b>9: To reduce air, noise &amp; light pollution</b>	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	0
<b>10: To protect &amp; conserve natural resources – soil, water, minerals &amp; waste<sup>243</sup></b>	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024) <sup>244</sup> indicates that there is water capacity for the identified development need – indicating neutral effects.  Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	+ 0
<b>11: To protect and enhance nature &amp; biodiversity</b>	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	+?
<b>12: To protect and enhance the historic environment, and its setting</b>	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic	0

<sup>243</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

<sup>244</sup> JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

	environment. Likely neutral effects on the historic environment.	
<b>13: To protect and enhance the quality and character of townscapes &amp; landscapes</b>	A location accessible to the city centre and designed according to other policy requirements as described above for SA No 12 should ensure that potential negative effects are mitigated.	+
	Likely positive effects as the development of a cleared and vacant site will improve the quality and character of the townscape.	
<b>LS001-23</b>	<b>Former School Site, New Century Park, Land to the south of Isadora Lea</b> Area: 2.58 hectares <b>Capacity: 93 dwellings</b>	
<b>Sustainability Objective</b>	<b>Assessment of Effects</b>  <b>Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</b>	
<b>1: To enable vibrant and inclusive communities</b>	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site easily accessible to the city centre.  The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.	+
<b>2: To provide accessible essential services and facilities for all residents</b>	Positive effects indicated for this location in the urban area with a range of essential services & facilities, including schools, several convenience shops/supermarkets, a community centres, pubs/restaurants and cafes. There is a range of open/green space including the River Sowe with footpaths to the east and it is adjacent to the Coventry Sphinx sports club to the west. City centre facilities are within about 2 miles to the west.	+

<p><b>3: To improve health &amp; promote active living</b></p>	<p>Provision of good quality housing &amp; access to employment is well established as contributing to better health and wellbeing – physical &amp; mental<sup>245</sup>. There are 4 health centres and 5 dental practices within about a mile of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services.</p> <p>These factors are covered by the following SA Nos 4 &amp; 5. There are 3 fitness centres/gyms within a mile of the site and others within about 2.5 miles towards the city centre.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD<sup>246</sup> provides information and guidance on completing the relevant health toolkit and HIA.</p>	<p style="text-align: center;">+</p>
<p><b>4: To provide decent and affordable housing for all</b></p>	<p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix &amp; tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is accessible to the city centre &amp; with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)<sup>247</sup> provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	<p style="text-align: center;">++</p>
<p><b>5: To support sustainable inclusive economic growth</b></p>	<p>Whilst provision of new homes is not directly attributable to economic growth, good quality homes will support working people. Overall – neutral/not applicable effects.</p>	<p style="text-align: center;">0</p>
<p><b>6: To help achieve the Council's ambition to reach net zero carbon emissions</b></p>	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions &amp; avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management</p>	<p style="text-align: center;">0</p>

<sup>245</sup> For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

<sup>246</sup> Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

<sup>247</sup> <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

	Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD <sup>248</sup> currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.	
<b>7: To build resilience to climate change</b>	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	0
<b>8: To reduce traffic &amp; improve sustainable transport choices</b>	The urban environment is well connected and with a good transport system; the location is some 2 miles from the city centre.  It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	+
<b>9: To reduce air, noise &amp; light pollution</b>	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	0
<b>10: To protect &amp; conserve natural resources – soil, water, minerals &amp; waste<sup>249</sup></b>	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024) <sup>250</sup> indicates that there is water capacity for the identified development need – indicating neutral effects.  Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	+ 0
<b>11: To protect and enhance nature &amp; biodiversity</b>	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	+?

<sup>248</sup>Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)  
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

<sup>249</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

<sup>250</sup> JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

<b>12: To protect and enhance the historic environment, and its setting</b>	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. Likely neutral effects on the historic environment.	<b>0</b>
<b>13: To protect and enhance the quality and character of townscapes &amp; landscapes</b>	A location accessible to the city centre and designed according to other policy requirements as described above for SA No 12 should ensure that potential negative effects are mitigated.  Likely positive effects as the development of a cleared and vacant site will improve the quality and character of the townscape.	<b>+</b>

<b>SH004-24</b>	<b>Land at Spon End</b> Area: 7.2 hectares <b>Capacity: 750 dwellings</b>	
<b>Sustainability Objective</b>	<b>Assessment of Effects</b>  <b>Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</b>	
<b>1: To enable vibrant and inclusive communities</b>	<p>The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site close to the city centre.</p> <p>The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical &amp; mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.</p> <p>The site is part of the Citizen Housing<sup>251</sup> portfolio, a social housing provider, &amp; the organisation has relocated occupants of the site where the existing homes are not considered fit for habitation. Therefore, potentially major positive effects for redeveloping a new inclusive community.</p>	<b>++?</b>

<sup>251</sup> <https://www.citizenhousing.org.uk/about-us/what-we-do/#row1>

<p><b>2: To provide accessible essential services and facilities for all residents</b></p>	<p>Positive effects indicated for this location in the urban area with a range of essential local services &amp; facilities, including schools, several convenience shops/supermarkets, 3 community centres, pubs/restaurants and cafes. City centre facilities are within about 0.5 miles to the east.</p>	<p style="text-align: center;">+</p>
<p><b>3: To improve health &amp; promote active living</b></p>	<p>Provision of good quality housing &amp; access to employment is well established as contributing to better health and wellbeing – physical &amp; mental<sup>252</sup>. There are 6 health centres and 9 dental practices within about a mile of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services.</p> <p>These factors are covered by the following SA Nos 4 &amp; 5. There are fitness centres/gyms within about 0.5 miles towards the city centre.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD<sup>253</sup> provides information and guidance on completing the relevant health toolkit and HIA.</p>	<p style="text-align: center;">+</p>
<p><b>4: To provide decent and affordable housing for all</b></p>	<p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix &amp; tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is accessible to the city centre &amp; with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)<sup>254</sup> provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	<p style="text-align: center;">++</p>
<p><b>5: To support sustainable inclusive economic growth</b></p>	<p>Whilst provision of new homes is not directly attributable to economic growth, good quality homes will support working people. Overall – neutral/not applicable effects.</p>	<p style="text-align: center;">0</p>

<sup>252</sup> For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

<sup>253</sup> Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

<sup>254</sup> <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

<p><b>6: To help achieve the Council's ambition to reach net zero carbon emissions</b></p>	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions &amp; avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD<sup>255</sup> currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.</p>	<p>0</p>	
<p><b>7: To build resilience to climate change</b></p>	<p>All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 2 &amp; partly in FZ3 indicating risk of flooding.</p>	<p>0</p>	
<p><b>8: To reduce traffic &amp; improve sustainable transport choices</b></p>	<p>The urban environment is well connected and with a good transport system; the location is some 0.5 miles from the city centre &amp; 1 mile from the railway station.</p> <p>It may be noted that facilitating active travel has further positive effects for air quality &amp; noise (SA No 9), health &amp; wellbeing (SA No 3) and GI (SA No 11).</p>	<p>+</p>	
<p><b>9: To reduce air, noise &amp; light pollution</b></p>	<p>Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.</p>	<p>0</p>	
<p><b>10: To protect &amp; conserve natural resources – soil, water, minerals &amp; waste<sup>256</sup></b></p>	<p>Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)<sup>257</sup> indicates that there is water capacity for the identified development need – indicating neutral effects.</p> <p>Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.</p>	<p>+</p>	<p>0</p>
<p><b>11: To protect and enhance</b></p>	<p>The current adopted Plan has policies to protect nature &amp; biodiversity, including GB1 Green Belt &amp; Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity.</p>	<p>+</p>	

<sup>255</sup>Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)  
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

<sup>256</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

<sup>257</sup> JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

<b>nature &amp; biodiversity</b>	These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	
<b>12: To protect and enhance the historic environment, and its setting</b>	<p>The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation &amp; Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. Likely neutral effects on the historic environment.</p> <p>The site is partly within the Spon End Conservation Area &amp; partly within an archaeological constraint area – therefore, development will need sensitive design - other plan policies provide mitigation. Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies &amp; creative detailed design.</p>	<b>0?</b>
<b>13: To protect and enhance the quality and character of townscapes &amp; landscapes</b>	<p>A location close to the city centre and designed according to other policy requirements as described above for SA No 12 should ensure that potential negative effects are mitigated.</p> <p>Likely positive effects as the regeneration of an area with dwellings not considered fit for habitation (currently vacant) will improve the quality and character of the townscape.</p>	<b>++</b>
<b>H2:3</b>	<p><b>Walsgrave Hill Farm</b> Area: 59 hectares <span style="float: right;"><b>Capacity: 900 dwellings</b></span> A long standing Local Plan Allocation – retained for the Local Plan Review; challenges to delivery relate to access &amp; the A46 but this may be improved in due course.</p>	
<b>Sustainability Objective</b>	<b>Assessment of Effects</b>	
	<b>Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</b>	
<b>1: To enable vibrant and</b>	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement	<b>++?</b>



<p><b>inclusive communities</b></p>	<p>of community participation is likely to be guided by specific housing policies. Major positive effects indicated for this site with capacity to design inclusive communities for a range of people – uncertainty as depends on detailed design.</p> <p>The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical &amp; mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.</p> <p><b>SA Suggestion:</b></p> <ul style="list-style-type: none"> <li>■ Creative design for inclusivity &amp; to encourage support social interaction</li> </ul>	<p style="background-color: #4F7942; color: white; text-align: center;">+</p>
<p><b>2: To provide accessible essential services and facilities for all residents</b></p>	<p>Positive effects indicated for this location at the edge of the city urban area with a variety of accessible services &amp; facilities. City centre facilities are within about 3.5 miles to the south-west.</p> <p>The current site allocation recognises the need for expansion of schools to accommodate the increased need.</p>	<p style="background-color: #70AD47; color: white; text-align: center;">+</p>
<p><b>3: To improve health &amp; promote active living</b></p>	<p>Provision of good quality housing &amp; access to employment is well established as contributing to better health and wellbeing – physical &amp; mental<sup>258</sup>. There are 2 health centres (but dental practices some 1.5 mile distance) within about 1 mile of the site. The current site allocation recognises the need to expand health services at Walsgrave Hill Farm to accommodate the increased population</p> <p>These factors are covered by the following SA Nos 4 &amp; 5. There are various fitness centres within a mile of the site &amp; access to wider green spaces, including the Sowe Valley footpath &amp; Coombe Abbey Country Park.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD<sup>259</sup> provides information and guidance on completing the relevant health toolkit and HIA.</p>	<p style="background-color: #70AD47; color: white; text-align: center;">+</p>
<p><b>4: To provide decent and</b></p>	<p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper</p>	<p style="background-color: #4F7942; color: white; text-align: center;">++</p>

<sup>258</sup> For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

<sup>259</sup> Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

<p><b>affordable housing for all</b></p>	<p>recognise the importance of providing a suitable mix &amp; tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is accessible to the city centre &amp; with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)<sup>260</sup> provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	
<p><b>5: To support sustainable inclusive economic growth</b></p>	<p>Whilst provision of new homes is not directly attributable to economic growth, good quality homes will support working people. Overall – neutral/not applicable effects.</p>	<p>0</p>
<p><b>6: To help achieve the Council's ambition to reach net zero carbon emissions</b></p>	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions &amp; avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD<sup>261</sup> currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.</p>	<p>0</p>
<p><b>7: To build resilience to climate change</b></p>	<p>All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 &amp; partly within FZ2 &amp; 3 indicating a range of risk of flooding. Capacity studies have confirmed that the assessed number of homes can be delivered safely – neutral effects overall.</p>	<p>0</p>
<p><b>8: To reduce traffic &amp; improve sustainable transport choices</b></p>	<p>The urban environment is well connected and with a good transport system; the location is some 3.5 miles from the city centre.</p> <p>The current site allocation recognises that proposals for revised junction works to the A46 at Clifford Bridge may impact on the delivery of dwellings and therefore some uncertainty for timings.</p> <p>It may be noted that facilitating active travel has further positive effects for air quality &amp; noise (SA No 9), health &amp; wellbeing (SA No 3) and GI (SA No 11).</p>	<p>+?</p>

<sup>260</sup> <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

<sup>261</sup> Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)  
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

	<p><b>SA Suggestion:</b></p> <ul style="list-style-type: none"> <li>■ Incorporate a safe walking/cycling network through the new development &amp; linking to urban area to west &amp; country area to east to encourage more active transport/living locally</li> </ul>	
<b>9: To reduce air, noise &amp; light pollution</b>	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	0
<b>10: To protect &amp; conserve natural resources – soil, water, minerals &amp; waste<sup>262</sup></b>	<p>Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)<sup>263</sup> indicates that there is water capacity for the identified development need – indicating neutral effects.</p> <p>Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.</p>	+ 0
<b>11: To protect and enhance nature &amp; biodiversity</b>	<p>The current adopted Plan has policies to protect nature &amp; biodiversity, including GB1 Green Belt &amp; Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects.</p> <p>All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects more certain as the site is near to the River Sowe &amp; the wider countryside to the east providing creative opportunities for linking into green &amp; blue infrastructure; uncertainty as depends on detailed design.</p>	++?
<b>12: To protect and enhance the historic environment, and its setting</b>	<p>The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation &amp; Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. Likely neutral effects on the historic environment.</p> <p>The current site allocation recognises risk to heritage and includes a requirement for retention and enhanced</p>	0

<sup>262</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

<sup>263</sup> JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

	setting of listed buildings at Hungerley Hall Farm, thus providing mitigation measures.	
<b>13: To protect and enhance the quality and character of townscapes &amp; landscapes</b>	A location accessible to the city centre and designed according to other policy requirements as described above for SA No 12 should ensure that potential negative effects are mitigated.	+
	Likely positive effects as the location between the urban area to the west & the countryside to the east offers opportunities for creative design.	

<b>H2:15</b>	<b>Sandy Lane</b> Area: 2.7 hectares <span style="float: right;"><b>Capacity: 250</b></span> <b>dwellingings</b> A current Local Plan Allocation – retained with increased density for the Local Plan Review	
<b>Sustainability Objective</b>	<b>Assessment of Effects</b>  <b>Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</b>	
<b>1: To enable vibrant and inclusive communities</b>	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects indicated for this site easily accessible to the city centre  The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.	+
<b>2: To provide accessible essential services and facilities for all residents</b>	Positive effects indicated for this site in the city urban area with a variety of accessible services & facilities. with a range of essential local services & facilities, including schools, several convenience shops/supermarkets, pubs/restaurants and cafes, including close to the Canal Basin & its services/facilities. City centre facilities are less than about one mile to the south.	+
<b>3: To improve health &amp;</b>	Provision of good quality housing & access to employment is well established as contributing to better	+

<p><b>promote active living</b></p>	<p>health and wellbeing – physical &amp; mental<sup>264</sup>. There are several health centres &amp; dentists within about 1 mile of the site.</p> <p>These factors are covered by the following SA Nos 4 &amp; 5. There are several fitness centres within a mile of the site &amp; green/open spaces nearby, such as Radford Recreation Ground, Naul's Mill Park, and the Coventry Canal towpath.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD<sup>265</sup> provides information and guidance on completing the relevant health toolkit and HIA.</p>	<p></p>
<p><b>4: To provide decent and affordable housing for all</b></p>	<p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix &amp; tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is very accessible to the city centre &amp; with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)<sup>266</sup> provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	<p>++</p>
<p><b>5: To support sustainable inclusive economic growth</b></p>	<p>Whilst provision of new homes is not directly attributable to economic growth, good quality homes will support working people. Overall – neutral/not applicable effects.</p>	<p>0</p>
<p><b>6: To help achieve the Council's ambition to reach net zero carbon emissions</b></p>	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions &amp; avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy</p>	<p>0</p>

<sup>264</sup> For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

<sup>265</sup> Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

<sup>266</sup> <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

	SPD <sup>267</sup> currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.	
<b>7: To build resilience to climate change</b>	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating a low of risk of flooding. Capacity studies have confirmed that the assessed number of homes can be delivered safely – neutral effects overall.	0
<b>8: To reduce traffic &amp; improve sustainable transport choices</b>	The urban environment is well connected and with a good transport system, some 0.5 miles from the city centre.  It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	+
<b>9: To reduce air, noise &amp; light pollution</b>	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	0
<b>10: To protect &amp; conserve natural resources – soil, water, minerals &amp; waste<sup>268</sup></b>	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024) <sup>269</sup> indicates that there is water capacity for the identified development need – indicating neutral effects.  Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	+ 0
<b>11: To protect and enhance nature &amp; biodiversity</b>	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects.  All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	+?

<sup>267</sup>Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)  
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

<sup>268</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

<sup>269</sup> JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

<p><b>12: To protect and enhance the historic environment, and its setting</b></p>	<p>The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation &amp; Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. Likely neutral effects on the historic environment.</p> <p>The current site allocation recognises that the site contains a locally listed building and is adjacent to the Canal Conservation Area - thus providing mitigation measures.</p>	<p>0</p>
<p><b>13: To protect and enhance the quality and character of townscapes &amp; landscapes</b></p>	<p>A location accessible to the city centre and designed according to other policy requirements as described above for SA No 12 should ensure that potential negative effects are mitigated.</p> <p>Likely positive effects as the regeneration of this site will offer positive effects for townscape objectives.</p>	<p>+</p>

<p><b>STM014-24</b></p>	<p><b>JE2:1 Friargate Mixed Use Scheme, City Centre</b> Area: 10.0 hectares <span style="float: right;"><b>Capacity: 1,350 dwellings</b></span> Current allocation within the City Centre Area Action Plan CC12 for 400 new homes – partially implemented with the construction of 2 office blocks, a hotel, &amp; public realm improvements. Changes to development types &amp; capacities proposed.</p>	
<p><b>Sustainability Objective</b></p>	<p style="text-align: center;"><b>Assessment of Effects</b></p> <p style="text-align: center;"><b>Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</b></p>	
<p><b>1: To enable vibrant and inclusive communities</b></p>	<p>The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Major positive effects indicated with such a capacity &amp; opportunities for inclusive communities for this site in the city centre. The mix of uses, public realm improvements, and proposed enhanced housing capacity will contribute to social interactions.</p>	<p>++?</p>

	<p>The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical &amp; mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.</p> <p><b>SA Suggestion:</b></p> <ul style="list-style-type: none"> <li>■ Creative design for inclusivity &amp; to encourage, support social interaction</li> </ul>	
<b>2: To provide accessible essential services and facilities for all residents</b>	Major positive effects indicated for this location in the city centre and a wide range of services & facilities, including schools, nurseries, shops, community & faith centres, and diverse cultural & entertainment facilities. There is a range of open/green space nearby such as Lady Herbert's Gardens, Swanswell Park & Pool, Greyfriars Green, Spencer Park, and Charterhouse Field.	++
<b>3: To improve health &amp; promote active living</b>	<p>Provision of good quality housing &amp; access to employment is well established as contributing to better health and wellbeing – physical &amp; mental<sup>270</sup>. These factors are covered by the following SA Nos 4 &amp; 5. There are many health centres/general practices and dental practices within about a mile radius of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. Such a city centre location provides a potential variety of health services and within walking distances.</p> <p>With a location in the city centre, there is easy access to a range of health/fitness facilities, such as gyms, pools - the Wave Waterpark, and dance, yoga studios - and the longer distance walking with the canal towpath. There is also easy access to a wide range of food shopping with associated positive effects for health.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD<sup>271</sup> provides information and guidance on completing the relevant health toolkit and HIA.</p>	+
<b>4: To provide decent and affordable housing for all</b>	Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable	++

<sup>270</sup> For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

<sup>271</sup> Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>



	<p>homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is in the city centre &amp; with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)<sup>272</sup> provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p> <p><b>SA Suggestion:</b></p> <ul style="list-style-type: none"> <li>■ Creative design to encourage flexible &amp; adaptable housing to support mix &amp; tenure with changing needs</li> </ul>	
<b>5: To support sustainable inclusive economic growth</b>	<p>Whilst provision of new homes is not directly attributable to economic growth, good quality homes in the city centre will support working people. Redevelopment for mixed uses proposed – residential, class E, learning &amp; community uses, sui generis uses including drinking establishments – regeneration of the urban city centre core will have major positive effects for economic growth objectives – and could inspire enhancement beyond the site itself with sportive implications for the sub-regional economy.</p>	++
<b>6: To help achieve the Council's ambition to reach net zero carbon emissions</b>	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions &amp; avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD<sup>273</sup> currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.</p>	0
<b>7: To build resilience to climate change</b>	<p>All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.</p>	0
<b>8: To reduce traffic &amp; improve</b>	<p>The urban environment is well connected and with a good transport system; the location in the city centre will enable active travel &amp; should discourage car travel as</p>	++

<sup>272</sup> <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

<sup>273</sup> Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)  
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

<p><b>sustainable transport choices</b></p>	<p>most services &amp; facilities will be accessible by walking or public transport. The main railway station is adjacent to the south of the site.</p> <p>It may be noted that facilitating active travel has further positive effects for air quality &amp; noise (SA No 9), health &amp; wellbeing (SA No 3) and GI (SA No 11).</p>	
<p><b>9: To reduce air, noise &amp; light pollution</b></p>	<p>Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.</p>	<p>0</p>
<p><b>10: To protect &amp; conserve natural resources – soil, water, minerals &amp; waste<sup>274</sup></b></p>	<p>Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)<sup>275</sup> indicates that there is water capacity for the identified development need – indicating neutral effects.</p> <p>Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.</p>	<p>+ 0</p>
<p><b>11: To protect and enhance nature &amp; biodiversity</b></p>	<p>The current adopted Plan has policies to protect nature &amp; biodiversity, including GB1 Green Belt &amp; Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.</p>	<p>+?</p>
<p><b>12: To protect and enhance the historic environment, and its setting</b></p>	<p>The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation &amp; Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment.</p> <p>The site is within the city centre &amp; within the Three Spires View Cone and but not within an archaeological constraint area - The Tall Buildings Design Guide &amp; Three</p>	<p>0?</p>

<sup>274</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

<sup>275</sup> JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

	Spires View Framework SPD (2022) <sup>276</sup> provides further guidance to mitigate potential effects - other plan policies should provide mitigation measures. Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies & creative detailed design.	
<b>13: To protect and enhance the quality and character of townscapes &amp; landscapes</b>	A location in the city centre and designed according to policies as described above for SA No 12 should ensure that potential negative effects are mitigated.	<b>++</b>
	Likely major positive effects as the regeneration of the existing urban city centre core will significantly improve the quality and character of the townscape with the potential to inspire wider enhancements beyond the site itself.	

<b>BAB016-24</b>	<b>Land North of A45</b> Developable Area: 11.81 hectares <b>Employment</b>	
<b>Sustainability Objective</b>	<b>Assessment of Effects</b>  <b>Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</b>	
<b>1: To enable vibrant and inclusive communities</b>	The provision of good quality accessible employment will support vibrant communities.	<b>+?</b>
<b>2: To provide accessible essential services and facilities for all residents</b>	Positive effects indicated for this employment location adjacent to the A45 with local facilities within a mile in Allesley & Eastern Green; city centre facilities are within about 4 miles to the south-east.	<b>+?</b>

<sup>276</sup>

<https://edemocracy.coventry.gov.uk/documents/s54726/Appendix%201%20Draft%20All%20Building%20View%20Management%20Framework%20Guide%20SPD.pdf>

<p><b>3: To improve health &amp; promote active living</b></p>	<p>Provision of &amp; access to employment is well established as contributing to better health and wellbeing – physical &amp; mental<sup>277</sup>.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD<sup>278</sup> provides information and guidance on completing the relevant health toolkit and HIA.</p>	<p style="text-align: center;">+</p>
<p><b>4: To provide decent and affordable housing for all</b></p>	<p>Employment site – neutral effects on housing.</p>	<p style="text-align: center;">0</p>
<p><b>5: To support sustainable inclusive economic growth</b></p>	<p>The Council cannot find sufficient employment land within its own administrative area in order to meet identified needs. Therefore, the identification of this site for employment, close to the urban environment &amp; readily accessible via the adjacent A45 to the city and the wider strategic transport network suggests likely major positive effects for economic growth objectives.</p>	<p style="text-align: center;">++</p>
<p><b>6: To help achieve the Council's ambition to reach net zero carbon emissions</b></p>	<p>All new development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions &amp; avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD<sup>279</sup> currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.</p>	<p style="text-align: center;">0</p>
<p><b>7: To build resilience to climate change</b></p>	<p>All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1, 2 &amp; 3 indicating some risk of flooding but this will be mitigated through national requirements to ensure safety for employment uses.</p>	<p style="text-align: center;">0</p>

<sup>277</sup> For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

<sup>278</sup> Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

<sup>279</sup> Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) <https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

<p><b>8: To reduce traffic &amp; improve sustainable transport choices</b></p>	<p>The site is some 0.5 miles north-west of the urban environment adjacent to the A45 - well connected and with a good transport system; the location is some 4 miles from the city centre.</p> <p>It may be noted that facilitating active travel has further positive effects for air quality &amp; noise (SA No 9), health &amp; wellbeing (SA No 3) and GI (SA No 11).</p>	<p style="text-align: center;">+</p>	
<p><b>9: To reduce air, noise &amp; light pollution</b></p>	<p>Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.</p>	<p style="text-align: center;">0</p>	
<p><b>10: To protect &amp; conserve natural resources – soil, water, minerals &amp; waste<sup>280</sup></b></p>	<p>The land is classed as Grade 3 moderate to good agricultural land &amp; therefore, negative effects for loss of best &amp; most versatile agricultural land &amp; the important soils resource. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)<sup>281</sup> indicates that there is water capacity for the identified development need – indicating neutral effects. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.</p>	<p style="text-align: center;">- 0</p>	
<p><b>11: To protect and enhance nature &amp; biodiversity</b></p>	<p>The current adopted Plan has policies to protect nature &amp; biodiversity, including GB1 Green Belt &amp; Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.</p>	<p style="text-align: center;">+?</p>	
<p><b>12: To protect and enhance the historic environment, and its setting</b></p>	<p>The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation &amp; Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment.</p> <p>Likely neutral effects on the historic environment as site not located in any sensitive areas.</p>	<p style="text-align: center;">0</p>	

<sup>280</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

<sup>281</sup> JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

<p><b>13: To protect and enhance the quality and character of townscapes &amp; landscapes</b></p>	<p>The site is located within the Green Belt with potential negative effects. There are some other established employment sites in Pickford Green indicating that such new development could be accommodated locally. However, the site is located in Area 1 of the Green Belt – it is the largest area &amp; considered to make a significant contribution to the GB purposes. It forms part of the wider Meriden Gap and Coundon wedge, any built development on the western extremity of the built-up area would be extremely sensitive. Further development in this area would therefore have the effect of substantially reducing its open character leading to the appearance of urban sprawl and very significant encroachment of the open countryside in this strategically important area of Green Belt between Coventry and Birmingham<sup>282</sup>.</p> <p>Therefore, likely major negative effects for landscape and Green Belt objectives.</p>	<p>--</p>
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<sup>282</sup> Coventry City Council Green Belt Technical Review Update (July 2024)

## EQUALITY IMPACT ASSESSMENT (EIA)



<b>Title of EIA</b>		<b>Coventry Local Plan Review Proposed submission (Regulation 19)</b>
<b>EIA Author</b>	Name	<b>Rob Haigh</b>
	Position	<b>Senior Planning Policy Officer</b>
	Date of completion	<b>01 October 2024</b>
<b>Head of Service</b>	Name	<b>Rob Back</b>
	Position	<b>Strategic Lead - Planning</b>
<b>Cabinet Member</b>	Name	<b>Councillor Naeem Akhtar</b>
	Portfolio	<b>Housing and Communities</b>

<b>EIA</b>	<ul style="list-style-type: none"> <li>• Having identified an EIA is required, ensure that the EIA form is completed as early as possible.</li> <li>• Any advice or guidance can be obtained by contacting Jaspal Mann (Equalities) or Hannah Watts (Health Inequalities)</li> </ul>
<b>Sign Off</b>	<ul style="list-style-type: none"> <li>• Brief the relevant Head of Service/Director/Elected Member for sign off</li> <li>• Have the EIA Form ready for consultation if it is required</li> <li>• Amend according to consultation feedback and brief decision makers of any changes</li> </ul>
<b>Action</b>	<ul style="list-style-type: none"> <li>• Implement project / changes or finalise policy/strategy/contract</li> <li>• Monitor equalities impact and mitigations as evidence of duty of care</li> </ul>

**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)* Coventry Local Plan Review – Proposed Submission



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

The Coventry Local Plan (incorporating the City Centre Area Action Plan) was adopted in December 2017. Local Plan policies need to be reviewed once they are five years old to see whether they are still up to date. A full review of the Coventry Local Plan formally commenced in 2023 with the publication of the Regulation 18 Issues and Options<sup>1</sup>. The review of the Coventry Local Plan has to go through a statutory planning process which ultimately leads to the plan being examined in public by an independent Planning Inspector.

The Local Plan, City Centre Area Action Plan and existing Neighbourhood Development Plan (Willenhall) together form the statutory development plan for the city, which is used, alongside the National Planning Policy Framework, to help direct decisions on planning applications in Coventry. The reviewed Local Plan, once adopted, will provide an updated planning policy framework needed to guide development up to 2041.

Given the scope of the reviewed Local Plan in terms of geographical extent (citywide), range of policy content, and timespan (up to 2041) it has the potential to affect many people who will live and work in the city, and who will visit the city, over the plan period. As such, the content of the document will be relevant to the Public Sector Equality Duty, as set out above, and for this reason an EqIA of the Coventry Local Plan review is required. However, as the plan primarily relates to the use and development of land and seeks to address people's needs in relation to how land is used (i.e. for homes, employment, transport, services and facilities and to provide a safe and healthy environment), the beneficial effects of policies in the plan are largely focused on those 'protected characteristics' and other relevant characteristics that can act as barrier to those needs being met. These include deprivation, disability, age and race. Other 'protected characteristics' are less relevant, such as gender reassignment, pregnancy and maternity, religion or belief, sexual orientation, and marriage or civil partnership, but would still be subject to beneficial effects as the policies are designed and written to address the needs of everyone.

This EqIA of the publication draft (Regulation 19) has included a comprehensive update of many policies and so any potential impacts need to be considered accordingly. Consultation on the publication draft before proceeding to submission for the purposes of Examination is required (which will be independently examined). The Local Plan covers a wide range of topics including: -

- Health
- Employment
- Housing
- Retail
- Communities
- Green Belt and Green Space
- Access and Movement
- Environmental Management
- Design

<sup>1</sup> <https://coventrycitycouncil.inconsult.uk/CLPRIO/consultationHome>





- Conservation and Heritage and
- Infrastructure.

We have reviewed the responses after the initial consultation of the Local Plan Review (Regulation 18) which included any responses to the associated EqIA that was published at that time. Therefore, this EqIA and Health Impact Assessment provides a high level assessment of the various policy areas highlighted above based on the protected characteristics.

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

The local community and those delivering services in the area, landowners, developers and agents, special interest groups and organisations. This is due to the fact that the Local Plan considers development throughout the whole city and will affect everyone who lives and works in Coventry.

### 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
- 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 data analysis for the local plan has been prepared through a range of evidence base documents and whilst not totally exhaustive, these include, for example:

## EQUALITY IMPACT ASSESSMENT (EIA)



- Housing and Economic Development Needs Assessment (HEDNA) (2022) and Addendum Report (2024): Prepared on behalf of the Coventry and Warwickshire Local Authorities to provide a joint and integrated assessment of the need for housing, economic growth potential and employment land needs over the period to 2041 and 2050.
- Housing and Economic Land Availability Assessment (HELAA) (2024): A technical assessment which seeks to identify land which is suitable, available and achievable for housing and economic development over the Local Plan Period. The HELAA does not allocate land for development or determine the acceptability of any site for development, instead this assessment is an important source of evidence for deciding where new housing/economic development may be located.
- Gypsy and Traveller Accommodation Assessment (2023) - addresses the specific needs of Gypsies and Travellers, reviews current policies and ensures that the reviewed plan provides for their future needs.
- A series of background papers to inform the review of the policy themes (which refer to a wide range of sources of evidence).
- Strategic Flood Risk Assessment (SFRA) Level 1 (2022)  
Evidence base on flood risk issues to support the review and update of the Coventry and Warwickshire Authorities Local Plans and associated Planning Policy documents.
- Coventry Employment Land Review and office market addendum (2024)
- Green Belt Technical Update (2024)
- Carbon Policy Report (2024): Specialist report assessing options available within the local planning system to address climate change in Coventry informing local plan policy.
- Sustainability Appraisal
- Viability Appraisal (2024): comprehensive whole Local Plan Viability Assessment that demonstrates viability of the policies set out in the Local Plan.
- Coventry and Warwickshire Water Cycle Study 2024

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
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## EQUALITY IMPACT ASSESSMENT (EIA)



<p>Age 0-18</p>	<p>P</p>	<p>The review of the policies includes consideration of family housing provision, including affordable housing. 22.9% of children (0-15) live in relative low income families which is above the national average of 18.5% (2022/23 figures). The review ensures that infrastructure is aligned to development (e.g. schools, health, open space, walking and cycling networks) and supports the provision and retention of services such as community facilities. The review also addresses the known health issues and challenges into account by promoting and encouraging healthy and active lifestyles.</p> <p>The review also includes a policy basis for social and community uses, which includes schools, universities, places of worship and health centres which all help this cohort to live a healthy and fulfilled upbringing.</p>
<p>Age 19-64</p>	<p>P</p>	<p>The review of the policies includes supporting a range of different housing models to meet a variety of needs from people in this age group, including affordable housing, market housing, specialist housing, and a range of different models. How and where new development is located may affect different age groups in varying ways. The accessibility of new development may have implications for some people more than others and some age groups might be impacted more (or less) than others. For example, for older age groups, proximity of new housing and other development to services, such as health and social care, convenience shopping and community facilities may be especially important and/or the means to access these provisions safely and easily via public transport.</p> <p>The delivery of high quality affordable housing will help to support all people whose needs are not met by the housing market. These will include all people on the city's housing register. Affordable housing will include housing for rent below market levels and housing for sale that provides a subsidised route to home ownership. The level of affordable housing need is determined by the Local Housing Needs Assessment and the level of affordable housing that can be delivered through the planning system will be determined by the viability of development and the level of public subsidy (if any) available.</p> <p>In association with affordable housing, accessing quality jobs, training and education opportunities, as well as establishing a place on the property ladder, is more likely to be a key issue for younger people. Access to pre-school provisions, play areas</p>



		and healthcare is likely to more important to households with young families. Although all age groups are likely to be impacted, the potential exists for some age groups to be impacted by local plan policies more than others.
Age 65+	P	<p>The older person population is projected to increase notably in the future and an ageing population means that the number of people with disabilities is likely to increase substantially. Key findings for the 2022-32 period include:</p> <ul style="list-style-type: none"> <li>- A 18% increase in the population aged 65+ (potentially accounting for 54% of total population growth;</li> <li>- A 21% increase in the number of people aged 65+ with dementia and a 20% increase in those aged 65+ with mobility problems</li> </ul> <p>The review of Policy H8 (Care Homes, Supported Housing, Nursing Homes and Older Persons Accommodation) considers the need for the growth in housing including sheltered / retirement housing, housing with care, and housing for wheelchair users.</p> <p>The review seeks to combat deprivation on a number of fronts. It looks to respond to growth in jobs within the city and manage any imbalance that may exist between the quality of jobs and housing. As well as planning for new housing growth the review also looks to set a new direction for new employment proposals and supports existing schemes (e.g. Friargate and Coventry gateway), which is relevant to this cohort given some people aged 65+ choose to continue working with research suggesting this trend becoming more prevalent<sup>2</sup>. It is also accepted that house building in itself creates jobs both through construction and knock on jobs through the supply chain etc. As such ensuring a varied supply of homes in all parts of the city informed by the HELAA will help spread jobs growth and opportunities. By looking to prioritise development within the existing urban area where possible, the plan also promotes urban regeneration through a previously developed land perspective can help with the removal of derelict and vacant sites that act as a blight within local communities. Instead turning them into sites for new homes or jobs or infrastructure. Indeed, the review is proactive in planning for replacement</p>

2

[https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/peopleaged65yearsandoverinemploymentuk/januarytomarch2022toapriltojune2022#:~:text=and%20employment%20types-,In%20April%20to%20June%202022%2C%20the%20number%20of%20people%20aged,record%20level%20\(Figure%201\).](https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/peopleaged65yearsandoverinemploymentuk/januarytomarch2022toapriltojune2022#:~:text=and%20employment%20types-,In%20April%20to%20June%202022%2C%20the%20number%20of%20people%20aged,record%20level%20(Figure%201).)

## EQUALITY IMPACT ASSESSMENT (EIA)



		<p>employment land to facilitate urban regeneration and enhance the built environment.</p> <p>As part of the wider infrastructure aspect of the plan, it provides a policy basis for ensuring sufficient community and social provisions are provided alongside new development. This includes schools, community buildings and useable green spaces. It also seeks to ensure new developments are well connected and well integrated with their surroundings in order to help community cohesion.</p>
Disability	<b>P</b>	<p>For disabled people, isolation from services, public transport options and/or communities as well as an undersupply of more specialist or flexible types of housing can be a barrier to living independently and to health and wellbeing. There are a wide range of needs within this category, and it is recognised that the review of the Local Plan can play a role in helping to meet specific specialist needs, in providing an accessible, healthy and inclusive communities, open spaces, facilities and a public realm that is appropriate and accessibly for all who want to use them.</p> <p>The review of Policy H8 includes consideration of specialist accommodation needs and explores the possibility of adaptations and homes meeting higher building regulations standards where there is evidence of need. In terms of delivering housing the review considers the housing needs of the population as a whole.</p> <p>As part of the HEDNA, evidence was developed around housing needs for those with disabilities and this is reflected through the plan and the policies. The accessibility policies are also aimed at including transport and access for all aspects of the population.</p>
Gender reassignment	<b>NI</b>	<p>The Equality Act provides protection for transgender people, defined as people who propose to have started or completed a process to change their gender. Local Plan policies should seek to respond to the needs of all in the community, avoid discrimination and support inclusivity. No direct impact although a range of policies will be applicable depending on individual / household circumstances.</p>
Marriage and Civil Partnership	<b>NI</b>	<p>Those within this category are not considered to be affected differently by the policies within the Local Plan. As such, the Local Plan is considered no impact with respect to equality issues relating to marriage and civil partnerships.</p>

## EQUALITY IMPACT ASSESSMENT (EIA)



Pregnancy and maternity	<b>NI</b>	A proportion of the population will be pregnant at any time and/or looking after babies and very young children. They may have health, socialisation and childcare requirements, including around access to pre- and post-natal care, childcare and health services. They may be more likely to be seeking affordable accommodation that is suitable for a young or growing family, with access to facilities, schools, and open spaces (including play areas). These needs have implications for how our environment, infrastructure, housing and communities are planned and are relevant to the review of the Local Plan. No direct impact although a range of policies will be applicable depending on individual / household circumstances.
Race (Including: colour, nationality, citizenship ethnic or national origins)	<b>NI</b>	<p>The Local Plan policies, proposal and allocations aim to ensure that sites are available to provide sufficient housing to meet a significant proportion of housing needs of all groups in Coventry.</p> <p>The Gypsy and Traveller policy is being reviewed to ensure that their needs can be met over the plan period and this is informed by a new Gypsy and Traveller Accommodation Assessment.</p>
Religion and belief	<b>NI</b>	People of different religions and faiths may face barriers to accessing suitable places of worship, which may have particular requirements in terms of location, space and built form/function. The review of the Local Plan can influence the protection and location of community facilities and services and can therefore influence opportunities for religious groups to practice their religion and worship. No direct impact although a range of policies will be applicable depending on individual / household circumstances.
Sex	<b>NI</b>	<p>The pattern and location of development may have some impacts with regard to gender. The lives of older women are often different to those of older men. On average, women live longer and are more likely to be working later in life and, on a like for like comparison with men, have lower average incomes. These factors will also impact on how the review of the Local Plan can have regard to other protected characteristics (including Age and Disability).</p> <p>Traditionally, working-age women have been more likely to have varied working patterns compared to men, with one or more parttime jobs, and may leave the labour market earlier, perhaps to care for children. Therefore, the need for access to public transport, proximity to workplaces and the avoidance of</p>

## EQUALITY IMPACT ASSESSMENT (EIA)



		isolated locations are all considerations in planning to meet the needs of women.
Sexual orientation	<b>NI</b>	No direct impact although some policies will be applicable depending upon the individual / household circumstances.



### Method

2.3 The Regulation 19 Coventry Local Plan Review has been reviewed to consider the likely impacts of the 73 policies on each of the nine protected characteristics from the Equality Act 2010 listed above and the findings are shown in table 1 below. For each protected characteristic, consideration has been given to whether the options considered for inclusion in the Local Plan are compatible or incompatible with the three main duties of the Equality Act 2010.

2.4 A colour coded scoring system has been used to show the effects that the Local Plan is likely to have on each protected characteristic, as shown below.

Score	Likely effect
+	Positive
0/?	Neutral or unknown
-	Negative

2.5 The purpose of this assessment is to ensure that the local plan policies are providing equality of opportunity and eliminating unlawful discrimination for everyone. The Council takes into account of the needs, circumstances and experiences of those in the community who it intends to benefit from a policy.

2.6 The Local Plan Review includes numerous different policies. This equality impact assessment considers the potential for disproportionate impacts and opportunities for advancing equality of opportunity and fostering good relations in respect of the Local Plan Review. However, this does not negate the need to consider individual policies in greater detail in relation to the wider corporate aims. The approach has been to undertake a high-level assessment in partnership with individual service areas on policy areas which are likely to impact on people with different protected characteristics. The aim of this is to identify key areas of focus and where a more detailed individual equality impact assessment on a specific policy, undertaken by the service area is likely to be required. In order to achieve positive equalities outcomes, there will be an on-going commitment from all service areas involved to assess and, where they exist, to mitigate, disproportionate impacts on particular protected characteristics. This will be an on-going duty and should be given proportionate attention according to the relevance at various stages.



## EQUALITY IMPACT ASSESSMENT (EIA)



Table 1 Likely effects of the policies in the Coventry Local Plan Review (Regulation 19) on the nine protected characteristics under the Equality Act 2010

Policy	Age	Disability	Gender reassignment	Marriage & civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Policy DS1: Overall Development Needs	+	+	+	+	+	+	+	+	+
Policy DS2: The Duty to Co-operate and partnership working	0	0	0	0	0	0	0	0	0
Policy DS3: Sustainable Development Policy	0	0	0	0	0	0	0	0	0
Policy DS4 (Part A) – General Masterplan principles	0	0	0	0	0	0	0	0	0
Policy DS4 (Part B) - Whitley Specific Masterplan Principles	0	0	0	0	0	0	0	0	0
Policy DS4 (Part C) – Keresley SUE Specific Masterplan Principles	0	0	0	0	0	0	0	0	0
Policy DS4 (Part D) – Eastern Green SUE Specific Masterplan Principles	0	0	0	0	0	0	0	0	0
Policy HW1: Health and Health Impact Assessments (HIA)	+	+	+	+	+	+	+	+	+
Policy JE1: Overall Economy and Employment Strategy	+	+	+	+	+	+	+	+	+
Policy JE2: Provision of Employment Land and Premises	0	0	0	0	0	0	0	0	0
Policy JE3: Non-Employment Uses on Employment Land	0	0	0	0	0	0	0	0	0
Policy JE4: Location and type of Office Development	0	0	0	0	0	0	0	0	0
Policy JE5: Industrial and Storage / Distribution Development	0	0	0	0	0	0	0	0	0
Policy JE6: Tourism/Visitor Related Development	0	0	0	0	0	0	0	0	0
Policy JE7: Accessibility to Employment Opportunities	+	+	+	+	+	+	+	+	+
Policy JE8: Location of Research and Development (R&D)	0	0	0	0	0	0	0	0	0
Policy H1: Housing Land Requirements	0	0	0	0	0	0	0	0	0
Policy H2: Housing Allocations	0	0	0	0	0	0	0	0	0
Policy H3: Provision of New Housing	+	+	+	+	+	+	+	+	+
Policy H4: Securing a Mix of Housing	+	+	+	+	+	+	+	+	+

## EQUALITY IMPACT ASSESSMENT (EIA)



Policy H5: Managing Existing Housing Stock	0	0	0	0	0	0	0	0	0
Policy H6: Affordable Housing	+	+	+	+	+	+	+	+	+
Policy H7: Gypsy and Traveller Accommodation	+	+	+	+	+	+	+	+	+
Policy H8: Specialist Housing including with elements of care, Older Persons accommodation and hostels	+	+	+	+	+	+	+	+	+
Policy H9: Residential Density	0	0	0	0	0	0	0	0	0
Policy H10: Student Accommodation	+	+	+	+	+	+	+	+	+
Policy H11: Homes in Multiple Occupation (HMOs)	+	+	+	+	+	+	+	+	+
Policy H12 – Build to Rent	+	+	+	+	+	+	+	+	+
Policy H13 – Co-living	+	+	+	+	+	+	+	+	+
Policy R1 Delivering Retail Growth	0	0	0	0	0	0	0	0	0
Policy R2: Coventry City Centre – Development Strategy	0	0	0	0	0	0	0	0	0
Policy R3: The Network of Centres	0	0	0	0	0	0	0	0	0
Policy R4: Out of Centre Proposals	0	0	0	0	0	0	0	0	0
Policy R5: Retail Frontages and Ground Floor Units in defined centres	0	0	0	0	0	0	0	0	0
Policy R6 Restaurants, Bars and Hot Food Takeaways	+	+	+	+	+	+	+	+	+
Policy CO1: New or improved social community and leisure premises	+	+	+	+	+	+	+	+	+
Policy CO2: Re-Use of or Redevelopment of Facilities	+	+	+	+	+	+	+	+	+
Policy CO3: Neighbourhood and Community Planning	+	+	+	+	+	+	+	+	+
GB1 Green Belt	0	0	0	0	0	0	0	0	0
Policy GB2: Safeguarded Land in the Green Belt	0	0	0	0	0	0	0	0	0
LGS1 Local Green Space	+	+	+	+	+	+	+	+	+
Policy GE1 Green and Blue Infrastructure	+	+	+	+	+	+	+	+	+
Policy GE2: Green Space	+	+	+	+	+	+	+	+	+
Policy GE3: Biodiversity, Geological, Landscape and Archaeological Conservation	+	+	+	+	+	+	+	+	+
Policy GE4: Tree Protection	+	+	+	+	+	+	+	+	+
Policy DE1 Ensuring High Quality Design	0	0	0	0	0	0	0	0	0

## EQUALITY IMPACT ASSESSMENT (EIA)



Policy DE2: Delivering High Quality Places	+	+	0	0	0	0	0	+	0
Policy HE1 Conservation Areas	0	0	0	0	0	0	0	0	0
Policy HE2: Conservation and Heritage Assets	0	0	0	0	0	0	0	0	0
Policy HE3 Heritage Park – Charterhouse	0	0	0	0	0	0	0	0	0
Policy HE4: Archaeology	0	0	0	0	0	0	0	0	0
Policy AC1: Accessible Transport Network	+	+	+	+	+	+	+	+	+
Policy AC2: Road Network	0	0	0	0	0	0	0	0	0
Policy AC3: Demand Management	0	0	0	0	0	0	0	0	0
Policy AC4: Active Transport Provision including Walking, Cycling and Micro Mobility	+	+	+	+	+	+	+	+	+
Policy AC5: Bus, Demand Response Transit and Rapid Transit	+	+	0	0	0	0	0	0	0
Policy AC6: Rail	0	0	0	0	0	0	0	0	0
Policy AC7: Freight	0	0	0	0	0	0	0	0	0
Policy EM1: Planning for Climate Change Adaptation	+	+	0	0	0	0	0	0	0
Policy EM4 Flood Risk Management	+	+	0	0	0	0	0	0	0
Policy EM5 Sustainable Drainage Systems (SuDS)	0	0	0	0	0	0	0	0	0
Policy EM6 Redevelopment of Previously Developed Land	0	0	0	0	0	0	0	0	0
Policy EM7 Air Quality	+	+	+	+	+	+	+	+	+
Policy EM8 Waste Management	0	0	0	0	0	0	0	0	0
Policy EM9 Safeguarding Mineral Resources	?	?	?	?	?	?	?	?	?
Policy EM10 Non Mineral Development in Mineral Safeguarding Areas	?	?	?	?	?	?	?	?	?
Policy EM11 Net zero operational carbon new build residential development	+	+	+	+	+	+	+	+	+
Policy EM12 Net zero (regulated operational carbon) new build non-domestic development	0	0	0	0	0	0	0	0	0
Policy EM13 Overheating in new buildings	+	+	+	+	+	+	+	+	+
Policy EM14 Embodied carbon and waste	0	0	0	0	0	0	0	0	0
Policy EM15 Noise	+	+	+	+	+	+	+	+	+
Policy IM1: Developer Contributions for Infrastructure	0	0	0	0	0	0	0	0	0
Policy CC1: City Centre	+	+	+	+	+	+	+	+	+



### Conclusion

- 2.7 The EqIA has examined whether the Regulation 19 Coventry Local Plan Review policies would have an adverse impact on or discriminate against different groups in the community with specific consideration to groups identified under the nine protected characteristics as identified in the Equalities Act 2010.
- 2.8 The assessment identified that all policies within the Local Plan are likely to have either a positive or neutral impact on the protected characteristics. No adverse impacts have been identified meaning it is not necessary to move further into the EqIA process and require action planning. The identified benefits will also have benefits for the wider community.
- 2.9 Based on the judgements made in the EqIA, it is not considered that any measures are required to mitigate against any adverse impacts. Due regard has been given to the three aims expressed in paragraph 149 of the Equalities Act and it is considered that the plan will work to eliminate discrimination by including policies that are inclusive, provide equal opportunity for all and foster good relations between persons where possible within the remits of Local planning. In addition, the specific Articles of the ECHR relevant to planning including Article 6 (Right to a fair and public trial within a reasonable time), Article 8 (Right to respect for private and family life, home and correspondence), Article 14 (Prohibition of discrimination) and Article 1 of Protocol 1 (Right to peaceful enjoyment of possession and protection of property) have been considered as part of the assessment undertaken in this EqIA document.
- 2.10 The Council will monitor the implementation and impact of the Local Plan policies through the production of its Annual Monitoring Report (AMR).



## HEALTH INEQUALITIES

<p><b>2.11</b></p>	<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> <p><b>Please answer the questions below to help identify if the area of work will have any impact on health inequalities, positive or negative.</b></p> <p><b>If you need assistance in completing this section please contact: Hannah Watts (<a href="mailto:hannah.watts@coventry.gov.uk">hannah.watts@coventry.gov.uk</a>) in Public Health for more information. More details and worked examples can be found at <a href="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</a></b></p>	
<p>Question</p>	<p>Issues to consider</p>	
<p>2.12a What HIs exist in relation to your work / plan / strategy</p>	<ul style="list-style-type: none"> <li>• 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>)</li> <li>• Consider protected characteristics and different dimensions of HI such as socio-economic status or geographical deprivation</li> </ul>	
	<p>Response: The local Plan evidence base calls upon a range of sources of information and a background paper on health has been produced in conjunction with officers from the public health team to ensure that health issues are considered in the development of the Local Plan review. The Local Plan Regulation 19 document has also been subject to independent Sustainability Appraisal which also includes consideration of health in that context.</p>	
<p>2.13b How might your work affect HI</p>	<p><b>Consider and answer below:</b></p>	



<p>(positively or negatively).</p> <p>How might your work address the needs of different groups that share protected characteristics</p>	<ul style="list-style-type: none"> <li>● 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</li> <li>● Consider what the unintended consequences of your work might be</li> </ul>
	<p>Response:</p> <p style="padding-left: 40px;">a. Potential outcomes including impact based on socio-economic status or geographical deprivation</p> <p>Coventry became a Marmot City<sup>3</sup> in 2013 and is committed to reducing inequality and improving health outcomes for all. Since 2019, the key focus is on children and young people, and following the impact of Covid19 on the city, also prioritising the effect on ethnic minority group communities. Healthy ageing is a challenge throughout England and the provision of good quality housing and access to employment is well established as contributing to better health and wellbeing – physical and mental.</p> <p>The effectiveness of reducing health inequalities is likely to be associated with the location of new development. In consideration of the land constraints in Coventry, the higher levels of housing are likely to be difficult to accommodate - homes may need to be small, more densely located and thus less able to meet the variety and adaptability of needs. Such levels of housing would also place pressures on the capacities of the open/green spaces in the city and thus, limit the health and wellbeing associated with such spaces.</p> <p>As set out in the EqIA above, the evidence and proposed policy changes take into account a range of needs to ensure that Coventry delivers the right types of development for a range of needs. Health is not just determined by individual and lifestyle factors but also the environment and communities in which we live, work and play. In the context of regeneration, the development of local areas can impact on their affordability for some communities. As a lower socio-economic gradient is associated with poorer health outcomes, this can lead to a worsening of health inequalities. The Local Plan review should not inadvertently widen health inequalities, but rather should seek to reduce them. This may require monitoring, particularly of impacts to deprived sectors of the population.</p>

<sup>3</sup> [www.coventry.gov.uk/policy-1/coventry-marmot-city](http://www.coventry.gov.uk/policy-1/coventry-marmot-city)



Employment: has a multitude of physical and mental health benefits such as increased self-rated physical health and mental health. The Local Plan review sets about many ways in which employment could be increased as a result of development, particularly in respect of the new build sector. The increase in office workspace in the city can have a positive impact, although it is recommended to be considered alongside the rise in demand and popularity of home/agile working. This needs to be reflected in how the relevant policies are developed particularly in relation to office space demand and forecasting for such realities.

Sustainable Transport: is a key part of The Local Plan review linked directly to tackling the challenges associated with climatic changes. Increased use of public transport can result in improved air quality which has a multitude of health benefits. Poor air quality is associated with exacerbation of asthma, cardiovascular disease and other respiratory conditions. In Coventry, 93% of residents live within 600m of a bus stop and most bus routes head towards the city centre. With the Local Plan review making various references to improved bus infrastructure, there is huge potential for increased useability, resulting in improved accessibility and social connectedness for Coventry people. However, it is recognised that increases in the cost of public transport could have a detrimental impact to affordability of sustainable transport, with knock on impacts on mental health and wellbeing, and therefore should be avoided where possible, albeit the applicable Local Plan Review policies have no control on public transport pricing.

Obesity: has been causally linked with several chronic diseases including diabetes, hypertension, stroke and certain forms of cancer. There is also increased risk of mortality with disproportionate impacts on those in a lower socio-economic position, those with disabilities and people with mental health problems. The 'obesogenic environment' refers to the role environmental factors play in determining nutritional and physical activity behaviours; and the obesogenicity of an environment is defined as the sum of influences that the surroundings, opportunities, or conditions of life have on promoting obesity in individuals or populations.

Obesogenic environments are implicit our everyday lives. Modern advances in technology and design have resulted in increased sedentary behaviour and less movement, for example through desk-based jobs, escalator use over stair use, and home deliveries over in person shopping. The Local Plan review includes policies to increase active travel modes of walking and cycling thereby supporting modal shift through reference to traffic dominance and policies to shift design and management of streets to incorporate cycle lanes and safer walkways.

However, infrastructure needs to be complemented by continual work to encourage, enable and facilitate walking and cycling within communities directly through policy but also indirectly through behaviour change initiatives. Benefits of

such initiatives include improved mental health and social connectivity, cleaner air, safer streets enabling children to play and less sedentary lifestyles. The COVID-19 pandemic may have resulted in people having increased unstructured time confined to their homes, and higher levels of stress and anxiety which are associated with overeating.

Availability, access and promotion of certain foods, particularly those high in fat, sugar and salt (HFSS) facilitate increased consumption of unhealthy food, which further contributes to obesity. More needs to be done to limit access to these foods, or increase availability, access and affordability of healthy foods especially in at-risk populations. It is with these considerations that it is recommended that spaces are designed with evidence of limiting further creation of obesogenic environments.

Housing: the potential negative health impacts of housing include sub standard internal and/or external conditions due to a variety of factors such as physical effects from mould, poor insulation/ventilation, internal air quality and overcrowding. Mental health effects such as depression and anxiety can also occur as a result of the physical effects. Poorly designed and built housing can limit an individual's ability to reach their potential and living in areas with high crime, lack of access to green and blue space coupled with litter can have adverse impacts on individuals abilities to choose to exercise outdoors. Adequate energy efficiency and insulation of homes is essential for reducing heating costs and limiting negative environmental impact. The Local Plan review will introduce bespoke targets through policies EM11, EM12, EM13 and EM14 to make new homes as sustainable as possible for all sections of the community.

Communities: a sense of belonging with one's neighbourhood has positive impacts for wellbeing. This forms part of the Index of Multiple Deprivation (IMD). An increased sense of belonging can improve deprivation and therefore health and wellbeing. This is a theme that comes through strongly in the Local Plan review with policies seeking to uplift areas by facilitating community cohesion and civic engagement. Design principles to create good quality, sustainable, inclusive and accessible places to live, work and play are referenced throughout the Local Plan review. Creating public spaces that encourage social interaction can have positive impacts on mental and physical health. It is recognised that continual assessment of need through community participation is crucial, particularly considering inward migration into the city and changing population dynamics.

Equally, adherence to design principals is key, with due consideration for different population groups including for example, people with limited mobility or people living with dementia, to support them in leading more fulfilling lives. While there are negative impacts of building on green space, Local Plan review policies indicate mitigations for this in line with NPPF guidance to make as much use as possible of previously developed land or brownfield land and to include green space in new developments. Equally, the commitment to working with



communities and community groups through means such as neighbourhood plans shows willingness for citizen-led participation.

**Affordability:** the Marmot Review highlighted that financial deprivation can be a barrier to living healthier lives. The current cost of living crisis therefore will inevitably impact many people across Coventry, particularly those who are already facing financial challenge. While costs fall outside the parameters of a Local Plan review, the reduction in disposable income, and its impact on paying for homes and heating, food and travel, and other necessities, and its inevitable impact on health and wellbeing, cannot be ignored. The Local Plan review seeks to mitigate these issues where possible through for example, creating a proportion of affordable homes and supporting infrastructure for active travel. It is recommended that these aspects, particularly the need for affordable housing and use of the viability loophole, is continually monitored to prevent people living in overcrowded and unsafe conditions as much as possible.

- 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.

This HIA has assessed the Local Plan review impacts on lifestyles, social and community influences, living and environment conditions, access and quality of services and macro-economic environment and sustainability factors. The Local Plan review publication draft (Reg 19) version is being written at a time where the country is in a post COVID-19 pandemic recovery, with opportunities to implement learnings to 'build back fairer'.

Policy JE1 seeks to provide economic growth and jobs. The policy would ensure a sufficient quantum of development opportunities are provided to meet the demand for economic growth and support the diversification of Coventry's economy. This will be beneficial in increasing employment opportunities for people who are currently unemployed.

Policy JE5 aims at providing Local Employment Areas characterised by a critical mass of industrial, warehousing and service activity with good access to local markets and employees. This will provide the needed local employment opportunities for people with lower qualifications.

Policy JE7 recognises that economic transformation cannot be achieved without new skills and training in the workforce. The policy seeks to ensure initiatives that provide training opportunities to assist residents in accessing employment opportunities are secured. Also, support will be provided to residents in applying for jobs arising from development. These policy approaches could potentially bring benefits for residents in deprived areas where low qualifications are barriers for gaining employment.



Policy H6 seeks to secure a percentage of affordable housing depending on the local housing values and land type with a percentage of new affordable homes required to be in accordance with the PPG. This policy is important in ensuring the housing needs of households of lower income are met and this will help to reduce inequalities. The policy also seeks to ensure that all new homes including affordable homes adhere to the design standards requirements and accords with the requirements for good design. Poor housing quality negatively impacts general health and wellbeing. As such, this policy is important in addressing health conditions associated with poor housing quality.

Additionally, other policies in the in the Plan such as Policy GE1 relating to green and blue infrastructure and Policy GE3 relating to nature conservation helps in addressing health inequalities.

Throughout the plan preparation period (2022-to date), there have been numerous challenges, supported by empirical evidence of increasing interest rates, a rise in the energy cap, higher average house prices, fluctuating levels of irregular migration<sup>4</sup>, social unrest<sup>5</sup>, taxation and inflation without concurrent pay rises. The Local Plan review is able to facilitate improvement in the health of the population of Coventry by using its influence to mitigate risks and create an environment in which all citizens can flourish. While the Local Plan review policies guide the design and location of future new build developments, it is recognised that individual behaviour changes are required to help improve one's own health.

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

The health policy of the Local Plan review, which requires major planning applications over a certain threshold to undertake Health Impact assessment has been strengthened and this will impact on proposals for different development typologies in the future to ensure that health matters are appropriately considered. The policies that have been reviewed in the Local Plan have been developed in more detail (after consultation feedback) and include an updated Health Impact Assessment to update the assessment undertaken for the adopted Local Plan and ensures that the policies take health matters into account. Throughout the review process, there are multiple references to creating good quality, long lasting, and accessible homes and developments.

<sup>4</sup> <https://www.gov.uk/government/statistics/irregular-migration-to-the-uk-year-ending-june-2023/irregular-migration-to-the-uk-year-ending-june-2023>

<sup>5</sup> <https://commonslibrary.parliament.uk/policing-response-to-the-2024-summer-riots/>



Alongside this, the mitigation of projected climatic change impacts through the introduction of new policies EM11, EM12, EM13 and EM14 is welcomed. Aligned to this new policy approach is the strengthening and celebration of the city's unique heritage, and this is linked to a stronger and more connected community identity which is conducive to good mental health and wellbeing. Retaining places of worship and cultural spaces will also further reinforce identity and connectedness in the city together with the strengthening of blue and green infrastructure policies.

The reference to both physical and mental health within the Plan is noted and considered important to help improve overall levels of health within Coventry. Furthermore, due consideration of mitigation of unavoidable negative health impacts are also apparent throughout the reviewed policies. Given the above, the recommendations for policy is to make more explicit reference to both positive and negative health impacts and any appropriate mitigations. This seeks to support policy development in giving due consideration to health matters in the Local Plan Review. Other recommendations seek to account for or emphasise health issues brought to the forefront through the covid-19 pandemic and minimise risk of inadvertently widening the inequality gaps that already exist across the city.

**2.15 Thinking of the main aims of your work area that this EIA is for; does your work area impact digital inequalities or exacerbate them?** Does your work assume service users have digital access and skills? Do outcomes vary across groups, for example digitally excluded people benefit the least compared to those who have digital skills and access? Consider what the unintended consequences of your work might be.

The Review of the Coventry Local Plan will, directly and indirectly have a positive impact on reducing digital inequalities. Directly, this will occur through the continued positive promotion and encouragement of new or improved social and community facilities through policies CO1-3. In providing social, community and leisure services the provision and use of shared spaces, community facilities (such as meeting and sports venues, cultural buildings and places of worship) and other local services to enhance the sustainability of communities and residential environments. In doing so many, if not all of these facilities will have public internet access, for example in all community libraries across the city, members of the community can access online services at no personal cost to themselves other than through their required Council Tax payments.

Indirectly, policy IM1 sets out the approach to developer contributions for infrastructure and it is recognised that the delivery of infrastructure to support digital inclusion through improved telecommunications that will require a partnership approach. The Council has an important role to play in setting the level of and securing developer contributions that will help to deliver the necessary digital infrastructure to support development and growth. In line with its role and responsibilities, the Council will have a lead role in coordinating and delivering infrastructure in Coventry to support growth.



**2.16 Where are the opportunities for your area to reduce digital exclusion inequalities and embed supports/interventions as part of your work?** If any digital inequalities are identified how can you reduce these? For e.g. if a new service requires online registration you may work with partner organisations to improve digital skills and ensure equitable processes are available if someone is unable to access online.

A digitally accessible city will allow people enhanced freedom of choice about where and how they work, how they interact with services and facilities and how they promote and operate their businesses. The Local Plan Review will also support the city centre and its role within Coventry's electric city initiatives and its position as a Gigabyte City. A connected community is a more sustainable one, as it represents the opportunity for a reduction in car-based commuting and a commensurate reduction in carbon outputs and traffic congestion. It also promotes Coventry as a suitable place for high technology activities and employment to take place, especially in accordance with the growth and continued success of the city's two universities.

Despite the nationwide installation programmes of major suppliers there is a genuine risk that gaps will continue to remain within the market, especially within new developments that grow and expand the existing urban area. Indeed, the Council is aware of recent developments across Coventry where superfast broadband has been installed from the outset and as a result is helping residents directly access online services. Telecommunications infrastructure will continue to be of great importance through incorporating such provisions at the initial development stage. It also highlighted that within predominantly urban areas where existing networks can be connected and enhanced the cost of delivering such provisions is highly unlikely to have an impact on development viability when delivered from the outset in partnership with a specific provider. Through this Local Plan Review, the Council will continue to support and encourage through its policies ultra-fast broadband connectivity and will therefore aim to support the delivery of ultrafast broadband to throughout the plan period. Any opportunity to accelerate or increase connectivity across Coventry will be supported at every opportunity.

Finally, the way we engage, involve and consult with communities as we progress the Local Plan Review in line with the Statement of Community Involvement (SCI) recognises the issue of digital inclusivity. The SCI sets out how we engage, consult and involve through a range of mediums both digitally and in person.

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

The Local Plan already includes monitoring indicators, and these will need to be developed in accordance with the review of and introduction of new policies as part of the review process. However, there is scope to improve the monitoring process and this will be developed in more detail as the Local Plan review progresses through the regulatory process towards proposed submission.

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

No.

## EQUALITY IMPACT ASSESSMENT (EIA)



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](mailto: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:**

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	

## EQUALITY IMPACT ASSESSMENT (EIA)



### 4.0 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

### 5.0 Approval

<b>Signed: Head of Service:</b> Rob Back	<b>Date:</b>
<b>Name of Director:</b> Andrew Walster	<b>Date sent to Director:</b>
<b>Name of Lead Elected Member:</b> Cllr. Naeem Akhtar	<b>Date sent to Councillor:</b>

Email completed EIA to [equality@coventry.gov.uk](mailto:equality@coventry.gov.uk)

# **Coventry City Council**

## **Coventry Local Plan Review**

### **Issues and Options Consultation**

#### **Regulation 18: Consultation Statement**

**Sept 2024**

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## 1. Introduction

1.1 Coventry City Council adopted its Local Plan and accompanying Area Action Plan for the City Centre in December 2017. The Government currently requires that the policies of the adopted Local Plan should be reviewed every five years to see if they are up to date or whether they need changing, rewriting or deleting, to reflect changes to national policy or other matters.

1.2 As part of this process, the Council undertook an Issues and Options Consultation between Tuesday 18 July and Friday 29 September 2023. This offered the opportunity for comment on our ideas for updating the plan, in accordance with Regulation 18 of the Town and Country Planning (Local Development) (England) Regulations 2012. This was supported by the Sustainability Appraisal Initial Report and Equalities & Health Impact Assessment, on which comments (representations) could also be made during the consultation period.

1.3 The purpose of this consultation statement is to set out how the Council undertook this consultation and the findings that emerged from it. The following document summarises how the Council consulted, who was invited to make representations, the comments that were received and how we have responded to these in the Local Plan Review.

1.4 The Council received 930 separate responses resulting in 1719 individual representations during the Regulation 18 consultation. This statement summarises the main comments received and the Councils response to them when reviewing the local plan.

1.5 This report has been produced in accordance with Town and Country Planning (Local Development) (England) Regulations 2012. This states that a Consultation Statement has to be produced to show:

- Which bodies and persons were invited to make representations under Regulation 18;
- How those bodies and persons were invited to make representations under Regulation 18;
- A summary of the main issues raised by the representations;

- How any representations have been used to inform the review.

1.6 The Consultation Statement will assist the Inspector at the Examination in determining whether the Councils Local Plan Review complies with the requirements for public participation and government guidance. The report shows that the consultation carried out by the Council has complied with the statutory requirements set out in the Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 18). The report also shows that public engagement was carried out following the approach set out in the Councils Statement of Community Involvement (SCI)<sup>1</sup>.

## **2. Consultation Approach**

2.1 There is considerable flexibility open to Local Planning Authorities in how they carry out the initial stages of plan production, provided they comply with the specific requirements in Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, in respect of consultation, and with the commitments made within the Councils Statement of Community Involvement (SCI).

### **Promotion of the consultation**

2.2 Consultation on the Local Plan Review Issues and Options (Regulation 18) document took place between 18 July 2023 until 29 September 2023.

2.3 The Regulation 18 consultation was promoted through a variety of means.

- Formal notifications of the consultation were sent via the Council's consultation management system to the specific and general consultation bodies set out in the SCI as well as other individuals and organisations on the Councils Local Plan consultee database that requested to be notified. Follow-up emails were also sent out when the consultation was extended (the deadline was initially 12<sup>th</sup> September and was extended to 29<sup>th</sup> September 2023).

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<sup>1</sup> [https://www.coventry.gov.uk/downloads/file/37080/statement\\_of\\_community\\_involvement\\_july\\_2021](https://www.coventry.gov.uk/downloads/file/37080/statement_of_community_involvement_july_2021)

- A follow up email was also sent to all of the statutory Duty to Co-operate bodies requesting that they take note of the consultation and contact the council if there were specific strategic issues they wished to discuss.
- The Councils Planning Policy bespoke Local Plan Review webpage was used to outline the Local Plan Regulation 18 consultation events. This gave people access to information on the consultation as well as the Issues and Options consultation document, a non-technical summary, the Sustainability Appraisal document, the Equalities & Health Impact Assessment document and other supporting documentation including the evidence base and a series of topic papers. A video was also included which explained the review and how people could respond.
- The Issues and Options consultation, the Sustainability Appraisal documents, and the Equalities and Health Impact Assessment document were all made available online and in hard copy at the Council House and in public libraries. Libraries have specific facilities to enable disabled users to access the consultation material including large print screens. The response form template can be seen at Appendix 1.
- A press release was issued on 23<sup>rd</sup> July 2023 (see Appendix 2).
- Social media was also used (see Appendix 3 for the report on this use) and this included:
  - 15 posts on Facebook and X, and 2 on LinkedIn, on the Councils official social media accounts during the consultation period.

### Consultation events and Hard to Reach Groups

2.4 A comprehensive round of drop-in sessions were carried out across several public libraries which involved officers answering questions and making available the Issues and Options consultation documents to anyone who attended. These included the following events:

Location	Date and Time
Central Library	22 July 2023, 10am – 12noon
Earlsdon Library	27 July 2023, 2pm – 4pm
Hillfields Library	28 July 2023, 12noon - 2pm

Location	Date and Time
Aldermore Library	1 August 2023, 11am - 1pm
Jubilee Library	8 August 2023, 5pm - 7pm
Bell Green Library	11 August 2023, 3pm - 5pm
Coundon Library	14 August 2023, 2pm – 4pm
Central Library	19 August 2023, 10am – 12noon
Central Library	23 August 2023, 9am – 11am
Stoke Library	24 August 2023, 5pm - 7pm
Keresley Library	30 August 2023 3pm - 5pm
Tile Hill Library	1 September 2023, 10am – 12noon
Cheylesmore Library	5 September 2023, 10am - 12noon
Willenhall Library	7 September 2023, 12noon – 2pm

2.5 The image below is an example from one of the library drop-in sessions.



2.6 A webinar was held for the public on 11<sup>th</sup> September 2023 which was attended by 12 people from the local residential and business community.

2.7 Hard-to-reach groups, who may be affected by the review of the local plan, were proactively invited to discuss the review with officers in a way which was best suited to their needs including targeted workshops, and / or attendance at their own group meetings and venues. The outcomes are set out in Section 3.

## Feedback

2.8 Comments from all respondents could be provided in various ways, including:

- Comments forms (available both online and hard copy versions);
- Online, directly via Inovem (the Council's consultation system);
- Submission of letters and emails.

## 3. Responses to the Consultation

3.1 As a result of the methods outlined in Section 2, a total of 1719 comments were received against all questions by 930 separate respondents during the consultation.

3.2 Comments were received from a wide range of individuals and organisations including statutory and non-statutory consultees, special interest groups, individual residents, developers and their agents.

3.3 A summary of all responses submitted and how the review has responded to these is set out later in this chapter (*Table 1*). In terms of the various workshops and meetings held these are summarised in the below paragraphs.

### Hard to reach groups

3.4 As previously mentioned, Council officers attended a range of separate meetings where specific engagement was proactively sought with suggested local hard to reach groups. Several responded and the main points raised (and the Council's response) are as follows:

#### *Carriers of Hope: Supporting Refugees, Asylum Seekers and other Migrants*

3.5 Key points raised included concern over regeneration and the relocation of businesses, a need for well-funded community spaces, the need for decent affordable housing of the right size to meet a variety of needs, the need to maintain existing stock (for example broken lifts), lack of amenity space in housing, long waiting lists, the need for well-maintained green space, and too much student accommodation.

3.6 Council's response: whilst some issues are outside of the scope of what the Local Plan can do (e.g. maintenance issues), the need to improve building standards and support the provision of community and green spaces as well as ensuring that the right

kind of housing stock is delivered over the plan period is very much within the scope of the plan review and these issues are being addressed especially through the housing, community, green infrastructure and environmental management policies of the plan.

*St Francis of Assis Church, Radford (Providing support on employment, skills, ESOL, community support, volunteering, a foodbank and a social supermarket)*

3.7 Concerns were raised about the lack of council housing, the amount of student accommodation and the number of Homes in Multiple Occupation (HMOs).

3.8 Council response: the need to rebalance the type and amount of housing – including student accommodation - is recognised and forms an integral part of the review and update of housing policy. In terms of the issue of HMOs the Council is producing a separate Development Plan Document to manage planning policy on this issue to ensure standards are improved and has also introduced an ‘Article 4 Direction’ to manage the situation in those wards where the situation faces the most pressure.

*Earlsdon Retirement Village*

3.9 Comment was made about uneven and badly maintained pavements, tree routes, poor lighting, parked cars on pavements and dropped kerbs in wrong places makes mobility hard for elderly people, especially those with mobility scooters. There was also concern about the city centre and local shops, which are shutting and there is a lack of independent shops.

3.10 Council response: maintenance and traffic enforcement issues sit outside of the local plan, but the relevant teams have been made aware of the comments. The local plan policies on design, accessibility and traffic management are being reviewed and updated. In terms of the comments about shops shutting down (and the lack of independents shops) much of this is due to changing shopping habits and market forces. However, the local plan policies will encourage a variety of uses in town centres and will also support improvements to the local environment to help them attract footfall.

### *Multi-Faith Group*

3.11 The group considered the creation of a religious quarter around Hillfields, better linking up and making it easier for people from outside the area to visit the different significant places of worship. It was commented that there is a lack of housing for large families. There are parking problems on inner city streets especially when large events happen, and electric vehicle charging points are now taking room up. It can be hard to get permission to extend a place of worship, so sites further afield have to be sought. New housing developments should include community space and places of worship.

3.12 Council response: the need for religious and community facilities is noted and the policies of the plan are being reviewed to ensure they are flexible to meet a variety of needs. Parking and travel policies are being updated so they are more reflective of the Council's adopted transport strategy. In terms of housing the policies are to be updated to be reflective of evidenced local need.

### *Disability Equality Action Party (DEAP)*

3.13 The group commented that there is not enough housing for people with disabilities. All properties should be wheelchair accessible. Pavement design, signage and the distance between disabled parking and places is crucial to allow disabled people to move and navigate traffic as easily as able-bodied people. Accessible public toilets should be an obligation of all planning permissions along with cameras and good lighting. Housing developers need to consider from the outset that all facilities provided are inclusive, such as gyms, which are not always suitable for people with disabilities.

3.14 Council response: the issue over housing accessibility and adaptability is being addressed through reviewed planning policy including the introduction of wheelchair-accessible standards. In terms of the other comments, these are being considered through a review of the design policies of the Local Plan.

### *Homelessness Forum*

3.15 Following a discussion there was broad support for the proposed changes to policies H4, securing a mix of housing and H6, affordable housing to reflect and promote the councils preference for social rent. It was agreed that all major

developments should demonstrate how health issues have been addressed and that a checklist would be a good idea.

3.16 Council comment: the comments from the discussion have been noted in terms of taking the review forward.

#### *WMCA Homelessness Unit*

3.17 It was commented that the flow of new people makes it a continuous challenge, but there is enough specialist homeless accommodation in Coventry, however, there are many reasons why people don't use it from substance abuse, safety, trauma, not wanting to lose their street community and so on, it is very much down to an individual's preference and personal situation. In wider terms, housing initiatives rely on social housing and landlords but there is a lack of stock in both the public and private sector.

3.18 Council response: the comments relating to specialist accommodation are noted, and in terms of the wider housing issues these are being considered through a review of the housing policies of the Local Plan particularly in terms of the affordable housing policy.

### **Business and community**

#### *The Federation of Small Businesses (FSB)*

3.19 A meeting was held with the Federation of Small Businesses. Feedback highlighted a lack of incubator, grow-on, hotdesking, coworking, and shared spaces. There is no suitable space for creative, digital or freelance companies. Affordability and T&Cs for small business are often not viable. Permitted Development rights should be removed to protect key office space. Concern over the loss of independent businesses because of regeneration schemes. Rail connections to and from Coventry are poor – to and from Warwick is difficult and there are only 2 trains to London per hour post-covid. Car parking charges too much in city centre. Deliveroo, Uber eats, having effect on footfall in city centres.

3.20 Council comment: the need for a range of business unit sizes and flexible and adaptable spaces is recognised and the policies will be updated to reflect this need in



line with an updated local evidence base. Some of the issues raised are beyond the scope of the local plan such as changing patterns of takeaway delivery although the policies of the plan are being reviewed so that they reflect national policy on town centres to ensure they remain vibrant and viable. Accessibility and travel are being addressed – where they are within scope of the local plan – in line with the Council’s recently adopted transport strategy.

#### *Other events*

3.21 The Council attended a business engagement event to give a presentation on the Local Plan Review on 6<sup>th</sup> September 2023, hosted by Marrons and similarly a Breakfast Event hosted by the Coventry and Warwickshire Chamber of Commerce on 8<sup>th</sup> September 2023. The Council also attended a local plan-focused workshop held by the Coventry Society on 5<sup>th</sup> September 2023. At all events officers advised on how to respond to the consultation.

#### **Comments from individuals and organisations**

3.22 The key issues raised by respondents to the consultation are summarised in *Table 1* below. A comprehensive capture of all respondent comments can be found online. Alongside the Local Plan Review Issues and Options Document, the Council also published a Sustainability Appraisal (SA) initial report and an Equalities/Health Impact Assessment (EqIA), and these documents were all available for public comment. Comments were received in respect of the SA (summary included in the table below) and no comments were received in respect of the EqIA report.

Table 1: Regulation 18 and SA Responses Summary Report

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<b>Chapter 2 review - Health and Wellbeing</b>			
<b>Review of Policy HW1 Health Impact Assessments (HIA)</b>			
Q1 Do you have any comments on our proposal to expand policy HW1 so that all major developments are required to demonstrate how health issues have been considered and addressed either within the Design and Access Statement or separate supporting health statement?	<p><b>Context:</b> currently the trigger for requiring Health Impact Assessment relates to residential developments of 150 homes or more. Given that so many developments are smaller than this in Coventry it was queried whether the threshold should be lowered, and whether there could be other ways of ensuring major developments (10 or more homes) should demonstrate how they have taken account of health issues.</p> <p><b>Responses</b> (37). Of these, 15 supported, 10 objected and a range of other comments were received. Those supporting felt that the Health Impact Assessment should also be updated, and that PBSA should be included. Those objecting said that this would be excessive, that the process was unclear. Others commented that it would be appropriate to consider health impacts through the Design and Access Statement, that a change to the threshold would need to be justified, and that Health Equality Impact Assessments would be more affected. Others commented on the need for health infrastructure. One commented that there was no Health Impact Assessment for the Regulation 18 document.</p>	<p>Expansion of the policy to ensure major applications (10 dwellings and over) have regard to health and wellbeing will be considered further, and it is important that this is proportionate and manageable both for those preparing applications and for those assessing them. It is also important to be clear and not duplicate other policies. Proposed that this is done through Design and Access Statement and that the SPD is expanded to provide further guidance.</p> <p>Propose that PBSA and other forms of residential development should also require HIA. In terms of the comment on a Health Impact Assessment of the Regulation 18 document itself, this was included with the Equality Impact Assessment and</p>	Update policy to include a requirement to have regard to health via Design and Access Statements and further guidance to be included in an updated Health SPD.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
		was consulted upon as part of the process.	
Q2 Do you have any comments on the proposed checklist and its content?	<p><b>Context:</b> in relation to the suggested policy change to HW1 (above) it was proposed that a checklist should be introduced for major developments that did not meet the threshold for a full Health Impact Assessment to ensure that they still account for health in their development proposals.</p> <p><b>Responses</b> (29). A number of respondents suggested topics which they felt should be included e.g. transport, parking, energy efficiency, active lifestyles, health infrastructure, air quality. Some felt health should not be 'split out' but should underpin all policies, others said it was too onerous or duplicated other policy areas. Some were concerned that health related infrastructure had not been delivered. It was commented that neighbourhood planning could play a role.</p>	See above. Consideration will be given to the best way of ensuring that health issues can be addressed through the process, working closely with Public Health and taking into account the proposed review of the Health Impact Assessment SPD.	See above comments.
Q3 Given the significant implications development proposals can have on people's physical and mental health, what do you think the proportional threshold for housing	<p><b>Context:</b> options were proposed for reviewing the threshold for requiring a full Health Impact Assessment for development proposals.</p> <p><b>Responses</b> (25). A mix of responses were received. Some felt HIA should be required on a case-by-case basis others had differing views on what level should trigger a full HIA. Some felt other developments should also require HIA (not</p>	In terms of the threshold this is set though the explanatory text to policy which is then pulled through into the Health Impact Assessment SPD. A review of the SPD is underway, and this will be consulted on in due course.	Threshold to remain as per current policy, however it will also be clarified that PBSA and

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<p>developments requiring a full HIA should be:</p> <p>A. Unchanged – 150 dwellings or more – please explain why</p> <p>B. 100 dwellings or more – please explain why</p> <p>C. 50 dwellings or more – please explain why</p> <p>D. Other – please explain why</p>	<p>just residential). Others felt the Design and Access statement was an appropriate place to address health matters.</p>	<p>There was no clear consensus on whether the threshold triggering full HIA should change therefore it is recommended this remains the same. However, it should also be clarified that PBSA and other types of residential accommodation will require HIA if these are for 150 bedspaces and over.</p>	<p>other types of residential accommodation will require HIA if these are for 150 bedspaces and over.</p>
<p>Q4 In terms of Outline applications and given how development proposals can change between outline approval and the reserved matters stage, when should HIAs and health checklists be required?</p> <p>A. At Outline stage only – please explain</p> <p>B. At Outline and reserved matters stage – please explain</p>	<p><b>Context:</b> this question was aimed at exploring the detail of implementing policy on requiring Health Impact Assessments and other health related information and at what point in the decision making process this should be required.</p> <p><b>Responses</b> (33). The majority (16) felt that it should be required at both stages. However, there were 8 objections, with respondents feeling this would be unduly onerous. Others made recommendations and suggestions: HIAs should only be required at outline unless it was clear further detail would be needed later, they should only be required for full / reserved matters applications, the HIA should set out broad principles / parameters for outline applications (which could sit within a DAS or be dealt with</p>	<p>Any outline approval would include a requirement to undertake HIA at the Reserved Matters stage.</p>	<p>No further change.</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	through a screening approach) then could move into a full assessment at Reserved Matters Stage.		
<b>Chapter 3: Review of the Overall Levels of Growth and the Duty to Co-operate</b>			
<b>Review of Policy DS1: Overall Development Needs</b>			
<p>Q5 Do you have any comments on the Council’s view that it should be using the HEDNA figure with the 35% uplift removed to establish its local housing need?</p>	<p>The majority of responses (30 out of 48, primarily from the development industry) objected to the removal of the 35% from the calculations. Various reasons were given, the most common being that this was a departure from national policy. Many felt that the approach undermined the HEDNA (and cross boundary working) and that the needs of the HMA should be dealt with as a whole. Other reasons given were that this was not positive planning, lacked ambition, would compromise economic development and also the delivery of affordable housing, and any shortfall should be exported.</p> <p>Several respondents (12/48) did support the proposal however as they consider the uplift is not evidenced, it is arbitrary (as shown by an LUHC cross party report), a similar approach is being followed elsewhere, too much housing will unbalance the economy, the 35% does not address local need.</p> <p>A range of other comments were made on more general issues such as all projections being too</p>	<p>In terms of the 35% being part of the standard method (NPPF 2023), this is acknowledged to be the case although this does not mean it is fair, evidenced, reasonable or justifiable as a national approach and has not been factored into the NPPF to meet local need but is aimed at meeting a national housing target.</p> <p>The HEDNA is an alternative and robust method for calculating housing need and this includes a local need figure, separated out from a figure where an uplift has been applied.</p>	<p>Utilise the HEDNA local need figure.</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	high (or low), a new MoU being needed, any figure needing to be a minimum, need to consider the impact of emerging new data sets, original figures being overestimated and SUEs not being needed, separate out the student population, the 2021 Census is not the answer to everything.		
Q6 Do you have any comments in relation to the alternative growth scenarios, or other options which the Council should consider? [housing]	<p><b>Context:</b> The three scenarios presented for the plan period 2021 were:</p> <ul style="list-style-type: none"> <li>• the Government default standard method using 2014 population projections (63,760 dwellings / 3,188 pa)</li> <li>• The HEDNA method using 2021 census data (39,280 or 1,964 pa)</li> <li>• The HEDNA method with the 35% uplift removed (29,100, or 1,455 pa)</li> </ul> <p><b>Responses (29):</b> there were fewer responses to this question than the previous question which specifically focused upon the 35% uplift. There was a clear preference for using the HEDNA method (favoured by 10 out of 29 responses). There was little support for the highest figure (the use of the 2014 projections) with only a couple of developer responses preferring this. A couple of respondents felt all figures were too low, and some felt they were all too high but did not offer alternative methods. One respondent did propose an alternative way of calculating need, supported</p>	<p>The Council considers that the HEDNA method is robust and is an appropriate method upon which to base plan making, this has been further reinforced by an additional report for Coventry. It is considered that the Local Need figure is appropriate as it is assessed based on local data: the uplift is unevidenced and arbitrary and bears no relevance to local context.</p> <p>It is not considered appropriate for some of Birmingham's growth to be addressed as Coventry sits in a different Housing Market Area, as defined by the HEDNA in line with national planning guidance.</p>	Proceed with option 3 (HEDNA local need with no uplift).

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	<p>by substantial documentation. Another suggested that the sub regional market signals study should be used. A number of developers proposed that the plan should be accommodating some of Birmingham’s growth.</p> <p>Some commented that by deleting the 35% uplift as an option, this was a departure from the standard method. A couple of respondents cited the need for a student demand study. Others advised that high growth was needed to help with delivering sufficient affordable housing. There were also comments on the need for infrastructure, and a need to focus more on the north of the city as there was already a lot of investment in the south.</p>	<p>Whilst in terms of monitoring housing numbers the Council is allowed to include PBSA (in line with government reporting methods) it is agreed that more evidence is needed on the student market, and this has been prepared.</p> <p>In terms of appropriate levels of growth and where this will be accommodated (and infrastructure needs in relation to this) this has been considered as part of further assessment work.</p>	
<p>Q7 Do you have any comments on the overall Employment Land Needs for Coventry?</p>	<p><b>Context:</b> The employment land needs were taken from the HEDNA, 8.5ha office, 147.6 ha general industrial excluding strategic B8, and 551 hectares strategic B8 (large scale warehousing /logistics) but across the Coventry and Warwickshire sub region.</p> <p><b>Responses</b> (29). These were almost evenly split between those who supported (10) and did not support (9) the HEDNA figures although many responses did not comment either way but instead offered a range of comments. Some respondents wanted more growth, some less, there was concern about economic imbalance</p>	<p>In terms of the reference to the wrong figures being used in table 4 (which lead to the conclusion of an oversupply) this is acknowledged to be the case and has been corrected.</p> <p>The issue of the emerging evidence on strategic employment (B8 and B2) has been considered.</p> <p>Updated evidence has informed revised figures including the West Midlands Strategic Employment</p>	<p>Figures updated in line with evidence.</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	<p>with the ‘gig economy’, large sheds, aligning economic and housing growth, using / not using Green Belt, overestimating need due to hybrid working, not clear on what is being proposed. Some comments referred to the emerging regional evidence and wanted to see strategic B8 and strategic B2 addressed by the plan. It was also highlighted that the oversupply figures in table 4 are incorrect as they are sourced from Table 9.4 of the HEDNA which illustrated an option which the HEDNA dismissed.</p>	<p>Sites Study (WMSESS), the Coventry and Warwickshire WMSESS / HEDNA Alignment Report and the Coventry Employment Land Review and Office Market Addendum.</p>	
<b>Review of Policy DS2 (Duty to Co-operate)</b>			
<p>Q8 [Duty to Co-operate policy] Do you have any comments on our proposed amendments to Policy DS2?</p>	<p><b>Context:</b> The consultation proposal was to update the policy (e.g. to replace the now defunct LEP references with the WMCA, improve references to joint projects and monitoring).</p> <p><b>Responses (33).</b> The majority agreed with the updates, there was no disagreement. Some used the question to promote particular sites, or comment on procedural issues under the DtC such as producing an updated MoU. It was also commented that replacing the reference to the LEP with the WMCA needs consideration as the roles are very different.</p>	<p>It is agreed that the roles of the LEP and WMCA are very different so it is proposed that reference should be added in about ‘partnership working’ as this goes beyond the Duty to Co-operate bodies and provides future resilience in line with any changes which may occur.</p>	<p>Include a reference to partnership working in policy.</p>
<b>Review of Policy DS3 (Sustainable Development)</b>			



Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<p>Q9 [Sustainable development policy] Do you have any comments on our proposals to update Policy DS3?</p>	<p><b>Context:</b> The consultation proposed that the policy should continue to reflect the NPPF but could also now include reference the One Coventry Plan and Climate Change strategy.</p> <p><b>Responses</b> (15). The majority (13) supported the change, there were no objections. A few commented on the need to ensure the plan is viable, and the plan needs to provide more detail.</p>	<p>The One Coventry Plan and Climate Change Strategy should be referenced in the policy.</p>	<p>As per the officer response.</p>
<p><b>Review of Policy DS4 Part A (general masterplan principles), part B (Whitley) Part C (Keresley SUE) Part D (Eastern Green SUE)</b></p>			
<p>Q10 [general masterplan principles] Do you have any comments on our proposed updates to Part A of policy DS4?</p>	<p><b>Context:</b> The consultation suggested that Part A of DS4 (general masterplan principles) could strengthen references to design and cross reference to design policy.</p> <p><b>Responses</b> (18). A majority (11) supported the proposed changes, there were no objections. Some wanted flexibility as not all developments require a masterplan and design principles / references to layout plans etc were proposed as alternative options. Some felt these would sit more appropriately under the design policy and it was felt there might be duplication which could be confusing. Comments were also made on embedding net zero, energy efficiency, drainage strategies and other climate change measures and understanding what makes a community.</p>	<p>Need to avoid duplication with other policy areas as this could be confusing. Design and climate change policies could be strengthened. AAP policies reviewed and pulled through to Local Plan.</p>	<p>Design and climate change policies strengthened . AAP policies reviewed and pulled through to Local Plan where relevant.</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	Ensuring that existing masterplans (as referenced in the AAP) were pulled through to the main Local Plan eg CC24.		
Q11 Do you agree that we should make a minor change to B, C and D in terms of changing the references to use classes to reflect new legislation?	<p><b>Context:</b> The consultation proposed that DS4 (general masterplan principles) parts xi and xii should emphasise green infrastructure and biodiversity, and that the policy should also be updated to reflect national changes to the Use Classes Order.</p> <p><b>Responses</b> (15). There was clear support for the changes to reflect new legislation. A number of comments were made in relation to site specifics, the need for more emphasis upon green infrastructure, observations on mitigation, the need for accessible routes.</p>	Support noted. Comments noted however because many relate to specific sites and other matters these are picked up in the appropriate more detailed sections of the plan. Duplication of policy with other areas to be avoided as this is confusing.	Minor update to Use Classes references.
<b>Chapter 4: Jobs and Economy</b>			
Q12 Do you have any comments on our proposals to introduce a <b>new policy</b> which defines our definition of 'employment' for planning policy purposes?	<p><b>Context:</b> Given the changes to the national definition of employment uses (the deletion of Class B1 and the new Class E uses) it was proposed that a new policy should be introduced which clearly defines what is now meant by 'employment' for the application of local policy. For the purposes of employment supply and monitoring it is proposed this now relates to Class E Part g (I to iii) plus B2 and B8, and for decision making that this relates to Class E Part g (I to iii),</p>	Definition to the provided in explanatory text rather than policy. It is considered to be consistent with national policy but is needed in terms of clarification.	Definition to the provided in explanatory text.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	<p>Classes B2, B8 and other uses serving an employment purpose. It was also suggested that in some instances there may be a need to remove permitted Development Rights to protect employment.</p> <p><b>Responses:</b> (20) – 11 agreed. Others commented that definitions should be consistent across the sub region, that there should be consistency for monitoring and decision making, ‘any other use’ is too vague, don’t try to change national policy, more work needs to be done on B8. Some questioned the potential removal of PD rights and what this would achieve. It was also questioned whether this needed a new policy or whether the redefined definition should be explanatory text (preamble).</p>		
<b>Review of Policy JE1: Overall Economy and Employment Strategy</b>			
<p>Q13: Do you have any comments on our proposals that Policy JE1 could be strengthened in line with our proposals?</p>	<p><b>Context:</b> The consultation proposed that the policy could be strengthened to reflect the One Coventry Plan and the Climate Change strategy including supporting Green Industry, sustainably located employment and more green infrastructure as part of new developments.</p> <p><b>Responses</b> (17). 16 respondents agreed with the proposals, no-one disagreed, one representation related to a site being promoted. Various comments were received about the need for sensitive design, being clear about the types of</p>	<p>The support is noted as are the comments. Clean, green and energy efficient developments are likely to encourage further investment in an area, but it appreciated that this is not a ‘one size fits all’ and policy updating has been carefully considered so that it is clear and deliverable.</p>	<p>Update policy in line with proposed changes to reflect the One Coventry Plan and the Climate Change</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	<p>development covered, the need to apply sustainability criteria to all new development. Clarity was suggested on maximising roof spaces – reword to ‘maximise the proportion of roof space’ (for solar panels), improvements to green infrastructure to include canals, be more ambitious, maintenance of green space is proportionate, don’t be too onerous and discourage new investment, costings need to be considered.</p>		<p>strategy including supporting Green Industry, sustainably located employment and more green infrastructure as part of new developments.</p>
<p>Q14: Do you have any comments, or local evidence which might be helpful in assisting us develop standards for new employment sites?</p>	<p><b>Context:</b> This was a follow on to question 13, above, to see if there was any feedback on developing specific standards.</p> <p><b>Responses (8).</b> Responses were mixed, general comments on the nature of warehousing jobs, the need for employment and housing to be located close to each other / near sustainable transport, for travel plans to be maintained, to co locate employment sites where the uses have something in common and a suggestion to allocate central city industrial estate.</p>	<p>Comments are noted however no particular, specific new standards were proposed. Locational issues are considered in JE1, and the Employment Land Review considers the potential role of Central City.</p>	<p>No further change</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<b>Review of Policy JE2: Provision of Employment Land and Premises</b>			
<p>Q15: Do you have any comments on the supply of employment land? [Policy JE2 – provision of employment land and premises]</p>	<p><b>Context:</b> The question asked related to the growth figures provided by the HEDNA (see also Policy DS1) for employment needs and considered the Council’s figures for allocated and non allocated sites, and supply vs need figures. <b>Responses (16).</b> As also raised in the ‘overall growth’ section the figures relating to need and supply need correcting. The HEDNA does not include strategic B2. Several commented that there is a need to work with neighbouring authorities and that the MoU and SoCG need updating. Supply is being constrained by having only two sites over 10ha. Table 17 is oversimplified as supply figures are gross whilst HEDNA is net. Market signals evidence has not been taken account of. Some expressed concern that B8 uses provide low value jobs. Some employment sites need protecting as such. Net zero projects should be encouraged. Some commentators were promoting various sites. It was commented that some allocations do not yet have planning permission.</p>	<p>The evidence base has been updated through the West Midlands Strategic Employment Sites Study, the HEDNA, and Alignment report (linking the aforementioned reports), an Employment Land Review and Office Market Addendum, and updated supply figures (HELAA).</p>	<p>Updated figures and allocations detail informed by evidence.</p>
<p>Q16: We are always keen to understand the employment land needs from local businesses</p>	<p><b>Context:</b> This question was aimed at establishing whether there were any additional sites or opportunities for employment.</p>	<p>Assessment work undertaken to inform allocations.</p>	<p>Sites assessed to inform the review.</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<p>and residents. Therefore, do you have:</p> <p>A. A site you wish to promote? Please provide as much detail as you can, using the Call for Sites form at Appendix 1</p> <p>B. A site you would like us to investigate? Please provide as much detail as you can</p> <p>C. Another suggestion or comment – please provide detail.</p>	<p><b>Responses (10).</b> A number of sites were proposed. Additionally, the matter of addressing strategic B8 was cited.</p>		
<p>Q17: Do you have any comments on our proposed changes to part 3 of Policy JE2?</p>	<p><b>Context:</b> This question related to Part 3 of policy JE2 which refers to the 58ha ‘rolling supply’. The Council proposed that this should be changed to reflect the emphasis in the NPPF to be clear on locational requirements and adapting to rapid change, and to focus upon the overall figure rather than a separate rolling supply.</p> <p><b>Responses (5).</b> Of these, 3 agreed, there was no disagreement, one respondent wanted a university policy which captures the growth agenda, and one was a general query about the Land Registry and the maps it provides.</p>	<p>Amend the policy to update it accordingly in line with the evidence base (Employment Land Review).</p> <p>In terms of the issue relating to the university this will be considered in the appropriate section. Existing policies are already considered to be sufficiently flexible to address universities’ ambitions. In terms of the Land Registry information can be found here:</p>	<p>Remove references to rolling supply and update in line with evidence base including update to allocations and including Key</p>

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		<a href="https://www.gov.uk/government/organisations/land-registry">https://www.gov.uk/government/organisations/land-registry</a>	Employment Sites.
<b>Review of Policy JE3 Non-employment uses on employment land</b>			
<p>Q18: Do you have any comments on our proposed changes to JE3 Part 1a?</p>	<p><b>Context:</b> Policy JE3 relates to non employment uses on employment land. The consultation suggested that, given the Government changes to the definition of ‘employment’ the policy is now too restrictive and should now reflect a new local definition (see Q12). The consultation also proposed that marketing should not be required if a site is clearly not suitable for employment use in line with specific criteria.</p> <p><b>Responses</b> (13). 10 agreed with the changes, none disagreed. Some suggested that the ‘and’ could be changed to ‘or’, for consistency and the exception should be split into two separate exceptions (i.e. now 5 in total). In terms of marketing, it was proposed that clear guidelines are needed, stipulating the length of time for collecting and submitting evidence. The 2018 Market Signals Study was cited in terms of protecting allocations. Other comments received related to the need to protect employment land, not to leave sites derelict, to prioritise brownfield and to ensure high quality redevelopment.</p>	<p>Definition of employment land to be provided in explanatory text to the employment chapter. Policy should be updated in line with recommendations of the Employment Land Review (2024). The ELR advises that the marketing guidance remains fit for purpose.</p>	<p>Update policy to take account of Employment Land Review including reference to how Key Employment Sites should be assessed.</p>

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Q19: Do you have any other comments regarding policy JE3?	<p><b>Context:</b> This question offered the opportunity for further issues to be raised on policy JE3.</p> <p><b>Responses (5).</b> Some made comments on the need to focus on sustainability, some felt the need for more clarification and to repeat the definition of 'employment' in policy. Need to be explicit about which definition of 'employment land' is being used. Need to allow offices outside identified centres to be redeveloped for non employment uses without the need to comply with part 2 of the policy. If a site meets the tests in part 1a it shows it is unsuitable for employment so part 2 should not apply and the policy should be amended to reflect this.</p>	Comments noted: employment land definition to be included in explanatory text to the chapter. Office policy covered in JE4 however Part 2 of this policy is still considered to remain an important part of the assessment process for applications.	Changes to JE3 noted above.
<b>Review of Policy JE4 Location of Office Development</b>			
Q20: Do you have any comments on our suggestions for proposed changes to Policy JE4? [location of office development]	<p><b>Context:</b> Policy JE4 relates to the location of office development. The consultation proposed that the policy should be updated to reflect national use class order change, and to remove the reference to Impact Assessments as this is no longer part of national policy. It was also proposed to remove permitted development rights from major office developments, not to have to require offices to be close to primary routes on the highway network, and to change reference from 'large scale' to 'major'.</p> <p><b>Responses (12).</b> Of those saying they agreed (5) it was commented that policies JE3 and JE4 need</p>	<p>Policy to be updated to reflect national change as proposed. In terms of location this would be applied in line with the centres-first approach of the NPPF and centre boundaries are identified through the retail policies of the plan.</p> <p>The evidence base (Employment Land Review Office Market Addendum) has now informed the approach to the review of office</p>	Introduce reference in policy title to type of office development to ensure flexibility in the market. Delete impact test.



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	<p>to be consistent, that centre locations need to be specified to understand the breadth of policy, that offices need more multi tenanted space, that the circular economy needs to be set out specifically, and that sustainability and green energy need to be included. Of those disagreeing (6), it was commented that requiring offices near sustainable transport modes could rule out key sites in the existing plan so these should be protected, that the road network can also encourage walking and cycling and electric vehicles, that the city should not be 'anti car', that new office space is not needed. One person offered a general comment about shifting policy to 'sustainable only' options.</p>	<p>policy. Flexibility of spaces to meet the needs of various tenants to be added in.</p> <p>Sustainable travel is addressed through the transport / accessibility chapter.</p> <p>Management of use classes would be controlled by condition if necessary.</p>	
<p><b>Review of Policy JE5 Location of R&amp;D, Industrial and Storage / Distribution Development</b></p>			
<p>Q21: Specifically in terms of general industrial, storage and distribution matters (not research and development which we consider separately), do you consider that the wording of policy JE5 is still up to date?</p>	<p><b>Context:</b> Policy JE5 currently focuses on Industrial and Storage, along with Research and Development. The consultation proposed that the policy is split given the differing needs of the sectors. In terms of Industrial and Storage the consultation suggested that the wording remained up to date and sought feedback on this view.</p> <p><b>Responses</b> (12). Of these, 5 agreed the policy is up to date in terms of the wording on Industrial and Storage. There was support for splitting JE5 into two policies. Some commented that the HEDNA was an appropriate basis for determining need and some stated that strategic B8 needs to</p>	<p>Proceed with splitting Policy JE5 into two separate policies. Quantum and location of B8 is considered in other sections of the plan review.</p>	<p>Split policy as proposed.</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	be addressed. One commented that the M40 corridor is an appropriate location, one that there should be more emphasis on green energy and sustainability, and another felt that B8 creates little employment and generates traffic issues.		
Q22: In terms of research and development needs do you think the wording of Policy JE5 is still relevant, or do you think we need to recognise it as a separate issue? What evidence do you have which can help us better understand the needs of the sector?	<p><b>Context:</b> In terms of the element of policy JE5 which focuses on Research and Development the consultation proposed that the needs of the sector might not be met by current policy and requested more information on understanding locational and operational needs of the sector (including R&amp;D relating to universities).</p> <p><b>Responses (7).</b> As above it was agreed this should be a separate policy. It was felt that Research and Development required its own policy document, links to universities were supported and liaison with the universities was recommended, flexibility is needed (both in terms of repurposing existing facilities and in terms of supporting innovative research and start up business focusing on green technology).</p>	Split policy as proposed, and the Local Plan creates hooks to the Universities' masterplans to ensure their needs are taken account of.	Split policy as proposed.
Q23: Are there other sectors we should be considering in being able to support their specific needs? What are these needs, and do you have	<p><b>Context:</b> This question invited comment on other sectors.</p> <p><b>Responses (2).</b> The respondents cited the need for HGV parking and overnight facilities, electric charging and consolidation facilities for logistics and distribution, the manufacture of modular and</p>	Many of these issues are picked up in Coventry City Council's transport strategy and these are reflected in the transport policies section of the plan. HGV facilities to be included as part of the	Include HGV parking, overnight facilities, electric vehicle

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
any information and evidence which would help us understand and accommodate these?	energy efficient home offices, extensions to local health services, recognition that Coventry lies at the heart of the 'golden triangle' for logistics and distribution.	review of this policy. Manufacture of modular buildings would most likely be categorised as strategic B2 and this (along with strategic B8) is considered through the West Midlands Strategic Employment Sites Study and the Council is working with partners in Coventry and Warwickshire and beyond to address this. In terms of extensions to health services this is considered as part of the Infrastructure Delivery Plan (and in the context of supportive health policy).	charging and consolidation facilities.
<b>Review of Policy JE6 Tourism / Visitor Related Development</b>			
Q24: Do you have any comments on our suggestion that policy JE6 should treat tourism as a main town centre use?	<p><b>Context:</b> Policy JE6 relates to tourism / visitor related development. As the glossary to the NPPF categorises tourism development as a 'main town centre use' it was asked if Policy JE6 should be updated to reflect this.</p> <p><b>Responses (7).</b> Although there was broad agreement it was considered this was too simplistic as this could preclude important areas for tourism including the CBS Arena, Warwick University (including the Arts Centre), the canal basin, Charterhouse, and future potential uses</p>	Feedback noted, policy wording to ensure that such uses can be included (in line with Destination Coventry, the new Destination Management Organisation) subject to compatibility with other local plan policies.	Policy wording to ensure that such uses can be included subject to compatibility with other local plan policies and to support

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	linked to the green technologies industries and their potential educational role.		the aims and objectives of Destination Coventry.
Q25: Do you have any other comments or suggestions relating to tourism and Policy JE6, including evidence if this is applicable?	<p><b>Context:</b> This question supplemented Q24 above in case there were other comments people might have.</p> <p><b>Responses</b> (0). No comments received on this question.</p>	No comments received.	N/A
<b>Review of Policy JE7: Accessibility to Employment Opportunities</b>			
Q26: Do you have any comments on our view that this policy [JE7] remains up to date?	<p><b>Context:</b> Policy JE7 relates to accessibility to employment opportunities. The consultation suggested that the policy was up to date although the reference to CIL should be replaced by the more flexible reference to ‘developer contributions.’</p> <p><b>Responses</b> (4). It was agreed the reference to CIL should be changed as proposed. Comments were received on the need for maintaining public transport, suggested text to read ‘especially those living in Coventry’s most deprived areas and communities’ and one respondent wanted to see developer contributions limited to transport infrastructure (in relation to the reference to ‘accessibility’).</p>	The comments are noted. However, it is considered that the current policy already references those in the more deprived parts of the city. Limiting contributions to transport only would not give sufficient flexibility to enable the policy to respond to contextual issues and circumstances.	Minor change to replace CIL reference with ‘developer contributions .’
<b>Chapter 5: Housing</b>			

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<b>Review of Policy H1 Housing Land Requirements</b>			
<p>Q27: Do you have any suggestions which can help us meet our housing need within our area?</p> <p>A. A site you wish to promote? Please provide as much detail as you can, using the Call for Sites form at Appendix 1</p> <p>B. An area you think could be densified while still achieving a high standard of living? Please provide as much detail as you can</p> <p>C. A site you would like us to investigate to see if it might be suitable for housing? Please provide as much detail as you can</p> <p>D. Another suggestion or comment – please provide detail</p>	<p><b>Context:</b> This question related to the review of Policy H1: Housing Land requirements. It links to the level of growth question (see Q5 and Q6 in the review of Policy DS1) but this policy specifically relates to how an appropriate level of growth might be delivered. The question therefore invited site submissions (call for sites), ideas for densification, ideas for sites which might come forward or other comments.</p> <p><b>Responses (34).</b> Through the consultation the following sites were submitted proposing development:</p> <ul style="list-style-type: none"> <li>• 20 brownfield</li> <li>• 3 greenfield</li> <li>• 1 on Local Green Space</li> <li>• 26 Green Belt</li> <li>• 2 for the safeguarded sites</li> </ul> <p>In terms of the densification aspect ‘gentle densification’ was felt to be appropriate to the edges of the ring road, around transport hubs and in relation to City Centre South.</p> <p>In relation to other suggestions, comments were general and reflected people’s views on whether Green Belt should or should not be used, varying views on PBSA including locational needs (close</p>	<p>A further call for brownfield sites was launched to run from 27/11/2023 to 22/01/2024.</p> <p>Assessment work and policy direction have informed proposed allocations.</p> <p>Densification has been considered and the new Density Study has shaped the plan review in terms of new opportunities.</p> <p>PBSA and other housing needs are considered later in this chapter.</p> <p>Comments on Biodiversity and brownfield are noted, and this is addressed through Biodiversity Net Gain.</p>	<p>Include new allocations in plan.</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	to campus), housing needs of various groups, comments on various levels of growth. Some expressed concern over the need to be careful with densification and the need to incorporate open space and that some brownfield sites may have high biodiversity value.		
<b>Review of Policy H2 Housing Allocations</b>			
Q28: Do you have any comments on the review of Policy H2 (Housing Allocations)?	<p><b>Context:</b> Adopted Policy H2 includes a table of sites which were allocated in the adopted Local Plan, along with an update on the current status of these. Comments were invited.</p> <p><b>Responses (150).</b> The majority of responses to this question (130) wanted land at Browns Lane removed from the allocations. Removal was requested for a range of other allocated sites including the SUEs and the area around Kingshill.</p> <p>Other responses confirmed commitment to delivering allocated sites including Walsgrave Hill Farm and Sandy Lane (the latter proposing increased capacity), and there was a request to allocate part of the Kersley SUE for further housing.</p> <p>Other comments were more general relating to net zero, viability, the need to ensure allocations are delivered before allocating new sites, views</p>	<p>The objections to the Browns Lane site were made at the time this was being considered at planning committee so that was the appropriate arena for considering those views.</p> <p>In terms of the status of the other allocations, the submissions through Call for Sites have been assessed and new allocations are being proposed.</p> <p>In terms of the more general comments these will be addressed through the review of the relevant policy areas.</p>	Updated and new housing allocations included.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	on the Green Belt and appropriate levels and location of growth.		
<b>Review of Policy H3 Provision of New Housing</b>			
<p>Q29: Do you have any comments, including supporting evidence which can help us address introducing standards which can help us proactively address climate change in terms of residential development?</p>	<p><b>Context:</b> This question related to whether or not new standards could be introduced</p> <p><b>Responses (33).</b> Responses varied. Generally, responses from the development industry commented that standards were already set by Building Regulations (including incoming further regulations), and there were concerns about viability. Some also commented that in covering standards in this chapter / policy there would be confusion / duplication as the issue is also being addressed through the environmental management chapter.</p> <p>Several respondents made comments about the need to address climate change and net zero providing examples e.g. insulation, energy, water technology.</p>	<p>The issue over duplication with other policies is acknowledged and so this will be addressed through the review of the policies in the Environmental Management chapter.</p>	<p>Address through the EM policies section.</p>
<p>Q30: Do you have any comments on our proposals for introducing new policy on amenity?</p>	<p><b>Context:</b> The question sought to gauge views on strengthening references to 'amenity', and whether Building for a Healthy Life principles should be utilised.</p>	<p>The policy context has been reviewed as 'amenity' could be interpreted in different ways. The points about liveable neighbourhoods (or similar) are noted and it is important to</p>	<p>Policy amended to include new standards for design, access to</p>

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	<p><b>Responses</b> (19). Some respondents questioned whether this was the right place for such a policy suggesting that the residential design guide was more appropriate. There was a proposal that ‘sustainable neighbourhood standards’ or ‘liveable neighbourhoods’ might be a better term than ‘amenity’ and there were several suggestions as to what this might mean in practice including housing types, streetscape, green and blue infrastructure. Comment was also made on what this might mean for employment sites e.g. mix of employment, landscape buffers, lighting etc. (examples were provided of sites considered to have been well designed in this context). There was a suggestion that the views of Age UK and Disability Rights should be sought.</p>	<p>ensure that these concepts are incorporated into the most appropriate parts of the plan. Ensuring that broad engagement is achieved as policies are formulated is noted and participation has actively been encouraged from a range of organisations representing different sections of the community in Coventry.</p>	<p>open space, services and facilities, for all ages and abilities and to link to the Council’s design guide SPDs.</p>
<p>Q31: Do you think we should require development to demonstrate how it has taken the Building for Healthy Life Principles into account?</p>	<p><b>Context:</b> This follows on from Q30, the question sought further elaboration. <b>Responses</b> (16). Views varied – 7 respondents were clearly in favour with the comment that reference should also be made to the Town and Country Planning Association’s work on planning and healthy place-making. 5 respondents objected, most stating a requirement to comply would be too onerous. Others offered a range of views, some felt that undertaking a full assessment would be inappropriate, a number felt these should be used as best practice guidance</p>	<p>Comments noted and agreed there is some potential duplication with other areas of the plan so it’s better to link to the Health and Design Guide SPDs. The Council is also developing Design Codes.</p>	<p>Strengthen links to Council’s SPDs (Residential design guide, householder design guide and Health).</p>



Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	<p>rather than a requirement. Others thought that the principles could cause confusion or issues of clarity when applying. It was commented that design codes could be used instead to set parameters. It was also commented that these should link to the health policies and Health Impact Assessment.</p>		
<p>Q32: Do you have any comments on our proposals to adopt the National Described Space standards (NDSS)?</p>	<p><b>Context:</b> This question sought to seek feedback on the Council’s stated intentions to adopt the NDSS  <b>Responses</b> (25). There was clear support for this (15 responses) although some caveated their support by saying there may be occasions where greater flexibility is needed. 4 representors objected outright to the proposals, citing lack of evidence, impact on viability, would reduce density and may well be dealt with by Government through the new Development Management policies. Several made more general comments / expressed concerns such as the need for viability testing and evidence, that the council should focus on good design instead, the impact upon affordability and choice, the different budgets and aspirations and, if implemented the need to have transitional arrangements.</p>	<p>Further reports produced after this consultation on Density and Viability have factored in NDSS compliance and the plan is deliverable taking these standards into account. Minimum space standards are essential to ensure quality of life.</p>	<p>Policies to include compliance with NDSS.</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<p>Q33: Do you have any comments on our proposals to introduce specific policy which supports Build to Rent (BTR) in Coventry?</p>	<p><b>Context:</b> Built to Rent is a model which has been gaining traction nationally since the plan was adopted so a potential policy was explored.</p> <p><b>Responses</b> (16). There was overall support for this policy in principle with comments generally relating to how this might be implemented. The main comments were in regard to viability and evidence and the level and nature of the affordable housing element and how this would be managed and delivered. One comment advised that BTR tends to have a different size mix to other developments (e.g. studios). The need for accommodation on a short term let was mentioned in relation to university needs e.g. for visiting staff. While there was support for this providing a good accommodation option for young people it could also help those on low incomes, or older people too. The need for energy efficient buildings was commented on.</p>	<p>The comments regarding viability and the needs of the sector have been included in the viability evidence base (produced after Regulation 18) and specific policy is to be developed.</p>	<p>Include a policy on Build to Rent.</p>
<p>Q34: Do you have any comments on our suggestion to introduce specific policy which supports Co-Living in Coventry?</p>	<p><b>Context:</b> Co-living is a newly emerging housing model, and some draft policy wording was consulted on.</p> <p><b>Responses</b> (19). The majority of comments (12) expressed support in principle although many caveated this, citing the need for more evidence including information on viability, the importance</p>	<p>Post Regulation 18, further work undertaken through viability report and examples of co-living also researched to help define and guide policy.</p> <p>The reference to the low graduate retention rate in the city comes</p>	<p>New policy on co-living to be included in the plan.</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	<p>of not confusing this with ‘co-housing’ and being clear on definitions, the need to be flexible on affordable housing contributions, not to over- rely on it as it would impact on the delivery of other types of accommodation, the need for energy efficiency, the need to widen the target groups of potential residents and the importance of not over-densifying.</p> <p>Some respondents did not support the potential new policy feeling this would enable more PBSA, not being convinced graduates would want to stay (and, conversely concerns about the reference in the consultation text to a low graduate retention rate) , concerns how such developments would be managed and run, concerns about climate change and the ‘heat island effect’ resulting from living in small spaces, and potential ‘oversupply’ of small homes when people need family homes and gardens.</p>	<p>from the HEDNA but it is accepted that other groups of people may also benefit from more choice of accommodation. Comments about family accommodation are noted but this is about the need to strike a balance to meet identified need (see HEDNA).</p> <p>Comments regarding energy are addressed in the section on energy.</p>	
<p>Q35: Do you have any comments on whether we should set a limit on how much co-living we should allow so that we are able to review its impact over time given that it is an emerging model? If you think we</p>	<p><b>Context:</b> this followed on from Q34 and was based upon a suggestion in the HEDNA that a limit could be explored</p> <p><b>Responses (9).</b> A number of comments advised that a limit was pointless as there is little / no co-living in the city at this point, that the markets would limit through supply and demand, monitoring and review is the most appropriate</p>	<p>There appears to be no justification for a limit to be set. No sites have been put forward specifically for an allocation for this use. As this is a newly emerging market the situation will be monitored.</p>	<p>New co-living policy to be monitored but no specific limits of quantum of</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
should, what should the limit be, and what evidence could we use to provide robust and fair justification?	approach. Other expressed concern over community cohesion, especially where tenancies were short term and the impact upon neighbourhoods and the health of the residents themselves. One respondent felt that a site or sites could be allocated to de-risk the process. An SPD was also proposed.		co living proposed.
Q36: Do you have any comments on our proposal to introduce a policy on Custom and Self Build Housing?	<p><b>Context:</b> currently Custom and Self Build Housing does not have a specific policy but is addressed in wider housing policy.</p> <p><b>Responses (19):</b> there was some support for the principle of this (10 responses) as respondents felt the Council should be proactive and the HEDNA identifies a need. In terms of the content of such a policy there was no clear consensus with some feeling this should be criteria based, others suggesting there should be plots as parts of wider development and others disagreeing with that approach (impacts on viability and deliverability logistics). Some did not feel a policy was necessary as the demand is low and ‘niche’ and in any case should be considered through the planning application process. Others made more general comments: people can be added to multiple Custom and Self Build registers so they do not reflect true need, people prefer sites in the countryside, if allocated as part of large sites there should be a fallback mechanism if not developed within a specific timeframe.</p>	Given that Policy H3 already includes supportive policy on Custom and Self Build Housing it is felt that this is sufficiently proactive as the assessment criteria for planning applications would be the same.	Retain in H3.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<p>Q37: We propose to delete the part of Policy H3 which supports limited infill [for self and custom build housing] in the Green Belt as this is contrary to national Green Belt policy. Do you have any comments on this?</p>	<p><b>Context:</b> currently, Policy H3 supports limited infill for self and custom build housing.</p> <p><b>Responses (12).</b> The majority of responses (9) supported the deletion of this part of Policy H3. It was commented that in the NPPF the exception relates to villages. A couple of respondents objected to the proposed removal of the text saying that this would prevent windfall contributing to the housing supply and there needs to be some greenfield to address the aspirations of self builders. One respondent felt that rural exception sites were needed to support the rural parts of Coventry.</p>	<p>The overall support for the deletion of the reference to infill is noted and will be taken forward. In terms of the objections the numbers would be small and would not significantly contribute to overall housing supply, and in terms of ‘aspirations’ this does not preclude a case being made in terms of greenfield which would be considered on its own merits through the planning application process. In terms of rural exception sites it is not considered these apply to the context of Coventry city council’s administrative area.</p>	<p>Delete reference to limited infill.</p>
<p>Q38: Do you think we should allocate a brownfield site (s) specifically for self and custom house building? If yes, how might we ensure such a site can be delivered?</p>	<p><b>Context:</b> this question was to explore whether the council could be more proactive in supporting self and custom build housing.</p> <p><b>Responses (9).</b> Most respondents (6) felt this was a good idea, citing examples (Cherwell, parts of the Netherlands) and saying that the council should use its enabling powers to deliver. Three respondents opposed the suggestion stating that market forces would deliver, and asking whether the council had ever been asked the question before and whether it was an issue at all</p>	<p>Government requires the council to be proactive in supporting self and custom build housing however demand is not considered to be such that there is a need to allocate a specific site for self and custom build and it is preferable to let the market deliver as the principle is supported in Policy H3.</p>	<p>No change.</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
Q39: Do you have any comments on the inclusion of support for Community-Led Housing in this proposed new policy?	<p><b>Context:</b> this question was asked to see if Community led housing should receive specific support.</p> <p><b>Responses</b> (6). All respondents supported this. Further comment was made in terms of a possible need to review the Affordable housing SPD, more information on delivery and viability, and the need for high build standards.</p>	Support noted. Include in policy H3.	Include in Policy H3.
<b>Review of Policy H4: Securing a Mix of Housing</b>			
Q40: Do you have any comments on our proposed minor revisions to Policy H4 (securing a mix of housing)?	<p><b>Context:</b> Views were sought on a minor change which updated the reference to the Strategic Housing Market Assessment (SHMA) with the more up to date Housing and Economic Development Needs Assessment (HEDNA)</p> <p><b>Responses</b> (16). The majority supported this (12) there were no objections. Some chose to comment more broadly on the application of the HEDNA.</p>	Change the reference from SHMA to HEDNA. Take account of the other comments in relation to the relevant policy areas of the plan. Comments on the application of the HEDNA are covered elsewhere in the plan review.	Change the reference from SHMA to HEDNA.
<b>Review of Policy H5: Managing Existing Housing Stock</b>			
Q41: Do you have any comments on the review of Policy H5 Managing Existing Housing Stock?	<p><b>Context:</b> The consultation sought views on strengthening the policy to include reference to energy efficiency.</p> <p><b>Responses</b> (12) Responses varied, some felt it was appropriate to reference energy efficiency here whilst others felt this was unnecessary as it would duplicate other areas of the plan. Some made broader comments about the need for more</p>	Issues regarding duplication are agreed. Issues relating to energy efficiency and net zero are considered in the Environmental Management (EM) policies section of the plan.	Inclined to agree on the duplication issue – to discuss internally.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	housing, the potential application of a cost / benefit approach, set a high bar for demolition and rebuild, widen references to sustainable neighbourhoods and net zero and energy efficiency.		
<b>Review of Policy H6: Affordable Housing</b>			
<p>Q42: We propose that the policy should be updated to reflect the Council’s preference for Social Rent as opposed to Affordable Rent. Do you agree            A. Yes – please comment further if you wish            B. No – please explain</p>	<p><b>Context:</b> affordable housing and the nature of its delivery is defined in the NPPF however there is still some local flexibility which was explored here.  <b>Responses</b> (25). 9 stated that they agreed, citing concerns that other models were unaffordable despite the definition. 2 disagreed, stating that the need will vary over the plan period and a rigid policy will not enable evolving demand to be met. The majority of responses (16) made a variety of points, some asking where the evidence and justification is for this, the HEDNA should determine mix of tenures, there is a need for flexibility, more homes are needed to deliver sufficient affordable housing, there is a need to provide housing for key workers as set out in a study by PWC (July 2019).</p>	<p>Further work after the Regulation 18 consultation undertaken regarding viability has informed the review of the policy to express the preference for social rent.</p>	<p>Add in preference for social rent.</p>
<p>Q43: Do you have any comments on our proposals regarding affordable home ownership? What</p>	<p><b>Context:</b> This question was asked because the council believes that affordable home ownership should be affordable with the principle that it is intended for those who cannot meet their need through the open market so it is considering how</p>	<p>Further work after the Regulation 18 consultation undertaken with housing team and regarding viability has informed the review of the policy.</p>	<p>Policy wording updated including reference to</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
evidence do you think we should use?	<p>this is achieved, how maximum income levels are set, and maximum property prices for affordable ownership products.</p> <p><b>Responses (18).</b> A range of responses were made: some were generic comments about the need to comply with national policy and guidance, supporting the principle of affordable home ownership and that affordable homes should remain as such and should be of good quality. In terms of evidence, it was suggested that the policy should be based on a threshold level for purchase which should be re-assessed annually to reflect house prices and income patterns. It was proposed that the approach should be defined on the basis of the housing waiting list, prevailing market price and average household income. That definitions should be included as per the approach taken in The London Plan. That local criteria for First Homes should be provided. It was suggested that evidence could come from Shelter and affordable housing providers. That Discount Market Sale should be used. That the policy wording should reflect the needs of Build to Rent which should be Affordable Rent rather than social rent. That a range of sizes of property should be available for Affordable home ownership so people do not become trapped in small homes that do not meet changing needs.</p>		an updated Affordable Housing SPD.



Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<p>Q44: Do you have any other comments on the review of Policy H6 Affordable Housing including issues and evidence relating to viability which we need to consider</p>	<p><b>Context:</b> this question was asked in order to gauge whether there were other issues not already addressed, including viability.  <b>Responses</b> (12). Most comments were of a general nature citing the need for viability work, too many constraints rendering sites unviable, comments on the scale and nature of affordable need. Comments were made on older persons' housing and that this should be assessed in the viability work, focusing on a report by Three Dragons (May 2013 – briefing note on viability prepared for Retirement Housing Group).</p>	<p>The issues cited have been explored through the viability assessment and have been used to shape policy.</p>	<p>The viability evidence has been used to shape the updated policy.</p>
<p><b>Review of Policy H7: Gypsy and Traveller Accommodation</b></p>			
<p>Q45: Do you have any comments on our review of Policy H7, Gypsy and Traveller Accommodation?</p>	<p><b>Context:</b> The consultation explained that a new Gypsy and Traveller Accommodation Assessment was completed in February 2023 which identified a shortfall of 6 pitches which could potentially be accommodated. In terms of transit arrangements the evidence recommended planning for transit sites / negotiated stopping points. Views were sought on this.  <b>Responses</b> (7). Views varied, with the majority focusing upon transit need with some feeling temporary pitches are needed with others supporting negotiated stopping. Other made more general comments about provision of good accommodation and the need for good management.</p>	<p>In terms of standards and the provision of pitches the policy should provide supportive wording which addresses the recommendations of the GTAA. This provides flexibility to support provision over the plan period.</p>	<p>Policy to be updated to include standards and wording which supports the recommendations of the GTAA.</p>

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<b>Review of Policy H8: Care Homes, Supported Housing, Nursing Homes and Older Persons Accommodation</b>			
<p>Q46: Do you have any comments on the potential requirements for housing to be built to M4(2) and M4(3) housing technical standards (accessibility and wheelchair standards)? Please provide evidence to support your views</p>	<p><b>Context:</b> these are optional standards which go beyond standard building regulations, but which could be added to policy if appropriately evidenced.</p> <p><b>Responses (26).</b> Comments varied with some feeling this should be supported but others stating there is no evidence (or evidence is required if the council wishes to pursue introducing additional standards). Some comments suggested that this should apply equally to market and affordable homes, that this is not just an ‘older persons’ issue, that adjustments need to be focused on existing properties, that all care homes and older persons accommodation should comply with these standards and should include disabled parking, that viability testing is needed, that adapted housing does not provide onsite support, care and companionship, that wheelchair users should not be assumed to be elderly and dealt with under a housing for older people ‘tag’. Should use the Three Dragons 2013 report produced for the Retirement Housing Group. One commented that it is not clear how the HEDNA has taken into account the needs of the over-85s</p>	<p>The comments were noted, and the viability report was requested to assess the potential for introducing these standards. The breadth of the policy has been widened to ensure that its clearer a range of specialist uses are included.</p>	<p>Update policy in line with evidence.</p>

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<p>Q47: Do you have any other comments on our review of Policy H8?</p>	<p><b>Context:</b> The question was based around potential locational requirements, building for a Healthy Life criteria, different use classes, affordable housing contributions and viability. Comments were invited to encourage as much feedback as possible in this evolving sector.</p> <p><b>Responses (8).</b> Responses were varied, some felt flexibility was key with policy encouraging specialist accommodation (including new models which might emerge over the plan period) while others felt a criteria based policy was more suitable. Viability testing was cited as was the needed for sustainable neighbourhoods and for high standards of energy efficiency.</p>	<p>Comments are noted. Policy to be expanded to take more account of the needs of the sector and to ensure flexibility.</p>	<p>Policy expanded.</p>
<p><b>Review of Policy H9: Residential Density</b></p>			
<p>Q48: Do you consider:            A. The policy is up to date and sets sufficient standards to maximise capacity already            B. The policy could be amended to increase minimum density levels in certain locations outside the ring road? (please explain and provide evidence where applicable)</p>	<p><b>Context:</b> Policy H9 currently sets minimum density standards of 35 dwellings per hectare (dph) outside the ring road and 200dph within it. The question sought to gauge views on increased opportunities for densification.</p> <p><b>Responses (21).</b> Responses were split between those who felt the policy is up to date and those who felt it should be updated. Some felt some areas outside the ring road (but still ‘city centre’) were appropriate for densification whereas other commented that they thought the current figure of 200dph was already too high. It was commented that there needs to be flexibility as sometimes</p>	<p>Density work has since been undertaken to assess what might be realistic and deliverable in various locations, to inform site assessment and capacity work and to inform policy revision.</p>	<p>Update to reflect the evidence (Density Study).</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	other factors impact on being able to deliver a minimum. Some felt care needed to be taken to ensure housing needs are met e.g. homes for families.		
<b>Review of Policy H10: Student Accommodation</b>			
Q49: Do you have any comments on our review of Policy H10?	<p><b>Context:</b> Policy H10 actively supports Purpose Built Student Accommodation (PBSA). The consultation proposed a more nuanced approach where applications were considered on their merits and in line with revised assessment criteria.</p> <p><b>Responses</b> (18). Responses were mixed, many supported the principle of updating policy but for different reasons. Some felt that there was too much PBSA (some suggested a moratorium until need was better understood) and others felt PBSA should be supported as it means less demand for HMOs. Comment was made that PBSA should be assessed separately to housing need. If a needs assessment is introduced to accompany planning applications, this should be made clear at the outset. There was support for assessing applications on their merits. Many comments focused upon the criteria, feeling that 'directly accessible' needs clarification. The proposed reference to '15 minutes walk time' was considered impractical, limiting possibilities and may prevent development in sustainable locations accessible by public transport. It was commented</p>	<p>Student Accommodation study commissioned and completed to inform the review of policy.</p> <p>PBSA has been monitored and has not impacted on HMOs which address a wider variety of accommodation needs as can be seen through the new HMO Development Plan Document.</p>	New PBSA policy.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	that a 'university quarter' boundary should be established.		
Q50: Do you have any comments on a 'monitor and manage' approach, including how this could be implemented, or any alternative ways of managing delivery which can be supported by robust evidence?	<p><b>Context:</b> Following on from Q49, a 'monitor and manage' approach was suggested to recognise the universities' growth plans, whilst delivering a balanced housing market. Views were sought on this.</p> <p><b>Responses:</b> (6). Comments varied. Some supported the approach whereas others felt there was already too much, growth should be stopped and other housing should be prioritised. It was also commented that the universities were preparing design guides which could assist with this approach.</p>	The details of a monitor and manage approach are being explored currently in the light of the aforementioned PBSA evidence base.	
Q51: Do you have any examples of policy or evidence which would help us develop a policy relating to standards for student accommodation, to include matters of design, amenity, sustainability and mechanisms to ensure that it is truly inclusive for students from all	<p><b>Context:</b> This question was asked to assist with developing robust policy which would ensure PBSA meets the needs of its intended residents, delivers safe and sustainable communities and is well designed.</p> <p><b>Responses</b> (7). A number of comments were made which referenced the ANUK and UK Code of Practice, Residence Life Programmes and management practices, and universities offered further discussion. Other comments were made in terms of Building for a Healthy Life standards and the need to address climate change, net zero and</p>	The PBSA evidence base has been used to inform development of standards for PBSA and it is intended that these would be expanded further through an SPD.	New PBSA policy to address these issues at a high level with commitment to developing an SPD to provide further

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backgrounds including the potential need for developer contributions to secure affordable tenures?	student wellbeing. The need for viability assessment was also cited.		detailed guidance.
Q51: Do you have any other issues you think we should be taking into account when planning for student housing?	<p><b>Context:</b> This question was asked to invite wider comment on issues not already covered.</p> <p><b>Responses:</b> (8) Several points were made, some of which duplicated those submitted against earlier questions including the need to engage with universities, comments on too much PBSA, the need to be flexible, for good design, addressing climate change etc. Locational issues were also flagged, the need to help students with dependents, affordability, the need to ensure students staying in the city after graduating can find suitable accommodation, and suggestions for potential PBSA allocations.</p>	As mentioned above the council has commissioned further evidence to understand the needs of the sector and the issues raised will be considered.	
<b>Review of Policy H11: Homes in Multiple Occupation (HMOs)</b>			
Q53: Do you have any comments on our proposal to delete Policy H11 and instead make sure the Local Plan cross references to the HMO Development Plan document?	<p><b>Context:</b> Views were sought on whether this policy should still be retained given that a separate HMO DPD is being produced.</p> <p><b>Responses:</b> (7). Responses varied, some were general comments about HMOs. Generally, there was support for the approach, it was felt that there should be flexibility so that documents can be cross referenced.</p>	Further to the HMO DPD examination this policy needs to be retained to provide a policy link to the new DPD as it supplements the Local Plan.	Update policy H11 to provide the link to the new HMO DPD.

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<b>Chapter 6 Retail and Centres</b>			
<b>Overarching questions</b>			
Q54: Do you have any comments on our view that removing references to use classes and using the terminology of Convenience, Comparison and Service is appropriate?	<p><b>Context:</b> This was an overarching question (rather than relating to one specific policy) given the changes to national retail policy and use classes and increased flexibility around Permitted Development.</p> <p><b>Responses (7).</b> Responses were divided with 4 in agreement and 3 disagreeing. Those who disagreed felt the terminology was too prescriptive, centres need to evolve, and terminology needs to follow the NPPF. One comment was received in relation to fuel stations and Electric Vehicle charging with the respondent stating they should not have to meet the sequential test.</p>	The comments have been considered through the retail evidence base and policy has been revised in accordance with this report which updates policy terminology and allocations.	Update policy in line with the Retail and Centres Study 2024.
Q55: We think that references to floorspace figures should be removed to enable a more organic approach to retail development within the defined centres. Do you have any comments on this?	<p><b>Context:</b> This question was asked to gauge views on how planning policy can be more flexible to adapt and respond to the rapidly changing needs of the sector.</p> <p><b>Responses (5).</b> There was general agreement with the proposal to remove floorspace figures although it was also commented that SUEs need retail space protecting, and floorspace loss needs to be monitored.</p>	Update policy in line with the Retail and Centres Study 2024 which protects a revised level of floorspace in the SUEs (Strategic Urban Extensions) but does not set quantum elsewhere.	Update policy R1 in accordance with the Retail Study evidence.

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<b>Review of Policy R1: Delivering Retail Growth</b>			
Q56: Do you think the centres listed in this policy remain fit for purpose and should be retained as allocations within this policy?	<b>Context:</b> This question related to the current hierarchy of centres querying whether this still remains applicable. <b>Responses (2).</b> There was agreement. Respondents also felt retail should be focused on the city centre, targets should be aspirational and mixed use should be supported where it supports regeneration.	Update policy in line with the Retail and Centres Study 2024 which makes some minor changes to the centres hierarchy.	Update policy R1 in accordance with the Retail Study evidence.
Q57: Do you have any comments on a potential change to policy wording to include tourism in relation to the Arena Park Major District Centre?	<b>Context:</b> This question was asked as it is considered that the area is a key tourist attraction, and this could be recognised in policy. <b>Responses (2).</b> There was agreement with the proposed change. One comment was made that other developments in the vicinity should not have to consider functions of the district centre when applying sequential assessment and that further guidance may be needed on the impact test or how the proposal would be considered an essential element of supporting wider 'tourism'.	The retail evidence base considered the issues raised, reference to tourism retained.	Retail evidence clarifies this position.
<b>Review of Policy R2: Coventry City Centre – development strategy</b>			
Q58: Do you have any comments on the insertion of a reference to limit the disproportionate concentration of sui	<b>Context:</b> Sui-generis uses mean those which do not fit into a defined 'use class', and the question sought views on whether such uses should be limited in the centre. <b>Responses (8).</b> Of these, 2 supported and 4 objected. It was commented that some sui	The retail evidence base considered the issues raised and the context of retail in the light of national policy. No specific comment in retail study, other than the national use class order	None on this issue.



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<p>generis uses within frontages?</p>	<p>generis uses contribute to vibrant town centres / footfall, that the vacancy rate could increase, would need to define where restrictions apply as should be focusing on retail frontages and corridors, each case should be considered on its merits. A couple of commentators made more general observations feeling it was a minor issue.</p>	<p>and the fact that every SUI use requires an application, and therefore applies the relevant assessment and associated controls on development. Also notes that some SUI uses are beneficial in centres. In terms of gambling uses, national picture shows a decline in high street establishments due to online presence.</p>	
<p><b>Review of Policy R3: the Network of Centres</b></p>			
<p>Q59: Do you have any comments on the proposed changes to the above paragraph?</p>	<p><b>Context:</b> The ‘above paragraph’ referred to in the question proposed to amend the final paragraph of part five of the policy (Local Centres) to read: ‘day to day convenience shopping and proportionate main town centre uses.’ This reflects the fact they are local centres and often are of a small scale and serve a local role in the community. <b>Responses (3).</b> One agreed, one disagreed and it was commented that centres need to be well served by public transport and should have accessibility criteria.</p>	<p>Retail study states that the hierarchy of centres should stay the same but that there should be some minor boundary changes and the removal of Sutton Avenue due to its localised location and accessibility.</p>	<p>Minor boundary changes as shown in the study.</p>
<p>Q60: With the above in mind, do you have any comments on whether</p>	<p><b>Context:</b> In this question, the ‘above’ refers to ‘as part of ongoing work with our consultants we will be re-visiting the hierarchy of centres and</p>	<p>The Retail and Centres Study 2024 proposes some minor changes to the hierarchy and</p>	<p>Update policy in line</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
the centres listed in this chapter of the Local Plan remain fit for purpose, or should changes to the hierarchy and/or defined centres be made?	considering if the centres currently defined in the Local Plan remain fit for purpose.’ <b>Responses</b> (2). One felt changes could be made, one did not want to see hierarches and one requested the Gallagher retail park should be allocated as a District Centre.	policy should be revised to reflect these.	with evidence.
<b>Review of Policy R4: Out of Centre Proposals</b>			
Q61: Do you have any comments on whether part one of Policy R4 should include reference to hot food takeaways?	<b>Context:</b> The proposal was that part one of the policy be amended to read: <i>Proposals for retail, Main Town Centre uses and hot food takeaways (including proposals for the expansion or re-configuration of existing uses and the variation of existing conditions) will not be permitted in out-of-centre locations unless they satisfy the Sequential Assessment and the Impact Test (where appropriate).</i> <b>Responses</b> (6). 5 supported this. One person stated there was no evidence to support this, that hot food takeaways will not undermine the role and function of town centres and policy R4 follows Government policy regarding the sequential test.	Retail evidence (2024) is very clear about definitions within the NPPF. Hot Food Takeaways are not considered as being main town centre uses. Therefore, they are not subject to the sequential and impact test, as they cannot be considered sequentially preferable.	None for this issue.
Q62: Do you have any comments on the creation of primary shopping areas in the	<b>Context:</b> This question was based on bringing local policy up to date with national policy. <b>Responses</b> (2). Both supported the proposals.	The retail evidence base has set out Primary Shopping Areas which will be reflected in Policy R4.	Update Policy R4 to define Primary

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City Centre, Major District and District Centres?			Shopping Areas.
Q63: Do you agree with our suggestion that due to their scale, Local Centres should not have primary shopping areas defined and should use the centre boundary for all elements of sequential assessment?	<p><b>Context:</b> this was asked to explore the evolving context of the sector.</p> <p><b>Responses (2).</b> Both supported the proposals.</p>	This has been confirmed by the retail evidence base (2024) which recommends this approach.	No primary shopping areas for Local Centres.
<b>Review of Policy R5: Retail Frontages and Ground Floor Units in Defined Centres</b>			
Q64: Do you agree with our suggestion that this policy (Policy R5: Retail Frontages and Ground Floor Units in defined centres) should be deleted?	<p><b>Context:</b> This question was asked as, given the use classes order has changed significantly, it was considered this policy may no longer be necessary, especially in light of the broad spectrum of uses which can occupy an E class unit without needing planning permission.</p> <p><b>Responses (1).</b> The respondent agreed and suggested this should also be applied to the Area Action Plan policy CC22.</p>	Given further consideration in the light of the retail evidence base (2024) the policy needs to be retained and updated to reflect the new Use Classes and the defined centres and include the new Design Guidance for shopfronts to help ensure shopping areas are attractive, vital and viable.	Retain policy R5. Update to reflect use classes A-E and include reference to shopfront design SPD.
<b>Review of Policy R6: Restaurants, Bars and Hot Food Takeaways</b>			
Q65: Do you agree with our proposals for the deletion of 'normally' and	<b>Context:</b> The current use of the term 'normally' in adopted policy can be ambiguous, ('Hot food takeaways often attract considerable customer	Reference to the adopted SPD should be added in for clarification but otherwise policy	Update to include

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
to add in 'adopted' where suggested?	<p>numbers and are regularly associated with issues such as litter, waste disposal, noise, odour, traffic and health. For a combination of these reasons, they will <b>normally</b> only be supported within defined centres where residential amenity is less likely to be an issue and will be resisted elsewhere'). It was proposed that 'adopted' is added in reference to the Hot Food Takeaway SPD for clarity.</p> <p><b>Responses</b> (3). One agreed others commented that no more cafes are needed and that takeaways should be ten minutes walk time.</p>	concluded to remain fit for purpose with no further change.	'adopted' SPD.
Q66: Do you have any comments on our suggestion that reference should be made to the 5-minute walk school exclusion zone?	<p><b>Context:</b> This question was asked in order to gauge views on an exclusion zone around schools for hot food takeaways.</p> <p><b>Responses</b> (6) 5 agreed with the suggestion also saying that advertising should be restricted and that there is a need to define how the five minutes walk time should be defined. One disagreed stating that there needs to be flexibility, and that five minutes walk time is not supported.</p>	Although there is potential to add this in it is already addressed in the Hot Food Takeaway SPD so the link to this will be added in to policy.	Link to the Hot Food Takeaway SPD.
<b>Potential new policy: Local services</b>			
Q67: Do you have any comments on our proposal? Have you any examples of a policy	<p><b>Context:</b> The question was asked to gauge views on a possible new policy, including draft wording to recognise the importance to local communities of the role of shops and shopping parades outside of the centres hierarchy.</p>	Retail evidence (2024) states that Local Parades are outside of the NPPF hierarchy and therefore don't form part of any sequentially preferable sites. However, there	No new policy – expand CO2 scope through

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which protects local shopping parades?	<b>Responses</b> (9). 7 supported the proposal, it was commented that the impact of HGVs should be considered. Libraries should also be considered. In terms of other comments one commented that evidence of marketing for retail / change of use should be required, and one commented that Keresley is unsustainable.	may be merit in including this in a community policy based on local services therefore this issue has been considered in that chapter.	explanatory text instead to include this.
<b>Chapter 7: Communities</b>			
<b>Review of Policy CO1: New or improved social community and leisure premises</b>			
Q68: Do you have any comments on our review of Policy CO1?	<b>Context:</b> Policy CO1 relates to new or improved social, community and leisure premises and the consultation suggested that the policy was working well and did not need to be changed. Views were sought on this. <b>Responses</b> (8), these included several comments on the need to cite Liveable Neighbourhoods / Neighbourhood Planning and the 20 minute toolkit, planning for shared spaces, protecting green spaces, ensuring leisure facilities in Keresley, supporting new facilities.	Comments are noted and will be considered in the review of policy for the following areas: accessibility (re liveable neighbourhoods), shared and flexible spaces (design), green space policy and Keresley SUE.	No change proposed to CO1.
<b>Review of Policy CO2 Re-Use of or Redevelopment of Facilities</b>			
Q69: Do you have any comments on our suggestions for amending Policy CO2?	<b>Context:</b> This question was asked in response to suggested changes to the scope of the policy to include community uses beyond the current local Plan definition of ‘community premises’ where they could be demonstrated as being important	The explanatory text to the policy will be expanded to include other uses such as pubs and shopping parades. In terms of specific marketing circumstances these	Explanatory text to policy to be expanded to include pubs

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	<p>e.g. a local pub or a shopping parade. A review of proposals involving loss of education facilities was also suggested.</p> <p><b>Responses (9).</b> A range of responses were made in relation to the types of uses. It was commented that NHS properties were constrained by marketing requirements and that flexibility needs to be given in terms of the evolution of the NHS estate. A separate policy was requested for educational premises distinct from community use as these are not subject to market demand. Some felt a wider definition was a positive change others requested a definitive list for clarity. A site-specific policy to guide the former City Leisure Centre was requested, as was a comprehensive masterplan for city council assets. It was commented that Assets of Community Value do not need local plan policy as already covered in national policy. It was commented that the existing policy part 1 lists 3 criteria – suggestion that the word ‘or’ should be added to clarify that if one of the criteria are met then redevelopment can be supported.</p>	<p>would need to be considered on their merits in relation to the planning application process rather than a blanket policy being applied. It is considered that it is still right to consider education and health under this definition of ‘community use’. In terms of plans for council assets and assets of community value these would be governed under separate processes rather than planning procedure.</p>	<p>and shopping parades.</p>
<b>Review of Policy CO3 Neighbourhood and Community Planning</b>			
<p>Q70: Do you have any comments on our view that Policy CO3 needs a</p>	<p><b>Context:</b> A minor update was proposed through the consultation in order to bring terminology up to date in line with the NPPF.</p>	<p>On reflection the wording is considered fit for purpose in the local context as it is felt to be flexible and resilient.</p>	<p>No change.</p>

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minor update as described?	<b>Responses</b> (10). There was general support for this with comments relating to the need to be proactive and support Neighbourhood Planning and to recognise this is done voluntarily.		
<b>Chapter 8: Green Belt and Green Environment</b>			
<b>Review of Policy GB1 Green Belt and Local Green Space</b>			
Q71: Do you have any comments regarding Policy GB1?	<b>Context:</b> Q71 and 72 should be read together. Q71 was focusing upon general comments relating to the policy overall. <b>Responses</b> (143). The majority of these (114) were calling for all of Coundon Wedge to be Green Belt and objecting to development at Browns Lane. Other comments related to protecting Green Belt, providing the right infrastructure to support development, using Natural England’s Accessible Greenspace Standards, the policy should reference blue infrastructure, sites should be managed for community benefit. A number of representors referred to sites they were promoting.	In terms of the Browns Lane allocation, this was at the time being considered as a planning application and so the objections needed to be considered in the light of the decision making, rather than the plan-making, process (which approved the application). In terms of the other comments, the plan needs to reflect the National Planning Policy Framework in terms of the purposes of Green Belt and some comments go beyond this scope, however, will be addressed in relation to green space matters. Site promotion submissions have been considered separately.	Policy to be updated – wording to reflect national policy, Local Green Space to have its own policy.
Q72: Do you think that Green Belt and Local	<b>Context:</b> Q72 was asked because the policy currently covers Green Belt and Local Green	The review proposes separating Green Belt and local Green	Separate out Green Belt

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
Green Space should be covered in two separate policies?	<p>Space but as, nationally, these are separate designations the consultation suggested these should be separate policies.</p> <p><b>Responses</b> (21). The majority of these (16) agreed that separate policies would be preferred. Two disagreed. Others commented more generally about needing to protect Green Belt, suggesting that the public should be able to propose Local Green Space sites, and a strategic approach is needed.</p>	Space policy to reflect the different types of designation and the context within which they must be assessed.	from Local Green Space – each should have its own policy.
<b>Review of Policy GB2: Safeguarded land in the Green Belt</b>			
Q73: Do you have any comments of the review of Policy GB2?	<p><b>Context:</b> This policy identifies a number of sites stating that they will be ‘subject to consideration through a full or partial review of this Local Plan having explicit regard to development proposals in Warwick District’. Views were sought on this.</p> <p><b>Responses</b> (21). Responses were varied. Some were promoting their site submissions on the safeguarded sites, some commented more generally that they needed to be developed, that proximity to the university is relevant, it was commented that cross boundary work with Warwick DC is needed, some felt that they should not be developed and that Green Belt should be protected, some commented that the NPPF says that safeguarded land should be reviewed after the plan period i.e. after 2041.</p>	In terms of the timeline for review of the safeguarded land Policy GB2 is clear that this needs to be done as part of a review of the local plan i.e. at this time. Given that the South Warwickshire Local Plan is emerging it is considered appropriate to retain the safeguarded status of these sites for the present time.	Retain safeguarded sites.



Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<b>Review of Policy GE1 Green Infrastructure</b>			
<p>Q74: Do you have any comments on our review of Policy GE1: Green Infrastructure?</p>	<p><b>Context:</b> A number of changes to this policy were proposed through the consultation, including the inclusion of trees, key corridors for enhancement, wildlife friendly buildings, references to health and climate change, targets for tree canopy cover, links to natural capital and ecosystems, baseline data for biodiversity.</p> <p><b>Responses (28).</b> There was a good level of support to the proposals (12), 6 commentators objected stating that GE1 was sufficient already, that the issues raised were already covered and that the list was too vague, and targets would be hard to monitor (tree canopy coverage). Several comments and suggestions were made in terms of potential standards which could be introduced including canals / blue infrastructure, giving weight to the Local Nature Recovery Strategy, Woodland Trust Access to Woodland Standards, 20% biodiversity net gain (and maintaining units for 50 not 30 years, the latter being the national figure), Natural England’s Green Infrastructure Framework, soil biodiversity. Some concerns cited over inaccuracies (river Sherbourne is a tributary of the Sowe). Removal of culverts supported but should also reference flood plain connectivity and natural flood management.</p>	<p>Comments noted – propose policy is amended to incorporate blue infrastructure for comprehensiveness and clarity.</p> <p>References should be updated to ensure the policy links to the emerging Local Nature Recovery Strategy (LNRS) and to the Council’s emerging Green and Blue Infrastructure Strategy and Action Plan which is being formulated using Natural England’s Green Infrastructure Framework as this will address the issues highlighted.</p>	<p>Policy to be updated to reflect recommended changes.</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	Inequalities should be addressed and related to health. Need for viability testing.		
<b>Review of Policy GE2 Green Space</b>			
Q75: Do you have any comments on our proposals to retain the above policy with no changes?	<p><b>Context:</b> It was suggested through the consultation that the Green Space policy remained up to date.</p> <p><b>Responses (4).</b> The following was requested to be added to policy wording ‘development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space’. It was also commented that reference to green space standards does not reflect playing fields, the new playing pitch strategy does not use a standards approach. Up to date assessment work is needed.</p>	Policy to be revised to reflect flood mitigation, and to reflect the new requirements of the Playing Pitch Strategy.	Update policy in line with recommendations.
<b>Review of Policy GE3 Biodiversity, Geological, landscape and Archaeological Conservation</b>			
Q76: Do you have any comments on our suggested policy approach to strengthening and updating Policy GE3?	<p><b>Context:</b> A number of changes were proposed in the consultation to update this policy in line with the Environment Act and other, more local considerations. This included reference to 10% BNG, identification of offsetting sites, key enhancement corridors, green spaces to achieve ANGS standards, new targets for connectivity, reference to veteran trees, improvements to blue infrastructure.</p>	Policy needs to be updated to reflect national legislation in regard to Biodiversity Net Gain (BNG) and Local Nature Recovery Strategies (LNRS), and there is potential to update the Biodiversity Net Gain SPD to provide further guidance	Update policy as recommended.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	<p><b>Responses</b> (22). Respondents were split equally between those who cited agreement and those who did not (both 6). Those objecting felt policy was sufficient, that viability testing would be needed and that the reference to ‘veteran tree quality’ is not an industry standard and is confusing. Those supporting, or offering comment advised that connectivity is essential (requiring bird boxes needs access to commuting routes for wildlife), should link to Natural England’s Benefits from Nature tool, should link to the Local Nature Recovery strategy and Biodiversity Net Gain plan, should not top street trees (to protect the canopy), protect trees, do not use whips on new estates, agree with offsetting on council land but not private sites, protect irreplaceable habitats, habitat survey river metric should be 10m from red line boundary, medieval ridge and furrow should be given more protection.</p>		
<b>Review of Policy GE4: Tree Protection</b>			
<p>Q77: Do you have any comments on our review of Policy GE4 Tree protection?</p>	<p><b>Context:</b> A number of changes were proposed in the consultation which it was felt might strengthen policy GE4 including buffer zones (ancient woodland), compensatory measures and planting specifications.</p> <p><b>Responses</b> (13). Of these, 6 supported the changes, 3 objected, stating that it should accord with national policy, that ‘TPO quality’ should not</p>	<p>Comments noted. Some proportionate additions to policy recommended to provide clarity and strengthen links to the SPD.</p>	<p>Update to provide additional clarification and to strengthen policy and</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	<p>be referenced, if a tree is of such quality, it should be TPO'd, that the reference to 'specimen tree' is confusing as there is no such designation and it should not be confused with other designations i.e. ancient woodland and veteran trees. It was considered onerous to require exceptional circumstances to justify loss if the rest of the development is acceptable. The proposals regarding buffer zones and ancient woodland / veteran trees were controversial, one commented that it should be 50m not 30m, and another referencing Natural England standing advice of 15m. Others sought clarification on what is meant by 'adequate', 'unacceptable loss', 'adequate compensatory provision'. One respondent asked that the policy works in tandem with the BNG metric and the precautionary principle which requires developers to consider tree retention on site.</p>		link to the SPD.
<b>Chapter 9: Design</b>			
<b>Review of Policy DE1 (Encouraging High Quality Design)</b>			
Q78: Do you have any comments on the review	<b>Context:</b> A number of changes were proposed in the consultation to strengthen policy in relation to	Policy could be strengthened to include better placemaking, social	Strengthen policy DE1

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<p>of Policy DE1 (Encouraging High Quality Design)?</p>	<p>adaptation and resilience, social sustainability principles, the impacts of an ageing population, diversity, mixed tenures, innovation, health, wellbeing and cross referencing to heritage assets.</p> <p><b>Responses (27).</b> A range of responses were received. In terms of the references to HAPPI and Building for a Healthy Life principles some felt these were unduly onerous (one commented HAPPI relates to older people), however there was also support too. Some felt the proposals duplicated other areas of the plan (e.g. references to open space). There was support for local design codes, the recognition of neurodiversity in design, increased emphasis on climate change and health and wellbeing, the need to link to policy HW1 and a potential health checklist, the need to take viability into account, promote a mix of tenures, the need to take a comprehensive and co-ordinated approach to development (including utilities), should include gentle densification, set out key expectations on energy efficiency.</p>	<p>inclusion, design codes and a range of other matters to help provide further clarity and direction.</p>	<p>and add new policy DE2 on delivering high quality places. Reference to design codes to be included.</p>
<p><b>Chapter 10: Heritage</b></p>			
<p><b>Review of Policy HE1, Conservation Areas</b></p>			

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
Q79: Do you have any comments on the review of Policy HE1?	<p><b>Context:</b> It was proposed through consultation to add in the new Conservation Areas and Brownhill Green and Earlsdon.</p> <p><b>Responses (10).</b> It was correctly pointed out that the reference to DE1 in the question should have been HE1. Notwithstanding this, the comments were made in the correct policy context. There was support for the proposed update, some felt the policy could be widened to include net zero and climate change, conservation areas should be reviewed in line with national policy, the Coventry Canal Conservation Area should be reviewed to include more of Longford's Grade 2 listed buildings.</p>	<p>The policy to be updated to include the new Conservation Areas of Earlsdon and Brownhill Green.</p> <p>It should also be updated to enable additional areas to be added over the plan period if required. Conservation Areas and Listed Buildings are also covered in separate legislation beyond the scope of this review.</p>	Update in line with officer recommendation.
<b>Review of Policy HE2, Conservation and Heritage Assets</b>			
Q80: Do you have any comments on our review of Policy HE2, Conservation and Heritage Assets?	<p><b>Context:</b> The consultation suggested the policy was up to date but could benefit from a reference to Historic England guidance 'streets for all'.</p> <p><b>Response (10):</b> it was suggested that all conservation areas should be reviewed, Brownhill Green and Earlsdon should be added, that Coventry's mid century modernist heritage 'festival of Britain', focus on post war, heritage should be carefully appraised, should restore the market building, the latest Historic England publications should be referenced, the reference to 'streets for all' is not supported as has been replaced by updated guidance, publications and advice notes should be considered in policy</p>	Some of the comments relate to matters which are controlled already by national policy, some relate to more localised matters and these will be considered in the light of what needs to be included in local policy to add value. It is suggested that rather than cite specific guidance a link is instead provided to Historic England's webpage to ensure resilience over the plan period. Also recommend policy is brought up to date to reflect additional	Update policy in line with officer recommendation.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	justification not policy, demolition of assets should require substantial justification, that assets should be sympathetically re-used, remove inappropriate designations such as Spon End to help regeneration.	local context. Include reference to the importance of post World War 2 heritage in the city centre.	
<b>Review of Policy HE3 Heritage Park – Charterhouse</b>			
Q81: Do you have any comments on the review of Policy HE3 (Heritage Park – Charterhouse)	<b>Context:</b> Minor changes to update the latest position were proposed by the consultation. <b>Responses</b> one person commented, to say they supported this.	Policy reviewed and considered to remain fit for purpose	No change
<b>Review of Policy HE4 Archaeology</b>			
Q82: Do you have any comments on whether a separate archaeological policy would be beneficial (Policy HE4)	<b>Context:</b> Comments were sought on whether there should be a separate archaeology policy. <b>Responses (6)</b> There was broad support for this proposal. There was one comment that this was not strictly necessary as heritage assets include archaeology.	Note the comments and consider introducing a new policy	New archaeology policy to be added
<b>Chapter 11: Accessibility</b>			
<b>Review of Policy AC1: Accessible Transport Network</b>			
Q83: Do you have any comments on the review of Policy AC1 (Accessible Transport Network)	<b>Context:</b> The consultation proposed updates to bring policy in line with national policy and strategy. <b>Responses (25):</b> The majority of responses supported the proposed changes (13), but those that disagreed (3) sought for consideration for those living in more rural areas where public	Note the comments. Policy could be updated to reflect latest national, regional and local policy and guidance and the Council’s emphasis on prioritising walking, cycling and sustainable modes of travel.	Update in line with officer recommendation

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	transport is inadequate and consideration of people that can't or don't want to cycle. Other comments (11) were concerned over there being too much emphasis on untried and untested methods of transportation. E-Scooters need to be included and a joined up and strategic approach needs to be taken.	<p>Policy to include the latest sustainable travel modes such as very light rail and emerging technologies.</p> <p>Policy including improvements to street greening and layout as part of ways to improve the pedestrian and cycle experience.</p>	
<b>Review of Policy AC2: Road Network</b>			
Q84: Do you have any comments on a mechanism to support the provision of Electric Vehicle Charging Points (EVCP)?	<p><b>Context:</b> It was proposed to include separate and specific requirements on how EVC can be better supported.</p> <p><b>Responses (17):</b> Broad support (8) for more EVCP with the aim to change behaviour. Objections to the proposal (7) include objections to road schemes and that the proposals are onerous as this is covered by Buildings regs and possibly wouldn't be proven to be viable. Other comments (3) including ensuring the proposal is proportionate to developments and that active and passive spaces should be sought instead of offsite contributions.</p>	Comments noted and the approach to increasing the provision of EVCP will be included, however it sits better under Policy AC1 so will be included there.	See officer comments regarding AC1
<b>Review of Policy AC3: Demand Management</b>			
Q85: Do you have any comments on whether parking standards should	<b>Context:</b> Proposal is for a more nuanced approach to the current parking distinction of inside the ring road and outside the ring road.	Parking standards to be updated	Update Appendix 5



Question asked	Summary of key issues raised	Officer response	Proposed change to plan
reflect the strategy to reduce overall levels of car travel and promote more sustainable alternatives?	<b>Responses (17):</b> Broad support for the proposal (7) with other comments (11) stating the approach should be flexible, based on a site by site basis, reflect local characteristics, acknowledges that car ownership is unavoidable and that change will only happen when sustainable modes of transport are safe, reliable, convenient and cost effective.		on parking standards.
Q86: Do you have any comments on whether parking levels should take into account a range of factors such as the nature of the accommodation, availability of public transport, ease of walking and cycling in the local area etc?	<b>Context:</b> The proposal is for a more nuanced approach to parking levels that accounts for the nature of the development and site context. <b>Responses (10):</b> Broad support for the range of factors to be taken into account (10), but that removing on-site parking should be evidenced by existing and future movement patterns so as not to increase on-street parking and that consideration should be given to improved green corridors and networks between rural communities and key destinations.	Support is noted , the parking standards to be updated to reflect local context.	Update to Appendix 5 parking standards
Q87: Do you have any comments on the mechanism of mobility credits to be secured as part of planning permissions to provide active and sustainable modes of travel and their inclusion in policy AC3?	<b>Context:</b> To introduce a mechanism to secure mobility credits as part of planning permissions. <b>Responses (10):</b> The mechanism needs to be evidenced, proportionate, flexible, resourced and well implemented to not render development unviable. The proposal will only work if there is a reliable bus service and investment in sustainable modes of transport and is easy to use/access, especially for older and younger people.	Support is noted and reference will be included in AC3 with a proposed update to the Coventry Connected SPD	Update A3 in line with officer recommendation.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<b>Review of Policy AC4: Walking and Cycling</b>			
<p>Q88: Do you agree that strengthening the wording to promote cycling and walking more is the right approach? Please provide comments</p>	<p><b>Context:</b> It is proposed that the wording in every part of Policy AC4 is strengthened to better reflect the higher priority which the Council is now placing on promoting walking and cycling and specific requirements are included.</p> <p><b>Responses (17):</b> Broad support for the proposals (16) but needs to be part of a strategic multi-modal integrated transport system including cycle schemes and consideration needs to be given to those physically unable, people doing multiple trips and the increase in e-scooters and e-bike delivery services.</p>	<p>Support is noted and approach will be strengthened to reflect this</p>	<p>Update AC4 in line with officer recommendation and to reflect the Transport Strategy.</p>
<b>Review of Policy AC5: Bus and Rapid Transit</b>			
<p>Q89: Do you have any comments on the review of Policy AC5 (Bus and Rapid Transit)?</p>	<p><b>Context:</b> The consultation suggested the policy be updated in terms of progress on Very Light Rail and for the experience of bus travel to be improved for all users.</p> <p><b>Responses (11):</b> Recognition that bus services need improving and that people are looking to travel around the city to shops and services, not just into the city centre. The approach should not just focus on VLR with areas of high deprivation need to be better considered for improved bus services.</p>	<p>Support is noted and the policy will be strengthened to reflect the Transport Strategy and wider regional context.</p>	<p>Update in line with officer comment.</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<b>Review of Policy AC6: Rail</b>			
Q90: Do you have any comments on the review of Policy AC6 (Rail)?	<p><b>Context:</b> No changes were proposed via the consultation although a re-ordering of policies to reflect the importance of sustainable transport was suggested.</p> <p><b>Responses (10):</b> Broad support for the proposal (8), but NUCKLE needs the additional stations to be delivered to address Coventry’s through traffic issue.</p>	Support is noted. Current policy still supported, but should be updated to include support for electrification of rail lines and improved routes to the East Midlands	Update in line with officer recommendation.
<b>Review of Policy AC7: Freight</b>			
Q91: Do you have any comments on the review of Policy AC7 (Freight)?	<p><b>Context:</b> Some updates in line with Government strategy were proposed via the consultation along with strategies to reduce certain HGV movements.</p> <p><b>Responses (9):</b> Broad support for the proposed changes (8), but also needs to be dealt with at the sub-regional level, M6 junction improvements are imperative and impact on existing communities and air quality need to be taken into account. Standards for distances between industrial buildings and dwellings along with buffers and bunds should be introduced.</p>	Support is noted. Policy to be updated requiring applicants have more consideration of HGV movements and facilities on site, particularly regarding big warehouse and distribution centres and avoidance of HGV traffic on smaller roads. Air quality is included in the Environmental Management chapter.	Update to policy to ensure this reflects the need to control freight movement.
<b>Chapter 12: Environmental Management, Minerals and Waste</b>			
<b>Review of Policy EM1 Planning for Climate Change</b>			

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<p>Q92: Do you have any comments on the proposed policy direction that Policy EM1 needs updating with the introduction of specific targets for mitigating and addressing the challenges of climate change and working towards achieving net zero in all new build developments?</p>	<p><b>Context:</b> Policy EM1 was considered out of date as it did not reflect the emerging Climate Change Strategy, NPPF and updated and incoming Building Regulations.</p> <p><b>Responses</b> (26). Of these, 15 respondents supported a need to update the policy. Several stated that this needed to be in line with building regulations, that timescales for bringing in standards needed to be clear, that evidence is needed. Some suggested ways of achieving net zero eg solar panels, retrofitting and good maintenance. One commented the needs to the logistics sector should be taken into account. One sought definition of the term 'low flood risk'. Another cited the need to mitigate for harm to the natural environment</p>	<p>In terms of the matters raised, the review of the plan will consider whether these are best served through updated policy EM1 or elsewhere in the plan (to avoid confusion and duplication) and whether additional standards can be introduced subject to viability and this will be followed with new policy additions into the plan. Further evidence has since been produced to explore this further. In terms of flood risk definition, further information is here <a href="https://www.gov.uk/guidance/flood-risk-and-coastal-change">https://www.gov.uk/guidance/flood-risk-and-coastal-change</a></p>	<p>Update policy EM1 to reflect the Council's Climate Change strategy and the evidence base.</p>
<p>Q93: Do you have any comments on the above proposals?</p>	<p><b>Context:</b> This question sought views on non-domestic developments, retrofit, refurbishment and change of use schemes, considering that there is scope to achieve net zero for such proposals, in line with the WMCA Climate Change Adaptation Plan and Coventry City Council's emerging Adaptation and Resilience Plan.</p> <p><b>Responses</b> (15). 8 respondents expressed support, others commented that the policy should be stepped in line with Government policy, that a timetable is needed, that different building forms</p>	<p>Further evidence has been commissioned on Carbon Policy, and on viability to inform the potential introduction of new policy to address these issues.</p>	<p>Update the plan accordingly where possible to reflect updated evidence and the Council's ambitions..</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	and uses would be needed, that district heating should be referenced and that the role of canals should be considered.		
<b>Review of Policy EM2 Building Standards</b>			
Q94: Do you have any comments our suggested policy proposals in that Policy EM2 needs to be deleted and replaced with an up-to-date new policy?	<p><b>Context:</b> it was considered that this policy should be deleted as it was out of date, and should propose more challenging building standards as well as a suite of options in relation to biodiversity.</p> <p><b>Responses</b> (21) 14 respondents expressed support, two objected. A series of comments were also received, some felt the policy should only refer to Building Regulations, some wanted more ambitious targets, and enforcement action taken where not met. The need to consider coal mining legacy and land instability was mentioned.</p>	Having reviewed the evidence it is considered that the policy should be deleted and new policies introduced instead to reflect updated evidence and the Council’s ambitions.	As per the officer comment
Q95: Do you have any comments on our proposals for setting more ambitious standards for new build developments with the introduction of specific targets that go beyond existing Building Regulations as described	<p><b>Context:</b> This question was aimed at establishing any local evidence and justification for going beyond Building Regulations.</p> <p><b>Responses</b> (23). No specific evidence was received. Comments were more general, stating that evidence would be needed, that this should include viability evidence, that there should be a whole-life carbon emissions assessment approach and carbon offsetting.</p>	See comment above	See above

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
above? Please provide detail including what such targets might be, and any evidence to show how these would be viable and deliverable.			
<b>Review of Policy EM3 Renewable Energy Generation</b>			
Q96: Do you have any comments on our suggestions for updating Policy EM3?	<p><b>Context:</b> The consultation suggested that policy should be strengthened in line with the NPPF and local ambitions including the potential for requiring renewables in developments.</p> <p><b>Responses</b> (19). There was support by 12 respondents, 3 objected and several general comments were made stating further evidence is needed.</p>	Comments noted. It is recommended that this policy adds no local added purpose and should be replaced with new policies which reflect updated evidence and the Council's ambitions.	
<b>Policy EM4 Flood Risk Management</b>			
Q97: Do you have any comments on our suggestions that Policy EM4 needs updating as described above with further technical amendments to help strengthen the policy further?	<p><b>Context:</b> The consultation proposed updates to bring policy in line with national and local policy and strategy, cross reference to Green Infrastructure, and a potential new SPD.</p> <p><b>Responses</b> (15). There was general support for this, some expressed views about not allowing or restricting certain types of development in areas of flood risk, others felt there was some duplication with other policy areas (eg biodiversity).</p>	The policy should be updated in line with national policy, local evidence and consideration will be given to a new SPD or further guidance. Policy will be reviewed to ensure that it does not duplicate other policies of the plan.	Update the policy in line with officer recommendations.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<b>Review of Policy EM5 Sustainable Drainage Systems (SuDS)</b>			
Q98: Do you have any comments on our suggestion that Policy EM5 needs updating as described above with further technical amendments to help strengthen the policy further?	<p><b>Context:</b> The consultation proposed that this policy needs a minor technical update in terms of bringing it up to date with the approach and direction set out in the NPPF (2021) and the latest research and guidance published for successful SuDS.</p> <p><b>Responses (12):</b> there was general support for this. There was one question about SuDS maintenance and another comment about the need for evidence.</p>	Comments noted and the policy should be updated in accordance with the proposals. An SPD or additional guidance is also to be produced.	Update policy in line with officer recommendation.
<b>Review of Policy EM6 Redevelopment of Previously Developed Land</b>			
Q99: Do you agree with our proposal that Policy EM6 needs updating as described above with further technical amendments to help strengthen the policy further?	<p><b>Context:</b> The consultation proposed that this policy needs a minor technical update in terms of specific reference Water Environment Regulations.</p> <p><b>Responses (7)</b> There was support for policy updates as proposed, and comments around the need for policy to reflect the NPPF</p>	Update policy as recommended through the consultation	Update in line with officer recommendation.
<b>Review of Policy EM7 Air Quality</b>			
Q100: Do you agree with our suggestion that Policy EM7 needs updating as described above?	<p><b>Context:</b> The policy was generally considered to be up to date although it was suggested a minor update to the policy could include a specific reference to the Ministerial Direction for nitrogen dioxide alongside the AQMA to give the policy more weight.</p>	Update the policy as recommended through the consultation.	Policy update as proposed.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	<p><b>Responses (8):</b> of these 5 agreed with the proposals. There were no objections. It was commented that the policy must address air quality on designated sites, that it should be updated in line with the Air Quality SPD, and that cumulative effects of vehicular traffic to the north of the city needs to be considered.</p>		
<b>Review of Policy EM8 Waste Management</b>			
Q101: Do you agree with our view that Policy EM8 remains up to date?	<p><b>Context:</b> Policy EM8 deals with waste management</p> <p><b>Responses (6).</b> Of these, two agreed, one objected and a number of general comments were received. It was commented that there needs to be a more general approach to waste management and that it needs to be considered in terms of the circular economy, that its should be considered alongside net zero policy and NO2 emissions, and that more detail is needed on MRF volume capacities.</p>	The comments are noted and are considered to relate to the Waste Management Strategy: policy wording is considered to remain fit for purpose	No change proposed.
<b>Review of Policy EM9 Safeguarding Mineral Resources</b>			
Q102: Do you agree with our view that Policy EM9 remains up to date?	<p><b>Context:</b> this policy relates to mineral resources such as aggregates and recycled and secondary materials and the safeguarding of these.</p> <p><b>Responses (1).</b> It was agreed the policy was up to date.</p>	Comments noted: no change proposed as wording remains fit for purpose.	No change
<b>Review of Policy EM10 Non Mineral Development I Mineral Safeguarding Areas</b>			



Question asked	Summary of key issues raised	Officer response	Proposed change to plan
Q103: Do you agree with our view that Policy EM10 remains up to date?	<p><b>Context:</b> this policy cites a balanced approach to protecting minerals against the need to attract investment and regeneration in a mainly built up area.</p> <p><b>Responses:</b> None received</p>	No comments received. No change proposed.	No change
<b>Chapter 13 Connectivity</b>			
<b>Review of Policy C1: Broadband and Mobile Internet</b>			
Q104: Do you have any comments on our assessment of Policy C1 Broadband and Mobile Internet?	<p><b>Context:</b> It was proposed that the policy remained relevant but duplicated national policy so potentially could be deleted and views were sought on this.</p> <p><b>Responses:</b> one comment was received making general observations about difficulty being able to deliver on unadopted roads.</p>	The comments are noted, these relate to technical matters of delivery rather than policy so this is an issue for the providers. Consideration will be given to whether the policy should be retained as it duplicates national policy.	Delete policy
<b>Review of Policy C2: Telecommunications</b>			
Q105: Do you have any comments on our assessment of Policy C2 Telecommunications?	<p><b>Context:</b> It was proposed that the policy remained relevant but duplicated national policy so potentially could be deleted and views were sought on this.</p> <p><b>Responses:</b> None</p>	No responses. Propose policy is deleted as this duplicates national policy.	Delete policy
<b>Review of Policy IM1: Developer Contributions for Infrastructure</b>			
Q106: Do you have any comments on our proposals for a minor amendment to policy IM1? Do you have any	<p><b>Context:</b> The consultation suggested that the policy on contributions for infrastructure was still relevant but should have a minor change to reference 'developer contributions' rather than CIL</p>	Comments noted, and the term 'developer contributions' is used as this relates to a range of potential funding sources such as Section 106 or any future	Minor update to refer to 'developer contributions'.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
other comments on our review of this policy?	<b>Responses (8)</b> Comments generally supported the reviewed wording, one considered the term 'developer contributions' to be too bland preferring 'CIL' and one suggested CIL is brought in. Others commented about the need for timely provision of infrastructure. One respondent wanted to see more contributions for Green Infrastructure.	requirements which may be introduced such as the Infrastructure Levy. CIL has been considered by the council but was found not to be viable but again, Government may introduce new mechanisms. In terms of what contributions are spent on, there is legislation which determines this but the Council does take contributions for open space, and also biodiversity (Biodiversity Net gain)	
<b>Infrastructure Delivery Plan (IDP)</b>			
Q107: Do you have any comments on the updated Infrastructure Delivery Plan at Appendix 3?	<b>Context:</b> In order to ensure that the plan is viable, deliverable and that development is delivered alongside a range of infrastructure requirements and Infrastructure Delivery Plan is prepared. <b>Responses (9):</b> Comments varied including: the section on cross boundary issues being blank, glossary needs updating, local infrastructure strategies needed, too vague, needs to inform viability, partners need to be engaged eg National Highways.	The Infrastructure Delivery Plan will be updated and included as an appendix	Update the IDP
<b>Chapter 14: Coventry City Area Action Plan Context</b>			

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
<p>Q108: What are your views on the most effective mechanisms for the future planning of Coventry City Centre? Please provide supporting evidence where relevant</p>	<p><b>Context:</b> The consultation wanted to explore views on options for the best ways of planning for the city centre including whether the AAP remains fit for purpose or whether other mechanisms might be more appropriate, for example masterplans</p> <p><b>Responses (8):</b> responses varied, some felt it provided a useful and flexible framework for development but could be absorbed as a chapter into the Local Plan. Suggestions were made as to which policies should be retained and which could be changed. There was also support for masterplans and design codes. A number of respondents wanted to discuss specific areas e.g. heritage, university campus, employment, food production, retail, housing, student accommodation.</p>	<p>The feedback is noted and the relevant aspects of the AAP will be pulled through in to a new chapter of the Local Plan.</p>	<p>New chapter in the Local Plan.</p>
<b>Sustainability Appraisal</b>			
<p>Feedback was sought on the Sustainability Appraisal which was consulted on at the same time</p>	<p><b>Responses (4)</b>            Concern was expressed in terms of the level of harm to the historic environment from the higher growth scenarios depending on site location, and the SA should also reflect uncertainty on the density scenarios pending further work.            It was proposed that the evidence base should include landscape and visual assessments, soil and ecological surveys, green infrastructure and</p>	<p>The responses to be discussed with the SA consultant and assessed accordingly regarding the next iteration of the SA</p>	<p>The SA is part of the evidence which influences the evolution of the plan.</p>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	<p>biodiversity mapping, protection of best and most versatile agricultural land grades 1,2 and 3a, mitigation measures for site allocations and Habitats Regulation assessment.</p> <p>A developer commented that there were no exceptional circumstances for deviating from the standard method, that the high growth scenario should be considered, that green belt should be used to help deliver affordable housing and address socio economic matters.</p> <p>One respondent commented that Birmingham Airport should be consulted on planning applications.</p>		
<b>Equalities and Health Impact Assessment</b>			
Feedback was sought	No comments received.		

## Appendix 1 – Comments Form

### Coventry City Council Local Plan Review

#### Issues and Options Consultation, Sustainability Appraisal and Equality / Health Impact Assessment

#### Comments form

If you cannot respond using our online system please use this form attached to share your comments on the first stage of our Local Plan Review. Completed forms should be scanned and sent to [planningpolicy@coventry.gov.uk](mailto:planningpolicy@coventry.gov.uk), or posted to **Planning Policy, PO Box 15, Council House, Earl Street, Coventry, CV1 5RR.** The deadline for submissions is **12<sup>th</sup> September 2023.**

Please note, submitted information including your name and your comments will be publicly available. Other personal details e.g. private address and email will be kept confidential. For further information please read our privacy statement <https://www.coventry.gov.uk/planning-policy/planning-policy-privacy-notice> (printed copies will be made available alongside this form)

Name:.....  
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Address:.....  
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Representing (If Applicable):  
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Email (Optional):

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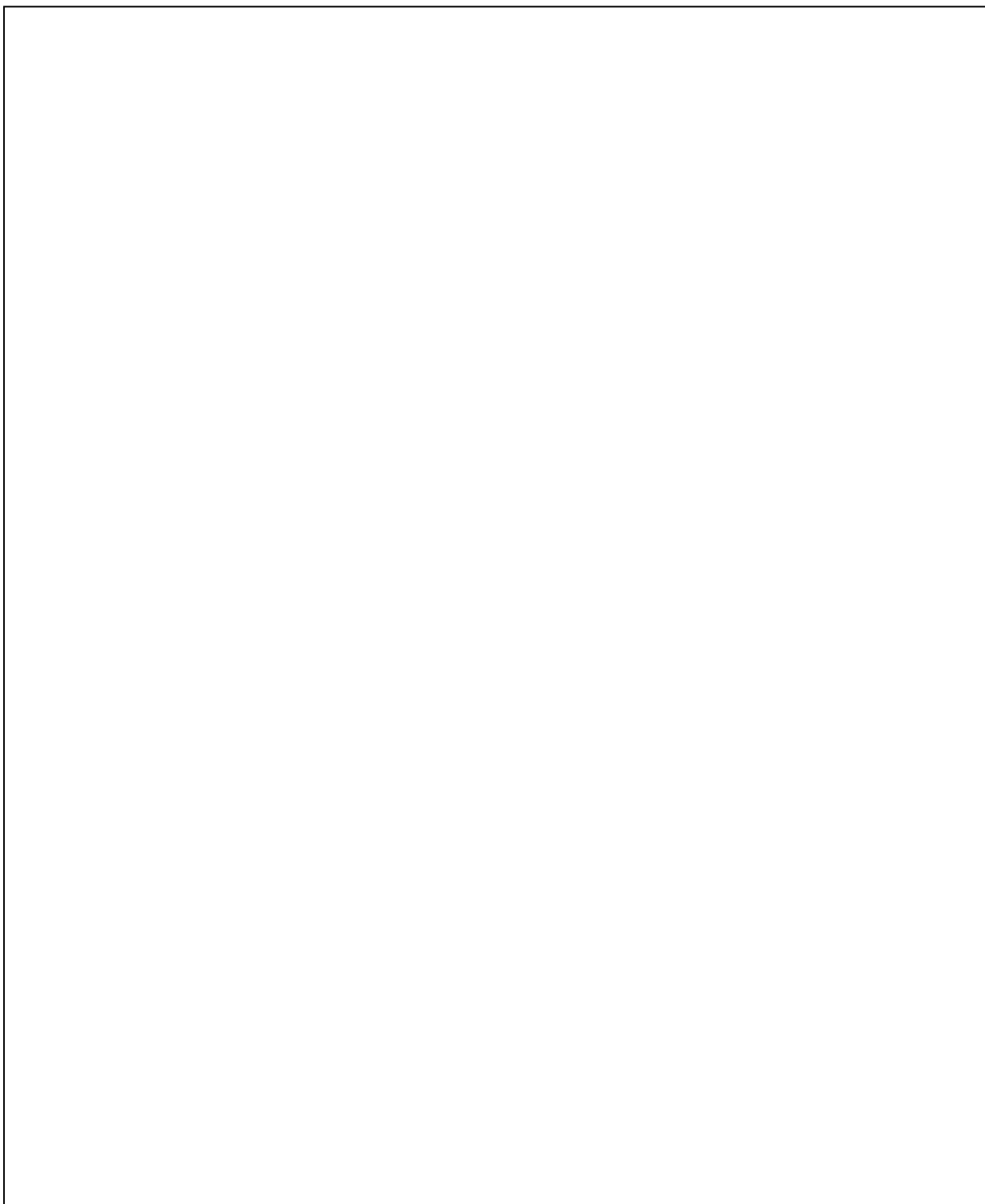
Would you like us to add your email to our consultation database, so you are aware of updates and other planning consultations. (Please tick yes if you consent to us adding your details). Yes

**Which document are you commenting on (please tick).**

Issues and Options Consultation document

Sustainability Appraisal

Equality & Health Impact Assessment



## Appendix 2 – Press release

### Media release

Tuesday 18 July 2023

## Now is the right time review Coventry Local Plan

A senior councillor responsible for housing in the city said he has always said that the right time to review the Local Plan is once the Council has more accurate figures – and that is what is now available.

Cllr David Welsh, Cabinet Member for Housing and Homelessness, said: “We have begun a consultation to look at reviewing the city’s Local Plan because it is the right time to.

“I have always said that we need more up-to-date and accurate statistics and that is what we now have following the publication of the national census figures.”

Coventry City Council is undertaking a full review of its Local Plan and is running an initial public consultation stage. The Council recommended a full review of the city’s local plan in December 2022 stating that it is absolutely the right thing to do.

The consultation will seek views across the full range of local plan policies, including the methodology employed to establish local housing need.

Councillor Welsh, added: “We also need to keep questioning the current national policy. We want to meet our housing needs - but the government is expecting Coventry to absorb a 35 per cent higher number of homes than other places. Current housing forecasts used by the government are placing a greater burden on cities like Coventry. We want to challenge them on their numbers.”

“We do need more affordable, good standard homes to meet housing need and our plan must help to deliver this – but the numbers must be accurate and achievable.

“Helping create a greener infrastructure and recognising the impact of climate change are also factors we need to draw into the review.

“We are looking for local people to tell us what they think and get involved in the consultation process.”



Since the Coventry Local Plan was drawn up in 2017 there have been significant changes to national policy including the method for calculating housing need.

Cllr Welsh added: “A review will also help us to look at housing affordability, and environmental factors. It also needs to support economic growth and retain accessible open space.”

“Local people need to have every opportunity to give their comments.”

One part of the review will reference the Housing and Economic Development Needs Assessment (HEDNA), which highlights the government’s ‘cities and urban centres uplift’ of a 35% additional housing delivery target, based on Coventry being one of the top 20 populated cities in the UK.

Cabinet members gave their support to start the ‘regulation 18’ consultation phase, known as ‘issues and options’, at last week.

The key issues being considered through the review of the plan are:

- That policies reflect the most up to date national statistics;
- The review and re-establishment of local housing need and supply;
- That reviewed policies reflect the priorities of the One Coventry Plan 2022 – 2030;
- That reviewed policies reflect the priorities of the Climate Change strategy (noting that this is currently at a draft stage and may be subject to change).
- That reviewed policies reflect the priorities of other Council strategies such as the;
- recently adopted Transport Strategy for example, and discussions have been ongoing with a range of council departments in formulating this review – these are reflected in the suite of Topic Papers and other supporting evidence which have informed this stage of the review.

Have your say at [www.coventry.gov.uk/localplanreview](http://www.coventry.gov.uk/localplanreview)

**Ends**


## Appendix 3 – Social media analytic report

22/01/2024, 17:19

Orlo - App

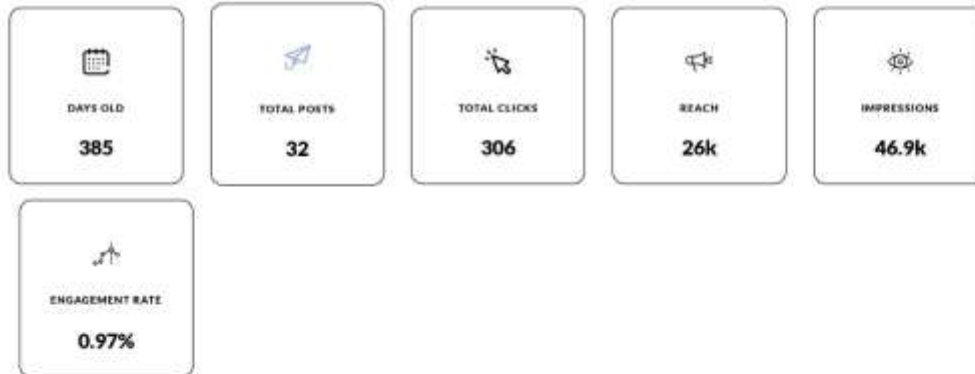
### CAMPAIGN REPORT

2 Jan 23 - 22 Jan 24 **Local Plan 2023**

 <b>X</b> 1 Account	<b>0</b>	<b>15</b>
	MESSAGES	POSTS
 <b>Facebook</b> 1 Account	<b>0</b>	<b>15</b>
	MESSAGES	POSTS
 <b>LinkedIn</b> 1 Account	<b>0</b>	<b>2</b>
	MESSAGES	POSTS

### Overview

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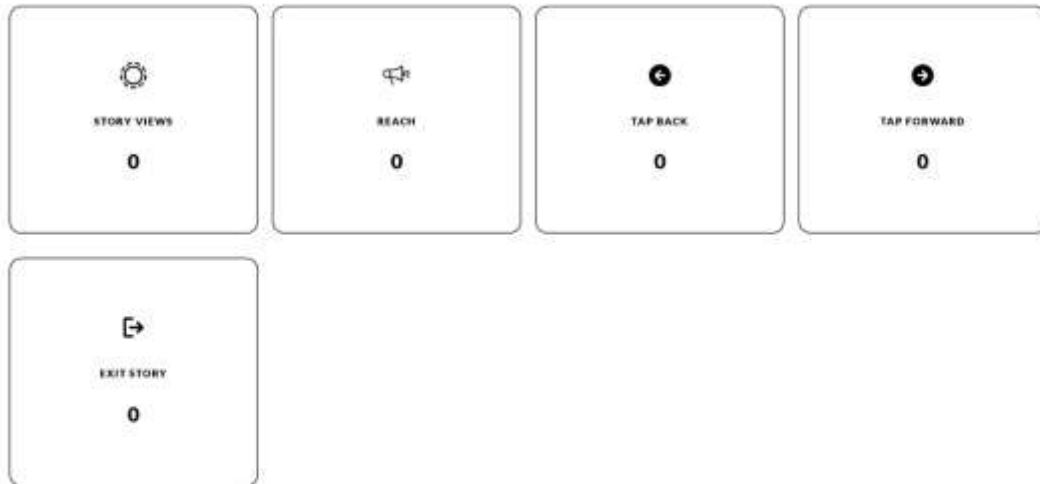


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### Instagram Stories



### Link clicks <sup>2</sup>

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#### Make sure it all clicks into place!

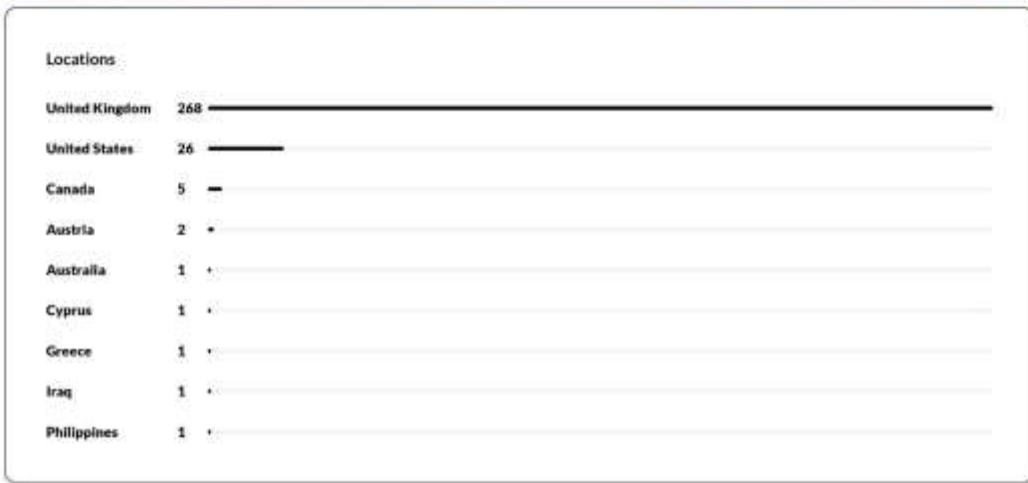
Shorten URLs and get the most accurate reporting by using orlo.uk (unsafe:~/http://orlo.uk/~) tracking links in your posts! Remember, for Instagram and Youtube, no data will be available as posts on these channels can't contain links

<https://www.orlo.app/#analytics/campaign/report?campaignId=45960&startDate=2023-01-02T00:00:00.000Z&endDate=2024-01-22T23:59:59.99...> 2/6

22/01/2024, 17:19

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Global Link Clicks



Posts breakdown

Posts by Network



f Facebook  
TOTAL REACH

23.2k

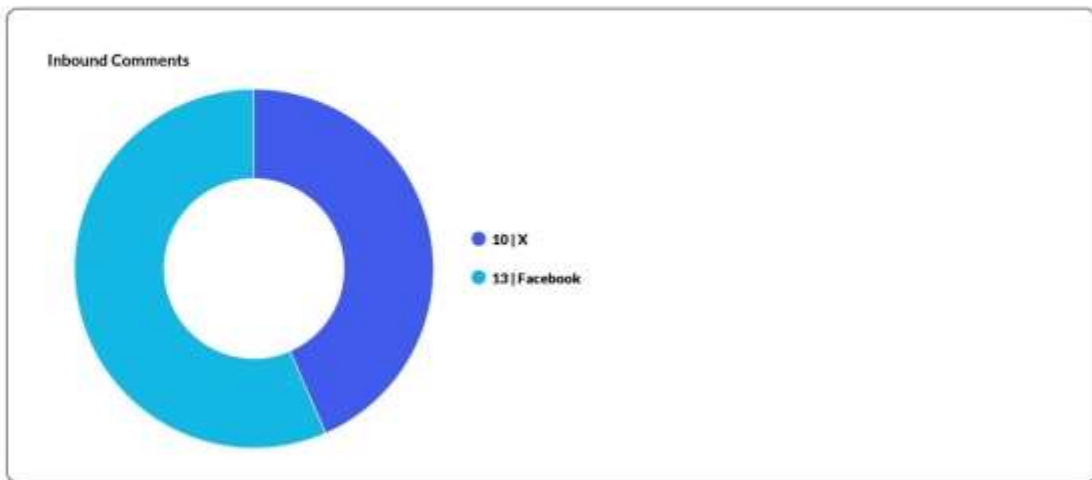
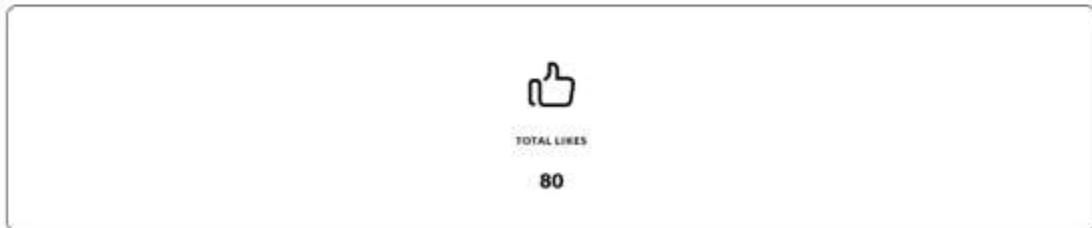
in LinkedIn (Video)  
TOTAL REACH

2.8k

<https://www.orlo.app/#analytics/campaign/report?campaignId=45960&startDate=2023-01-02T00:00:00.000Z&endDate=2024-01-22T23:59:59.99...> 3/6

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<https://www.orlo.app/#analytics/campaign/report?campaignId=45960&startDate=2023-01-02T00:00:00.000Z&endDate=2024-01-22T23:59:59.99...> 4/6

# Local Plan Review: Issues and Options Consultation Regulation 18 – Consultation Statement

22/01/2024, 17:19

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### By Clicks

View post	Profile	Date	Time	Image/Video	Heart	Share	Comment	Click	Retweet	Clicks			
View post	coventrycc	22 Aug 2023	08:00		7	7	13	40	4.3K	4.8K	1.39	9	40
View post	coventrycc	01 Aug 2023	08:10		1	3	0	34	2.4K	2.5K	1.51	1	34
View post	coventrycc	30 Jul 2023	06:55		1	3	1	26	1.7K	1.84	1	1	26
View post	coventry-city-council	26 Jul 2023	11:00		25	5	0	21	1.3K	1.7K	2.99	25	
View post	coventrycc	24 Jul 2023	08:00		1	1	0	19	2.4K	2.6K	0.82	1	
View post	coventrycc	18 Jul 2023	20:00		2	1	1	16	1.4K	1.44	2	2	
View post	coventrycc	03 Aug 2023	17:10		0	0	0		1.1K		1.49		

<https://www.orlo.app/#analytics/campaign/report?campaignId=45960&startDate=2023-01-02T00:00:00.000Z&endDate=2024-01-22T23:59:59.99...> 5/6

# Local Plan Review: Issues and Options Consultation Regulation 18 – Consultation Statement

Date	Author	Text	Image	Reactions	Engagement
22/01/2024, 17:19	Orlo - App	It's the right time to review Coventry's Local Plan, and we'd like to get residents' comments. Have your say at...		0 16	0
	coventrycc	It's the right time to review Coventry's Local Plan, and we'd like to get residents' comments. Drop-in to Cheylesmore Library...		1 1 0 15	955 1.78 1
	coventrycc	It's the right time to review Coventry's Local Plan, and we'd like to get residents' comments. Drop-in to Caludon Library...		1 1 1 14	1.4K 1.24 1
	coventrycc	With more up-to-date information available to us, we need to update the city's Local Plan policies. Visit <a href="https://orlo.uk/4Asq7...">https://orlo.uk/4Asq7...</a>		0 0 4 13	1.4K 1.19 0

<https://www.orlo.app/#analytics/campaign/report?campaignId=45960&startDate=2023-01-02T00:00:00.000Z&endDate=2024-01-22T23:59:59.99...> 6/6

If you need this information in another format or language  
please contact us

**Telephone: (024) 7683 1109**

**e-mail: [planningpolicy@coventry.gov.uk](mailto:planningpolicy@coventry.gov.uk)**



## Local Plan Review Proposed Policy updates and changes guidance note

Key – **middle column** proposed new wording – any **changes to existing policy wording highlighted yellow**. If no change proposed, the column will state no change

**GREEN UPPER CASE**: strategic policy

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
DS1	<p><b>Policy DS1: Overall Development Needs</b></p> <p>1. Over the Plan period significant levels of housing, employment and retail development will be planned for and provided along with supporting infrastructure and environmental enhancements:-</p> <ul style="list-style-type: none"> <li>a. A minimum of 24,600 additional homes.</li> <li>b. A minimum of 128ha of employment land within the city’s administrative boundary, including: <ul style="list-style-type: none"> <li>i. at least 176,000sq.m of office floor space at Friargate and the wider city centre,</li> </ul> </li> </ul>	<p><b>STRATEGIC POLICY</b></p> <p><b>Policy DS1: Overall Development Needs</b></p> <p>1. Over the Plan period <b>2021-2041</b> significant levels of housing <b>and</b> employment will be planned for and provided along with supporting infrastructure and environmental enhancements:-</p> <ul style="list-style-type: none"> <li>a. A minimum of <b>29,100</b> additional homes.</li> <li>b. A minimum of <b>60 ha</b> of employment land to <b>meet local needs</b> within the city’s administrative boundary, including: <ul style="list-style-type: none"> <li>i. the continued expansion of Whitley Business Park; and</li> <li>ii. 15ha strategic allocation adjoining the A45 as part of the Eastern Green sustainable urban extension.</li> </ul> </li> </ul>	<p>The policy wording is considered broadly up to date however the plan period has changed, as have the housing needs figures and employment figures. The retail evidence demonstrates that there is no need to quantify a retail requirement.</p> <p>The evidence and justification for these figures and the alternatives considered are explained in the Strategic Growth Topic paper. In summary the housing growth figure is that derived from the HEDNA, and the employment figure is the assessed capacity. The office figure has been calculated in line with the Office Market Addendum: since the start</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>ii. the continued expansion of Whitley Business Park; and</p> <p>iii. 15ha strategic allocation adjoining the A45 as part of the Eastern Green sustainable urban extension</p> <p>c. 84,900sq.m gross retail based floor space (across use classes A1-A5 (including bulky goods) and 21,900sq.m gross convenience floor space by 2031, of which at least 70,000sq.m is to be allocated to Coventry city centre.</p> <p>2. Notwithstanding the above, Coventry’s objectively assessed housing need for the period 2011 to 2031 is at least 42,400 additional homes and 369ha of employment land (including qualitative replacements). It is not possible to deliver all of this additional development land within the city boundary. As such, the Council will continue to work actively with neighbouring Councils through</p>	<p>c. 25 ha, to be provided at Baginton Fields, to contribute to sub regional need in Coventry and Warwickshire</p> <p>2. A minimum of 41,200 sqm overall office provision to include 39,549 sqm of office floor space at Friargate in compliance with Friargate Allocation JE2:1 with the remainder delivered in compliance with the criteria set out in Policy JE4</p> <p>3. Notwithstanding the above, Coventry’s employment need for the period 2021 to 2041 is for 105 ha of employment land (including qualitative replacements). It is not possible to deliver all of this additional development land within the city boundary. As such, the Council will continue to work proactively with neighbouring Councils through the Duty to Cooperate to ensure that appropriate provision is made elsewhere within the Functional Economic Market Area.</p> <p>4. The Council will undertake a comprehensive review of national policy, the regional context, updates to the evidence base and monitoring data within 5 years of the date of adoption of the plan to assess</p>	<p>of the plan period 12,449 sq m has been delivered at 2 Friargate and a further allowance will be made through a revised Friargate allocation for 27,100 sqm.</p> <p>In terms of retail, as recommended in the 2024 Retail and Centres Study Coventry’s retail need for the plan period is considered to be met by existing provision. Therefore, no new retail floorspace will be allocated.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>the Duty to Cooperate to ensure that appropriate provision is made elsewhere within the Housing Market Area.</p> <p><b>3.</b> The Council will undertake a comprehensive review of national policy, the regional context, updates to the evidence base and monitoring data before 31st March 2021 to assess whether a full or partial review of the Plan is required. In the event that a review is required, work on that review will commence immediately.</p> <p>Furthermore, the Plan will be reviewed (either wholly or partially) prior to the end of the Plan Period in the event of one or more of the following circumstances arising: -</p> <ul style="list-style-type: none"> <li><b>a.</b> Through the Duty to Co-operate, the unmet housing and employment needs of the city are proven to be undeliverable within the Local Plans of Warwickshire authorities;</li> <li><b>b.</b> Updated evidence or changes to national policy</li> </ul>	<p>whether a full or partial review of the Plan is required. In the event that a review is required, work on that review will commence immediately.</p> <p>Furthermore, the Plan will be reviewed (either wholly or partially) prior to the end of the Plan Period in the event of one or more of the following circumstances arising: -</p> <ul style="list-style-type: none"> <li><b>a.</b> Through the Duty to Co-operate, the unmet employment needs of the city are proven to be undeliverable within the Local Plans of Warwickshire authorities;</li> <li><b>b.</b> Updated evidence or changes to national policy suggest that the overall development strategy should be significantly changed;</li> <li><b>c.</b> The monitoring of the Local Plan (in line with the Plan’s Monitoring Framework having particular regard to the monitoring of housing delivery) demonstrates that the overall development strategy or the policies are not delivering the Local Plan’s objectives and requirements;</li> <li><b>d.</b> Any other reasons that render the Plan, or part of it, significantly out of date.</li> </ul>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>suggest that the overall development strategy should be significantly changed;</p> <p><b>c.</b> The monitoring of the Local Plan (in line with the Plan’s Monitoring Framework having particular regard to the monitoring of housing delivery) demonstrates that the overall development strategy or the policies are not delivering the Local Plan’s objectives and requirements;</p> <p><b>d.</b> Any other reasons that render the Plan, or part of it, significantly out of date.</p>		
DS2	<p><b>Policy DS2: The Duty to Co-operate</b></p> <p><b>1.</b> Coventry City Council will work with neighbouring authorities within its Housing Market Area to support the delivery of the development needs identified in</p>	<p><b>STRATEGIC POLICY</b></p> <p><b>Policy DS2: The Duty to Co-operate and partnership working</b></p> <p><b>1.</b> Coventry City Council will work with neighbouring authorities within its Housing Market Area to support the delivery of the</p>	<p>The wording is considered to be still relevant – the reference to the Coventry and Warwickshire Local Enterprise Partnership has been removed as the LEP no longer exists but broader reference to partnership working provides future resilience.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>Policy DS1 that originate from the city.</p> <p><b>2.</b> In order to ensure the affordable housing needs of the city are met, the Council will work with its neighbouring authorities to secure opportunities for Coventry citizens to access affordable homes within Warwickshire where they are delivered as part of the city's wider housing needs being met.</p> <p><b>3.</b> The Council will support the preparation of joint strategic evidence which will enable the successful delivery of regeneration and economic growth across the sub-region. The Council will continue to be proactive in this regard and will seek to cooperate with all partners on an ongoing basis across all topic areas including housing, infrastructure, economy and jobs, transport, health and the environment.</p> <p><b>4.</b> Should the need arise and should it be considered appropriate the Council is committed to working with</p>	<p>development needs identified in Policy DS1 that originate from the city.</p> <p><b>2.</b> In order to ensure the affordable housing needs of the city are met, the Council will work with its neighbouring authorities to secure opportunities for Coventry citizens to access affordable homes within Warwickshire where they are delivered as part of the city's wider housing needs being met.</p> <p><b>3.</b> The Council will support the preparation of joint strategic evidence which will enable the successful delivery of regeneration and economic growth across the sub-region. The Council will continue to be proactive in this regard and will seek to cooperate with all partners on an ongoing basis across all topic areas including housing, infrastructure, economy and jobs, transport, health and the environment.</p> <p><b>4.</b> Should the need arise and should it be considered appropriate the Council is committed to working with partners on preparing joint development plan documents, supplementary planning documents and design guides to help deliver new sustainable development that may straddle or adjoin the city's administrative boundary.</p> <p><b>5.</b> Where sites cross or are adjacent to administrative boundaries and are not subject to joint development plan documents, the</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>partners on preparing joint development plan documents, supplementary planning documents and design guides to help deliver new sustainable development that may straddle or adjoin the city's administrative boundary.</p> <p><b>5.</b> Where sites cross or are adjacent to administrative boundaries and are not subject to joint development plan documents, the Council will continue to work proactively and on an on-going basis with all relevant partners to enable the delivery of new development on these sites.</p> <p><b>6.</b> Of particular relevance to parts 4 and 5 of this policy are the continued growth and expansion of:</p> <ul style="list-style-type: none"> <li><b>a.</b> Jaguar Land Rover at Whitley;</li> <li><b>b.</b> The University of Warwick;</li> <li><b>c.</b> The wider Coventry Gateway proposals;</li> <li><b>d.</b> Ansty Park;</li> </ul>	<p>Council will continue to work proactively and on an on-going basis with all relevant partners to enable the delivery of new development on these sites.</p> <p><b>6.</b> Of particular relevance to parts 4 and 5 of this policy is the continued support for and recognition of the contribution which the following sites make to the sub-regional economy:</p> <ul style="list-style-type: none"> <li><b>a.</b> Jaguar Land Rover at Whitley;</li> <li><b>b.</b> The University of Warwick;</li> <li><b>c.</b> The wider Coventry Gateway proposals;</li> <li><b>d.</b> Ansty Park;</li> <li><b>e.</b> Pro-Logis Park at Keresley; and</li> <li><b>f.</b> Proposed residential developments to the south of the city's administrative boundary.</li> </ul> <p><b>7.</b> The Council is committed to supporting the economic growth objectives of the sub-region and, in partnership will continue to work proactively will all partners to deliver economic growth and prosperity across Coventry and Warwickshire.</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>e. Pro-Logis Park at Keresley; and f. Proposed residential developments to the south of the city's administrative boundary.</p> <p>7. The Council is committed to supporting the economic growth objectives of the sub-region and, in partnership with the CWLEP will continue to work pro-actively will all partners to deliver economic growth and prosperity across Coventry and Warwickshire.</p>		
DS3	<p><b>Policy DS3: Sustainable Development Policy</b></p> <p>1. When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work proactively with applicants to find solutions to enable proposals to be approved wherever possible, and to secure development that</p>	<p><b>STRATEGIC POLICY</b></p> <p><b>Policy DS3: Sustainable Development Policy</b></p> <p>1. When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work proactively with applicants to find solutions to enable proposals to be approved wherever possible, and to secure development that improves the economic,</p>	<p>The policy is still considered up to date as it reflects the wording of national policy. However, it is proposed to add in reference to the One Coventry Plan and the emerging Climate Change Strategy to provide local context.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>improves the economic, social and environmental conditions in the area, including:</p> <ul style="list-style-type: none"> <li><b>a.</b> access to a variety of high quality green and blue infrastructure;</li> <li><b>b.</b> access to job opportunities;</li> <li><b>c.</b> use of low carbon, renewable and energy efficient technologies;</li> <li><b>d.</b> the creation of mixed sustainable communities through a variety of dwelling types, sizes, tenures and range of community facilities</li> <li><b>e.</b> increased health, wellbeing and quality of life;</li> <li><b>f.</b> measures to adapt to the impacts of climate change;</li> <li><b>g.</b> access to sustainable modes of transport;</li> <li><b>h.</b> preservation and enhancement of the historic environment; and</li> <li><b>i.</b> sustainable waste management.</li> </ul> <p><b>2.</b> Planning applications that accord with the policies in the</p>	<p>social and environmental conditions in the area, taking into account the ambitions of the <b>One Coventry Plan and the Climate Change Strategy</b> and including:</p> <ul style="list-style-type: none"> <li><b>a.</b> access to a variety of high quality green and blue infrastructure;</li> <li><b>b.</b> access to job opportunities;</li> <li><b>c.</b> use of low carbon, renewable and energy efficient technologies;</li> <li><b>d.</b> the creation of mixed sustainable communities through a variety of dwelling types, sizes, tenures and range of community facilities</li> <li><b>e.</b> increased health, wellbeing and quality of life;</li> <li><b>f.</b> measures to adapt to the impacts of climate change;</li> <li><b>g.</b> access to sustainable modes of transport;</li> <li><b>h.</b> preservation and enhancement of the historic environment; and</li> <li><b>i.</b> sustainable waste management.</li> </ul> <p><b>2.</b> Planning applications that accord with the policies in the Coventry Local Plan (and, where relevant, with policies in supporting plans) will be approved without delay, unless material considerations indicate otherwise.</p> <p><b>3.</b> Where there are no policies relevant to the application or relevant policies are out of date</p>	



Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>Coventry Local Plan (and, where relevant, with policies in supporting plans) will be approved without delay, unless material considerations indicate otherwise.</p> <p><b>3.</b> Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise.</p> <p><b>4.</b> This will take into account:</p> <p style="padding-left: 20px;"><b>a.</b> Any adverse impacts of granting permission that would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or</p> <p style="padding-left: 20px;"><b>b.</b> Specific policies in that Framework that indicate that development should be restricted.</p>	<p>at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise.</p> <p><b>4.</b> This will take into account:</p> <p style="padding-left: 20px;"><b>a.</b> Any adverse impacts of granting permission that would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or</p> <p style="padding-left: 20px;"><b>b.</b> Specific policies in that Framework that indicate that development should be restricted</p>	
DS4 (Part A)	<b>Policy DS4 (Part A) – General Masterplan principles</b>	<b>STRATEGIC POLICY</b>	The policy wording is considered up to date and remains fit for purpose, particularly as this has

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>The following General Principles should be adhered to when master planning any major development proposal:</p> <ul style="list-style-type: none"> <li>i) Where appropriate the Masterplan should clearly identify any phasing of development along with the timely provision of supporting infrastructure;</li> <li>ii) Where the site is identified as an allocation within the Local Plan or City Centre AAP it should plan positively to meet in full the requirements identified within the relevant policies associated with the allocation. Where the proposal represents a phase or phases of a wider scheme however, the quantum of development should reflect the relative size and characteristics of the phase, including its</li> </ul>	<p><b>Policy DS4 (Part A) – General Masterplan principles</b></p> <p>The following General Principles should be adhered to when master planning any major development proposal:</p> <ul style="list-style-type: none"> <li>i) Where appropriate the Masterplan should clearly identify any phasing of development along with the timely provision of supporting infrastructure;</li> <li>ii) Where the site is identified as an allocation within the Local Plan it should plan positively to meet in full the requirements identified within the relevant policies associated with the allocation. Where the proposal represents a phase or phases of a wider scheme however, the quantum of development should reflect the relative size and characteristics of the phase, including its position within the wider site;</li> <li>iii) Where possible, all proposals should be planned in a comprehensive and integrated manner reflecting partnership working with relevant stakeholders. Where proposals represent a phase of a larger development the</li> </ul>	<p>been used to inform the development of key allocations some of which are underway at the time of the review.</p> <p>Reference to the AAP has been taken out in the proposed updated wording as the plan review proposes to incorporate the relevant AAP policies into a City Centre policy chapter of the Local Plan.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>position within the wider site;</p> <p>iii) Where possible, all proposals should be planned in a comprehensive and integrated manner reflecting partnership working with relevant stakeholders. Where proposals represent a phase of a larger development the Masterplan should have full regard to any adjoining land parcels and development proposals to ensure it delivers appropriate parts of the strategic or site-wide infrastructure and other relevant features. This should support the wider delivery of the comprehensive scheme;</p> <p>iv) Opportunities to deliver higher density residential and mixed-use development should</p>	<p>Masterplan should have full regard to any adjoining land parcels and development proposals to ensure it delivers appropriate parts of the strategic or site-wide infrastructure and other relevant features. This should support the wider delivery of the comprehensive scheme;</p> <p>iv) Opportunities to deliver higher density residential and mixed-use development should be maximised along public transport corridors and in designated centres with lower densities provided elsewhere (in accordance with policies H9 and R3);</p> <p>v) Employment and commercial proposals should respond positively to market demands and requirements, maximising opportunities to locate within or close to designated centres (as appropriate) and provide a range and choice of opportunities to meet business and customer needs;</p> <p>vi) Identify appropriate highway infrastructure along with sustainable transport corridors that include the provision for integrated public transport, cycling and walking which</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>be maximised along public transport corridors and in designated centres with lower densities provided elsewhere (in accordance with policies H9 and R3);</p> <p>v) Employment and commercial proposals should respond positively to market demands and requirements, maximising opportunities to locate within or close to designated centres (as appropriate) and provide a range and choice of opportunities to meet business and customer needs;</p> <p>vi) Identify appropriate highway infrastructure along with sustainable transport corridors that include the provision for integrated public transport, cycling and</p>	<p>provides excellent connectivity and linkages to within the site itself, the city centre and with the surrounding area and existing networks;</p> <p>vii) Appropriate levels of car and cycle parking should be made in accordance with the Local Plan's parking requirements. Spaces should be well integrated within the development and laid out to ensure they do not result in the obstruction of the highway as a result of excessive on-street parking;</p> <p>viii) Where appropriate social and community facilities should be concentrated within mixed use hubs and designated centres and easily accessed by public transport, walking and cycling (having regard to Policy CO1);</p> <p>ix) Proposals should respond to the local context and local design characteristics (in accordance with Policies GE3, HE2 and DE1), to create new well designed developments with a distinctive character which residents will be proud of;</p> <p>x) Features of the historic environment should be respected as part of new</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>walking which provides excellent connectivity and linkages to within the site itself, the city centre and with the surrounding area and existing networks;</p> <p>vii) Appropriate levels of car and cycle parking should be made in accordance with the Local Plan's parking requirements. Spaces should be well integrated within the development and laid out to ensure they do not result in the obstruction of the highway as a result of excessive on-street parking;</p> <p>viii) Where appropriate social and community facilities should be concentrated within mixed use hubs and designated centres and easily accessed by public transport, walking</p>	<p>developments with existing heritage assets conserved and enhanced as part of development proposals (in accordance with Policy HE2). Where appropriate, this should include the setting of buildings and spaces and the restoration of assets at risk of loss;</p> <p>xi) 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 (having regard to Policies GE1-4);</p> <p>xii) Provide fully integrated, accessible and connected multi-functional green and blue infrastructure which forms strategically important links to the surrounding area to provide routes for people and wildlife and open spaces for sports, recreation and play;</p> <p>xiii) Where appropriate incorporate innovative and creative approaches to energy generation, the provision</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>ix) and cycling (having regard to Policy CO1); Proposals should respond to the local context and local design characteristics (in accordance with Policies GE3, HE2 and DE1), to create new well designed developments with a distinctive character which residents will be proud of;</p> <p>x) Features of the historic environment should be respected as part of new developments with existing heritage assets conserved and enhanced as part of development proposals (in accordance with Policy HE2). Where appropriate, this should include the setting of buildings and spaces and the restoration of assets at risk of loss;</p>	<p>xiv) of utilities and information technology, mitigation of pollutants, management of surface water and flood risk and waste management solutions. These should be adopted to make new developments more sustainable and resistant to the impacts of climate change; and All new Masterplans should be informed by consultation with existing communities in adjoining areas. This should take place prior to the submission of a planning application to ensure feedback can influence the final proposals.</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>xi) 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 (having regard to Policies GE1-4);</p> <p>xii) Provide fully integrated, accessible and connected multi-functional green and blue infrastructure which forms strategically important links to the surrounding area to provide routes for people and wildlife and open spaces for sports, recreation and play;</p>		

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>xiii) Where appropriate incorporate innovative and creative approaches to energy generation, the provision of utilities and information technology, mitigation of pollutants, management of surface water and flood risk and waste management solutions. These should be adopted to make new developments more sustainable and resistant to the impacts of climate change; and</p> <p>xiv) All new Masterplans should be informed by consultation with existing communities in adjoining areas. This should take place prior to the submission of a planning application to ensure feedback can influence the final proposals.</p>		



Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
DS4 (Part B)	<p><b>Policy DS4 (Part B) - Whitley Specific Masterplan Principles</b>            In addition to the general principles outlined in Policy DS4 (Part A) of this policy, development proposals which relate to this area should also have regard to the relevant requirements below:</p> <ul style="list-style-type: none"> <li>i) Any development should support and complement the existing JLR global headquarters;</li> <li>ii) New provision should be primarily focused within 'B class' uses (excluding B1 offices) unless they are shown to be ancillary and supportive to the overall provisions of the business park and in accordance with the other policies of this Plan;</li> <li>iii) Support and integrate the planned highway infrastructure (as listed</li> </ul>	<p><b>Policy DS4 (Part B) - Whitley Specific Masterplan Principles</b>            In addition to the general principles outlined in Policy DS4 (Part A) of this policy, development proposals which relate to this area should also have regard to the relevant requirements below:</p> <ul style="list-style-type: none"> <li>i) Any development should support and complement the existing JLR global headquarters;</li> <li>ii) New provision should be primarily focused within 'B class' uses unless they are shown to be ancillary and supportive to the overall provisions of the business park and in accordance with the other policies of this Plan;</li> <li>iii) Support and integrate the planned highway infrastructure (as listed in the IDP) across the A45, A444 and other appropriate surrounding roads to ensure efficient and appropriate vehicle access into the site(s);</li> <li>iv) Continue to maximise links and connectivity with surrounding business parks within both Coventry City and Warwick District to enhance the employment hub;</li> </ul>	<p>The policy is considered up to date and relevant, although in Part ii) the reference to B1 offices has been deleted as this use class no longer exists</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>in the IDP) across the A45, A444 and other appropriate surrounding roads to ensure efficient and appropriate vehicle access into the site(s);</p> <p>iv) Continue to maximise links and connectivity with surrounding business parks within both Coventry City and Warwick District to enhance the employment hub;</p> <p>v) Expand and enhance on existing travel plans and continue to encourage excellent connectivity to public transport as well as the provision of high quality routes to support both walking and cycling;</p> <p>vi) Enhance the connectivity of ecology and biodiversity at the Stonebridge meadows LNR and Baginton Fields nature reserve. This should include a</p>	<p>v) Expand and enhance on existing travel plans and continue to encourage excellent connectivity to public transport as well as the provision of high quality routes to support both walking and cycling;</p> <p>vi) Enhance the connectivity of ecology and biodiversity at the Stonebridge meadows LNR and Baginton Fields nature reserve. This should include a 'green' connection into the River Sowe along the northern edge of the site and south of the A46;</p> <p>vii) An appropriate buffer should be retained between the new commercial activity and the existing homes in and around Sedgemoor Road;</p> <p>viii) Development should not compromise the presence and ecological value of the River Sowe and River Sherbourne; and</p> <p>ix) Make positive provisions to relocate the existing sports fields (as appropriate) in accordance with Policy GE2;</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>'green' connection into the River Sowe along the northern edge of the site and south of the A46;</p> <p>vii) An appropriate buffer should be retained between the new commercial activity and the existing homes in and around Sedgemoor Road;</p> <p>viii) Development should not compromise the presence and ecological value of the River Sowe and River Sherbourne;</p> <p>and</p> <p>ix) Make positive provisions to relocate the existing sports fields (as appropriate) in accordance with Policy GE2;</p>		
DS4 (Part C)	<b>Policy DS4 (Part C) – Keresley SUE Specific Masterplan Principles</b>	<b>Policy DS4 (Part C) – Keresley SUE Specific Masterplan Principles</b>	This policy is considered to remain up to date. Only change is an updated position on the Northern Local Centre which is no longer proposed as part of the

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>In addition to the general principles outlined in Policy DS4 (Part A) of this policy, development proposals which relate to this area should also have regard to the relevant requirements below:</p> <ul style="list-style-type: none"> <li>i) Incorporate the recommendations of the Council's SUE Design Guidance SPD;</li> <li>ii) Ensure that the planned Local Centres are located at separate ends (north and south) in accordance with Policy R1;</li> <li>iii) Ensure the new defensible boundaries to the Green Belt are clearly supported on the western side of the site to Tamworth Road and to the north around Thompsons Lane;</li> <li>iv) Establish a comprehensive green and blue infrastructure corridor focused around the Ancient Woodlands, Hounds Hill and the Hall</li> </ul>	<p>Change proposed to part 2. Ensure that the planned Local Centre is in accordance with Policy R1;</p>	<p>allocation, as it was removed via Planning approval OUT/2019/0484</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>Brook. This corridor should run north-south between the Burrow Hill Fort to the north and the Jubilee Woodland to the south east; and</p> <p>v) Identify clear access points to the site and make appropriate provisions for new transport infrastructure and highway improvements to support the comprehensive delivery of the site. This should include:</p> <ul style="list-style-type: none"> <li>a. The provision of a new Link Road in accordance with Policy H2. The Link Road should be operational to traffic prior to the full completion of all development components within the SUE;</li> <li>b. The delivery of the Link Road should not be to the detriment of Pro-Logis Park; and</li> </ul>		

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>c. The management of the existing highway junctions at Bennetts Road, Tamworth Road, Fivefield Road, Sandpits Lane, Thompsons Lane, Long Lane and Watery Lane to ensure they continue to operate in a safe and appropriate way.</p>		
DS4 (Part D)	<p><b>Policy DS4</b> (Part D) – Eastern Green SUE Specific Masterplan Principles</p> <p>In addition to the general principles outlined in Policy DS4 (Part A) of this policy, development proposals which relate to this area should also have regard to the relevant requirements below:</p> <p>i) Incorporate the recommendations of the Council’s SUE</p>	<p><b>Policy DS4</b> (Part D) – Eastern Green SUE Specific Masterplan Principles</p> <p>No change proposed</p>	<p>This policy is considered to remain up to date, no change proposed</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>Design Guidance SPD;</p> <ul style="list-style-type: none"> <li data-bbox="584 347 965 671">ii) Respond to the transport and economic opportunities associated with the site's proximity to the planned HS2 interchange to the west.</li> <li data-bbox="584 679 965 1267">iii) Ensure that the employment provisions and Major District Centre are located towards the north of the site and are accessed directly from the new A45 Junction. Neither the employment provision or new Major District Centre should be occupied until the new A45 junction is fully operational;</li> <li data-bbox="584 1275 965 1374">iv) Furthermore, the residential element of the scheme</li> </ul>		

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>should be limited to the occupation of no more than 250 homes until such time as the new A45 junction is fully operational, unless otherwise agreed in writing by the Council in response to a robust TA.</p> <p>v) Ensure the new defensible boundaries to the Green Belt are clearly supported to Pickford Green Lane in the west and the A45 to the north;</p> <p>vi) Provide appropriate green infrastructure along the western edge of the SUE around Pickford Green Lane to help blend and integrate the development into the wider Countryside;</p>		



Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>vii) Establish a comprehensive green and blue infrastructure corridor focused along the Pickford Brook and its tributary. This should run from Pickford Green Lane in the west and link to existing corridors off-site, for example, across Westridge Avenue and Parkhill Drive towards Allesley Park;</p> <p>viii) Identify clear access points to the site and make appropriate provisions for new transport infrastructure and highway improvements to support the comprehensive delivery of the site;</p> <p>ix) In accordance with Policy AC2, manage</p>		

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>the existing highway junctions at Pickford Green Lane and Brick Hill Lane with the A45 to ensure they are either integrated into the new A45 Junction or safely retained within the existing highway network; and</p> <p>x) Make appropriate provision to aid future integration of the new rapid transit route within the site once the final route is known.</p>		
HW1	<p><b>Policy HW1:</b> Health Impact Assessments (HIA)</p> <p>1. All major development proposals will be required to demonstrate that they would have an acceptable impact on health and wellbeing. This should be demonstrated through a:</p>	<p><b>STRATEGIC POLICY</b></p> <p><b>Policy HW1:</b> Health and Health Impact Assessments (HIA)</p> <p>1. All major development proposals will be required to demonstrate that they would have an acceptable impact on health and wellbeing. This should be demonstrated through a:</p>	<p>The Health Impact Assessment SPD sets thresholds for requiring full HIA, and it is felt more guidance on taking health into account in schemes which do not meet this threshold would be beneficial for example showing how Building for a Healthy Life Principles, or any matters highlighted in an updated Health Impact Assessment SPD have</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p><b>a.</b> HIA where significant impacts on health and wellbeing would arise from that proposal; or</p> <p><b>b.</b> HIA Screening Report which demonstrates that the proposed development would not overall give rise to negative impacts in respect of health and wellbeing.</p> <p><b>2.</b> All HIAs shall be undertaken in accordance with the Council’s HIA Supplementary Planning Document.</p> <p><b>3.</b> Where a development has significant negative or positive impacts on health and wellbeing the Council may require applicants to provide for the mitigation or provision of such impacts through planning conditions and/or financial/other contributions secured via planning obligations and/or the Council’s CIL Charging Schedule.</p>	<p>a. HIA where significant impacts on health and wellbeing would arise from that proposal; or</p> <p>b. HIA Screening Report which demonstrates that the proposed development would not overall give rise to negative impacts in respect of health and wellbeing.</p> <p><b>2.</b> All HIAs shall be undertaken in accordance with the Council’s HIA Supplementary Planning Document <b>or any future equivalent.</b></p> <p><b>3.</b> Where a development has significant negative or positive impacts on health and wellbeing the Council may require applicants to provide for the mitigation or provision of such impacts through planning conditions and/or financial/<b>other developer contributions</b></p> <p><b>4.</b> <b>Where the threshold has not been met for requiring a full Health Impact Assessment, for major applications of 10 dwellings or more, applicants will be required to demonstrate through their Design and Access Statements how they have taken health matters into account in line with principles contained in an updated Health SPD.</b></p>	<p>been applied incorporation of health matters into the Design and Access Statement.</p> <p>The HIA SPD will be reviewed and updated and policy has been revised to reference this and the broadened scope.</p> <p>The reference in Part 3 of the Policy to CIL has been removed and replaced with a broad reference to developer contributions to ensure resilience given potential planning reform</p> <p>Explanatory text to be revised in line with changed policy wording and to include the need for student accommodation and other forms of residential development of 150 bedspaces and above to be subject to HIA with further detail to be included in an updated Health SPD</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
JE1	<p><b>Policy JE1:</b> Overall Economy and Employment Strategy</p> <p><b>1.</b> The Council will work positively and proactively with the business community in the city, inward investors, the city's two Universities, key public sector employers, the CWLEP and neighbouring local authorities to support sustainable economic growth and job creation. In this regard the Council will:</p> <p><b>a.</b> Promote continued diversification of the city's economic base, particularly through supporting the expansion of companies operating in growth sectors and partnership working with the city's Universities to promote innovation;</p> <p><b>b.</b> Ensure that job opportunities arising from employment development are accessible to all of the city's working age residents, particularly priority groups and those in the most deprived areas of the city;</p> <p><b>c.</b> Provide for a readily available range and choice of employment</p>	<p><b>STRATEGIC POLICY</b></p> <p><b>Policy JE1:</b> Overall Economy and Employment Strategy</p> <p><b>1.</b> In accordance with the One Coventry Plan, the Economic Development Strategy and the Climate Change Strategy the Council will work positively and proactively with the business community in the city, inward investors, the city's two Universities, key public sector employers, partners, and neighbouring local authorities to support sustainable economic growth and job creation. In this regard the Council will:</p> <p><b>a.</b> Promote continued diversification of the city's economic base, particularly through supporting the expansion of companies operating in growth sectors particularly those relating to sustainable and green technologies, and through fostering partnership working with the city's Universities to promote innovation;</p> <p><b>b.</b> Ensure that job opportunities arising from employment development are accessible to all of the city's working age residents, particularly priority groups and those in the most deprived areas of the city;</p> <p><b>c.</b> Provide for a readily available range and choice of employment sites and premises to meet projected need over the Plan period</p>	<p>Policy updated to be more reflective of the One Coventry Plan, the Economic Development Strategy and the Climate Change Strategy including the need to support sustainable and green technology.</p> <p>References to the CWLEP deleted as this body no longer exists, and instead broader references to partnerships is included as this provides more resilience to future change.</p> <p>Reference to Friargate Business District removed in regard to offices as whilst Friargate remains an allocation its emphasis is proposed to be changed to more mixed use.</p> <p>Reference to tourism broadened to encompass a range of uses eg opportunities along the canal network etc</p> <p>In order to protect a sustainable balance of uses in the city a hook to the Employment Land Review</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>sites and premises to meet projected need over the Plan period related to growth of the city's population and the pivotal role of the city in the CWLEP's ambitious growth agenda for the sub-region;</p> <p><b>d.</b> Safeguard existing employment sites and premises from being lost to non-employment uses unless certain exceptional circumstances are demonstrated;</p> <p><b>e.</b> Support companies, including Jaguar Land Rover, in retaining, expanding and/or relocating their headquarters operations within the city and support the provision of new infrastructure that encourages these companies to grow.</p> <p><b>f.</b> Seek to direct office development to locations in the city centre and other defined centres with new large scale office development focused on the city centre's Friargate Business District;</p> <p><b>g.</b> Ensure that new research and development, light industrial, general industrial and storage/</p>	<p>related to growth of the city's population and the pivotal role of the city in the ambitious growth agenda for the sub-region;</p> <p><b>d.</b> There will be a presumption against the loss of employment uses, and change to non-employment uses will be assessed against the criteria set out in Policy JE3</p> <p><b>e.</b> Support companies, including Jaguar Land Rover, in retaining, expanding and/or relocating their headquarters operations within the city and support the provision of new infrastructure that encourages these companies to grow.</p> <p><b>f.</b> Seek to direct office development to locations in the city centre and other defined centres with new large scale office development focused on the city centre</p> <p><b>g.</b> Ensure that new research and development, light industrial, general industrial and storage/ distribution developments are appropriately sited and designed to maximise their accessibility by a choice of means of transport, have an acceptable impact on the highway network and to minimise the potential for environmental conflict with nearby sensitive land uses;</p> <p><b>h.</b> Support tourism/visitor related development including Coventry city centre, the CBS Arena</p>	<p>is provided to ensure that good quality high performing employment locations are protected.</p> <p>Supporting text to be updated to provide an updated definition of 'employment' for the application of policy. For the purposes of employment supply and monitoring it is proposed this now relates to Class E Part g plus B2 and B8, and for decision making that this relates to Class E Part g Classes B2, B8 and other uses serving an employment purpose.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>distribution developments are appropriately sited and designed to maximise their accessibility by a choice of means of transport, have an acceptable impact on the highway network and to minimise the potential for environmental conflict with nearby sensitive land uses;</p> <p><b>h.</b> Support tourism/visitor related development in respect of Coventry city centre, the Ricoh Arena and the Coventry and Warwick University Campuses.</p> <p><b>i.</b> Support the continued growth of the city's two universities and in doing so maximise the economic development and other community benefits associated with them</p>	<p>and the Coventry and Warwick University Campuses.</p> <p><b>i.</b> Support the continued growth of the city's two universities and in doing so maximise the economic development and other community benefits associated with them</p> <p><b>j</b> support the provision of new green infrastructure as part of new and improved developments</p>	
JE2	<p><b>Policy JE2: Provision of Employment Land and Premises</b></p> <p>1 A total of 107ha of land are allocated for employment development within the city's administrative area.</p> <p>The allocations are as specified below together with details of the</p>	<p><b>STRATEGIC POLICY</b></p> <p><b>Policy JE2: Provision of Employment Land and Premises</b></p> <p>1 A total of 52 ha of land is allocated for employment development within the city's administrative area, plus 27,100 sq m remaining floorspace at Friargate as part of a wider mixed use allocation.</p>	<p>The overall growth figures are updated in line with the HEDNA but do not include the figure for strategic B8 which needs to be considered separately across the sub region</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation																																																		
	<p>type of employment development that will be promoted on each of these sites.</p> <table border="1" data-bbox="468 421 960 711"> <thead> <tr> <th>Site Ref</th> <th>Site</th> <th>Ward/UPA</th> <th>Area Ha (hectares)</th> <th>Employment Type</th> </tr> </thead> <tbody> <tr> <td>JE21</td> <td>Friargate (part of mixed use site)</td> <td>St. Michael's</td> <td>3</td> <td>Primary B1a</td> </tr> <tr> <td>JE22</td> <td>Lyons Park</td> <td>Balsley</td> <td>19</td> <td>B1, B2 &amp; B8</td> </tr> <tr> <td>JE23</td> <td>Whitley Business Park</td> <td>Chykelesmore</td> <td>35</td> <td>B1a, B2 &amp; B8</td> </tr> <tr> <td>JE24</td> <td>Land at Baginbun Fields and South East of Whitley Business Park</td> <td>Chykelesmore</td> <td>23</td> <td>B1a, B2 &amp; B8</td> </tr> <tr> <td>JE25</td> <td>A45 Eastern Green (part of mixed use site)</td> <td>Balsley</td> <td>15</td> <td>B1a, B2 &amp; B8</td> </tr> <tr> <td>JE26</td> <td>Whitmore Park (part of mixed use site)</td> <td>Hillbrook</td> <td>9</td> <td>B1a, B2 &amp; B8</td> </tr> <tr> <td>JE27</td> <td>Durbar Avenue (part of mixed use site)</td> <td>Foleshill</td> <td>1.5</td> <td>B1a &amp; B8</td> </tr> <tr> <td>JE28</td> <td>Land at Alderman's Green Road and Sutton Stop (part of mixed use site)</td> <td>Longford</td> <td>1.5</td> <td>B1a &amp; B8</td> </tr> <tr> <td colspan="3">TOTAL</td> <td>107</td> <td></td> </tr> </tbody> </table> <p>2 The Friargate, A45 Eastern Green, Whitmore Park, Durbar Avenue and Alderman's Green Road and Sutton Stop employment allocations are to be progressed as part of wider mixed-use re-development schemes and should be supported by comprehensive Masterplans.</p> <p>3 A minimum supply of new employment land on a 5 year rolling cycle of 58ha is required to be available at all times in Coventry and on sites outside but adjacent to the city's</p>	Site Ref	Site	Ward/UPA	Area Ha (hectares)	Employment Type	JE21	Friargate (part of mixed use site)	St. Michael's	3	Primary B1a	JE22	Lyons Park	Balsley	19	B1, B2 & B8	JE23	Whitley Business Park	Chykelesmore	35	B1a, B2 & B8	JE24	Land at Baginbun Fields and South East of Whitley Business Park	Chykelesmore	23	B1a, B2 & B8	JE25	A45 Eastern Green (part of mixed use site)	Balsley	15	B1a, B2 & B8	JE26	Whitmore Park (part of mixed use site)	Hillbrook	9	B1a, B2 & B8	JE27	Durbar Avenue (part of mixed use site)	Foleshill	1.5	B1a & B8	JE28	Land at Alderman's Green Road and Sutton Stop (part of mixed use site)	Longford	1.5	B1a & B8	TOTAL			107		<p>The allocations are as specified below together with details of the type of employment development that will be promoted on each of these sites.</p> <p>SEE MAIN LOCAL PLAN FOR DETAILED ALLOCATIONS LIST</p> <p>2 The Friargate, A45 Eastern Green, Whitmore Park, Durbar Avenue and Alderman's Green Road and Sutton Stop employment allocations are to be progressed as part of wider mixed-use re-development schemes and should be supported by comprehensive Masterplans.</p> <p>3 . A balanced portfolio of employment land supply offering a choice of sites will be maintained, with details of need and supply set out in the Annual Monitoring Report and informed by the Employment Land Review which will be updated on a five yearly basis.</p> <p>4. The following sites, shown oat Appendix 9a and listed in bullet point 5, are designated as Key Employment Sites which will be protected for employment use. Alternative uses will not be considered acceptable unless exceptional circumstances demonstrate otherwise. In such cases it must be demonstrated that</p>	<p>The table of allocations has been updated to reflect the latest position</p> <p>The reference to the rolling supply is deleted as this no longer reflects national policy</p> <p>The Employment Land Review and Offices Addendum 2024 sets out the Key Employment Sites for protection.</p>
Site Ref	Site	Ward/UPA	Area Ha (hectares)	Employment Type																																																	
JE21	Friargate (part of mixed use site)	St. Michael's	3	Primary B1a																																																	
JE22	Lyons Park	Balsley	19	B1, B2 & B8																																																	
JE23	Whitley Business Park	Chykelesmore	35	B1a, B2 & B8																																																	
JE24	Land at Baginbun Fields and South East of Whitley Business Park	Chykelesmore	23	B1a, B2 & B8																																																	
JE25	A45 Eastern Green (part of mixed use site)	Balsley	15	B1a, B2 & B8																																																	
JE26	Whitmore Park (part of mixed use site)	Hillbrook	9	B1a, B2 & B8																																																	
JE27	Durbar Avenue (part of mixed use site)	Foleshill	1.5	B1a & B8																																																	
JE28	Land at Alderman's Green Road and Sutton Stop (part of mixed use site)	Longford	1.5	B1a & B8																																																	
TOTAL			107																																																		

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>administrative boundary (the “Minimum Reservoir”). This will be achieved by using a combination of newly allocated and recycled land. A balanced portfolio of employment land supply offering a choice of sites will be maintained, with details of need and supply set out in the Annual Monitoring Report.</p>	<p>delivery of mixed use including retention of employment has been considered on the site. Only where this has been evidenced not to be viable or appropriate will policy JE3 and associated Appendix 2 be applicable.</p> <p>5 Key Employment Sites are shown at Appendix 9a and are:</p> <ul style="list-style-type: none"> <li>• Binley Business Park</li> <li>• Coventry Business Park</li> <li>• Cyan Park</li> <li>• Lyons Park</li> <li>• Swallowgate Business Park</li> <li>• University of Warwick Science Park</li> <li>• Whitley Business Park</li> </ul>	
JE3	<p><b>Policy JE3: Non-Employment Uses on Employment Land</b></p> <p>1. Proposals for the redevelopment in whole or in part of employment land for non-employment purposes will not be permitted unless it can be demonstrated that the part(s) of the site where non employment development is proposed are:</p> <p>a. No longer suitable for employment use bearing in mind their physical characteristics,</p>	<p><b>Policy JE3: Non-Employment Uses on Employment Land</b></p> <p>1. Sites designated as Key Employment Sites will firstly be assessed in accordance with Policy JE2</p> <p>2 Proposals for the redevelopment in whole or in part of employment land for non-employment purposes will not be permitted unless it can be demonstrated that the part(s) of the site where non employment development is proposed are:</p> <p>a. No longer suitable for employment use bearing in mind their physical characteristics,</p>	<p>The wording of the policy itself is considered up to date (albeit with the additional point at the start to reflect the new Key Employment Sites and subsequent renumbering of bullets), however the context for its application (see JE 1 note on explanatory text) to change to provide an updated definition of ‘employment’ for the application of policy. For the purposes of employment supply</p>



Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>access arrangements and/or relationship to neighbouring land-uses and there is evidence of unsuccessful active and substantial marketing of the site for employment use using a variety of media which supports this; or</p> <p><b>b.</b> It would not be financially viable to re-use or re-develop the land or buildings on the land in whole or in part for employment purposes; or</p> <p><b>c.</b> The non-employment development proposed would be used for purposes which are clearly ancillary to and will support the operations of a primary employment use on the land; or</p> <p><b>d.</b> The non-employment development would generate significant employment gains which are of sufficient weight to justify the loss of employment land</p> <p><b>2.</b> In addition to at least one of the above criteria being satisfied it will also need to be demonstrated that:</p> <p><b>a.</b> The potential of the site to contribute to the employment land</p>	<p>access arrangements and/or relationship to neighbouring land-uses and there is evidence of unsuccessful active and substantial marketing of the site for employment use using a variety of media which supports this; or</p> <p><b>b.</b> It would not be financially viable to re-use or re-develop the land or buildings on the land in whole or in part for employment purposes; or</p> <p><b>c.</b> The non-employment development proposed would be used for purposes which are clearly ancillary to and will support the operations of a primary employment use on the land; or</p> <p><b>d.</b> The non-employment development would generate significant employment gains which are of sufficient weight to justify the loss of employment land</p> <p><b>2.</b> In addition to at least one of the above criteria being satisfied it will also need to be demonstrated that:</p> <p><b>a.</b> The potential of the site to contribute to the employment land requirements of the city over the plan period is not significant; and</p> <p><b>b.</b> The proposal would not significantly compromise the viability or deliverability of other adjacent employment land or land allocated in this Plan for employment development; and</p>	<p>and monitoring it is proposed this now relates to Class E Part g (I to iii) plus B2 and B8, and for decision making that this relates to Class E Part g (I to iii), Classes B2, B8 and other uses serving an employment purpose.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>requirements of the city over the plan period is not significant; and</p> <p><b>b.</b> The proposal would not significantly compromise the viability or deliverability of other adjacent employment land or land allocated in this Plan for employment development; and</p> <p><b>c.</b> The proposal will not have an unacceptable adverse impact on the continuing operation of any nearby existing businesses.</p> <p><b>3.</b> Planning applications to which this Policy applies should be accompanied by written evidence to demonstrate that the proposed development satisfies the exceptions criteria highlighted above.</p> <p><b>4.</b> This Policy applies to land which is currently in use or was last used for employment purposes unless such land has been allocated in this Plan wholly for non-employment use.</p>	<p><b>c.</b> The proposal will not have an unacceptable adverse impact on the continuing operation of any nearby existing businesses.</p> <p><b>3.</b> Planning applications to which this Policy applies should be accompanied by written evidence to demonstrate that the proposed development satisfies the exceptions criteria highlighted above.</p> <p><b>4.</b> This Policy applies to land which is currently in use or was last used for employment purposes unless such land has been allocated in this Plan wholly for non-employment use.</p>	
JE4	<p><b>Policy JE4: Location of Office Development</b></p> <p><b>1.</b> New office development (including change of use of buildings to provide office</p>	<p><b>Policy JE4: Location and type of Office Development</b></p> <p><b>1.</b> New office development (including change of use of buildings to provide office</p>	<p>A reference to type of office development has been introduced to ensure flexibility within the market. Whist Friargate remains the primary location,</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>accommodation and the expansion of existing office uses) should normally be sited within Coventry city centre or other defined centres (as defined on the Policies Map).</p> <p><b>2.</b> The Friargate site within Coventry city centre is the Council's preferred location for new large scale office development. This site is allocated for primarily B1 office development under Policy JE2.</p> <p><b>3.</b> Proposals for new office development in other locations will only be permitted if the following criteria are satisfied:</p> <p><b>a.</b> Having regard to locational factors, there are no suitable sequentially preferable sites available within the city centre, another defined centre or in an edge-of-centre location (if no Defined Centre sites are suitable and available); or</p> <p><b>b.</b> The proposal is for small scale rural offices;</p> <p><b>4.</b> In addition to at least one of the above criteria being satisfied it will</p>	<p>accommodation and the expansion of existing office uses) should normally be sited within Coventry city centre or other defined centres (as defined on the Policies Map).</p> <p><b>2.</b> The Friargate site within Coventry city centre is the Council's preferred location for new large scale office development.</p> <p><b>3.</b> Proposals for new office development in other locations will only be permitted if the following criteria are satisfied:</p> <p><b>a.</b> Having regard to locational factors, there are no suitable sequentially preferable sites available within the city centre, another defined centre or in an edge-of-centre location (if no Defined Centre sites are suitable and available); or</p> <p><b>b.</b> The proposal is for small scale rural offices;</p> <p><b>4.</b> In addition to at least one of the above criteria being satisfied it will also need to be demonstrated that:</p> <p><b>a.</b> The proposal would not have a significant adverse impact on the vitality and viability of defined centres and on existing, committed and planned public and private investment in office development within a defined centre; and</p> <p><b>b.</b> The site is accessible by a choice of means of transport or will be made accessible by a choice of means of transport as a</p>	<p>other locations may also be appropriate in line with the criteria set out in policy as it is important that there is a degree of flexibility to address changing needs of this sector. An additional Point 6 has been added to encourage and support flexibility of design so that internal layouts can be adapted to meet the needs of changing business models for example space which can be sub divided to accommodate small start ups, SMEs and so on.</p> <p>Reference to the Impact Test has been removed as this no longer reflects national policy.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>also need to be demonstrated that:</p> <p><b>a.</b> The proposal would not have a significant adverse impact on the vitality and viability of defined centres and on existing, committed and planned public and private investment in office development within a defined centre; and</p> <p><b>b.</b> The site is accessible by a choice of means of transport or will be made accessible by a choice of means of transport as a consequence of planning permission being granted for the development;</p> <p>and</p> <p><b>c.</b> There is good access from the development to a primary route on the highway network and an acceptable impact on the capacity of that network; and</p> <p><b>d.</b> The proposals are compatible with other Plan Policies.</p> <p><b>5.</b> Proposals for new office development outside of Defined Centres shall be accompanied by a Sequential Assessment and where a proposal is for 2,500</p>	<p>consequence of planning permission being granted for the development;</p> <p>and</p> <p><b>c.</b> There is good access from the development to a primary route on the highway network and an acceptable impact on the capacity of that network; and</p> <p><b>d.</b> The proposals are compatible with other Plan Policies.</p> <p><b>5.</b> Proposals for new office development outside of Defined Centres shall be accompanied by a Sequential Assessment</p> <p><b>6. New build offices, and conversions of premises to offices should be designed to allow for flexibility of internal layouts so that these can be altered to adapt to changing market conditions and the needs of users.</b></p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>square metres (gross) or more of office floor space an Impact Assessment shall also be provided which examines the impact of the proposal on the vitality and viability of Defined Centres and its impact on existing, committed and planned public and private investment in office development within Defined Centres.</p>		
JE5	<p><b>Policy JE5:Location of R&amp;D, Industrial and Storage/Distribution Development</b></p> <p>1. The Council’s preferred location for new Research &amp; Development (R&amp;D), industrial and storage/distribution development are the sites allocated for such purposes under Policy JE2</p> <p>2. However, proposals for new R&amp;D, industrial and storage/distribution development (including changes of use and the expansion of existing operations) on sites not allocated under Policy JE2, will be permitted provided that they are:</p>	<p>Split into two policies: JE5 to focus on Industrial and Storage / Distribution Development and R&amp;D will become a new policy JE8.</p> <p><b>Policy JE5: Industrial and Storage / Distribution Development</b></p> <p>1. The Council’s preferred location for new industrial and storage/distribution development are the sites allocated for such purposes under Policy JE2</p> <p>2. Proposals for new industrial and storage/distribution development (including changes of use and the expansion of existing operations) on sites not allocated under Policy JE2, will be permitted provided that they are:</p> <p>a. Accessible by a choice of means of transport or will be made accessible by a</p>	<p>The policy has been split, as the needs of the storage and distribution sector differs from that of research and development. This policy focuses on storage and distribution (use class B8) and wording remains unchanged except for the additional point 4, parking and overnight facilities to reduce the impact upon lorry parking on roadsides in in other inappropriate unserved locations, and in terms of electric charging and consolidation this brings the policy in line with the updated transport polices</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p><b>a.</b> Accessible by a choice of means of transport or will be made accessible by a choice of means of transport as a consequence of planning permission being granted for the development;</p> <p><b>b.</b> Have good access to a primary route on the highway network and an acceptable impact on the capacity of that network;</p> <p><b>c.</b> The proposal would not significantly compromise the viability or deliverability of land allocated in this Plan for employment development;</p> <p><b>d.</b> The development is compatible with other Plan Policies.</p> <p><b>3.</b> In addition to the above, proposals for new general industrial and storage/distribution development (including changes of use and the expansion of existing operations) on all sites (including those allocated under Policy JE2) will also be required to demonstrate that the proposed development would not result in significant harm to the amenities of persons occupying nearby residential property or</p>	<p>choice of means of transport as a consequence of planning permission being granted for the development;</p> <p>b. Have good access to a primary route on the highway network and an acceptable impact on the capacity of that network;</p> <p>c. Would not significantly compromise the viability or deliverability of land allocated in this Plan for employment development;</p> <p>d. Would be compatible with other Plan Policies.</p> <p>3. In addition to the above, proposals for new general industrial and storage/distribution development (including changes of use and the expansion of existing operations) on all sites (including those allocated under Policy JE2) will also be required to demonstrate that the proposed development would not result in significant harm to the amenities of persons occupying nearby residential property or other land occupied by uses sensitive to environmental pollution.</p> <p>4. In addition to the above, where B8 uses will include HGV parking and overnight facilities, electric vehicle charging and consolidation facilities</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	other land occupied by uses sensitive to environmental pollution.		
JE6	<p><b>Policy JE6: Tourism/Visitor Related Development</b></p> <p>1. Proposals for development within Coventry city centre (as defined on the Policies Map) or on sites at or adjacent to the Ricoh Arena or the Coventry and Warwick University campuses which would contribute towards the city's role as a tourist destination will be supported subject to compatibility with other Plan Policies.</p>	<p><b>Policy JE6: Tourism/Visitor Related Development</b></p> <p>Proposals which would contribute towards the city's role as a tourist destination will be supported subject to compatibility with other Local Plan Policies.</p>	In accordance with the Economic Development Strategy and to support the aims and objectives of Destination Coventry
JE7	<p><b>Policy JE7: Accessibility to Employment Opportunities</b></p> <p>1. Planning applications for new employment development (including changes of use and the expansion of existing operations) will be required to demonstrate how job opportunities arising from the proposed development will be made accessible to the city's residents, particularly those in the most deprived areas of the city and priority groups. In this regard applicants</p>	<p><b>Policy JE7: Accessibility to Employment Opportunities</b></p> <p>1. Planning applications for new employment development (including changes of use and the expansion of existing operations) will be required to demonstrate how job opportunities arising from the proposed development will be made accessible to the city's residents, particularly those in the most deprived areas of the city and priority groups. In this regard applicants will be expected to give consideration to a range of measures including:</p>	It is considered that this policy remains up to date with an amendment to replace the CIL reference with 'developer contributions' to ensure resilience of terminology.

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>will be expected to give consideration to a range of measures including:</p> <ul style="list-style-type: none"> <li><b>a.</b> enhancement of the accessibility of the development to residents by a choice of means of transport;</li> <li><b>b.</b> developments must be well designed to accommodate the needs of all transport modes and must be fully integrated with existing transport networks.</li> <li><b>c.</b> the provision of support to residents in applying for jobs arising from the development;</li> <li><b>d.</b> the provision of training opportunities to assist residents in accessing employment opportunities;</li> <li><b>e.</b> childcare provision which enables residents to access employment opportunities; and/or</li> <li><b>f.</b> measures to assist those with physical or mental health disabilities to access employment opportunities.</li> </ul> <p><b>2.</b> In respect of planning applications for new employment development the Council may require applicants to make</p>	<ul style="list-style-type: none"> <li><b>a.</b> enhancement of the accessibility of the development to residents by a choice of means of transport;</li> <li><b>b.</b> developments must be well designed to accommodate the needs of all transport modes and must be fully integrated with existing transport networks.</li> <li><b>c.</b> the provision of support to residents in applying for jobs arising from the development;</li> <li><b>d.</b> the provision of training opportunities to assist residents in accessing employment opportunities;</li> <li><b>e.</b> childcare provision which enables residents to access employment opportunities; and/or</li> <li><b>f.</b> measures to assist those with physical or mental health disabilities to access employment opportunities.</li> </ul> <p><b>2.</b> In respect of planning applications for new employment development the Council may require applicants to make <b>developer contributions</b> to maximise the accessibility of job opportunities to the city's residents.</p>	



Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	financial or other contributions secured through planning obligations or its CIL Charging Schedule to maximise the accessibility of job opportunities to the city's residents.		
JE8	<b>Split from original JE5</b>	<p><b>Policy JE8: Location of Research and Development (R&amp;D)</b></p> <p>1. The Council's preferred location for new Research &amp; Development (R&amp;D), are the sites allocated under Policy JE2.</p> <p>2. However, proposals for new R&amp;D, (including changes of use and the expansion of existing operations) on sites not allocated under Policy JE2, will be permitted provided that they are:</p> <p><b>a.</b> Accessible by a choice of means of transport or will be made accessible by a choice of means of transport as a consequence of planning permission being granted for the development;</p> <p><b>b.</b> Have good access to a primary route on the highway network and an acceptable impact on the capacity of that network;</p> <p><b>c.</b> The proposal would not significantly compromise the viability or deliverability of land allocated in this Plan for employment development;</p> <p><b>d.</b> The development is compatible with other Plan Policies.</p>	It is considered that the wording of this policy remains up to date but has been separated from the combined policy (JE5 of the 2017 Local Plan) to provide clarity and recognise that R&D and Industrial and warehousing are different in nature and therefore applications assessed and decisions made should be based on unique policy wording for each sector.

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
H1	<p><b>Policy H1: Housing Land Requirements</b></p> <p>1. Provisions will be made for a minimum of 24,600 additional dwellings between 2011 and 2031.</p> <p>2. As part of the housing trajectory (Appendix 1), this requirement is to be stepped in the following way:</p> <p>a. 2011-2016 (first 5 years): 1,020 homes per annum</p> <p>b. 2017-2031 (following 15 years): 1,300 homes per annum</p> <p>3. Housing land will be released in order to maintain a continuous 5 year supply of housing land in order to support a varied and flexible land supply to support housing delivery and sustainable development.</p> <p>This will be monitored through the Council's Annual Monitoring Report.</p>	<p><b>STRATEGIC POLICY</b></p> <p><b>Policy H1: Housing Land Requirements</b></p> <p>1. Provisions will be made for a minimum of <b>29,100</b> additional dwellings between <b>2021</b> and <b>2041</b>.</p> <p>2. <b>The housing requirement is to be delivered in line with the trajectory set out in Appendix 1</b></p> <p>3. Housing land will be released in order to maintain a continuous 5 year supply of housing land in order to support a varied and flexible land supply to support housing delivery and sustainable development.</p> <p>This will be monitored through the Council's Annual Monitoring Report.</p>	<p>The background to housing provision is set out in the Housing Background paper.</p>
H2	<p><b>Policy H2: Housing Allocations</b></p> <p>1. Table 4.2 identifies the sites to be allocated for housing development alongside essential details that will support the principles of sustainable</p>	<p><b>STRATEGIC POLICY</b></p> <p><b>Policy H2: Housing Allocations</b></p> <p>1. Table <b>6.2</b> identifies the sites to be allocated for housing development alongside essential details that will support the principles of</p>	<p>New Table 4.2 to include remained site allocations from current local plan plus the new identified sites.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>development. The development of all sites will also need to be considered in accordance with other policies in this Local Plan (and supporting documents) and the Infrastructure Delivery Plan, with the infrastructure needs of each site to be secured through legal agreements and/or the Council's CIL Charging Schedule where appropriate.</p> <p><b>2.</b> The urban extension proposals at Keresley and Eastern Green are to be brought forward in full accordance with comprehensive Masterplans and in accordance with the Council's Urban Extension Design Guidance SPD.</p> <p>Table 4.2 - Site Allocations for Housing (from 2017 local plan) - Please see Appendix.</p>	<p>sustainable development. The development of all sites will also need to be considered in accordance with other policies in this Local Plan (and supporting documents) and the Infrastructure Delivery Plan, with the infrastructure needs of each site to be secured through legal agreements and developer contributions where appropriate.</p> <p><b>2.</b> The urban extension proposals at Keresley and Eastern Green are to be brought forward in full accordance with comprehensive Masterplans and in accordance with the Council's Urban Extension Design Guidance SPD.</p> <p>Table 6.2 - Site Allocations for Housing – Please see main Local Plan</p>	
H3	<p><b>Policy H3: Provision of New Housing</b></p> <p><b>1.</b> New residential development, including opportunities for self-build homes and starter homes,</p>	<p><b>STRATEGIC POLICY</b></p> <p><b>Policy H3: Provision of New Housing</b></p> <p><b>1.</b> All new residential development including conversions, must provide a high-quality</p>	Policy updated to reflect changes in national standards and legislation.

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>must provide a high quality residential environment which assists in delivering urban regeneration or contributes to creating sustainable communities and which overall enhances the built environment.</p> <p><b>2.</b> In addition, opportunities to provide self-build homes and starter homes will be considered acceptable as part of limited infill within existing ribbon developments within the Green Belt where it is demonstrated that they do not have an adverse impact upon the openness and integrity of the wider Green Belt.</p> <p><b>3.</b> A suitable residential environment will include safe and appropriate access, have adequate amenity space and parking provision and be safe from environmental pollutants such as land contamination, excessive noise and air quality issues.</p> <p><b>4.</b> Wherever possible new developments should also be:</p> <p><b>a.</b> within 2km radius of local medical services;</p>	<p>residential environment that ensures all new dwellings:</p> <p><b>a.</b> comply with Nationally Described Space Standards (NDSS);</p> <p><b>b.</b> comply with internal and external standards set out in the Design Guide for New Residential Developments SPD, Householder Design Guide SPD and Open Space SPD;</p> <p><b>c.</b> meet M4(2) - Adaptable and Accessible Dwellings;</p> <p><b>d.</b> For major schemes 10% of all new dwellings meet M4(3) - Wheelchair User Dwellings Adaptable and Accessible - of Building Regulation standards for access;</p> <p><b>e.</b> Where possible developments should be located to meet Natural England's Accessible Natural Greenspace Standards (ANGST) doorstep standards or future equivalent and where this is not possible developer contributes may be sought from major developments for local projects identified in the Council's Blue and Green Infrastructure Strategy and Action Plan;</p> <p><b>f.</b> contribute to the delivery of urban regeneration or to the creation of</p>	<p>Define new resi – this includes all C3 market and affordable, conversion and subdivisions.</p> <p>It has been demonstrated that it is viable to introduce NDSS for all residential developments in the city in the interest of providing a good standard of accommodation. Evidence in the HEDNA demonstrates that there is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings as well as providing specific provision of older persons housing. The evidence demonstrates that the Council could consider requiring all dwellings (in all tenures) to meet the M4(2) standards and 10%+ of homes meeting M4(3) – wheelchair user dwellings.</p> <p>Requiring new developments to consider the amenity impact of existing residential units and the operations of existing business was added due to the current policy not include this protection</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p><b>b.</b> within 1.5km of a designated centre within the city hierarchy (policy R3);</p> <p><b>c.</b> within 1km radius of a primary school;</p> <p><b>d.</b> within 1km of indoor and outdoor sports facilities;</p> <p><b>e.</b> within 400m of a bus stop; and</p> <p><b>f.</b> within 400m of publicly accessible green space.</p> <p><b>5.</b> Proposals should also be in conformity with all other relevant plan policies.</p> <p><b>6.</b> Sustainable transport provision and the infrastructure required to support housing development must be considered from the onset, to ensure all sites have easy access to high quality public transport and walking and cycling routes.</p> <p><b>7.</b> The delivery of self-build homes will be supported where they meet the criteria of this policy.</p>	<p>sustainable communities and overall enhance the built environment.</p> <p><b>2. New developments result in a satisfactory residential environment for neighbouring and future occupiers</b></p> <p><b>3 New developments must not result in existing businesses having unreasonable restrictions placed on them because of the new residential development.</b></p> <p><b>4. New developments should provide sustainable and liveable neighbourhoods, have consideration to the accessibility mapping as set out in the Council's Transport strategy and where possible have convenient, reasonable and practicable access that can be accessed safely and by all abilities to:</b></p> <ul style="list-style-type: none"> <li>a. local medical services;</li> <li><b>b. convenient shopping facilities;</b></li> <li>c. primary school;</li> <li>d. <b>sustainable transport modes;</b> and</li> <li><b>e. high quality publicly accessible green space that can be used for a range of leisure and sporting activities, in line with the Open Space SPD.</b></li> </ul>	<p>and to ensure the plan is in accordance with national policy, including the agent of change principle.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p><b>5.</b> Proposals should also be in conformity with all other relevant plan policies.</p> <p><b>6</b> Sustainable transport provision and the infrastructure required to support housing development must be considered from the onset and conform to the City Council’s adopted Transport Strategy to ensure all sites have easy access to high quality public transport and walking and cycling routes.</p> <p><b>7</b> The delivery of custom and self-build homes and community led housing will be supported where they meet the criteria of this policy and are in accordance with all other development plan policies.</p>	
H4	<p><b>Policy H4: Securing a Mix of Housing</b></p> <p><b>1.</b> The Council will require proposals for residential development to include a mix of market housing which contributes towards a balance of house types and sizes across the city in accordance with the latest Strategic Housing Market Assessment.</p> <p><b>2.</b> In assessing the housing mix in residential schemes the Council</p>	<p><b>Policy H4: Securing a Mix of Housing</b></p> <p><b>1.</b> The Council will require proposals for residential development to include a mix of market housing which contributes towards a balance of house types and sizes across the city in accordance with the latest Housing and Economic Development Needs Assessment (HEDNA) or its future equivalent.</p> <p><b>2.</b> In assessing the housing mix in residential schemes the Council may take into account the following circumstances where it may not</p>	Evidence base updated to refer to the HEDNA and a requirement added in for grant funding to be considered by applicants.

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>may take into account the following circumstances where it may not be appropriate to provide the full range of housing types in accordance with the latest Strategic Housing Market Assessment:</p> <p><b>a)</b> physical constraints, such as those associated with small sites of less than 5 houses and conversion schemes, where opportunities for a range of different house types are limited;</p> <p><b>b)</b> locational issues, such as highly accessible sites within or close to a designated centre where larger homes and low/ medium densities may not be appropriate;</p> <p><b>c)</b> sites with severe development constraints where housing mix may impact on viability;</p> <p><b>d)</b> sites where particular house types and/ or building forms may be required in order to sustain or enhance the setting of a heritage asset; and</p> <p><b>e)</b> developments in parish or neighbourhood plan areas, where there is an up-to-date local</p>	<p>be appropriate to provide the full range of housing types in accordance with the latest <b>Housing and Economic Development Needs Assessment or its future equivalent:</b></p> <ul style="list-style-type: none"> <li>a. physical constraints, such as those associated with small sites of less than 5 houses and conversion schemes, where opportunities for a range of different house types are limited;</li> <li>b. locational issues, such as highly accessible sites within or close to a designated centre where larger homes and low/ medium densities may not be appropriate;</li> <li>c. sites with severe development constraints where housing mix may impact on viability;</li> <li>d. sites where particular house types and/ or building forms may be required in order to sustain or enhance the setting of a heritage asset;</li> <li>e. developments in parish or neighbourhood plan areas, where there is an up-to-date local housing needs assessment which provides a more appropriate indication of housing need; and</li> <li><b>f. evidence that there is no grant or equivalent funding available which</b></li> </ul>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	housing needs assessment which provides a more appropriate indication of housing need.	would ensure that the development could viably proceed.	
H5	<p><b>Policy H5: Managing Existing Housing Stock</b></p> <p>1. Where appropriate, the existing housing stock will be renovated and improved, in association with the enhancement of the surrounding residential environment and to meet local housing needs. Where appropriate these works should include opportunities to improve energy efficiency of existing homes.</p> <p>2. The conversion of buildings from non-residential to residential use will be supported providing a satisfactory residential environment is created and the proposals are compatible with other Plan Policies.</p> <p>3. Demolition and redevelopment schemes will be supported where existing housing stock does not meet local housing market needs, and its redevelopment represents the principles of sustainable development.</p>	<p><b>Policy H5: Managing Existing Housing Stock</b></p> <p>1. Where appropriate, the existing housing stock will be renovated and improved, in association with the enhancement of the surrounding residential environment and to meet local housing needs. Where appropriate these works should include opportunities to retrofit existing properties with features that meet existing climate change requirements while maintaining the existing character of the existing property and to improve energy efficiency of existing homes.</p> <p>2. Demolition and redevelopment schemes will be supported where:</p> <ul style="list-style-type: none"> <li>a. Existing housing stock does not meet local housing market needs;</li> <li>b. the redevelopment represents the principles of sustainable development;</li> <li>c. the development does not result in a net loss in the quality and size / type of dwellings currently on the site, unless it can be robustly justified;</li> <li>d. the development has considered the embodied carbon in existing buildings in line with policy EM14, along with</li> </ul>	<p>Updated with latest climate change requirements from the Council climate change strategy set out in new EM policies.</p> <p>Given the housing need in the city and climate change crisis, the need to demonstrate the demolition of existing buildings and conversion of existing residential units to non-residential uses has been strengthened.</p> <p>Relevant evidence base:</p> <p>HELAA Site assessment Viability study</p>



Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>waste disposal, transportation and construction; and</p> <p>e. the development is in line with the requirements of Policy H3.</p> <p>3. The conversion of existing dwellings to uses other than primary residential, will be resisted, unless very special circumstances can be demonstrated including why the non-residential use would better meet the need of the local area and the aims of the Local Plan than the existing dwellings.</p>	
H6	<p><b>Policy H6:</b> Affordable Housing</p> <p>1. New residential schemes of 25 dwellings or more (excluding student accommodation), or more than 1ha, will be expected to provide 25% of all dwellings as affordable homes.</p> <p>2. Proposals within areas of existing high concentration (shown on Figure 4.1) should make provisions as follows:</p> <p>a. 10% Social/Affordable Rental provision</p> <p>b. 15% Intermediate Provision</p> <p>3. Proposals within areas of existing medium concentration</p>	<p><b>Policy H6: Affordable Housing</b></p> <p><b>Proportion of Affordable Housing</b></p> <p>1. The Council will seek to maximise the delivery of affordable housing across the city, in accordance with the high level of need set out in the HEDNA. Affordable housing delivery should be in accordance with the Council's Affordable Housing SPD.</p> <p>2. Positive weight will be given to schemes which contribute to the delivery of house types which address the Council's long-standing need for larger house types on the affordable housing waiting list, as</p>	<p>Policy updated to reflect national policy including the latest affordable housing products and updated in line with the need evidenced in the HEDNA (provision, tenure, housing size) and from the Council's Housing team and Homefinder data.</p> <p>This has resulted in the heat map approach being removed and a single affordable housing approach being taken across the whole city.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>(shown on Figure 4.1) should make provisions as follows:</p> <p><b>a.</b> 12.5% Social/Affordable Rental provision</p> <p><b>b.</b> 12.5% Intermediate Provision</p> <p><b>4.</b> Proposals within areas of existing low concentration (shown on Figure 4.1) should make provisions as follows:</p> <p><b>a.</b> 15% Social/Affordable Rental provision</p> <p><b>b.</b> 10% Intermediate Provision</p> <p><b>5.</b> Where the specified level of affordable housing cannot be provided, including for reasons of viability, robust evidence must be presented to justify a reduced or alternative form of contribution.</p> <p><b>6.</b> Through appropriate design standards, new affordable housing units must be appropriately integrated within the development and with other affordable homes adjoining the site.</p> <p><b>7.</b> Through engagement with the Council, Registered Providers, and having regard to the recommendations of the SHMA,</p>	<p>identified and monitored by the Council's Homefinder data or future equivalent.</p> <p>3. New residential developments of 10 or more dwellings (gross) located within the area identified at Appendix 9(c) on individual sites, or on sites of more than 1ha will be required to provide 25% of all dwellings as affordable. This excludes Purpose Built Student Accommodation, co-living accommodation and Built to Rent accommodation, where the affordable housing provision is set out in points 5, 6 and 7 of this policy.</p> <p>4. Affordable housing will be expected to be provided on site with the exception of Purpose Built Student Accommodation (PBSA) as set out in Point 5.</p> <p>5. On sites providing 25 bed spaces or more of Purpose Built Student Accommodation (PBSA) outside of Campus as defined at policy H10, a commuted sum will be required in lieu of on-site 20% affordable housing provision</p> <p>6. On sites providing build to rent accommodation of 10 units or more, developments will be expected to provide</p>	<p>Purpose Built Student Accommodation (PBSA) has provided a significant portion of residential development in the city in recent years, and in line with Policy H10, any PBSA which is delivered outside of the defined university campus / boundary areas will need to contribute to the delivery of affordable housing in the city. Beyond the campus areas of the universities, PBSA is competing for residential land, much of which is required to deliver the urban-focused spatial strategy of the reviewed Local Plan, and should PBSA be permitted by virtue of the exceptions approach of H10 it should contribute to the delivery of affordable stock, much of which will be needed to retain recent graduates and attract other young professionals in the city, ensuring they have affordable options available to them to live and work in the area.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>developers should ensure that affordable housing contributions comprise dwellings of the right size, type, affordability and tenure to meet local needs.</p>	<p>10% of all dwellings as affordable private rent in line with the following:</p> <ul style="list-style-type: none"> <li>a. The affordable rent homes should be in accordance with the requirements of the PPG and be at genuinely affordable rents to be agreed with the council.</li> <li>b. The eligibility criteria for the occupants of the affordable homes and the discount, size and mix of the affordable units is to be agreed with the council.</li> <li>c. Affordable private rent and private market rent units within a development should be managed collectively by a single build to rent landlord (no need for the involvement of a registered landlord). The affordable private rent should be distributed throughout the development and physically indistinguishable from the market rent homes in terms of quality and size.</li> </ul> <p>7 On sites providing co-living accommodation of 25 bed spaces or more (gross), developments will be expected to provide</p>	<p>The Co-living calculation is based on the current Housing Delivery Test average number of adults in all households (1.8) multiplied by the Council's residential development size threshold (25 dwellings).</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>25% of all bed spaces as affordable private rent.</p> <p><b>Tenure</b></p> <p>8 The affordable housing tenure and mix will be based on the need highlighted in the latest HEDNA supplemented with Homefinder (or equivalent) data. On this basis the Council will expect to seek:</p> <ul style="list-style-type: none"> <li>a. a tenure split of 60% social/affordable rent and 40% intermediate provision,</li> <li>b. of the social and affordable rent provision a minimum of half should be for social rent; and</li> <li>c. Accounting for any nationally set contribution for intermediate home ownership products, the remainder of the affordable home ownership is to be delivered as other intermediate home ownership products.</li> </ul> <p>9 Proposals must meet national policy requirements relating to affordable home ownership initiatives and local eligibility criteria, and where these are updated/alterd, the latest requirements will be applicable.</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p data-bbox="987 309 1256 341"><b>Housing Size Mix</b></p> <p data-bbox="1039 384 1644 932">10 The expected mix for affordable housing provision will initially be guided by the HEDNA, however, through engagement with the Council and Registered Providers, positive weight will be given to a housing mix that is also informed by the latest Homefinder data (or future equivalent) to ensure the delivery reflects the most up to date need and circumstances. The affordable housing mix should reflect the overall mix and type of housing proposed across the application site guided by an updated affordable housing SPD.</p> <p data-bbox="987 975 1621 1043"><b>Where a policy compliant provision is not provided</b></p> <p data-bbox="1039 1086 1637 1299">11 Where the required specified level, tenure and mix of affordable housing cannot be provided on site, including for reasons of viability, robust evidence must be presented to justify a reduced or alternative form of contribution.</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>12 A reduction in the requirements of policy EM11 may be presented for assessment in order to maximise Affordable Housing delivery.</p> <p><b>Design Standards</b></p> <p>13 Through high design standards, new affordable housing units must be appropriately integrated within developments and with other affordable homes adjoining the site.</p> <p>14 Affordable housing proposals must be in accordance with the design principles set out in Policy H3, including NDSS standards and the internal and external standards set out in the Design Guide for New Residential Developments SPD and Householder Design Guide SPD.</p>	
H7	<p><b>Policy H7: Gypsy and Traveller Accommodation</b></p> <p>1. Provision will be made for at least 16 permanent pitches for Gypsies and Travellers through the remodelling of the site at</p>	<p><b>Policy H7: Gypsy and Traveller Accommodation</b></p> <p>1. Provision will be made for at least 6 permanent pitches for Gypsies and Travellers.</p> <p>2. Proposals for additional Gypsy and Traveller sites outside of the Green Belt (and</p>	Changes made to reflect local policy and in line with Gypsy and Traveller Accommodation Assessment, February 2023.

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>Siskin Drive, Coventry (as identified on the Policies Map).</p> <p><b>2.</b> Proposals for additional permanent and temporary Gypsy and Traveller sites outside of the Green Belt (and within it, if very special circumstances have been demonstrated) will be assessed against the following criteria:</p> <p><b>a.</b> The sites use should not conflict with other development plan policies or national planning policy relating to issues such as risk from flooding, contamination or agricultural land quality;</p> <p><b>b.</b> Sites should be located within reasonable travelling distance of local services and community facilities, including a primary school;</p> <p><b>c.</b> The site should enable safe and convenient pedestrian and vehicle access to and from the public highway, and adequate space for vehicle parking, turning and servicing;</p> <p><b>d.</b> The site should be served by adequate water and sewerage</p>	<p>within it, if very special circumstances have been demonstrated) will be assessed against the following criteria as set out in the Council's Gypsy and Traveller Accommodation Assessment (GTAA):</p> <p>a. The site's use should not conflict with other development plan policies or national planning policy relating to issues such as risk from flooding, including sites not being in functional floodplains; contamination; or agricultural land quality;</p> <p>b. The site should be in a sustainable location in terms of being within reasonable travelling distance of local services and community facilities, including health care and schools;</p> <p>c. The site should enable safe and convenient pedestrian and vehicle access to and from the public highway, and adequate space for vehicle parking, turning and servicing;</p> <p>d. The site should be served by adequate water and sewerage connections, and drainage, power and waste and recycling facilities;</p> <p>e. Proposals must not have an adverse impact on the amenities of occupiers of nearby properties or the appearance or character of the area in which it would</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>connections, power and waste facilities;</p> <p>e. The use of the site should not have an adverse impact on the amenities of occupiers of nearby properties or the appearance or character of the area in which it would be situated.</p>	<p>be situated, with proposals including appropriate landscaping;</p> <p>f. The site must not be affected by environmental hazards that may affect the residents' health or welfare;</p> <p>g. Proposals should make adequate provision for on-site facilities that meet best practice for modern Traveller site requirements, including play areas, storage and mixed business and residential accommodation; and</p> <p>h. The proposal must be well related to the size and location of the site and respects the scale of the nearest settled community.</p> <p>3. Proposals for transit and / or stop over areas will be supported where they meet an evidenced need and accord with other policies in this plan.</p>	
H8	<p><b>Policy H8: Care Homes, Supported Housing, Nursing Homes and Older Persons accommodation</b></p> <p>1. Proposals for care homes, nursing homes and other specialist and supported forms of housing for the elderly and those requiring care will be encouraged</p>	<p><b>Policy H8: Specialist Housing including specialist housing with elements of care, Older Persons accommodation and hostels</b></p> <p>1. Proposals for specialist housing, which includes accommodation with elements of care, support for people in need and older person housing will be supported where a</p>	<p>Policy updated to broaden its scope to include all specialist forms of housing and to require accessibility and adaptability standards as evidenced by the HEDNA as set out in the explanation of Policy H3.</p>



Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>in areas that are accessible by a choice of means of transport and that are situated in close proximity to key local services.</p> <p>2. Proposals should be of a high quality and design and be compatible with the character of the surrounding area.</p>	<p>local need can be demonstrated. Positive weight will be given to proposals that provide private rental opportunities that are affordable for those who do not meet social care eligibility criteria.</p> <p>2. Proposals will be encouraged in areas which are accessible by a choice of means of sustainable transport and which are easily accessible to the key local services listed in point 3 of policy H3 and which are appropriate to the specific needs of the residents and employees.</p> <p>3. Proposals should be laid out to allow the intended residents to live with the maximum level of independence that considers the changing needs of residents and should be of a high quality and design, compatible with the character of the surrounding area and be in line with the design requirements set out in Policy H3 where applicable.</p> <p>4. Where relevant, proposals should ensure all dwellings meet M4(2) and 10% of dwellings meet M4(3).</p>	
H9	<p><b>Policy H9: Residential Density</b></p> <p>1. Residential development, including conversions, must make</p>	<p><b>Policy H9: Residential Density</b></p>	<p>Updated to reflect the evidence of the Urban Density Study.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>the most effective and efficient use of land whilst ensuring compatibility with the quality, character and amenity of the surrounding area.</p> <p><b>2.</b> Therefore, outside of the Ring Road (The A4053) a minimum of 35 dwellings per hectare (net) should be provided on Previously Developed Land.</p> <p><b>3.</b> Developments inside the Ring Road (The A4053) should aim to achieve a minimum of 200 dwellings per hectare (net).</p> <p><b>4.</b> Developments on Greenfield sites should achieve a minimum of 30 dwellings per hectare (net).</p>	<p><b>1.</b> Residential development, including conversions, must make the most effective and efficient use of land.</p> <p><b>2.</b> Proposed development density should be informed by a site’s local character and context, in alignment with other plan policies.</p> <p><b>3.</b> To ensure that the most effective use of land, new developments, with relevant consideration to Part 2 of this policy, should seek to deliver the following densities:</p> <ul style="list-style-type: none"> <li>• Greenfield sites – 35Dph</li> <li>• Brownfield Sites – 45Dph</li> <li>• Sites within the City Centre Transition zone* – 125Dph</li> <li>• Development within the defined City Centre boundary** - 250Dph</li> </ul> <p>*City Centre Transition Zone as shown at Appendix 9(d)</p> <p>**City Centre boundary as shown at Appendix 9(d)</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
H10	<p><b>Policy H10: Student Accommodation</b></p> <p>1. Purpose-built student accommodation and conversions of residential and non-residential properties to student accommodation will be encouraged where:</p> <p><b>a.</b> It is directly accessible from the universities;</p> <p><b>b.</b> Such development can play a part in the regeneration of the immediate neighbourhoods without disadvantage to local services.</p> <p><b>c.</b> It will not materially harm the amenities of occupiers of nearby properties; and</p> <p><b>d.</b> It will reflect and support or enhance the appearance and character of the area.</p> <p>2. To support the intended use of the proposals the specified tenure will be secured through a Section 106 agreement.</p>	<p><b>Policy H10: Student Accommodation</b></p> <p>1. PBSA development must be located within or immediately adjacent to the University of Warwick Campus or Coventry University Campus unless exceptional circumstances demonstrate otherwise.</p> <p>2. Purpose Built Student Accommodation (PBSA) proposed outside of the areas identified in point 1, whether new build or conversions, will be delivered in line with the Council's PBSA monitor and manage approach, and will only be considered appropriate where:</p> <p>a. the PBSA monitor and manage approach demonstrates evidence of need for additional student accommodation; or</p> <p>b. There is support from one of the City's universities that evidences a need for additional student accommodation.</p> <p>3. Proposals must provide evidence to show adaptability to other uses by being designed in such a way that it can be capable of being re-configured through internal alterations to meet NDSS standards to meet general housing needs in the future.</p>	<p>Policy updated to reflect the evidence and recommendations in the student accommodation market study, which shows that:</p> <ul style="list-style-type: none"> <li>- the PBSA market in Coventry shows signs of being at saturation point.</li> <li>- The city centre is over catered for.</li> <li>- The city is dominated by studio accommodation.</li> <li>- The council should expect more applications to change the use of PBSA to other (residential) uses.</li> </ul> <p>And recommends that:</p> <ul style="list-style-type: none"> <li>- any new PBSA developments to only be allowed if evidence is provided to show it is needed.</li> <li>- restrict the location of PBSA developments.</li> <li>- Restrict studio only developments.</li> <li>- The city would benefit from living and amenity standards being introduced.</li> </ul>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>4. Developments that comprise a predominant studio ratio will be resisted.</p> <p>5. Proposals should comprise predominantly cluster units of no more than 8 units per cluster.</p> <p>6. Design innovation will be encouraged within the sector, particularly in high quality affordable products, in line with the design standards set out in the Residential Design Guide SPD.</p> <p>7. To support the intended use of the proposals the specified tenure will be secured through a Section 106 agreement.</p> <p>8. Where a change of use is proposed to part of an existing student accommodation block to another residential use, the residential use must be self-contained and segmented from the student accommodation.</p>	<p>- Set standards for when PBSA blocks are proposed to partly change use.</p> <p>The policy has been updated incorporating all of these recommendations.</p> <p>In terms of internal and external standards for PBSA these are to be included within a future PBSA SPD or updated residential design guide SPD.</p> <p>Explanatory text definition of Campus - For the purposes of 'Campus' within policy H10, the areas are as per the adopted Warwick University SPD, and the University and Enterprise Area of the City Centre, or future adopted university masterplan Supplementary Planning Document</p>
H11	<p><b>Policy H11: Homes in Multiple Occupation (HiMOs)</b></p> <p>1. The development of purpose built HiMOs or the conversion of existing homes or non-residential properties to large HiMOs will not</p>	<p><b>Policy H11: Homes in Multiple Occupation (HMOs)</b></p> <p>All applications for Homes in Multiple Occupation (HMOs) will be determined in accordance with the Council's Homes in Multiple Occupation Development Plan</p>	<p>To ensure that policy wording now accords with the Council's new Homes in Multiple Occupation Development Plan Document. The HMO DPD examination determined that the Local Plan needed to retain a</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>be permitted in areas where the proposals would materially harm:</p> <ul style="list-style-type: none"> <li>a. the amenities of occupiers of nearby properties (including the provision of suitable parking provisions);</li> <li>b. the appearance or character of an area;</li> <li>c. local services; and</li> <li>d. The amenity value and living standards of future occupants of the property, having specific regard to internal space and garden/amenity space.</li> </ul>	<p>Document alongside other policies in the adopted Local Plan.</p>	<p>policy which links to this document as it supplements the Local Plan with detailed policy on HMOs.</p>
H12		<p><b>New policy H12 – Build to Rent</b></p> <p>1. Proposals for the development of Build to Rent housing will be supported where they are in accordance with all other development plan polices and where they meet all the following criteria:</p> <ul style="list-style-type: none"> <li>a. the development provides a high-quality residential environment that improves housing choice and makes a positive contribution to the achievement of mixed and sustainable communities in accordance with Policy H3;</li> <li>b. all the dwellings are self-contained and let separately;</li> </ul>	<p>A supportive policy included following recommendations for one in the HEDNA and to be in accordance with national policy.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<ul style="list-style-type: none"> <li>c. the build to rent housing is under unified ownership and will be subject to common management;</li> <li>d. the development will provide professional and on-site management;</li> <li>e. the development will offer tenancies of at least 3 years available to all tenants;</li> <li>f. the development complies with the Nationally Described Space Standards;</li> <li>g. The homes will be secured as part of a Section 106 agreement, which should include the process for the management and letting arrangements, covenants the build to rent homes are held under and any clawback arrangements.</li> <li>h. the development delivers a level of affordable housing as set out in Policy H6.</li> </ul>	
H13		<p><b>New Policy H13 – Co-living</b></p> <p>1. Co-living proposals will be supported where they are in accordance with all other development plan policies and where they comply with the following:</p> <ul style="list-style-type: none"> <li>a. it is of good quality and design and adhere to a minimum bedroom size of</li> </ul>	<p>Policy included following recommendations for one in the HEDNA and to be in accordance with national policy.</p> <p>LDCs and Ps since XX date – av size would give us an indication of how large HMOs go up to – to</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>25sqm for a single occupancy room, inclusive of an ensuite and storage space;</p> <p>b. it is well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency;</p> <p>c. it is under single management;</p> <p>d. The facility has an onsite concierge or other adequate safety and security onsite personnel;</p> <p>e. its units are all for rent with minimum tenancy length of no less than three months;</p> <p>f. The average internal communal amenity space is at least 4.5 sq.m. per bedspace;</p> <p>g. The communal facilities and services provided are sufficient, in terms of location, spread, facilities and size, to meet the requirements of the intended number of residents at times of relatively high demand and offer at least:</p> <p>i. Direct access to a communal kitchen that does not require any residents to travel between different floors and which has adequate facilities for a maximum of 8 bedrooms and</p>	<p>help set a threshold to determine where distinction between Co living &amp; HMOs possibly kicks in</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>adequate space for residents to store food and cooking and eating utensils and to prepare meals at times of relatively high demand;</p> <p>ii. Outside communal amenity space (roof terrace and/or garden);</p> <p>iii. internal communal amenity space (dining rooms, lounges, workspace); and</p> <p>iv. laundry and drying facilities.</p> <p>h. the private units provide adequate functional living space and layout, and are not self-contained homes or capable of being used as self-contained homes;</p> <p>i. a management plan is provided with the application;</p> <p>j. it delivers a level of affordable housing (discounted private rent) as set out in Policy H6.</p>	
R1	<p><b>Policy R1 Delivering Retail Growth</b></p> <p>1 The following sites/areas are allocated to support the provision of retail floor space across Coventry. These schemes are to be delivered in accordance with the specifications in this policy and</p>	<p><b>Policy R1 Delivering Retail Growth</b></p> <p>1 The following sites/areas are allocated to support the provision of retail floor space across Coventry. These schemes are to be delivered in accordance with the specifications in this policy and other policies within this plan.</p>	Retail and Centres Study 2024 evidence shows that City Centre allocations are no longer required to meet any quantitative need for convenience or comparison floorspace. There is no



Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation																																				
	<p>other policies within this plan and the City Centre AAP as appropriate</p> <table border="1" data-bbox="472 384 976 1046"> <thead> <tr> <th>Site</th> <th>Proposed floor space (sq.m gross)</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>City centre</td> <td>At least 70,100</td> <td>A1-A5 uses of varying size (including where appropriate) to be delivered through Plan at City Centre South, City Centre 9 Centre Supermarket and wider support active frontages within the wider city centre allowance for city centre vacant units.</td> </tr> <tr> <td>New Eastern Green Major District Centre</td> <td>Up to 10,000</td> <td>To include approx. 5,000sq.m for a new 4,000sq.m of predominantly bulky goods 1,000sq.m of small scale local provision</td> </tr> <tr> <td>Cannon Park Major District Centre*</td> <td>6,200</td> <td>New A1 elements of the scheme should convenience and bulky goods retail. 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The comprehensive redevelopment of the Riley Square element of Ball Green DC supported in accordance with an overarching Masterplan for the area.</p> <p>3. Further retail provision at Arena Park Major District Centre will not be supported unless it is demonstrated that it will not have a significant adverse impact on the essential element of supporting the wider parks tourism functions.</p>	Site	Proposed floor space (sq.m gross)	Details	City centre	At least 70,100	A1-A5 uses of varying size (including where appropriate) to be delivered through Plan at City Centre South, City Centre 9 Centre Supermarket and wider support active frontages within the wider city centre allowance for city centre vacant units.	New Eastern Green Major District Centre	Up to 10,000	To include approx. 5,000sq.m for a new 4,000sq.m of predominantly bulky goods 1,000sq.m of small scale local provision	Cannon Park Major District Centre*	6,200	New A1 elements of the scheme should convenience and bulky goods retail. 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New Keresley Local Centre (South)	Up to 1,500	Local centre to include a range of small scale units providing a range of local	<p>quantitative requirement for further retail development at Cannon Park, Brade Drive DC or Jardine Crescent DC. These allocations are therefore no longer required. The Policy has been amended to reflect Eastern Green and Keresley allocations as maximums to ensure a local need is met, rather than creating a city wide catchment within a local area.</p> <p>Amendments to table reflect changes in provision of centres at Eastern Green and Keresley and following recommendations from the Retail and Centres Study 2024.</p> <p>Part 2 is considered to remain relevant and should be carried forward.</p>
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	<p>2 The comprehensive redevelopment of the Riley Square element of Bell Green District Centre will be supported in accordance with an overarching Masterplan for the area.</p> <p>3. Further retail provision at Arena Park Major District Centre will not be supported during the plan period unless it is demonstrated that it will not have a significant adverse impact on the city centre or is an essential element of supporting the wider parks tourism functions.</p>	<p>2 The comprehensive redevelopment of the Riley Square element of Bell Green District Centre will be supported in accordance with an overarching Masterplan for the area.</p> <p>3 Further retail, <b>leisure and other town centre uses</b> at Arena Park <b>and Brandon Road Major District Centres</b> will not be supported during the plan period unless it is demonstrated that it will not have a significant adverse impact on the city centre or is an essential element of supporting the wider tourism functions.</p>	<p>community uses and top up provisions.</p>	<p>Expansion of policy to reference other town centre uses beyond that of purely retail. Addition of Brandon Rd MDC widens the catchment of provision across the city.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
R2	<p><b>Policy R2: Coventry City Centre – Development Strategy</b></p> <p>1. The city centre will continue to be developed and regenerated to ensure it is a truly world class city centre, leading in design, sustainability and culture. This will be achieved by:</p> <ul style="list-style-type: none"> <li><b>a.</b> Enhancement of its position as a focus for the entire sub-region and as a national and international destination to live, work and play;</li> <li><b>b.</b> Enhancement of its retail and leisure offer to strengthen the city’s sub-regional role;</li> <li><b>c.</b> Provision of high quality office space;</li> <li><b>d.</b> Becoming a hub for education;</li> <li><b>e.</b> Including a variety of places to live which cater for different needs;</li> <li><b>f.</b> Preserving or enhancing the character and setting of the historic built landscape and the archaeological environment;</li> <li><b>g.</b> A connected public realm including public squares and green spaces, easily accessible through the creation of desirable and legible pedestrian routes;</li> </ul>	<p><b>Policy R2: Coventry City Centre – Development Strategy</b></p> <p>1. The city centre will continue to be developed and regenerated to ensure it is a truly world class city centre, leading in design, sustainability and culture. This will be achieved by:</p> <ul style="list-style-type: none"> <li><b>a.</b> Enhancement of its position as a focus for the entire sub-region and as a national and international destination to live, work and play;</li> <li><b>b.</b> Enhancement of its retail and leisure offer to strengthen the city’s sub-regional role;</li> <li><b>c.</b> Provision of high quality office space;</li> <li><b>d.</b> Becoming a hub for education;</li> <li><b>e.</b> Including a variety of places to live which cater for different needs;</li> <li><b>f.</b> Preserving or enhancing the character and setting of the historic built landscape and the archaeological environment;</li> <li><b>g.</b> A connected public realm including public squares and green spaces, easily accessible through the creation of desirable and legible pedestrian routes;</li> <li><b>h.</b> Accessible for all;</li> <li><b>i.</b> Providing an attractive and safe environment for pedestrians, cyclists and motorists;</li> <li><b>j.</b> Provide a high-quality public transport system that benefits from seamless</li> </ul>	<p>The policy wording remains up to date. Minor changes to remove references to the Area Action Plan, instead cross referencing to the new City Centre section of the plan.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p><b>h.</b> Accessible for all;</p> <p><b>i.</b> Providing an attractive and safe environment for pedestrians, cyclists and motorists;</p> <p><b>j.</b> Provide a high quality public transport system that benefits from seamless integration and is well connected to existing and new infrastructure;</p> <p><b>k.</b> High quality sustainable built design;</p> <p><b>l.</b> Continuing to develop a vibrant and attractive night time economy;</p> <p><b>m.</b> Providing opportunities to improve health and wellbeing;</p> <p><b>n.</b> Continuing to support greater integration of the university within the wider city centre in accordance with the policies in the Area Action Plan;</p> <p><b>o.</b> Recognising and preserving key views to the iconic three spires of St Michaels, Holy Trinity and Christchurch;</p> <p><b>p.</b> Supporting the reintroduction of green and blue infrastructure throughout the city centre, including opportunities for de-culverting wherever possible.</p>	<p>integration and is well connected to existing and new infrastructure;</p> <p><b>k.</b> High quality sustainable built design;</p> <p><b>l.</b> Continuing to develop a vibrant and attractive night time economy;</p> <p><b>m.</b> Providing opportunities to improve health and wellbeing;</p> <p><b>n.</b> Continuing to support greater integration of the university within the wider city centre in accordance with <b>the City Centre policies of this plan.</b></p> <p><b>o.</b> Recognising and preserving key views to the iconic three spires of St Michaels, Holy Trinity and Christchurch;</p> <p><b>p.</b> Supporting the reintroduction of green and blue infrastructure throughout the city centre, including opportunities for de-culverting wherever possible.</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>2. An Area Action Plan will be developed to help deliver this strategy and support and guide development within the city centre.</p>		
R3	<p><b>Policy R3: The Network of Centres</b>  1. To support the city centre, the Council will designate, enhance, maintain and protect a network of</p>	<p><b>STRATEGIC POLICY</b>  <b>Policy R3: The Network of Centres</b>  1. To support the city centre, the Council will designate, enhance, maintain and protect a network of Centres consisting of Major District</p>	No change to part 1

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>Centres consisting of Major District Centres, District Centres and Local Centres. These Centres will be the preferred locations for new shops, and other Main Town Centre and community facility uses which do not serve a city-wide catchment.</p> <p><b>2.</b> In all these Centres:</p> <p><b>a.</b> A balance will be sought between shops (Class A1), and other Main Town Centre and community uses in order to protect the vitality and viability of the centre as a whole;</p> <p><b>b.</b> Proposals that reduce the concentration of A-class uses within a centre below 51% will not be approved;</p> <p><b>c.</b> A residential element will be promoted and encouraged, subject to the creation of a satisfactory residential environment and so long as it does not undermine the functionality of the centre;</p> <p><b>d.</b> Improvement to the environment and accessibility will be promoted and encouraged.</p>	<p>Centres, District Centres and Local Centres. These Centres will be the preferred locations for new shops, and other Main Town Centre and community facility uses which do not serve a city-wide catchment.</p> <p><b>a</b> A residential element will be promoted and encouraged, subject to the creation of a satisfactory residential environment and so long as it does not undermine the functionality of the centre;</p> <p><b>b.</b> Improvement to the environment and accessibility will be promoted and encouraged.</p> <p><b>2. Centre boundaries and Primary Shopping Areas for the following</b> Major District Centres are shown on the Policies Map at:</p> <p><b>a.</b> Arena Park;</p> <p><b>b.</b> Cannon Park;</p> <p><b>c.</b> Brandon Road.</p> <p>They will complement but not compete with the city centre and will contain a scale of development which is demonstrated to not impact negatively on the city centre and supports the needs of their part of the city.</p> <p><b>3. Centre boundaries and Primary Shopping Areas for the following</b> District Centres are shown on the Policies Map at:</p> <p><b>a.</b> Ball Hill;</p>	<p>Removal of part A, as limited control is available over retail (Class E) uses in centres and therefore the ability to maintain a balance based on retail may not be measurable or subject to controls through the planning system.</p> <p>Removal of part B as A class no longer exists and E class does not require planning permission in centres. Therefore the ability to measure and control is limited.</p> <p>Parts C and D remain relevant and are proposed to be carried forward to the new plan.</p> <p>No change proposed to the centres hierarchy apart from the removal of Sutton Avenue Local Centre, as recommended by the Retail and Centres Study 2024. The centre is located close to existing centres and is considered to serve a very local</p>

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	<p><b>3.</b> Major District Centres are shown on the Policies Map at:</p> <ul style="list-style-type: none"> <li><b>a.</b> Arena Park;</li> <li><b>b.</b> Cannon Park;</li> <li><b>c.</b> Brandon Road;</li> <li><b>d.</b> Eastern Green.</li> </ul> <p>They will complement but not compete with the city centre and will contain a scale of development which is demonstrated to not impact negatively on the city centre and supports the needs of their part of the city for:</p> <ul style="list-style-type: none"> <li><b>e.</b> a mix of bulk convenience and comparison shopping as well as service and catering uses;</li> <li><b>f.</b> social, community and leisure uses including hotels;</li> <li><b>g.</b> offices.</li> </ul> <p><b>4.</b> District Centres are shown on the Policies Map at:</p> <ul style="list-style-type: none"> <li><b>a.</b> Ball Hill;</li> <li><b>b.</b> Bell Green;</li> <li><b>c.</b> Brade Drive;</li> <li><b>d.</b> Daventry Road;</li> <li><b>e.</b> Earlsdon;</li> <li><b>f.</b> Foleshill;</li> <li><b>g.</b> Jardine Crescent;</li> <li><b>h.</b> Jubilee Crescent.</li> </ul>	<ul style="list-style-type: none"> <li><b>b.</b> Bell Green;</li> <li><b>c.</b> Brade Drive;</li> <li><b>d.</b> Daventry Road;</li> <li><b>e.</b> Earlsdon;</li> <li><b>f.</b> Eastern Green*</li> <li><b>g.</b> Foleshill;</li> <li><b>h.</b> Jardine Crescent;</li> <li><b>i.</b> Jubilee Crescent.</li> </ul> <p>They will contain a scale of development which is demonstrated to not impact negatively on higher order centres and supports the needs of their district of the city for bulk convenience shopping as well as an element of comparison shopping, service and catering uses. Social, community, leisure and small scale office uses will also be acceptable.</p> <p><b>4. Centre boundaries for the following</b> Local Centres are shown on the Policies Map at:</p> <ul style="list-style-type: none"> <li><b>a.</b> Acorn Street;</li> <li><b>b.</b> Ansty Road;</li> <li><b>c.</b> Baginton Road;</li> <li><b>d.</b> Bannerbrook;</li> <li><b>e.</b> Barkers Butts Lane;</li> <li><b>f.</b> Binley Road;</li> <li><b>g.</b> Birmingham Road;</li> <li><b>h.</b> Broad Park Road;</li> <li><b>i.</b> Charter Avenue;</li> </ul>	<p>community catchment, which functions more as a parade of shops as opposed to a centre. As recommended in the study, five centre boundaries have been amended to reflect recent changes to the built form or uses in the area. These are Ball Hill, Foleshill and Jardine Crescent District Centres and far Gosford Street Keresley Road and Winsford Avenue Local centres. These remain defined centres and therefore no overall policy change, but amended boundaries are reflected on the Proposals map and associated site specific maps.</p> <p>Following submission of the Eastern Green Application, it is now proposed that the SUE comprises a District Centre of approximately 10'000sqm mixed use development and a Local Centre of approximately 1000sqm mixed use development.</p>

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	<p>They will contain a scale of development which is demonstrated to not impact negatively on higher order centres and supports the needs of their district of the city for bulk convenience shopping as well as an element of comparison shopping, service and catering uses. Social, community, leisure and small scale office uses will also be acceptable.</p> <p><b>5.</b> Local Centres are shown on the Policies Map at:</p> <p><b>a.</b> Acorn Street;  <b>b.</b> Ansty Road;  <b>c.</b> Baginton Road;  <b>d.</b> Bannerbrook;  <b>e.</b> Barkers Butts Lane;  <b>f.</b> Binley Road;  <b>g.</b> Birmingham Road;  <b>h.</b> Broad Park Road;  <b>i.</b> Charter Avenue;  <b>j.</b> Far Gosford Street;  <b>k.</b> Green Lane;  <b>l.</b> Hillfields;  <b>m.</b> Holbrook Lane;  <b>n.</b> Holyhead Road;  <b>o.</b> Keresley North;</p>	<p><b>j.</b> Eastern Green*  <b>k.</b> Far Gosford Street;  <b>l.</b> Green Lane;  <b>m.</b> Hillfields;  <b>n.</b> Holbrook Lane;  <b>o.</b> Holyhead Road;  <b>p.</b> Keresley Road;  <b>q.</b> Keresley South;*  <b>r.</b> Longford;  <b>s.</b> Quorn Way;  <b>t.</b> Radford Road;  <b>u.</b> Station Avenue;  <b>v.</b> Walsgrave Road;  <b>w.</b> Willenhall;  <b>x.</b> Winsford Avenue.</p> <p>They will contain an appropriate scale of development which is demonstrated to not impact negatively on higher order centres and supports their immediate locality for day-to-day convenience shopping and also some service and restaurant uses; and social, community and leisure uses. Small scale office uses will also be acceptable.</p> <p>*Eastern Green District and Local Centres and Keresley South Local Centre are identified as broad locations due to the sites not yet being built out.</p>	<p>Therefore, the policy is updated to reflect these changes.</p> <p>No change</p> <p>Removal of Sutton Avenue from hierarchy, following recommendation from Retail and Centres Study 2024. Centre considered to be very local in nature and given location, the area is better served by another defined centre.</p> <p>Following submission of the Keresley Application OUT/2019/0484, the Keresley North Local Centre was removed due to existing local provision in Keresley End Village. The</p>



Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p> <b>p.</b> Keresley Road;  <b>q.</b> Keresley South;  <b>r.</b> Longford;  <b>s.</b> Quorn Way;  <b>t.</b> Radford Road;  <b>u.</b> Station Avenue;  <b>v.</b> Sutton Avenue;  <b>w.</b> Walsgrave Road;  <b>x.</b> Willenhall;  <b>y.</b> Winsford Avenue.  They will contain an appropriate scale of development which is demonstrated to not impact negatively on higher order centres and supports their immediate locality for day-to-day convenience shopping and also some service and restaurant uses; and social, community and leisure uses. Small scale office uses will also be acceptable. </p>		<p>allocation of the Southern Local Centre remains unchanged. Therefore, the policy is updated to reflect these changes.</p>
R4	<p> <b>Policy R4: Out of Centre Proposals</b>  1. Proposals for retail and other Main Town Centre uses (including proposals for the expansion or re-configuration of existing uses and the variation of existing conditions) will not be permitted in </p>	<p> <b>STRATEGIC POLICY</b>  <b>Policy R4: Out of Centre Proposals</b>  1. Proposals for retail and other Main Town Centre uses (including proposals for the expansion or re-configuration of existing uses and the variation of existing conditions) will not be permitted in out-of-centre locations </p>	<p>Policy amended to reflect national policy, to remove references to retail, due to changes in the Use Classes Order and reference Main Town Centre Uses. Addition of reference to use classes E and F to reflect changes in Use Classes Order.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>out-of-centre locations unless they satisfy the Sequential Assessment and the Impact Test (where appropriate).</p> <p><b>2. Sequential Assessment</b></p> <p><b>a.</b> A Sequential Assessment will be required for all retail and other Main Town Centre use proposals outside a defined centre and should be prepared in accordance with national guidance. This should have regard to the centres hierarchy set out in policy R3.</p> <p><b>b.</b> Where in-centre options are exhausted, edge of centre locations (within 300m of a centre boundary) that are well connected and accessible to the centres themselves should also be considered in advance of out of centre sites.</p> <p><b>3. Impact Test</b></p> <p><b>a.</b> An Impact Test will be required for all retail and other Main Town Centre use proposals outside a defined centre that exceed 1,000sq.m (gross) floor space. The Assessment of Impact should be</p>	<p>unless they satisfy the Sequential Assessment and the Impact Test (where appropriate).</p> <p><b>2. Sequential Assessment</b></p> <p><b>a.</b> A Sequential Assessment will be required for all Main Town Centre use proposals or any other use within use class E and F (or subsequent equivalent of these use classes), outside a defined centre and should be prepared in accordance with national guidance. This should have regard to the centres hierarchy set out in policy R3.</p> <p><b>b.</b> Where in-centre options are exhausted, the sequential assessment will be applied to edge of centre locations as follows:</p> <ul style="list-style-type: none"> <li>• Where there is a defined Primary Shopping Area within a centre, retail proposals which are within 300m of a defined Primary Shopping Area boundary as follows:</li> </ul> <p><b>i.</b> Arena Park;</p> <p><b>ii.</b> Cannon Park;</p> <p><b>iii.</b> Brandon Road.</p> <p><b>iv.</b> Ball Hill;</p> <p><b>v.</b> Bell Green;</p> <p><b>vi.</b> Brade Drive;</p> <p><b>vii.</b> Daventry Road;</p> <p><b>viii.</b> Earlsdon;</p> <p><b>ix.</b> Foleshill;</p> <p><b>x.</b> Jardine Crescent;</p>	<p>Changes to part 3 to reflect recommendations from the Retail and Centres study 2024 in relation to Impact test.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>prepared in accordance with national guidance and consider the potential impact on the vitality, viability, role and character of a defined centre(s) within the centres hierarchy (as set out in policy R3).</p> <p><b>b.</b> Catchment areas for Sequential Assessments and Impact Tests will be considered on a case by case basis to reflect the specific proposals being considered.</p>	<p><b>xi. Jubilee Crescent.</b></p> <ul style="list-style-type: none"> <li>• Other Main Town Centre use proposals within 300m of a defined centre boundary</li> </ul> <p><b>C.</b> Retail proposals close to centres which do not have a defined PSA.</p> <p><b>3. Impact Test</b> An Impact Test will be required for all retail and other Main Town Centre use proposals outside a defined centre that exceed:</p> <ul style="list-style-type: none"> <li>• 1,000 sqm gross for schemes expected to impact on, or have the potential to impact on Coventry City Centre;</li> <li>• 500 sqm gross for schemes expected to impact on, or have the potential to impact on the Major District Centres; and</li> <li>• 250 sqm gross for schemes expected to impact on, or have the potential to impact on the District Centres.</li> </ul> <p><b>4.</b> The Assessment of Impact should be prepared in accordance with national guidance and consider the potential impact on the vitality, viability, role and character of a</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>defined centre(s) within the centres hierarchy (as set out in policyR3).</p> <p>Centres to be considered when undertaking sequential assessments and impact tests will be considered on a case-by-case basis.</p>	
R5	<p><b>Policy R5: Retail Frontages and Ground Floor Units in defined centres</b></p> <p>1. Proposals to use ground floor units within defined centres for non-A class uses will normally be permitted provided that:</p> <p><b>a.</b> the primary retail function of the centre would not be undermined in the context of Policy R3;</p> <p><b>b.</b> the use would make a positive contribution to the overall role, vitality and viability of the centre;</p> <p><b>c.</b> the use is compatible with other Plan policies.</p> <p>2. The impact of a proposal on the primary retail function of a centre will be determined on the basis of:</p>	<p><b>Policy R5: Retail Frontages and Ground Floor Units in defined centres</b></p> <p>1. Proposals to use ground floor units within defined centres for non-E class uses will normally be permitted provided that:</p> <p><b>a.</b> the primary function of the centre would not be undermined in the context of Policy R3;</p> <p><b>b.</b> the use would make a positive contribution to the overall role, vitality and viability of the centre;</p> <p><b>c.</b> the use is compatible with other Plan policies.</p> <p>2. Proposals should seek to actively enhance the frontage of a unit within a defined centre in accordance with the Design Guidance for Shopfronts SPD</p>	<p>Amendment to remove A class and insert E Class following changes to Use Classes Order.</p> <p>Amendment of wording to reflect an updated frontage policy.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p><b>a.</b> the location and prominence of the unit within the relevant frontage;</p> <p><b>b.</b> the width of the frontage of the unit when compared to other units in the centre;</p> <p><b>c.</b> the number and proximity of other units occupied by 'A' class uses;</p> <p><b>d.</b> compatibility of the proposal with nearby uses.</p>		
R6	<p><b>Policy R6 Restaurants, Bars and Hot Food Takeaways</b></p> <p><b>1.</b> Outlets should be located within defined centres and will normally be discouraged outside those locations.</p> <p><b>2.</b> Proposals within defined centres will be permitted provided they:</p> <p><b>a.</b> would not result in significant harm to the amenity of nearby residents or highway safety;</p> <p><b>b.</b> would not result in harmful cumulative impacts due to the existence of any existing or consented proposed outlet;</p> <p><b>c.</b> are in accordance with the emerging Hot Food Takeaway Supplementary Planning</p>	<p><b>Policy R6 Restaurants, Bars and Hot Food Takeaways</b></p> <p><b>1.</b> Outlets should be located within defined centres and will normally be discouraged outside those locations.</p> <p><b>2.</b> Proposals within defined centres will be permitted provided they:</p> <p><b>a.</b> would not result in significant harm to the amenity of nearby residents or highway safety;</p> <p><b>b.</b> would not result in harmful cumulative impacts due to the existence of any existing or consented proposed outlet;</p> <p><b>c.</b> are in accordance with the Adopted Hot Food Takeaway Supplementary Planning Document <b>and any subsequent replacement</b></p> <p><b>d.</b> are compatible with other Plan Policies.</p>	No change to Policy R6 other than the insertion of a reference to the Hot Food Takeaway SPD or future replacement.

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	Document (in particular, proposals for A5 uses); and <b>d.</b> are compatible with other Plan Policies.		
CO1	<p><b>Policy CO1:</b> New or improved social community and leisure premises</p> <p><b>1.</b> Proposals for social, community and leisure facilities will be considered through the following sequential approach:</p> <p><b>a.</b> Designated centres to support the centres hierarchy;</p> <p><b>b.</b> Where no suitable sites are available in a designated centre, an edge-of-centre location;</p> <p><b>c.</b> Where no edge of centre sites are available, a site adjacent to other associated facilities including existing schools and educational facilities;</p> <p><b>d.</b> Only where no suitable site can be identified having regard to points 1-3, will stand alone sites be supported, subject to:</p> <p>i the proposal addressing an inmet meet within a local community</p>	No change.	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>ii there being no significant adverse impact upon the role of a defined Centre</p> <p>iii there being no material impact on neighbouring amenity</p> <p><b>2.</b> Proposals will be considered on the basis of:</p> <p><b>a.</b> The appropriateness of their proposed location in relation to their scale and intended catchment;</p> <p><b>b.</b> Compatibility with nearby uses;</p> <p><b>c.</b> Accessibility by a choice of means of transport;</p> <p><b>d.</b> Compatibility with other Plan Policies.</p> <p><b>3.</b> Where proposals are in accordance with the approved Masterplans for Coventry University or the University of Warwick they will normally be approved subject to high quality design proposals.</p>		
CO2	<p><b>Policy CO2:</b> Re-Use of or Redevelopment of Facilities</p> <p><b>1.</b> Proposals for the re-use or redevelopment of community premises for a use outside the scope of this policy will not be supported if:</p>	<p><b>Policy CO2:</b> Re-Use of or Redevelopment of Facilities</p> <p><b>1.</b> Proposals for the re-use or redevelopment of community premises for a use outside the scope of this policy will not be supported if:</p> <p><b>a.</b> There is an outstanding local need which could reasonably be met at that location;</p>	<p>Inserted 'and' in relation to part 1 to ensure any re-use or redevelopment properly assesses community facilities as the intention of this element of the policy has always been applied by insisting that each criteria</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p><b>a.</b> There is an outstanding local need which could reasonably be met at that location;</p> <p><b>b.</b> The site remains viable for existing uses or could be made viable through appropriate diversification of use;</p> <p><b>c.</b> the proposal is not compatible with nearby uses.</p> <p><b>2.</b> In all cases consideration should be given to the suitability of the location for such facilities having regard to other Policies in this plan and its supporting documents</p> <p><b>3.</b> Where replacement facilities are intended, they should:</p> <p><b>a.</b> continue to serve the community;</p> <p><b>b.</b> be of appropriate scale and character;</p> <p><b>c.</b> be of high quality design.</p>	<p><b>b.</b> The site remains viable for existing uses or could be made viable through appropriate diversification of use; <b>and</b></p> <p><b>c.</b> the proposal is not compatible with nearby uses.</p> <p><b>2.</b> In all cases consideration should be given to the suitability of the location for such facilities having regard to other Policies in this plan and its supporting documents</p> <p><b>3.</b> Where replacement facilities are intended, they should:</p> <p><b>a.</b> continue to serve the community;</p> <p><b>b.</b> be of appropriate scale and character;</p> <p><b>c.</b> be of high quality design.</p>	<p>need to be met rather than just one element. Education uses have always been considered as community uses and this has been operating successfully.</p> <p>It is considered that the supporting text also needs to include a recognition that pubs and shopping parades can operate as community uses and planning judgement will need to be exercised on a case by case basis depending on local context.</p>
CO3	<p><b>Policy CO3:</b> Neighbourhood and Community Planning</p> <p><b>1.</b> Where appropriate the Council will support communities in the preparation of:</p> <p><b>a.</b> Parish Plans;</p> <p><b>b.</b> Parish Design Statements, and;</p>	No change.	Wording is in accordance with the NPPF.



Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>c. Neighbourhood Plans.</p> <p>2. When preparing these plans they must remain in accordance with national legislation, this Local Plan and any other city wide planning documents which support it.</p> <p>3. Where appropriate the Council will support the application and designation of land or buildings as Assets of Community Value.</p> <p>4. The Council will not support applications for Neighbourhood, Parish Plans or Assets of Community Value where they conflict with this Local Plan or supporting documentation.</p>		
GB1	<p><b>Policy GB1: Green Belt and Local Green Space</b></p> <p>1. The city's most up-to-date Green Belt and Local Green Space boundaries are identified on the Policies Map.</p> <p><b>2A:</b> Inappropriate development will not be permitted in the Coventry Green Belt unless very special circumstances exist. Development proposals, including those involving previously developed land and buildings, in</p>	<p><b>STRATEGIC POLICY</b></p> <p><b>Policy to be split: GB1 Green Belt, new policy GB3 Local Green Space</b></p> <p><b>Policy GB1: Green Belt</b></p> <ol style="list-style-type: none"> <li>1. The city's Green Belt boundaries are identified on the Policies Map.</li> <li>2. Inappropriate development will not be permitted in the Coventry Green Belt unless very special circumstances exist. Development proposals, including those involving previously</li> </ol>	<p>Green Belt and Local Green Space are covered by entirely different national policy albeit still with high levels of protection so it is felt they should each have their own policy in the reviewed plan.</p> <p>The list of sites has been removed as these designations were considered and accepted as part of the previous adopted Local Plan (2017) and so will remain as designated Green Belt</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>the Green Belt will be assessed in relation to the relevant national planning policy.</p> <p><b>2B:</b> Within areas designated as Local Green Space, the erection of small buildings and structures which are ancillary to the primary use of the land may be acceptable. Other development will not be permitted unless very special circumstances are demonstrated.</p> <p><b>3.</b> The following areas will be removed from the Green Belt to accommodate future development needs and are shown on the Policies Map. Where appropriate further details are provided in Policy JE2, H2 and HE3;</p> <p><b>a.</b> Land part of the Wood End redevelopment (residential)</p> <p><b>b.</b> Land at Sutton Stop (residential and employment)</p> <p><b>c.</b> Land south at Walsgrave Hill Farm (residential)</p> <p><b>d.</b> Land at Keresley (residential)</p> <p><b>e.</b> Land north of Upper Eastern Green (residential and employment)</p>	<p>developed land and buildings, in the Green Belt will be assessed in relation to the relevant national planning policy.</p>	<p>(and Local Green Space) and will show as such on the policies map</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p><b>f.</b> Land at Cromwell Lane (residential)</p> <p><b>g.</b> Land at Mitchell Avenue (residential)</p> <p><b>h.</b> Land off Allard Way/London Road (residential)</p> <p><b>i.</b> Land at Cheltenham Croft (residential)</p> <p><b>j.</b> Land east of Browns Lane (residential)</p> <p><b>k.</b> Land west of Browns Lane/Burton Close (residential)</p> <p><b>l.</b> Land at Cryfield Heights (residential)</p> <p><b>m.</b> Land at Woodfield School, Stoneleigh Road (Residential and infrastructure)</p> <p><b>n.</b> Land south of Blue Coats School (Heritage and Education)</p> <p><b>o.</b> Land at Baginton Fields and South East of Whitley Business Park (employment)</p> <p><b>p.</b> Land to the east of the existing Energy from Waste plant at Bar Road (general industrial)</p> <p><b>4.</b> The following areas will be removed from the Green Belt and re-designated as Local Green Space</p>		

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>and are shown on the Policies Map:</p> <ul style="list-style-type: none"> <li><b>a.</b> Sowe Valley</li> <li><b>b.</b> Sherbourne Valley</li>   <li><b>c.</b> War Memorial Park</li> <li><b>d.</b> Tocil Wood Brook Stray</li> <li><b>e.</b> Park Wood and Ten Shilling Wood</li> <li><b>f.</b> Tile Hill Wood</li> <li><b>g.</b> Allesley Park</li> </ul> <p><b>5.</b> The following areas will be removed from the Green Belt and will not be re-designated as Local Green Space as they do not serve the purposes of either:</p> <ul style="list-style-type: none"> <li><b>a.</b> Land at Park Hill Lane</li> <li><b>b.</b> Land at Westwood School and Xcel Leisure Centre</li> </ul> <p><b>6.</b> The following areas will be designated as new areas of Local Green Space and are shown on the Policies Map:</p> <ul style="list-style-type: none"> <li><b>a.</b> Sowe Valley Northern Extension</li> <li><b>b.</b> Sherbourne Valley and Lake View Park</li> <li><b>c.</b> Walsgrave Triangle, Cross Point.</li> </ul>		

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>7. In addition to appropriate development in the Green Belt identified in the NPPF, limited infill development would be considered appropriate. Any proposal in these locations will be expected to be of an appropriate density to reflect surrounding properties should not impact negatively on the openness and character of the wider Coventry Green Belt and will also need to accord with Policy H3.</p>		
GB2	<p><b>Policy GB2:</b> Safeguarded Land in the Green Belt</p> <p>1. The areas of Safeguarded Land proposed partly or wholly comprise the following sites and are shown on the Policies Map.</p> <p>a. Land south of Westwood Heath Road;</p> <p>b. Land south of Bishop Ullathorne School;</p> <p>c. Playing Field south of Finham Park School; and</p> <p>d. Land west of Finham Primary School.</p> <p>Any development of these sites will be subject to consideration</p>	<p><b>STRATEGIC POLICY</b></p> <p><b>Policy GB2:</b> Safeguarded Land in the Green Belt</p> <p>1. The areas of Safeguarded Land proposed partly or wholly comprise the following sites and are shown on the Policies Map.</p> <p>a. Land south of Westwood Heath Road;</p> <p>b. Land south of Bishop Ullathorne School;</p> <p>c. Playing Field south of Finham Park School; and</p> <p>d. Land west of Finham Primary School.</p> <p>Any development of these sites will be subject to consideration through a full or partial review of this Local Plan having explicit regard to development proposals in Warwick District</p>	<p>Safeguarded land is defined by the NPPF (para 148 in the December 2023 iteration) as ‘land between the urban area and the Green Belt, in order to meet longer term development needs stretching well beyond the plan period’.</p> <p>Policy GB2 requires that the safeguarded sites listed need to be reviewed through this plan ‘having explicit regard to development proposals in Warwick District’.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	through a full or partial review of this Local Plan having explicit regard to development proposals in Warwick District.	and progress on the South Warwickshire Development Plan.	Given that the South Warwickshire Local Plan is emerging it is considered appropriate to retain the safeguarded status of these sites
GB3		<p><b>STRATEGIC POLICY</b>  <b>New Policy GB3: Local Green Space</b></p> <p>1. The city's Local Green Space boundaries are identified on the Policies Map.  2. Inappropriate development will not be permitted unless very special circumstances exist. Development proposals, including those involving previously developed land and buildings, will be assessed in relation to the relevant national planning policy.</p>	This policy has been extracted from the original GB1 Green Belt and Local Green Space policy, as Local Green Space is a separate type of designation albeit afforded the same level of protection as Green Belt.
GE1	<p><b>Policy GE1 Green Infrastructure</b>  1. The Council will protect green infrastructure based on an analysis of existing assets, informed by the Green Infrastructure Study and Green Space Strategy by incorporating the Council's Green Space Standards, and characterisation assessments.</p>	<p><b>STRATEGIC POLICY</b>  <b>Policy GE1 Green and Blue Infrastructure</b>  1. The Council will protect and enhance green and blue infrastructure based on an analysis of existing assets, informed by, and contributing to the delivery of the Local Nature Recovery Strategy and the Green and Blue Infrastructure Strategy and Action Plan or its future equivalent.</p>	<p>The policy has been amended to incorporate blue infrastructure for comprehensiveness and clarity.</p> <p>References have been updated to ensure the policy links to the emerging Local Nature Recovery Strategy (LNRS) and to the Council's emerging Green and Blue Infrastructure Strategy and</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>2. 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.</p> <p>3. Coventry's existing and planned network of green infrastructure should be used as a way of adapting to climate change through the management and enhancement of existing habitats. This must be demonstrated through the creation of new habitats wherever possible to assist with species movement, to provide a source of locally grown food through allotments and community gardens, to provide sustainable and active travel routes for people, to provide shade and counteract the urban heat island effect, and to assist in improving public health and wellbeing.</p> <p>4. New development will be expected to maintain the quantity,</p>	<p>2 New development proposals should make provision for green and blue 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, demonstrating how this links to the wider delivery of the Local Nature Recovery Strategy and the Green and Blue Infrastructure Strategy and Action Plan.</p> <p>3. Coventry's existing and planned network of green infrastructure should be used as a way of adapting to climate change through the management and enhancement of existing and new habitats. The creation of new habitats will be supported wherever possible to assist with species movement, to provide a source of locally grown food through allotments and community gardens, to provide sustainable and active travel routes for people, to provide shade and counteract the urban heat island effect, and to assist in improving public health and wellbeing.</p> <p>4. New development will be expected to maintain the quantity, quality and multifunctionality of existing green and blue infrastructure. Where quantity is not retained, enhancement to quality is expected. Where the opportunity arises, and in line with the</p>	<p>Action Plan (or its future equivalent), which is being formulated using Natural England's Green Infrastructure Framework.</p> <p>All mentions of corridors in policy link to the emerging LNRS. Proposed development needs to show how it contributes to the delivery of the LNRS and the Coventry green and blue infrastructure strategy. This is also important in order to contribute to addressing health equity and climate change (these latter two points being addressed elsewhere in the reviewed Local Plan)</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>quality and functionality of existing green infrastructure. Where quantity is not retained, enhancement to quality is expected. Where the opportunity arises, and in line with the city's most up-to-date Green Space Strategy, the Council will also expect new developments to enhance green infrastructure, and create and improve linkages between individual areas. Any development which is likely to adversely affect the integrity of a green corridor will be required to be expressly justified and where appropriate, mitigation measures put in place.</p> <p>5. A key element of Coventry's approach to green infrastructure will be the continued development of a network of green spaces, water bodies, paths and cycle ways, with priority given to those parts of the city where there is an identified deficiency of green space. Where a development proposal lies adjacent to a river corridor or</p>	<p>city's most up-to-date <b>Green and Blue Infrastructure Strategy and Action Plan</b>, the Council will also expect new developments to enhance green <b>and blue</b> infrastructure, and create and improve linkages between individual areas. Any development which is likely to adversely affect the integrity of a green corridor will be required to be expressly justified and where appropriate, mitigation measures put in place.</p> <p>5. A key element of Coventry's approach to green <b>and blue</b> infrastructure will be the continued development of a network of green spaces, water bodies, paths and cycle ways, with priority given to those parts of the city where there is an identified deficiency of green space. Where a development proposal lies adjacent to a river corridor or tributary, a natural sinuous river channel should be retained or, where possible, reinstated. Culverts should be removed unless it can be demonstrated that it is impractical to do so.</p> <p>6. Development must respect the importance of conservation, improvement and management of green infrastructure in order to complement and balance the built environment. A strategic network of green <b>and blue</b> infrastructure already exists in the city, connecting natural heritage, green space, biodiversity, historic landscapes <b>water bodies</b></p>	



Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>tributary, a natural sinuous river channel should be retained or, where possible, reinstated. Culverts should be removed unless it can be demonstrated that it is impractical to do so.</p> <p><b>6.</b> Development must respect the importance of conservation, improvement and management of green infrastructure in order to complement and balance the built environment. A strategic network of green infrastructure already exists in the city, connecting natural heritage, green space, biodiversity, historic landscapes or other environmental assets, together with links to adjacent districts in Warwickshire and Solihull. This strategic network will be safeguarded and enhanced by:</p> <p><b>a.</b> Not permitting development that compromises its integrity and that of the overall green infrastructure framework (including the Coventry/Oxford Canal);</p> <p><b>b.</b> Using developer contributions to facilitate improvements to its</p>	<p><b>and</b> other environmental assets, together with links to adjacent districts in Warwickshire and Solihull. This strategic network will be safeguarded and enhanced by:</p> <p>a. Not permitting development that compromises its integrity and that of the overall green <b>and blue</b> infrastructure framework (including the Coventry/Oxford Canal);</p> <p>b. Using developer contributions to facilitate improvements to its quality, connectivity, multifunctionality and robustness;</p> <p>c. Investing in enhancement and restoration where opportunities exist, and the creation of new resources where possible, such as linking green <b>and blue</b> infrastructure to other forms of infrastructure;</p> <p>d. Improving its functionality, quality, connectivity and accessibility;</p> <p>e. Ensuring that a key aim of green <b>and blue</b> infrastructure is the maintenance and improvement and expansion of biodiversity;</p> <p>f. Integrating proposals to improve <b>green and blue</b> infrastructure in the delivery of new developments, particularly through area based regeneration initiatives and major proposals and schemes;</p> <p>g. Flood risk management and improving surface water quality, <b>with preference being</b></p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>quality, connectivity, multifunctionality and robustness;</p> <p><b>c.</b> Investing in enhancement and restoration where opportunities exist, and the creation of new resources where possible, such as linking green infrastructure to other forms of infrastructure;</p> <p><b>d.</b> Improving its functionality, quality, connectivity and accessibility;</p> <p><b>e.</b> Ensuring that a key aim of green infrastructure is the maintenance and improvement and expansion of biodiversity;</p> <p><b>f.</b> Integrating proposals to improve green infrastructure in the delivery of new developments, particularly through area based regeneration initiatives and major proposals and schemes;</p> <p><b>g.</b> Flood risk management and improving surface water quality.</p>	<p>given to nature-based solutions where possible.</p>	
GE2	<p><b>Policy GE2:</b> Green Space</p> <p><b>1.</b> Development involving the loss of green space that is of value for amenity, recreational, outdoor sports and/or community use will not be permitted unless specifically</p>	<p><b>Policy GE2:</b> Green Space</p> <p><b>1.</b> Development involving the loss of green space that is of value for amenity, recreational and/or community use will not be permitted unless specifically identified as part of a strategic land use allocation, or it can be demonstrated that:</p>	<p>Bringing in line with National Planning Policy Framework and to ensure resilience in meeting local need for playing field provision.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>identified as part of a strategic land use allocation, or it can be demonstrated that:</p> <p><b>a.</b> An assessment showing there is no longer a demand, or prospect of demand, for the recreational use of the site or any other green space use; or</p> <p><b>b.</b> A deficiency would not be created through its loss, measured against the most up-to-date Coventry Green Space standards; or</p> <p><b>c.</b> The loss resulting from any proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location of the city.</p> <p><b>2.</b> To support the proposed allocations at H2:19 and JE2:4 the following sites are allocated for the provision of new replacement sports pitches:</p> <p><b>a.</b> Land at Charter Avenue (former Alderman Harris School site).</p> <p><b>b.</b> Land east of Coundon Wedge Road.</p>	<p><b>a.</b> An assessment showing there is no longer a demand, or prospect of demand, for the recreational use of the site or any other green space use; or</p> <p><b>b.</b> A deficiency would not be created through its loss, measured against the most up-to-date Coventry Green Space standards; or</p> <p><b>c.</b> The loss resulting from any proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location of the city.</p> <p><b>2.</b> The loss of sports provision will be considered in line with the approach set out in the NPPF and the Councils most up to date evidence including the Playing Pitch and Outdoor Sports Strategy.</p> <p><b>3.</b> To support the proposed allocations at H2:19 and JE2:4 the following sites are allocated for the provision of new sports pitches:</p> <p><b>a.</b> Land at Charter Avenue (former Alderman Harris School site).</p> <p><b>b.</b> Land east of Coundon Wedge Road.</p> <p><b>4</b> development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
GE3	<p><b>Policy GE3:</b> Biodiversity, Geological, Landscape and Archaeological Conservation</p> <p><b>1.</b> 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:</p> <p><b>a.</b> lead to a net gain of biodiversity, where appropriate, by means of an approved ecological assessment of existing site features and development impacts;</p> <p><b>b.</b> protect or enhance biodiversity assets and secure their long term management and maintenance;</p> <p><b>c.</b> avoid negative impacts on existing biodiversity;</p> <p><b>d.</b> preserve species which are legally protected, in decline, are</p>	<p><b>Policy GE3:</b> Biodiversity, Geological, and Landscape Conservation</p> <p><b>1.</b> 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:</p> <p><b>a.</b> lead to a <b>minimum 10%</b> net gain of biodiversity, <b>by means of an approved ecological assessment of existing site features and development impacts, and the creation or enhancement of habitats, urban greening features such as green walls and roofs, and/or the implementation of species specific features such as bird and bat boxes;</b></p> <p><b>b.</b> protect or enhance biodiversity assets and secure their long term management and maintenance;</p> <p><b>c.</b> avoid negative impacts on existing biodiversity;</p> <p><b>d.</b> preserve species which are legally protected, in decline, are rare within Coventry or which are covered by national, regional or local Biodiversity Action Plans.</p>	To bring in line with national legislation

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>rare within Coventry or which are covered by national, regional or local Biodiversity Action Plans.</p> <p><b>2.</b> 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.</p> <p><b>3.</b> 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</p>	<p><b>2.</b> Where this is not possible, the net gain must be delivered off site. Only if evidence demonstrates that insufficient gains cannot be made to meet the 10% requirement will statutory credits be allowed to be purchased.</p> <p><b>3.</b> 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, contributing to the delivery of the Local Nature Recovery Strategy and the Green and Blue Infrastructure Strategy and Action Plan or its future equivalent. 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</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>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.</p>	<p>measures must be taken for their assessment and recording.</p> <p>Further detail will be provided in an updated Biodiversity SPD.</p>	
<p>GE4</p>	<p><b>Policy GE4:</b> Tree Protection  <b>1.</b> Development proposals will be positively considered provided:  <b>a.</b> there is no unacceptable loss of, or damage to, existing trees or woodlands during or as a result of development, any loss should be supported by a tree survey;  <b>b.</b> trees not to be retained as a result of the development are replaced with new trees as part of a well designed landscape scheme; and  <b>c.</b> existing trees worthy of retention are sympathetically</p>	<p><b>Policy GE4:</b> Tree Protection  <b>1.</b> Development will be positively considered provided:  <b>a.</b> there is no reasonably unavoidable loss of, or damage to, existing trees or woodlands during or as a result of development. Any proposed loss should be supported by a tree survey;  <b>b.</b> trees not to be retained as a result of the development are replaced with new trees as part of a well designed landscape scheme; and</p>	<p>Updated to provide additional clarification and to strengthen policy and link to the SPD</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>incorporated into the overall design of the scheme including all necessary measures taken to ensure their continued protection and survival during construction.</p> <p><b>2.</b> Development proposals that seek to remove trees that are subject to 'Protection', without justification, will not be permitted.</p>	<p><b>c.</b> existing trees worthy of retention are sympathetically incorporated into the overall design of the scheme including all necessary measures taken to ensure their continued protection and survival during construction.</p> <p><b>d.</b> recommendations within the Coventry Trees and Development Guidelines SPD have been fully considered.</p> <p><b>e.</b> proposals are in accordance with the requirements of planning national legislation</p> <p><b>2.</b> Development proposals that seek to remove trees that are subject to 'Protection', without justification, will not be permitted.</p>	
DE1	<p><b>Policy DE1</b> Ensuring High Quality Design</p> <p><b>1.</b> All development proposals must respect and enhance their surroundings and positively contribute towards the local identity and character of an area.</p> <p><b>2.</b> The setting, integrity and character of heritage assets will be protected in accordance with Policy HE2.</p>	<p><b>STRATEGIC POLICY</b></p> <p><b>Policy DE1</b> Ensuring High Quality Design</p> <p><b>1.</b> All development proposals should follow a design-led approach to deliver sustainable, high quality placemaking. Development should contribute positively to the wellbeing of existing and new communities, the quality of the surrounding built and natural environment, and should be planned and designed with</p>	<p>Note in reference to point 5(g) and inserted point 5(h) – explanatory text to reference ; Crowded Places: The Planning System and Counter-Terrorism (January 2012) - suggested text as follows :</p> <p><i>Policy DE1 requires development proposals to create safe and</i></p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p><b>3.</b> All development will be expected to meet the following key principles:</p> <p><b>a.</b> respond to the physical context of the site;</p> <p><b>b.</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;</p> <p><b>c.</b> where appropriate, retain and incorporate into the layout the protection of important views, including key views of the three spires;</p> <p><b>d.</b> preserve or enhance the character and setting of the historic built, landscape and where appropriate archaeological environment;</p> <p><b>e.</b> preserve or enhance the character and setting of major road, rail and canal corridors;</p> <p><b>f.</b> clearly define the boundaries between public and private spaces and enclosure of space;</p> <p><b>g.</b> provide attractive, safe, uncluttered, active and easily</p>	<p><b>reference to the climate change strategy and the adaptation and resilience strategy.</b></p> <p><b>2.</b> The setting, integrity and character of heritage assets will be protected in accordance with Policy HE2.</p> <p><b>3.</b> Where buildings in excess of 20m in height are proposed, these must be informed by the guidance of the Tall Buildings SPD.</p> <p><b>4.</b> In and around the City Centre, the location of proposed development must be considered in relation to the identified views of the City's three spires, and the tall buildings design guide and view management framework SPD.</p> <p><b>5.</b> All development will be expected to meet the following key principles:</p> <p><b>a.</b> respond to the physical context of the site;</p> <p><b>b.</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;</p> <p><b>c.</b> where appropriate, retain and incorporate into the layout the protection of important views, including key views of the three spires;</p> <p><b>d.</b> preserve or enhance the character and setting of the historic built, landscape and where appropriate archaeological environment;</p> <p><b>e.</b> preserve or enhance the character and setting of major road, rail and canal corridors;</p>	<p><i>attractive streets and public spaces, which reduce crime and the fear of crime. As well as considering the impact of development proposals on public safety and the incidences of anti-social behaviour, the reference to safety in the Policy also relates to creating buildings and places that are better protected from terrorist attack, this reflects the Government's strategy for countering terrorism. Applications for development which affect higher risk buildings or spaces such as those that could attract crowds of people, should always fully consider the advice provided by National Counter Terrorism Security Office (NaCTSO) or equivalent.</i></p>



Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>identifiable, high quality public spaces;</p> <p><b>h.</b> make places that inter-connect and are easy to move through;</p> <p><b>i.</b> ensure places are easily understood by users, with clear routes and distinct physical features;</p> <p><b>j.</b> 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;</p> <p><b>k.</b> be adaptable to changing social, technological, economic and market conditions and ensure that developments maximise the use of the site;</p> <p><b>l.</b> promote diversity through mixes of uses within a site or building, which work together to create vital and viable places;</p> <p><b>m.</b> be proactive in responding to climate change and adopt sustainable and low carbon construction principles in terms of their design, layout and density;</p>	<p><b>f.</b> clearly define the boundaries between public and private spaces and enclosure of space;</p> <p><b>g.</b> provide attractive, safe, uncluttered, active and easily identifiable, high quality public spaces;</p> <p><b>h.</b> consider the safety and security of new and existing users, showing how these considerations have informed the design process;</p> <p><b>i.</b> make places that inter-connect and are easy to move through;</p> <p><b>j.</b> ensure places are easily understood by users, with clear routes and distinct physical features;</p> <p><b>k.</b> 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;</p> <p><b>l.</b> be adaptable to changing social, technological, economic and market conditions and ensure that developments maximise the use of the site;</p> <p><b>m.</b> promote diverse, viable places;</p> <p><b>n.</b> be proactive in responding to climate change and adopt sustainable and low carbon construction principles in terms of their design, layout and density;</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p><b>n.</b> 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);</p> <p><b>o.</b> support the integration of through routes for public transport and incorporate suitable bus priority measures as appropriate;</p> <p><b>p.</b> minimise adverse impact on important natural resources;</p> <p><b>q.</b> conserve, restore or enhance biodiversity; and</p> <p><b>r.</b> respect and enhance landscape quality including trees, hedges and other landscape features of value.</p>	<p><b>o.</b> 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);</p> <p><b>p.</b> support the integration of through routes for public transport and incorporate suitable bus priority measures as appropriate;</p> <p><b>q.</b> minimise adverse impact on important natural resources;</p> <p><b>r.</b> conserve and enhance biodiversity; and</p> <p><b>s.</b> respect and enhance landscape quality including trees, hedges and other landscape features of value.</p> <p><b>t.</b> Ensure that car parking is integrated into the development in a convenient, accessible manner and does not dominate the development and its surroundings or cause safety issues;</p> <p><b>u.</b> Provide safe, secure, convenient and accessible provision for cycle parking and storage, facilities for waste management, recycling and collection in a manner that is appropriately integrated within the overall development;</p> <p><b>6.</b> Development located in areas covered by Coventry City Council Design Codes, must demonstrate compliance with the Design Codes key principles.</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>7. Outline major applications located in areas not subject to a Coventry City Council Design Codes, will be required to submit a Design Code in order to assess compatibility with local context.</p>	
DE2		<p><b>New Policy DE2: Delivering High Quality Places</b></p> <p><b>1. Public Realm</b></p> <p>a. Where relevant, all development proposals will be required to integrate high quality soft and hard landscape designs.</p> <p>b. The palette of materials and street furniture for any development proposal will need to respect the prevailing character of its respective area or adjoining landscape.</p> <p><b>2. Public Art</b></p> <p>a. Public art should, where appropriate, form an integral part of the design process of development proposals.</p> <p>b. As an alternative to stand-alone pieces of public art, opportunities should be taken to incorporate this into the design of the buildings e.g. through the use of artist/architectural glass or ironmongery etc. thus giving it more legitimacy and integrity.</p>	<p>New DE2 policy (some elements pulled through from the Area Action Plan) to include public art, lighting, public realm, health and meanwhile uses.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>c. Established public art shall be retained within redevelopment proposals unless the benefits of its removal outweigh the harm of its loss. Where public art is lost replacement works shall be incorporated into new development unless robust justification is provided highlighting that this it is not viable.</p> <p>d. Where public art is provided, contributions and commuted maintenance sums for up to 10 years will be required and include the cost of decommissioning where appropriate.</p> <p><b>3.Lighting</b></p> <p>a. Lighting should be carefully considered in order to meet the requirements of creating attractive and safe environments for all, whilst also mitigating impacts upon neighbours and ensuring that lighting does not adversely affect biodiversity.</p> <p>b Carefully considered architectural lighting proposals for new buildings and refurbishment of existing buildings will be encouraged to enhance the overall appearance of the city during the hours of darkness.</p> <p><b>4.Designing for Healthy Communities</b></p> <p>Major development proposals must fully consider how physical and mental health and well-being for people of all abilities and ages</p>	

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		<p>has been considered and catered for. For residential developments of 10 units and above, proposals should include access to high quality open space and nature, the provision of attractive walking and cycling routes, play facilities, seating, and spaces for all mobility's to interact, with well-connected permeable layouts that incorporate desire lines.</p> <p><b>5.Meanwhile Uses</b></p> <p>1) Vacant plots/sites planned for redevelopment must investigate provision of meanwhile/temporary uses prior to commencement of any redevelopment work.</p> <p>Any meanwhile/temporary use of such sites will be welcomed where:</p> <p>a) the meanwhile/temporary use does not preclude permanent use of the site, particularly through the length of any temporary permission;</p> <p>b) the proposed meanwhile/temporary use contributes to the function of the area where it is located or meets a specific need identified by the Council;</p> <p>c) potential adverse amenity impacts are prevented or mitigated; and</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>d) the proposed use meets all other Local Plan policies relevant to the use.</p> <p>2) Site hoardings must be of high quality and responsive to their context.</p> <p>3) The use of high-quality accessible landscape areas will be welcomed for plots which may remain vacant for periods greater than 6 months.</p> <p><b>6. City Centre and Transition Zone</b> In line with other plan policies, proposals located within the City Centre Transition Zone* should fully consider their local context and the sites role in transitions to the City Centre context.</p> <p><b>7. Proposals within the defined City centre** and the City Centre Transition Area*, should demonstrate how they contribute to the key aims and objectives of Coventry City Council.</b></p> <p>*City Centre Transition Zone as shown at Appendix 9(d)</p> <p>**City Centre boundary as shown at Appendix 9(d)</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
HE1	<p><b>Policy HE1 Conservation Areas</b></p> <p>1. The areas listed below have been designated as Conservation Areas under Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and are detailed on the Policies Map:</p> <ul style="list-style-type: none"> <li>a. Allesley</li> <li>b. Chapelfields</li> <li>c. Coventry Canal</li> <li>d. Far Gosford Street</li> <li>e. Greyfriars Green</li> <li>f. Hawkesbury Junction</li> <li>g. High Street</li> <li>h. Hill Top</li> <li>i. Ivy Farm Lane</li> <li>j. Kenilworth Road</li> <li>k. Lady Herbert's Garden and The Burges</li> <li>l. London Road</li> <li>m. Naul's Mill</li> <li>n. Spon End</li> <li>o. Spon Street</li> <li>p. Stoke Green</li> </ul> <p>2. The following areas are proposed for designation as Conservation Areas:</p> <ul style="list-style-type: none"> <li>a. Earlsdon</li> <li>b. Brownhill Green</li> </ul>	<p><b>STRATEGIC POLICY</b></p> <p><b>Policy HE1 Conservation Areas</b></p> <p>1. The areas listed below have been designated as Conservation Areas under Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and are detailed on the Policies Map:</p> <ul style="list-style-type: none"> <li>a. Allesley</li> <li>b. Chapelfields</li> <li>c. Coventry Canal</li> <li>d. Far Gosford Street</li> <li>e. Greyfriars Green</li> <li>f. Hawkesbury Junction</li> <li>g. High Street</li> <li>h. Hill Top</li> <li>i. Ivy Farm Lane</li> <li>j. Kenilworth Road</li> <li>k. Lady Herbert's Garden and The Burges</li> <li>l. London Road</li> <li>m. Naul's Mill</li> <li>n. Spon End</li> <li>o. Spon Street</li> <li>p. Stoke Green</li> <li>q Earlsdon</li> <li>r Brownhill Green</li> </ul> <p>2. Conservation Area Appraisals and Management Plans will be produced for all of the Conservation Areas to guide their preservation and enhancement. All</p>	<p>The policy has been updated in Part 1 to include the new Conservation Areas of Earlsdon and Brownhill Green.</p> <p>Part 2 has been updated to enable additional areas to be added over the plan period if required.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>The exact boundaries will be determined by the production of Conservation Area Appraisals and Management Plans following public consultation.</p> <p><b>3.</b> Conservation Area Appraisals and Management Plans will be produced for all of the Conservation Areas to guide their preservation and enhancement. All development proposals within Conservation Areas will be determined in accordance with this Plan and the appropriate Appraisal and Management Plan.</p>	<p>development proposals within Conservation Areas will be determined in accordance with this Plan and the appropriate Appraisal and Management Plan.</p>	
HE2	<p><b>Policy HE2: Conservation and Heritage Assets</b></p> <p><b>1.</b> In order to help sustain the historic character, sense of place, environmental quality and local distinctiveness of Coventry, development proposals will be supported where they conserve and, where appropriate, enhance those aspects of the historic environment which are recognised as being of special historic, archaeological, architectural, artistic, landscape or townscape</p>	<p><b>STRATEGIC POLICY</b></p> <p><b>Policy HE2: Conservation and Heritage Assets</b></p> <p><b>1.</b> In order to help sustain the historic character, sense of place, environmental quality and local distinctiveness of Coventry, development proposals will be supported where they conserve and, where appropriate, enhance those aspects of the historic environment which are recognised as being of special historic, archaeological, architectural, artistic, landscape or townscape significance. These Heritage Assets include:</p> <p><b>a.</b> Listed Buildings and Locally Listed buildings;</p> <p><b>b.</b> Conservation Areas;</p>	<p>Policy updated to include elements previously contained within City Centre Area Action plan. Additional reference to good practice guidance and inclusion of potential S106 contributions in exceptional circumstances.</p>



Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>significance. These Heritage Assets include:</p> <p><b>a.</b> Listed Buildings and Locally Listed buildings;</p> <p><b>b.</b> Conservation Areas;</p> <p><b>c.</b> Scheduled Ancient Monuments and Archaeological sites;</p> <p><b>d.</b> Registered Parks and Gardens; and</p> <p><b>e.</b> Other places, spaces, structures and features which may not be formally designated but are recognised as significant elements of Coventry's heritage and are positively identified on the Coventry Historic Environment Record.</p> <p><b>2.</b> Proposals likely to affect the significance of a heritage asset or its setting should demonstrate an understanding of such significance using currently available evidence.</p> <p><b>3.</b> Development proposals involving heritage assets in general and listed buildings in particular, should acknowledge the significance of the existing building and the area by means of their siting, massing, form, scale, materials and detail.</p>	<p><b>c.</b> Scheduled Ancient Monuments and Archaeological sites;</p> <p><b>d.</b> Registered Parks and Gardens; and</p> <p><b>e.</b> Other places, spaces, structures and features which may not be formally designated but are recognised as significant elements of Coventry's heritage and are positively identified on the Coventry Historic Environment Record.</p> <p><b>2.</b> Proposals likely to affect the significance of a heritage asset or its setting should demonstrate an understanding of such significance using currently available evidence.</p> <p><b>3.</b> Development proposals involving heritage assets in general and listed buildings in particular, should acknowledge the significance of the existing building and the area by means of their siting, massing, form, scale, materials and detail.</p> <p><b>4.</b> The sympathetic and creative re-use of heritage assets will be encouraged, especially for heritage that is considered to be at risk, so long as it is not damaging to the significance of the heritage asset. The embodied energy present in historic buildings contributes to sustainability.</p> <p><b>5.</b> The Council will use its statutory powers to secure the preservation of buildings and other heritage assets that are deemed to be at risk by the national and local heritage at risk registers.</p> <p><b>6.</b> Demolition or destruction of heritage assets will be resisted; proposals to demolish a heritage asset will therefore need substantial justification. The greater the damage to the significance of the</p>	

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	<p><b>4.</b> The sympathetic and creative re-use of heritage assets will be encouraged, especially for heritage that is considered to be at risk, so long as it is not damaging to the significance of the heritage asset. The embodied energy present in historic buildings contributes to sustainability.</p> <p><b>5.</b> The Council will use its statutory powers to secure the preservation of buildings and other heritage assets that are deemed to be at risk by the national and local heritage at risk registers.</p> <p><b>6.</b> Demolition or destruction of heritage assets will be resisted; proposals to demolish a heritage asset will therefore need substantial justification. The greater the damage to the significance of the asset, the greater the justification required and the public benefit needed to outweigh such damage.</p> <p><b>7.</b> All proposals should aim to sustain and reinforce the special character and conserve the</p>	<p>asset, the greater the justification required and the public benefit needed to outweigh such damage.</p> <p><b>7.</b> All proposals should aim to sustain and reinforce the special character and conserve the following distinctive historic elements of Coventry:</p> <p><b>a.</b> The surviving buildings, defences and street plan of the medieval city centre and its suburbs;</p> <p><b>b.</b> The surviving pre-industrial settlements and landscape features which have been subsumed by the expansion of the city such as Walsgrave, Canley, Binley, Brownhill Green, Coundon Green, Little Heath (Spring Road), Stivichall Croft and Lower Eastern Green (at Dial House Lane);</p> <p><b>c.</b> The wider Arden rural environment on the fringe of the city comprising field-systems, ancient woodlands and commons which developed over centuries; interspersed with a mix of settlements, farmsteads and smallholdings;</p> <p><b>d.</b> Buildings associated with the city's industrial heritage; ribbon weaving, watch making, cycle making, motor car manufacturing, brick making, coal mining, synthetic textiles, munitions, aeronautical engineering, canals and railways;</p> <p><b>e.</b> The Victorian and Edwardian suburbs such as Earlsdon and Stoke;</p> <p><b>f.</b> Designed landscapes, including historic parks and gardens (both registered and locally listed), historic cemeteries, churchyards and public parks;</p> <p><b>g.</b> The significant elements of Coventry's ground-breaking post-war reconstruction including its plan, built form, public art works and public spaces; and</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>following distinctive historic elements of Coventry:</p> <p><b>a.</b> The surviving buildings, defences and street plan of the medieval city centre and its suburbs;</p> <p><b>b.</b> The surviving pre-industrial settlements and landscape features which have been subsumed by the expansion of the city such as Walsgrave, Canley, Binley, Brownhill Green, Coundon Green, Little Heath (Spring Road), Stivichall Croft and Lower Eastern Green (at Dial House Lane);</p> <p><b>c.</b> The wider Arden rural environment on the fringe of the city comprising field-systems, ancient woodlands and commons which developed over centuries; interspersed with a mix of settlements, farmsteads and smallholdings;</p> <p><b>d.</b> Buildings associated with the city's industrial heritage; ribbon weaving, watch making, cycle making, motor car manufacturing, brick making, coal mining,</p>	<p><b>h.</b> The city centre primary shopping area, respecting the architectural design principles of the significant elements of the post- World War II reconstruction such as Broadgate and the shopping Precincts.</p> <p><b>8.</b> Where material change to a heritage asset has been agreed, recording and interpretation should be undertaken to document and understand the asset's archaeological, architectural or historic significance. The scope of the recording should be proportionate to the asset's significance and the impact of the development on the asset. The information and understanding gained should be made publicly available, as a minimum through the Coventry Historic Environment Record.</p> <p><b>9:</b> For development in relation to heritage assets and / or in conservation areas, these should demonstrate how the relevant Historic England Good Practice Guidance has been taken into account.</p> <p><b>10.</b> In exceptional cases, where harm cannot be outweighed by public benefit and where proposals produce harm to the setting of heritage assets which cannot be mitigated, the Council may seek contributions from developers for the enhancement, repair and/or maintenance of the impacted historic assets.</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>synthetic textiles, munitions, aeronautical engineering, canals and railways;</p> <p><b>e.</b> The Victorian and Edwardian suburbs such as Earlsdon and Stoke;</p> <p><b>f.</b> Designed landscapes, including historic parks and gardens (both registered and locally listed), historic cemeteries, churchyards and public parks;</p> <p><b>g.</b> The significant elements of Coventry's ground-breaking post-war reconstruction including its plan,built form, public art works and public spaces; and</p> <p><b>h.</b> Archaeological remains of all periods from the earliest Prehistoric human habitation to the modern industrial period.</p> <p><b>8.</b> Where material change to a heritage asset has been agreed, recording and interpretation should be undertaken to document and understand the asset's archaeological, architectural or historic significance. The scope of the recording should be proportionate to the asset's significance and the</p>		

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>impact of the development on the asset. The information and understanding gained should be made publicly available, as a minimum through the Coventry Historic Environment Record.</p>		
HE3	<p><b>Policy HE3</b> Heritage Park – Charterhouse</p> <p>1. Proposals for a City Heritage Park in the grounds of the Charterhouse and London Road cemetery will be supported along with measures to improve linkages to the area along the River Sherbourne (between Charterhouse and Far Gosford Street), the former Coventry loop railway line and across the London Road. Proposals that are detrimental to the establishment of the heritage park and the improvement of linkages will be resisted.</p> <p>2. Land at Blue Coat School is to be removed from the Green Belt in accordance with policy GB1 to support the expansion of school facilities on condition that the existing school car park is removed from the area of the</p>	<p><b>Policy HE3</b> Heritage Park – Charterhouse</p> <p>1. Proposals which support the City Heritage Park in the grounds of the Charterhouse and London Road cemetery will be supported along with measures to improve linkages to the area along the River Sherbourne (between Charterhouse and Far Gosford Street), the former Coventry loop railway line and across the London Road. Proposals that are detrimental to the heritage park and the improvement of linkages will be resisted.</p> <p>2. The Heritage Park and any expansion of Blue Coat School should be guided by a comprehensive Master plan, which reflects the policies of this Plan (including Appendices).</p>	<p>Policy updated to reflect the now established heritage park at Charterhouse and removal of reference to previous designation revisions.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>Charterhouse Scheduled Ancient Monument. In addition, the expansion of the school should also support the appropriate relocation of the all-weather sports facilities and playground areas to secure the enhancement of the riverside area. This should facilitate the re-naturalisation of the area in an appropriate way in order to enhance the setting of the Charterhouse, its precinct and the Heritage Park as a whole.</p> <p><b>3.</b> The creation of the Heritage Park and expansion of Blue Coat School should be guided by a comprehensive Master plan, which reflects the policies of this Plan (including Appendix 4).</p>		
HE4		<p><b>New Policy HE4: Archaeology</b></p> <p>1. In order to be responsive to the historic character and local distinctiveness, proposals which are inclusive of intrusive groundworks are expected to conserve and, where appropriate, enhance archaeological features across the City.</p> <p>2. Where material change to an archaeological asset has been agreed, recording and</p>	<p>This has extracted the relevant elements to archaeology already contained in Policy HE2 but placed them in a bespoke archaeology policy for clarity and added some additional detail</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>interpretation must be undertaken to document the asset's historic significance and advance understanding of the asset to be lost. The scope of the recording should be proportionate to the asset's significance and the impact of the development on the asset. The information and understanding gained should be made publicly available, as a minimum through the Coventry Historic Environment Record.</p> <p>3. Archaeological investigations must be undertaken where development is proposed on or adjacent to the line of the former site of the City Wall. Positive weight will be given to schemes which incorporate design responses to reflect and respond to the line of the medieval City Wall.</p> <p>4. New development which include or takes place adjacent to the remaining above ground sections of the medieval City Wall, must enhance the setting of the wall and seek to incorporate it into design.</p> <p>5. In cases where loss cannot be avoided, the Council may seek contributions from developers for the enhancement, repair and/or maintenance of archaeological assets in the vicinity of the proposal.</p>	
AC1	<b>Policy AC1:</b> Accessible Transport Network	<b>STRATEGIC POLICY</b> <b>Policy AC1: Accessible Transport Network</b>	Policy updated to reflect latest national, regional and local policy and guidance and the Council's

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>1. Development proposals which are expected to generate additional trips on the transport network should:</p> <p>a. Integrate with existing transport networks including roads, public transport and walking and cycling routes to promote access by a choice of transport modes.</p> <p>b. Consider the transport and accessibility needs of everyone living, working or visiting the city. Special attention should be paid to the needs of disabled people, young children, and people with special needs. Special attention should be paid to the needs of an aging population to make Coventry an Age Friendly City.</p> <p>c. Support the delivery of new and improved high quality local transport networks which are closely integrated into the built form. This includes networks which support access to strategic growth corridors. The scale of measures required should be appropriate to the scale and impact of the</p>	<p>1. The Council will encourage proposals that minimise the need to travel, maximise trips made by sustainable transport modes, incorporate liveable neighbourhood principles and reduce the dependence on the private car in accordance with the National Design Guide, National Model Design Code, Transport for West Midlands (TfWM) Local Transport Plan (LTP) and the Council's Transport Strategy and Coventry Connect SPD.</p> <p>2. Sustainable transport modes should be fully integrated into the design and placemaking of developments to ensure sustainable and active travel is a real and long term alternative. As a result, proposals will be supported where:</p> <p>a. The proportion of trips made by walking, cycling and public transport is high, and local connections by these modes are improved;</p> <p>b. Car dominance is reduced;</p> <p>c. Streets and the public realm are made safer, more accessible and where the quality and resilience are improved such as through materials and increasing biodiversity; and</p> <p>d. Air quality, noise and green and blue infrastructure are improved to create</p>	<p>emphasis on prioritising walking, cycling and sustainable modes of travel.</p> <p>Policy includes the latest sustainable travel modes such as very light rail and emerging technologies.</p> <p>Policy including improvements to street greening and layout as part of ways to improve the pedestrian and cycle experience.</p>



Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>proposed development.</p> <p><b>d.</b> Actively support the provision and integration of emerging and future intelligent mobility infrastructure, including electric vehicle charging points, Car Club schemes and bicycle hire.</p> <p><b>2.</b> Further guidance will be contained in the Coventry Connected SPD.</p>	<p><b>more attractive neighbourhoods for people.</b></p> <p><b>3.</b> Development proposals which are expected to generate additional trips on the transport network should:</p> <ul style="list-style-type: none"> <li>a. Integrate with existing transport networks including roads, public transport and walking and cycling routes <b>through safe, accessible and sustainable links</b> to promote access by a choice of transport modes.</li> <li>b. Consider the transport and accessibility needs of everyone living, working or visiting the city. Special attention should be paid to the needs of disabled people, young children, and people with special needs. Special attention should be paid to the needs of an aging population to make Coventry an Age Friendly City.</li> <li>c. Support the delivery of <b>liveable neighbourhoods and</b> new and improved high quality local transport networks which are closely integrated into the built form. This includes networks which support access to strategic growth corridors. The scale of measures required should be</li> </ul>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>appropriate to the scale and impact of the proposed development.</p> <p>d. <b>Where appropriate,</b> support the provision and integration of emerging and future intelligent mobility infrastructure, including <b>Very Light Rail, Demand Responsive Transport, micro-mobility, Connected Autonomous Vehicles (driverless cars), autonomous delivery and drone technology.</b></p>	
AC2	<p><b>Policy AC2: Road Network</b></p> <p>1. New development proposals which are predicted to have a negative impact on the capacity and/or safety of the highway network should:</p> <p>a. Mitigate and manage the traffic growth which they are predicted to generate to ensure that they do not cause unacceptable levels of traffic congestion, highway safety problems and poor air quality. Highway mitigation and management measures should focus firstly on demand management measures (Policy AC3) including the promotion of sustainable modes of travel, and secondly on the</p>	<p><b>Policy AC2: Road Network</b></p> <p>1. New development proposals which are predicted to have a negative impact on the capacity and/or safety of the highway network should:</p> <p>a. Mitigate and manage the traffic growth which they are predicted to generate to ensure that they do not cause unacceptable levels of traffic congestion, highway safety problems and poor air quality. Highway mitigation and management measures should focus firstly on demand management measures (Policy AC3) including the promotion of sustainable modes of travel, and secondly on the delivery of appropriate highway capacity interventions. Highway capacity interventions should be appropriate to the scale of development and expected</p>	Policy updated to reflect latest HEDNA evidence.

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>delivery of appropriate highway capacity interventions. Highway capacity interventions should be appropriate to the scale of development and expected impact and will be determined through the associated Transport Assessment.</p> <p><b>b.</b> Developments should seek to support and accommodate, where appropriate, measures which facilitate enhancements to the wider transport network including those set out in the Infrastructure Delivery Plan.</p> <p><b>c.</b> Be served by routes which are suitable for that purpose. Where this is not achievable, proposals will only be considered acceptable if appropriate interventions can be applied to suitably mitigate any negative impacts, including the construction of new access link roads.</p> <p><b>2.</b> The Infrastructure Delivery Plan sets out specific measures and funding sources for the transport network improvements which are required to support the delivery of the Local Plan. The level of</p>	<p>impact and will be determined through the associated Transport Assessment.</p> <p><b>b.</b> Developments should seek to support and accommodate, where appropriate, measures which facilitate enhancements to the wider transport network including those set out in the Infrastructure Delivery Plan. Be served by routes which are suitable for that purpose. Where this is not achievable, proposals will only be considered acceptable if appropriate interventions can be applied to suitably mitigate any negative impacts, including the construction of new access link roads.</p> <p><b>2.</b> Development will be expected to actively support the provision and integration of intelligent mobility infrastructure, such as electric vehicle charging points and include rapid charging points, car club schemes and bicycle hire infrastructure. These should be provided onsite unless justification shows that off site is the only feasible option.</p> <p><b>3.</b> New development proposals that require changes to the highway network will be required to positively integrate with and have consideration of the movement of people and goods on the existing road network, including</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>financial contributions that will be sought from developers for highways infrastructure will be set out in the Council's Community Infrastructure Levy Charging Schedule. The Council may also seek to secure the provision of transportation infrastructure through planning conditions and legal agreements.</p> <p><b>3.</b> Further guidance will be contained in the Coventry Connected SPD.</p>	<p>walking, cycling and rapid transit routes in accordance with Policy AC4 and AC5.</p> <p><b>4.</b> Proposals should not negatively impact road safety and should be in line with the Council's Transport Strategy.</p> <p><b>5.</b> The Infrastructure Delivery Plan sets out specific measures and funding sources for the transport network improvements which are required to support the delivery of the Local Plan. The Council may seek to secure the provision of transportation infrastructure through planning conditions and legal agreements.</p> <p><b>6.</b> Further guidance will be contained in the Coventry Connected SPD and the emerging Transport Design Guide.</p>	
AC3	<p><b>Policy AC3: Demand Management</b></p> <p><b>1.</b> Transport Assessments will be required for developments which generate significant additional trips on the transport network. Thresholds for their requirement will be based on locally determined criteria set out in the Coventry Connected SPD.</p>	<p><b>Policy AC3: Demand Management</b></p> <p><b>1.</b> Transport Assessments will be required for developments which generate significant additional trips on the transport network. Thresholds for their requirement will be based on locally determined criteria set out in the Coventry Connected SPD.</p> <p><b>2.</b> Travel Plans will be required for new developments which generate significant additional traffic movements. Detailed</p>	<p>Policy updated to reflect latest national, regional and local policy and guidance and the Council's emphasis on prioritising walking, cycling and sustainable modes of travel including mobility credits. This includes text pulled through from the AAP.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p><b>2.</b> Travel Plans will be required for new developments which generate significant additional traffic movements. Detailed guidance on the requirement for Travel Plans will be set out in the Coventry Connected SPD.</p> <p><b>3.</b> Proposals for the provision of car parking associated with new development will be assessed on the basis of parking standards set out in Appendix 5.</p> <p><b>4.</b> New development proposals which require changes to the highway network will be required to integrate with any existing UTMC and ITS infrastructure and strategy and development of the Key Route Network.</p> <p><b>5.</b> Further guidance will be contained in the Coventry Connected SPD</p>	<p>guidance on the requirement for Travel Plans will be set out in the Coventry Connected SPD.</p> <p><b>3.</b> Proposals for the provision of car parking associated with new development will be assessed on the basis of parking standards set out in Appendix 6, with active and sustainable travel modes factored into the delivery of any new parking provision.</p> <p><b>4.</b> Development proposals which result in significant changes to the location or supply of public car parking spaces will be required to address any associated necessary changes to associated car park signing and management systems. In regard to development proposals in the city centre:</p> <ul style="list-style-type: none"> <li>• this should include clear justification as part of an on-going strategic review process and shown to have an acceptable impact on the performance and accessibility of the city centre and overall car parking provision.</li> <li>• The redevelopment and improvement of surface level car parks will be prioritised.</li> <li>• The provision of new surface level car parking will not be supported within the city centre unless its provision is to</li> </ul>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>support the implementation of longer term regeneration schemes. In such cases surface level provision will only be allowed on a temporary basis.</p> <ul style="list-style-type: none"> <li>• New car parking should be accommodated in a multi-storey format.</li> <li>• Proposals for multi storey car parks should respect the character and scale of the surrounding environment and maximise opportunities for high quality aesthetics.</li> <li>• Parking needs and the role of the car will also be balanced with promoting the use of public transport, cycling and walking.</li> </ul> <p><b>5.</b> Proposals will be required to encourage and incentivise sustainable travel, such as through the provision of Mobility Credits.</p> <p><b>6.</b> New development proposals which require changes to the highway network will be required to integrate with any existing Urban Traffic Management Control (UTMC) and Intelligent Transport Systems (ITS) infrastructure and strategy and development of the Key Route Network.</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		7. Further guidance will be contained in an updated Coventry Connected SPD.	
AC4	<p><b>Policy AC4:</b> Walking and Cycling</p> <p>1. Development proposals should incorporate appropriate safe and convenient access to walking and cycling routes. Where these links do not exist, new and upgraded routes will be required and these must appropriately link into established networks to ensure that routes are continuous. The expected type of provision will depend on the scale, use and location of the site. For larger developments, financial contributions may be required to support improved pedestrian and /or cycling routes on the wider network. Further details will be set out in the Coventry Connected SPD.</p> <p>2. A complementary network of connected Quiet Streets will be developed which include physical measures to control and restrict certain traffic movements and vehicle speeds to create an environment where walking and</p>	<p><b>Policy AC4: Active Transport Provision including Walking, Cycling and Micro Mobility</b></p> <p>1. Development proposals should be in accordance with the emerging Local Cycling and Walking Infrastructure Plan (LCWIP) and incorporate:</p> <ul style="list-style-type: none"> <li>a. safe, comfortable and convenient access to walking and cycling routes, appropriate for all abilities and needs that include wheelchair accessible routes, consideration of pedestrian desire lines within and outside site boundaries, pedestrian and cycle crossings and improvements and links to the city's towpaths;</li> <li>b. new and upgraded pedestrian and cycle routes where these links do not exist, which are in accordance with national guidance on standards and best practice. These must appropriately link and integrate seamlessly into established networks to ensure that routes are continuous, and they should include connecting to the public transport network, interchanges and stops to deliver seamless integration</li> </ul>	Policy updated to reflect latest national, regional and local policy and guidance and the Council's emphasis on prioritising walking, cycling and sustainable modes of travel. This includes text pulled through from the AAP.

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>cycling are the preferred modes of transport. These will be prioritised through the development of SUE sites, but will also be considered within existing areas of the city which are negatively affected by increased traffic associated with new development. Financial contributions will be sought to deliver those proposals where the predicted impact of development traffic is significant and measures are needed to support an improved pedestrian and cycle environment.</p> <p><b>3.</b> Further details will be set out in the Coventry Connected SPD.</p> <p><b>4.</b> High quality cycle parking and associated facilities, such as changing, shower and storage, as part of new development proposals. The expected level of provision should be based on the cycle parking standards set out in the Appendix 5.</p>	<p>together with provision of high quality cycle parking. The expected type of provision will depend on the scale, use and location of the site. Upgraded pedestrian routes should include, for development proposals in the city centre where appropriate, improvements to the significant routes and linkages as shown in Figure 8 and where appropriate, development proposals will be required to incorporate improvements to crossing the Ring Road to ensure enhanced connectivity between the city centre and the wider city for pedestrians and cyclists and should reflect the priorities in the supporting text above. This will be of particular relevance at:</p> <ul style="list-style-type: none"> <li>• Ring Road Junctions 1, 2, 4 and 5</li> <li>• The Canal Basin crossing between Ring Road junctions 9 and 1</li> <li>• Connectivity between Parkside and Much Park Street.</li> </ul> <p><b>c.</b> High quality cycle parking (for residents, employees and visitors), which includes provision for children's bikes, larger bikes like cargo bikes and associated facilities, such as changing, showers and storage in line with the</p>	



Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>cycle parking standards in Appendix 5; and</p> <p>d. the provision for West Midlands Cycle Hire docking stations(s) and hire bikes on site for larger development proposals.</p> <p>2. For larger developments, financial contributions may be required to support improved pedestrian and /or cycling routes on the wider network.</p> <p>3. The Council will promote walking and cycling by delivering a wide range of walking and cycling schemes. This includes schemes set out in the Council's Transport Strategy and will comprise physical measures to create an environment where walking and cycling are the preferred modes of transport. Such measures may include:</p> <ul style="list-style-type: none"> <li>• segregated cycleways on key corridors;</li> <li>• School Streets - temporary road closures around schools at pick up and drop off times;</li> <li>• Liveable Neighbourhoods;</li> <li>• Traffic calming and speed reductions;</li> <li>• Wider pavements;</li> <li>• Increased cycle parking; and</li> <li>• expanding the provision of the West Midlands Cycle Hire scheme.</li> </ul>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>These measures will be prioritised within existing areas of the city which are negatively affected by increased traffic associated with new development. <b>Proposals should incorporate such measures and</b> financial contributions will be sought to deliver those proposals where the predicted impact of development traffic is significant and measures are needed to support an improved pedestrian and cycle environment.</p>	
AC5	<p><b>Policy AC5: Bus and Rapid Transit</b>  <b>1.</b> New major development proposals should have safe and convenient access to the existing bus network and comply with the TfWM access standards. In areas where this is not achieved, new development may be required to include the provision of appropriate bus infrastructure to enable services to be fully integrated into the development site. The level of need and expected provision will be determined through Transport Assessments and Travel Plans.</p>	<p><b>Policy AC5: Bus, Demand Response Transit and Rapid Transit</b>  <b>1.</b> New major development proposals should have safe and convenient access to the existing bus network and comply with the TfWM access standards. In areas where this is not achieved, new development may be required to include the provision of appropriate bus infrastructure to enable services to be fully integrated into the development site. <b>Development proposals should also have regard to, and where appropriate, make provision for the development of Mobility Hubs.</b> The level of need and expected provision will be determined through Transport Assessments and Travel Plans.   <b>2. The Council will support new bus and rapid transit networks that link communities more</b></p>	<p>Policy updated to reflect latest national, regional and local policy and guidance and the Council's emphasis on prioritising bus use and to include the council's support for the WM Demand Response Transit and Rapid Transit networks. This includes text pulled through from the AAP.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p><b>2.</b> The development of a rapid transit network will be supported to improve accessibility to existing and new major trip attractors. Major development proposals which are expected to create significant numbers of additional trips on the network, and are located in close proximity to a proposed rapid transit route should seek to make provision for those routes, including new infrastructure to facilitate the integration of the rapid transit network into the development site. The level of need and expected provision will be determined through Transport Assessments and Travel Plans.</p> <p><b>3.</b> Further details will be set out in the Coventry Connected SPD, the West Midlands Strategic Transport Plan and Coventry's Bus Network Development Plan.</p>	<p>directly to places of work, education, essential services, centres, other sustainable transport modes and leisure / recreational / cultural attractions. This includes new or improved routes around the city and new and improved cross boundary routes outside the TfWM area.</p> <p><b>3.</b> The provision of demand response transit will be supported within all areas of the city as a convenient alternative for many people, including those less able.</p> <p><b>4.</b> The development of a rapid transit network, such as in the form of Very Light Rail will be supported to improve accessibility to existing and new major trip attractors. Major development proposals which are expected to create significant numbers of additional trips on the network, and are located in close proximity to a proposed rapid transit route should seek to make provision for those routes, including new infrastructure to facilitate the integration of the rapid transit network into the development site. The level of need and expected provision will be determined through Transport Assessments and Travel Plans.</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p><b>5.</b> Further details will be set out in the Coventry Connected SPD, the TfWM LTP and TfWM Bus Service Improvement Plan.</p>	
AC6	<p><b>Policy AC6: Rail</b></p> <p><b>1.</b> Proposals which improve the quality of local rail services and access to stations and rail interchange facilities will be supported. These include:</p> <p><b>a.</b> Improved access to rail stations, including HS2, by all modes of travel;</p> <p><b>b.</b> Improved interchange facilities between rail and other modes; and</p> <p><b>c.</b> Enhancements on the rail network which increase the frequency and quality of rail services which serve Coventry.</p> <p><b>2.</b> Measures which support the delivery of objectives in the Coventry Rail Investment Strategy for improved rail connectivity will be supported. This includes measures which facilitate improved rail</p>	<p><b>Policy AC6: Rail</b></p> <p><b>1.</b> Proposals which improve the quality of local rail services and access to stations and rail interchange facilities will be supported. These include:</p> <p>a. Improved access to rail stations, including HS2, by all modes of travel;</p> <p>b. Improved interchange facilities between rail and other modes; and</p> <p>c. Enhancements on the rail network which increase the frequency and quality of rail services which serve Coventry.</p> <p><b>2.</b> Measures which support the delivery of objectives in the West Midlands Rail Executive Rail Investment Strategy and Midland Connect Strategic Transport Plan for improved rail connectivity will be supported. This includes measures which facilitate improved rail services and supporting rail infrastructure, including further electrification of the rail network, on the Coventry north-south corridor between Leamington, Kenilworth, Coventry, Bedworth and Nuneaton and on routes to Leicestershire and the East Midlands.</p>	Current policy still supported, but updated to include support for electrification of rail lines and improved routes to the east midlands

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>services and supporting rail infrastructure on the Coventry north-south corridor between Leamington, Kenilworth, Coventry, Bedworth, Nuneaton and Leicestershire.</p> <p><b>3.</b> Proposals for additional local railway stations on the east-west and north/south rail corridor within Coventry will be supported where they are proven to be viable, support growth objectives and are consistent with the relevant national, regional or local rail strategies.</p> <p><b>4.</b> Further details are set out in the Coventry Connected SPD, Coventry Rail Investment Strategy and the West Midlands Strategic Transport Plan</p>	<p><b>3.</b> Proposals for additional local railway stations on the east-west and north/south rail corridor within Coventry will be supported where they are proven to be viable, support growth objectives and are consistent with the relevant national, regional or local rail strategies.</p> <p><b>4.</b> Further details are set out in the Coventry Connected SPD, West Midlands Rail Executive Rail Investment Strategy and Midland Connect Strategic Transport Plan.</p>	
AC7	<p><b>Policy AC7: Freight</b></p> <p><b>1.</b> New developments on sites which generate or are likely to generate significant HGV movements must accommodate appropriate on-site lorry parking and turning facilities to minimise disruption and safety issues on the public highway.</p>	<p><b>Policy AC7: Freight</b></p> <p><b>1.</b> New developments on sites which generate or are likely to generate significant HGV movements will be supported where they:</p> <ul style="list-style-type: none"> <li>a. accommodate appropriate on-site lorry parking and turning facilities to minimise disruption and safety issues on the public highway.</li> </ul>	<p>Policy updated requiring applicants have more consideration of HGV movements and facilities on site, particularly regarding big warehouse and distribution centres.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>2. New development which supports the use of rail and air freight facilities will be supported where there is an evidenced demand, proposals are consistent with the relevant air and rail industry plans, have an acceptable environmental impact and do not significantly compromise the capacity and safety of the local highway network.</p>	<p>b. Where they have 24 hour operations, provide overnight HGV parking and facilities such as toilets and showers;</p> <p>c. Can demonstrate that they can function without requiring HGVs to travel on smaller, residential roads, in line with Policy JE5.</p> <p>d. Submit a delivery and servicing plan that includes a method for monitoring trips to and from the site.</p> <p>2. Freight consolidation and distribution centres will be supported in appropriate edge of city locations close to the strategic road network to reduce the volume of HGV/LGV traffic within the city and where they provide appropriate welfare facilities for drivers as well as employees.</p> <p>3. Where appropriate, the Council will support proposals that utilise sustainable delivery methods and make provision for them, such as e-bikes, cargo bikes and autonomous delivery methods and other emerging technologies.</p> <p>4. New development which supports the use of rail and air freight facilities will be supported where there is an evidenced demand, proposals are consistent with the relevant air</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		and rail industry plans, have an acceptable environmental impact and do not significantly compromise the capacity and safety of the local highway network.	
EM1	<p><b>Policy EM1: Planning for Climate Change Adaptation</b></p> <p>1. All development is required to be designed to be resilient to, and adapt to the future impacts of, climate change through the inclusion of the following adaptation measures:</p> <p><b>a.</b> using layout, building orientation, construction techniques and materials and natural ventilation methods to mitigate against rising temperatures;</p> <p><b>b.</b> optimising the use of multi-functional green infrastructure, including tree planting for urban cooling, local flood risk management and shading,</p> <p><b>c.</b> incorporating water efficiency measures, such as the use of grey water and rainwater recycling, low water use sanitary equipment</p> <p><b>d.</b> minimising vulnerability to flood risk by locating development in</p>	<p><b>STRATEGIC POLICY</b></p> <p><b>Policy EM1: Planning for Climate Change Adaptation</b></p> <p>1. Development is required to be designed to be resilient to, and adapt to the future impacts of climate change through the inclusion of the following measures:</p> <p><b>a.</b> using layout, building orientation, construction techniques and materials and natural ventilation methods to mitigate against rising temperatures <b>and address overheating in new buildings;</b></p> <p><b>b.</b> optimising the use of multi-functional green infrastructure, including tree planting for urban cooling, local flood risk management and shading;</p> <p><b>c.</b> incorporating water efficiency measures, such as the use of grey water and rainwater recycling, low water use sanitary equipment <b>to achieve a water efficiency target of 100l/pd to be achieved using a fittings-based approach;</b></p> <p><b>d.</b> minimising vulnerability to flood risk by locating development in areas of low flood risk and including mitigation measures including</p>	<p>Ensure hook to climate change strategy and adaptation and resilience strategy within explanatory text</p> <p>Additional policy additions to strengthen the strategic approach and incorporate the policy approaches set out in the supporting evidence base.</p> <p>Reference to Heat Network Zoning, aligning to requirement for all development types to make connections available in area which are identified as heat network zones.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>areas of low flood risk and including mitigation measures including SUDS in accordance with Policy EM4;</p> <p><b>e.</b> Where applicable, maintain and enhance the canal network to reflect the canals' role in urban cooling.</p> <p><b>f.</b> seek opportunities to make space for water and develop new blue infrastructure to accommodate climate change.</p> <p><b>2.</b> Applicants will be required to set out how the requirements of the policy have been complied with including justification for why the above measures have not been incorporated.</p> <p><b>3.</b> Where justification for non-compliance with the requirements is based on viability, this will need to be clearly demonstrated through an open book financial appraisal.</p>	<p>SUDS in accordance with Policy EM4 <b>and EM5;</b></p> <p><b>e.</b> Where applicable, maintain and enhance the canal network to reflect the canals' role in urban cooling;</p> <p><b>f.</b> seek opportunities to make space for water and develop new blue infrastructure to accommodate climate change <b>challenges.</b></p> <p><b>g.</b> <b>major developments must consider making connections available to the Coventry Heat Network in areas identified as Heat Network Zones;</b></p> <p><b>h.</b> <b>development must meet net zero (regulated operational carbon) for residential and non-domestic development including the need to address embodied carbon and waste;</b></p> <p><b>i</b> <b>demonstrate how the concept of water neutrality has been addressed in relation to the potential to provide a benefit in improving resilience to climate change and enabling all waterbodies to be brought up to 'Good' status; and</b></p> <p><b>j.</b> <b>Larger residential developments (including new settlements), and commercial developments should consider incorporating greywater recycling and/or rainwater harvesting into development at the master planning stage to reduce water demand.</b></p> <p><b>2.</b> Set out how the requirements of the policy have been complied with including justification</p>	



Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>for why the above measures have not been incorporated.</p> <p><b>3.</b> Where justification for non-compliance with the requirements is based on viability, this will need to be clearly demonstrated through an open book financial appraisal.</p>	
EM2	<p><b>Policy EM2: Building Standards</b></p> <p><b>1.</b> New development should be designed and constructed to meet the relevant Building Regulations, as a minimum, with a view to:</p> <ul style="list-style-type: none"> <li><b>a.</b> Maximising energy efficiency and the use of low carbon energy;</li> <li><b>b.</b> Conserving water and minimising flood risk including flood resilient construction;</li> <li><b>c.</b> Considering the type and source of the materials used;</li> <li><b>d.</b> Minimising waste and maximising recycling during construction and operation;</li> <li><b>e.</b> Being flexible and adaptable to future occupier needs; and</li> <li><b>f.</b> Incorporating measures to enhance biodiversity value.</li> </ul> <p><b>2.</b> In meeting the carbon reduction targets set out in Building Regulations, the Council will expect</p>	<p><b>Delete policy EM2</b></p>	<p>Policy EM2 adds no local added purpose.</p> <p>EM2 replaced with new policies (see EM11, EM12, EM13 and EM14 below which all incorporate building standard requirements for different development typologies).</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>development to be designed in accordance with the following energy hierarchy:</p> <ul style="list-style-type: none"> <li><b>a.</b> Reduce energy demand through energy efficiency measures.</li> <li><b>b.</b> Supply energy through efficient means (i.e. low carbon technologies).</li> <li><b>c.</b> Utilise renewable energy generation.</li> </ul> <p><b>3.</b> A Sustainable Buildings Statement should demonstrate how the requirements of Climate Change policies in this Plan and any other relevant local climate change strategies have been met, and consider any potential coal mining legacy issues including land stability.</p> <p><b>4.</b> A comprehensive update of the Delivering a More Sustainable City SPD incorporating the approach to Building Sustainability Standards will be developed.</p>		
EM3	<b>Policy EM3</b> Renewable Energy Generation	<b>Delete policy EM3</b>	Policy EM3 adds no local added purpose. To be replaced with new policies (see EM11 and EM12 below which both incorporate

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>1. Proposals for the installation of renewable and low carbon energy technologies, including both building-integrated and standalone schemes will be promoted and encouraged, provided that:</p> <ul style="list-style-type: none"> <li>a. any significant adverse impacts can be mitigated;</li> <li>b. where biofuels are to be utilised, they should be obtained from sustainable sources and transportation distances are minimised;</li> <li>c. any energy centre is suitably located and designed to a high quality such that it is sympathetically integrated with its surroundings;</li> <li>d. all proposals are consistent with any relevant Policies in this Plan.</li> </ul>		integrated renewable energy requirements).
EM4	<p><b>Policy EM4 Flood Risk Management</b></p> <p>1. All major developments must be assessed in respect of the level of flood risk from all sources. If development in areas at risk of flooding is the only option following the application of the sequential test, it will only be</p>	<p><b>Policy EM4 Flood Risk Management</b></p> <p>1. All developments must be assessed in respect of the level of flood risk from all sources, taking into account current and future impacts of climate change. Where development in areas at risk of flooding is the only option following the application of the sequential test, it will only be permitted where all of the following criteria are met:</p> <p>a) the type of development is appropriate to</p>	To bring policy up to date in line with national legislation and policy and to reflect local context. In terms of the addition relating to ground-floor sleeping, accommodation can often put those on the ground floor at the highest risk of flooding (see also the HMO DPD). Criteria 10 requires applicants to

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>permitted where all of the following criteria are met:</p> <p><b>a.</b> the type of development is appropriate to the level of flood risk associated with its location with reference to Coventry's Strategic Flood Risk Assessment (SFRA) flood zone maps and advice on appropriate uses within these zones from the Environment Agency and/or Lead Local Flood Authority;</p> <p><b>b.</b> it is provided with the appropriate minimum standard of flood defence and resilience to aid recovery (including suitable warning and evacuation procedures) which can be maintained for the lifetime of the development;</p> <p><b>c.</b> it does not impede flood flows, does not increase the flood risk on site or elsewhere or result in a loss of floodplain storage capacity;</p> <p><b>d.</b> in the case of dwellings, it is evident that as a minimum, safe, dry pedestrian access would be available to land not at high risk;</p> <p><b>e.</b> in the case of essential infrastructure, access must be</p>	<p>the level of flood risk associated with its location <b>in</b> reference to Coventry's Strategic Flood Risk Assessment (SFRA) flood zone maps and advice on appropriate uses within these zones from the Environment Agency and Lead Local Flood Authority (LLFA);</p> <p>b) it is provided with the appropriate minimum standard of flood defence and resilience to aid recovery (including suitable warning and evacuation procedures) which can be maintained for the lifetime of the development;</p> <p>c) it does not impede flood flows, does not increase the flood risk on site or elsewhere or result in a loss of floodplain storage capacity;</p> <p>d) in the case of dwellings, it is evident that as a minimum, safe, dry pedestrian access would be available to land not at high risk, and;</p> <p>e) in the case of essential infrastructure, access must be guaranteed and must be capable of remaining operational during all flooding events.</p> <p>2. All opportunities to reduce flood risk in the surrounding area must be taken, including creating additional flood storage and exploring areas for natural flood</p>	<p>demonstrate how any identified potential flood risk would be addressed. This may include the incorporation of appropriate site specific mitigation such as raising floor levels, flood resistant construction and the preparation of a Water Exclusion Strategy.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>guaranteed and must be capable of remaining operational during all flooding events.</p> <p><b>2.</b> All opportunities to reduce flood risk in the surrounding area must be taken, including creating additional flood storage. In this instance reference should be made to the Councils IDP or Regulation 123 list. In order to achieve this:</p> <p><b>a.</b> the functional floodplain (Flood Zone 3b) should be protected from development and reinstated in brownfield areas wherever possible;</p> <p><b>b.</b> single storey buildings, basements and buildings on stilts will not be acceptable in Flood Zone 3;</p> <p><b>c.</b> all opportunities to undertake river restoration and enhancement including de-culverting, removing unnecessary structures and reinstating a natural, sinuous watercourse will be encouraged;</p> <p><b>d.</b> unless shown to be acceptable through exceptional circumstances, development should be set back at least 8m</p>	<p>management. In this instance, reference should be made to the Councils IDP. In order to achieve this:</p> <p>a) the functional floodplain (Flood Zone 3b) should be protected from development and reinstated in brownfield areas wherever possible;</p> <p>b) single storey buildings, basements and buildings on stilts will not be acceptable in Flood Zones 2 and 3;</p> <p>c) all opportunities to undertake river restoration and enhancement including de-culverting, removing unnecessary structures and reinstating a natural, sinuous watercourse will be encouraged;</p> <p>d) unless shown to be acceptable through exceptional circumstances, development should be set back at least 8m (from the top of bank or toe of a flood defence) of Main Rivers and 5m from Ordinary watercourses for maintenance access. This includes existing culverted watercourses.</p> <p>e) finished floor levels must be set a minimum of 300mm above the pluvial 1% AEP (1 in 100 year) plus climate change and 600mm above the fluvial 0.1% AEP (1 in 1000 year) plus climate change flood level.</p> <p>3. Where a development benefits from</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>(from the top of bank or toe of a flood defence) of Main Rivers and 5m from Ordinary watercourses for maintenance access. This includes existing culverted watercourses.</p> <p><b>e.</b> finished floor levels must be set a minimum of 600mm above the 1% AEP (1 in 100 year) plus climate change flood level. Where a development benefits from an existing or proposed flood defence scheme, the development should contribute towards the capital and/or maintenance of these defences over its lifetime.</p> <p><b>3.</b> For sites in Flood Zone 3a, development should not impede flow routes, reduce floodplain storage or consume flood storage in a 'flood cell' within a defended area. If the development does result in a loss of storage, compensatory floodplain storage should be provided on a 'level for level' and 'volume for volume' basis.</p> <p>127</p> <p><b>4.</b> For sites in Flood Zone 3a, all types of new development behind</p>	<p>existing or proposed flood measures, the development should contribute towards the capital and/or maintenance of these <b>measures</b> over the lifetime of the development.</p> <p>4. For sites in Flood Zone 3a, development should not impede flow routes, reduce floodplain storage or consume flood storage in a 'flood cell' within a defended area. If the development does result in a loss of storage, compensatory floodplain storage should be provided on a 'level for level' and 'volume for volume' basis.</p> <p>5. For sites in Flood Zone 3a, all types of new development behind flood defences should be avoided, where possible, due to the residual risks of breach and overtopping. Development should ensure that it would not prevent the Water bodies' ability to reach good status or its potential to do so as set in the Severn River Basin Management Plans and should support, where possible, to improving the status class.</p> <p>6. A sequential, risk-based approach to the location of suitable development will be undertaken by the Council based on flood</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>flood defences should be avoided, where possible, due to the residual risks of breach and overtopping. Development should ensure that it would not prevent the water bodies' ability to reach good status or its potential to do so as set in the Severn River Basin Management Plans and should support, where possible, to improving the status class.</p> <p><b>5.</b> A sequential, risk-based approach to the location of suitable development will be undertaken by the Council based on the Environment Agency's latest flood maps, SFRA flood zones and Vulnerability Classification to steer new development to areas with the lowest probability of flooding avoiding, where possible, flood risk to people and property and managing any residual risk.</p> <p><b>6.</b> The Exception Test (for use when there are large areas in Flood Zones 2 and 3, where the Sequential Test alone cannot deliver acceptable sites, but where some continuing development is</p>	<p>maps, SFRA flood zones and Vulnerability Classification to steer new development to areas with the lowest probability of flooding avoiding, where possible, flood risk to people and property and managing any residual risk.</p> <p>7. The Exception Test <b>is applicable where there are</b> areas in Flood Zones 2 and 3 where the Sequential Test alone cannot deliver acceptable sites but where some continuing development is necessary. <b>The Exception Test</b> will apply where development will provide wider sustainability benefits that outweigh flood risk, fully informed by an appropriately scaled Flood Risk Assessment (FRA) which indicates that the development will be safe for its lifetime, taking account of the vulnerability of its users without increasing flood risk elsewhere and where possible, reducing overall flood risk.</p> <p>8. Land that is required for current and future flood management will be safeguarded from development. Where development lies adjacent to or benefits from an existing or future flood defence scheme, they may be expected to contribute towards the cost of delivery and/or</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>necessary) will apply where development will provide wider sustainability benefits that outweigh flood risk, fully informed by an appropriately scaled Flood Risk Assessment (FRA) which indicates that development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible reducing flood risk overall.</p> <p><b>7.</b> Land that is required for current and future flood management will be safeguarded from development. Where development lies adjacent to or benefits from an existing or future flood defence scheme they may be expected to contribute towards the cost of delivery and/or maintenance of that scheme in accordance with Policy IM1.</p> <p><b>8.</b> A Flood Risk Assessment is required, appropriate to the scale and nature of the development proposed, where the development is:</p>	<p>maintenance of that scheme in accordance with Policy IM1.</p> <p>9. A Flood Risk Assessment is required, appropriate to the scale and nature of the development proposed, where the development is:</p> <ul style="list-style-type: none"> <li>a) within a river floodplain, as defined by the Coventry SFRA indicative flood zone maps;</li> <li>b) within 20 metres of any watercourse;</li> <li>c) adjacent to, or including, any flood bank or other flood control measure / structure;</li> <li>d) within an area where there may be surface water issues and drainage problems;</li> <li>e) within an area where there is flood risk from canals, reservoirs or flooding from sewers.</li> </ul> <p>10. Where a development proposal lies adjacent to the existing de-culverted river Sherbourne, a natural sinuous river channel should be retained. Consideration should also be given to removing water bodies from culverts wherever possible and viable. This will be</p>	



Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>a. within a river floodplain, as defined by the Coventry SFRA indicative flood zone maps;</p> <p>b. within 20 metres of any watercourse;</p> <p>c. adjacent to, or including, any flood bank or other flood control structure;</p> <p>d. within an area where there may be surface water issues and drainage problems;</p>	<p>of particular importance along Fairfax Street and will be vital to create multi-functional green and blue spaces within the city centre.</p> <p>11. All proposals will be expected to demonstrate, how, in areas at risk of flooding, the safety of those sleeping in any ground floor accommodation will be secured.</p>	
EM5	<p><b>Policy EM5 Sustainable Drainage Systems (SuDS)</b></p> <p>1. All development must apply SuDS and should ensure that surface water runoff is managed as close to its source as possible.</p> <p>2. SuDS are the preferred way of managing and conveying surface water. All developments will consider and demonstrate how the following hierarchy for the discharge of surface water from a site will be applied:</p> <p>a. Discharge by infiltration and water reuse technologies.</p> <p>b. Discharge to a watercourse allied with water reuse technologies.</p>	<p><b>Policy EM5 Sustainable Drainage Systems (SuDS)</b></p> <p>1. Schedule 3 of the Flood and Water Management Act (FWMA) 2010* provides the framework by which all new developments are required to apply SuDS and should ensure that surface water runoff is managed as close to its source as possible. The FWMA gives SuDS Approval Bodies (SABs) statutory responsibility for approving and where appropriate, adopting, the approved SuDS features.</p> <p>2. SuDS are the preferred way of managing and conveying surface water. All developments will consider and demonstrate how the following hierarchy for the discharge of surface water from a</p>	To bring policy up to date with national legislation and policy.

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>c. Discharge to surface water sewer allied with water reuse technologies.</p> <p>3. All development should carry out infiltration tests and a ground water risk assessment, including seasonal groundwater monitoring, to demonstrate whether infiltration is possible and that ground water would not be polluted to Environment Agency and Lead Local Flood Authority requirements. Where it is proven that infiltration is not possible, allied with water reuse technologies, surface water should be discharged into a watercourse (in agreement with the Environment Agency and Lead Local Flood Authority) at a rate no greater than Qbar greenfield runoff, or an appropriate minimum rate for small sites, agreed by the Lead Local Flood Authority. If there is no watercourse available then, allied with water reuse technologies, surface water should be discharged to a surface water sewer at a rate no greater than Qbar greenfield runoff.</p>	<p>site will be applied:</p> <ul style="list-style-type: none"> <li>a) Discharge by infiltration, attenuation, water reuse technologies and green roof technology;</li> <li>b) Discharge to a watercourse allied with attenuation, water reuse technologies such as green roof technology;</li> <li>c) Discharge to surface water sewer allied with attenuation, water reuse technologies and green roof technology.</li> </ul> <p>3. Where proven that infiltration allied with water reuse technologies is not possible, surface water should be discharged into a main river or ordinary watercourse (in agreement with the Environment Agency and the LLFA) at a rate no greater than Qbar greenfield runoff, or an appropriate minimum rate for small sites, agreed by the LLFA. If there is no watercourse available then, allied with water reuse technologies, surface water should be discharged to a surface water sewer at a rate no greater than Qbar greenfield runoff.</p> <p>4. In exceptional circumstances where a</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>4. In exceptional circumstances, where a sustainable drainage system cannot be provided, it must be demonstrated that it is not possible to incorporate sustainable drainage systems, and an acceptable means of surface water disposal is provided at source which does not increase the risk of flooding or give rise to environmental problems and improves on the current situation with a reduction in peak and total discharge.</p> <p>5. The long-term maintenance arrangements for all SuDS must be agreed with the relevant risk management authority. A separate SPD will be produced to detail how SuDS schemes will be designed in accordance with the technical standards set out by the Coventry Lead Local Flood Authority and by the Department for Environment, Food and Rural Affairs.</p>	<p>sustainable drainage system cannot be provided, it must be demonstrated that it is not possible, and an acceptable alternative means of surface water disposal is provided which does not increase the risk of flooding or give rise to environmental problems and improves on the current situation with a reduction in peak and total discharge.</p> <p>5. The <b>developer</b> must agree all long-term maintenance arrangements for all SuDS with the SAB, including the means for funding the maintenance for the lifetime of the development.</p> <p><b>Flood and Water Management Act (FWMA) 2010 or future equivalent.</b></p>	
EM6	<p><b>Policy EM6: Redevelopment of Previously Developed Land</b></p> <p>1. Development will be permitted where proposals do not have a</p>	<p><b>Policy EM6 Redevelopment of Previously Developed Land</b></p> <p>1. Development will be <b>supported</b> where proposals do not have a negative</p>	To bring policy up to date

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>negative impact on water quality, either directly through pollution of surface or ground water or indirectly through the treatment of waste water by whatever means.</p> <p><b>2.</b> Prior to any potential development, consultation must be held with Severn Trent Water to ensure that the required wastewater infrastructure is in place in sufficient time. In line with the objectives of the Water Framework Directive, development must not affect the water bodies' ability to reach good status or its potential as set in the Humber and Severn River Basin Management Plans and should support, where possible, to improving the status class.</p> <p><b>3.</b> Developers and operators must provide adequate information when submitting their proposals so that the potential impact on groundwater resources and quality can be adequately assessed'. This should include a risk assessment demonstrating there would be no adverse effect on water resources.</p>	<p>impact on water quality, either directly through pollution of surface or groundwater or indirectly through the treatment of wastewater by whatever means.</p> <p>2. Prior to any potential development, consultation <b>should</b> be held with Severn Trent Water <b>Ltd</b> to ensure that the required wastewater infrastructure is in place in sufficient time. In line with the objectives of the Water Environment Regulations, development must not affect the water bodies' ability to reach good status or its potential, as set in the Humber and Severn River Basin Management Plans and where possible should support improving the status class.</p> <p>3. Developers and operators must provide adequate information when submitting their proposals so that the potential impact on groundwater resources and quality can be adequately assessed. This should include a risk assessment demonstrating there would be no adverse effect on water resources.</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>4. Development will not be permitted within a groundwater Source Protection Zone 1 which would physically disturb an aquifer. This will include situations where proposed waste water infrastructure could pose an unacceptable risk of pollution of the underlying aquifer or receiving watercourse.</p>	<p>4. Development will not be permitted within a groundwater Source Protection Zone 1 which would physically disturb an aquifer. This will include situations where proposed wastewater infrastructure could pose an unacceptable risk of pollution of the underlying aquifer or receiving watercourse.</p> <p>5. Development must meet a water efficiency target of 100l/pd using a fittings-based approach.</p> <p>6. New build non residential development greater than 1000sqm to achieve at least 4 credits in the Wat01 Measure for water in the BREEAM New Construction standard.</p>	
EM7	<p><b>Policy EM7 Air Quality</b></p> <p>1. Major development schemes should promote a shift to the use of sustainable low emission transport (electric vehicles and vehicles that use biofuels) to minimise the impact of vehicle emissions on air quality. Development will be located where it is accessible to support the use of public transport,</p>	<p><b>Policy EM7 Air Quality</b></p> <p>1. Major development schemes should promote a shift to the use of sustainable low emission transport (electric vehicles and vehicles that use biofuels) to minimise the impact of vehicle emissions on air quality. Development <b>should</b> be located where it is accessible to support the use of public transport, walking and cycling. All major development proposals</p>	<p>Minor update to wordings - addition of the commitment to produce a SPD has been deleted as that has now been adopted and a link to the SPD has been added.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>walking and cycling. All major development proposals should be suitably planned to design out any adverse impact on air quality and be in accordance with the West Midlands Transport Emissions Framework and associated policies.</p> <p><b>2.</b> Major Development proposals will require the submission of an air quality assessment, as they may lead to a significant deterioration in local air quality resulting in unacceptable effects on human health, local amenity or the natural environment. The air quality assessment should address:</p> <p><b>a.</b> The existing background levels of air quality;</p> <p><b>b.</b> The cumulative background levels of air quality (related to the cumulative impact of developments in an area);</p> <p><b>c.</b> The feasibility of any measures of mitigation that would prevent the national air quality objectives being exceeded, or would reduce</p>	<p>should be suitably planned to design out any adverse impact on air quality and be in accordance with the West Midlands Transport Emissions Framework and associated policies.</p> <p><b>2.</b> Major Development proposals <b>will be required to demonstrate that they do not</b> lead to a significant deterioration in local air quality resulting in unacceptable effects on human health, local amenity or the natural environment. The air quality assessment should address:</p> <p>a) The existing background levels of air quality;</p> <p>b) The cumulative background levels of air quality (related to the cumulative impact of developments in an area); and</p> <p>c) The feasibility of any measures of mitigation that would prevent the national air quality objectives being exceeded, or would reduce the extent of the air quality deterioration.</p> <p><b>3.</b> This policy will be applied in line with the Air Quality SPD.</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>the extent of the air quality deterioration.</p> <p><b>3.</b> A Supplementary Planning Document will be developed to support this Policy.</p>		
EM8	<p><b>Policy EM8</b> Waste Management</p> <p><b>1.</b> The Council's Waste Management Strategy will be supported through:</p> <p><b>a.</b> encouraging less consumption of raw materials through the reduction and re-use of waste products;</p> <p><b>b.</b> a requirement for development proposals to incorporate adequate storage for waste and recycling services along with safe access for collection vehicles;</p> <p><b>c.</b> encouragement of new methods of processing and recycling at waste management sites;</p> <p><b>d.</b> supporting recycling proposals for aggregate materials subject to the criteria in part 2 of this policy;</p> <p><b>e.</b> Existing waste management facilities or land allocated for waste management uses being protected from encroachment by incompatible land uses that are</p>	No change.	No change.

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>more sensitive to odour, noise, dust and pest impacts; and</p> <p><b>f.</b> Proposals for waste management facilities only being permitted where they would not have an unacceptable impact on the quantity or quality of surface or groundwater resources.</p> <p><b>2.</b> Proposed new or expanded waste management facilities will be assessed against the following criteria:</p> <p><b>a.</b> The effect of the proposed waste facility upon the environment and neighbouring land uses;</p> <p><b>b.</b> The impact of traffic generated by the proposal and the availability of alternative transit modes, such as rail and waterways;</p> <p><b>c.</b> The need for pollution control measures appropriate to the type of waste to be processed or handled;</p> <p><b>d.</b> The impact of proposals on residential amenity. New waste facilities will not normally be approved adjacent to existing housing and proposals for anaerobic digestion will not be</p>		



Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>approved in close proximity to existing housing;</p> <p><b>e.</b> The effect of proposals on aircraft safety; and</p> <p><b>f.</b> The design of the proposal.</p> <p>Careful consideration should be given to the need to minimise environmental and visual impact. Wherever feasible, waste operations should be enclosed within buildings or sealed structures in order to minimise impacts on adjacent uses from noise, ordure, vermin and wildlife. Proposals advocating open air unenclosed storage of organic odour producing material will not be supported.</p> <p><b>3.</b> Proposals will be supported where it is demonstrated that these criteria are satisfied.</p> <p><b>4.</b> Development proposals should demonstrate measures to minimise the generation of waste in the construction, use and life of buildings and promote more sustainable approaches to waste management, including the reuse and recycling of construction waste and the promotion of</p>		

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	layouts and designs that provide adequate space to facilitate waste storage, reuse, recycling and composting.		
EM9	<p><b>Policy EM9 Safeguarding Mineral Resources</b></p> <p>1. Mineral Safeguarding Areas are defined for mineral reserves that are considered to be of current or future economic importance. Where developments are proposed in these areas, the application needs to acknowledge the presence of these mineral reserves. The extent of Mineral Safeguarding Areas are defined on the Policies Map.</p>	No change.	No change.
EM10	<p><b>Policy EM10 Non Mineral Development in Mineral Safeguarding Areas</b></p> <p>All non-mineral development proposals in the designated Mineral Safeguarding Areas should assess and evaluate the legacy of past mining heritage and should consider this in accordance with Policy EM2. It should also ensure that development does not entirely sterilise any potential</p>	No change.	No change.

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	future mineral extraction should this become viable and desirable. This should be considered in partnership with the Coal Authority.		
EM11	<b>New Policy</b>	<p><b>Policy EM11: Energy Infrastructure</b></p> <p>All new build dwellings (use class C3 and C4) are required to submit an energy statement demonstrating that the development meets the requirements set out in section 1.</p> <p>1. Building Efficiency Part L % improvement:  a. ≥63% improvement (reduction) on Part L 2021 TER (Target Emissions Rate), from energy efficiency measures.  b. Heat pumps are to be calculated as an energy efficiency measure, rather than a renewable energy measure.</p> <p>All the above should be calculated using SAP10.2 or an updated version (or the Home Energy Model, HEM, once it is implemented).</p> <p>2 Alternative Compliance  a. Positive weight will be given to applicants who can demonstrate the following absolute energy metrics:  - Total Energy Use: 35 kWh/m2/year</p>	<p>This policy addresses operational carbon to ensure the provision of residential buildings are fit for the future, both in terms of reduced energy consumption and holistic integration of design decisions that address climate adaptation through Building Regulations and its metrics. Target Emissions Rate (TER) used for Building Regulations has been used which represents the annual carbon emissions from a building.</p> <p><b>Evidence:</b> Carbon policy support evidence base and policy recommendations study 2024</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>- Space heating demand: 15 kWh/m<sup>2</sup>/year</p> <p>Performance in these targets must be evidenced using a methodology that accurately predicts buildings' operational energy use. Suitable methodologies include PHPP. Where a building achieves Passivhaus certification, it will be deemed to have complied with these targets.</p> <p>b. Where this section is demonstrated to have been achieved, it will be assumed that Policy EM11 section 1 is also achieved, as the section 2 targets reflect an improved and preferable standard that more robustly reflects actual energy performance based on energy metrics guidelines.</p> <p>3.Clean energy supply</p> <p>a. The use of fossil fuels and connection to the gas grid will not be considered acceptable.</p> <p>In addition to the requirements in sections 1 and 2, positive weight will be given to applicants who can demonstrate the following requirements:</p> <p>b. Major developments (residential development of ten or more dwellings) should include an assessment of decentralised energy networks within the Energy Statement.</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>c. This assessment should outline existing or planned decentralised energy networks in the vicinity of the development and should assess the opportunity to connect to them.</p> <p>d. Where there is an existing or imminently planned network, the general expectation to pursue a connection may be waived if it can be demonstrated that the development is not suitable, feasible or viable for district heat or decentralised energy networks, or that an individualised solution would result in lower overall carbon emissions than connecting to the decentralised network, taking into account that network's carbon emissions factors.</p> <p>e. For developments of over 10+ dwellings, applicants are expected to identify and address:</p> <ul style="list-style-type: none"> <li>i. Current or proposed major heat supply plants, or networks (for example, industrial uses, data centres)</li> <li>ii. Possible opportunities to utilise energy from waste, or waste heat from an industrial process</li> <li>iii. Opportunities for private wire electricity supply from renewable sources</li> <li>iv. Utilisation of natural and engineered heating or cooling systems.</li> </ul>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>4. On-site renewable energy:            Where viable, all major development should seek to deliver the following on site renewable energy generation standards.</p> <p>a. On-site annual renewable energy generation capacity (in kWh) at least equal to the predicted annual total regulated and unregulated energy use (residual energy use in kWh after section 1 has been achieved, plus unregulated energy use).</p> <p>b. Where an on-site net zero regulated and unregulated energy balance is not possible or viable<sup>1</sup>, it should be demonstrated that the amount of on-site renewable energy generation equates to &gt;114.9 kWh/m<sup>2</sup> projected building footprint/year.</p> <p>c. Where a building in a multi-building development cannot individually achieve the requirements in a. and b above, this shortfall is to be made up across other units onsite before carbon offsetting (section 5) is considered.</p> <p>d. Large-scale development (50 residential units or more) should demonstrate that opportunities for on-site renewable energy infrastructure (on-site but not on or attached</p>	

<sup>1</sup> Exceptional circumstances where an on-site net zero energy balance is not achieved may only be found acceptable in some cases, for example with taller flatted buildings (4 storeys or above) or where overshadowing significantly impacts solar PV output

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>to individual dwellings), such as solar PV canopies on car parks, have been explored.</p> <p>e. Regulated and unregulated energy use can both be calculated with Part L SAP or BREDEM, but a more accurate method such as PHPP is advised. Any other proposed methods are subject to Council confirmation of acceptability.</p> <p>f. The annual renewable energy generation and the annual energy use are whole-building figures, not per-m2 figures.</p> <p>g. Renewable energy output should be calculated in line with MCS guidance for the relevant technology (expected to be PV in most cases).</p> <p>5. Energy offsetting:</p> <p>a. Only in exceptional circumstances and as a last resort where it is demonstrably unfeasible to achieve an on-site net zero regulated and unregulated energy balance, any shortfall in on-site renewable energy generation that does not match energy use is to be offset via S106 financial contribution, reflecting the cost of the solar PV that will need to be delivered off-site.</p> <p>b. The energy offset price will be based on cost of solar PV data from the Department for Energy Security and Net Zero. The price should be revised annually. This is set as a</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>one-off payment, where the annual shortfall in on-site renewable energy generation is multiplied by the energy offset price. This amount does not need to be multiplied by any number of years.</p> <p>6.Reduced performance gap: When enacting section 4, developments will need to consider the following requirement. a. An assured performance method must be implemented throughout all phases of construction to ensure operational energy in practice performs to predicted levels at the design stage.</p> <p>7.Smart energy systems: When enacting section 4, developments will need to consider the following requirements. a. Proposals should demonstrate how they have considered the difference (in scale and time) of renewable energy generation and the on-site energy demand, with a view to maximising on-site consumption of energy generated on site and minimising the need for wider grid infrastructure reinforcement. b. Where the on-site renewable energy generation peak is not expected to coincide with sufficient regulated energy demand, resulting in a need to export or waste significant amounts of energy, proposals should demonstrate how they have explored scope for energy storage and/or smart</p>	



Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>distribution systems. The purpose being to optimise on-site or local consumption of the renewable energy (or waste energy) that is generated by the site. Where appropriate, proposals should demonstrate that they have integrated these to optimise these carbon- and energy-saving benefits and minimise the need for grid reinforcements.</p> <p>c. This may include smart local grids, energy sharing, energy storage and demand-side response, and/or solutions that combine elements of the above.</p> <p>8. Post-occupancy evaluation:</p> <p>a. Large-scale development (50 units or more) should monitor and report total energy use and/or renewable energy generation values on an annual basis. An outline plan for the implementation of this should be submitted with the planning application. The monitored in-use data are to be reported to the local planning authority for 5 years upon occupation.</p>	
EM12	New Policy	<p><b>Policy EM12 Reducing operational carbon in new build non-residential development</b></p> <p>All new build non-domestic development over 1,000sqm of non-residential floorspace including C1, C2 and C2a and C5 are required to submit an energy statement</p>	This policy addresses operational carbon to ensure the provision of non-residential buildings are fit for the future, both in terms of reduced energy consumption and holistic integration of design decisions that address climate

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>demonstrating that the development meets the following requirements:</p> <p>1. Building Efficiency Part L % improvement  a. % improvement on Part L 2021 TER (or equivalent reduction on future Part L updates), through on-site measures as follows:</p> <ul style="list-style-type: none"> <li>- Offices: ≥25%</li> <li>- Schools: ≥35%</li> <li>- Industrial buildings: ≥45%</li> <li>- Hotels (C2, C5) and residential institutions (C2, C2a): ≥10%</li> <li>- Other non-residential buildings: ≥35%</li> </ul> <p>2. Energy metrics guidelines  a. Positive weight will be given to applicants who can demonstrate the following absolute energy metrics:</p> <ul style="list-style-type: none"> <li>- Total Energy Use: 65 kWh/m<sup>2</sup>/year</li> <li>- Space heating demand: 15 kWh/m<sup>2</sup>/year.</li> </ul> <p>b. Employing absolute energy metrics reduces the amount of solar PV required under policy element 3 below for an on-site net zero balance of regulated energy. Applicable methodologies to calculate this include CIBSETM54 and the Passivhaus Planning</p>	<p>adaptation through Building Regulations and its metrics. Target Emissions Rate (TER) used for Building Regulations has been used which represents the annual carbon emissions from a building.</p> <p><b>Evidence:</b> Carbon policy support evidence base and policy recommendations study 2024; Water Cycle Study 2024.</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>Package. At present, the Part L calculation method (SBEM) is not considered suitable as it does not provide accurate predictions of a building's actual energy use.</p> <p>c. must achieve at least 4 credits in the Wat01 Measure for water in the BREEAM New Construction standard.</p> <p>3. Clean energy supply</p> <p>a. The use of fossil fuels and connection to the gas grid will not be considered acceptable.</p> <p>b. Major non-residential developments (over 1,000sqm of non-residential floorspace including C1, C2 and C2a and C5) should include an assessment of decentralised energy networks within the Energy Statement.</p> <p>c. This assessment should outline existing or planned decentralised energy networks in the vicinity of the development and should assess the opportunity to connect to them unless it can be demonstrated that the development is not suitable, feasible or viable for district heat or decentralised energy networks.</p> <p>d. For developments over 10,000sqm of non-residential floorspace, applicants are expected to identify and address:</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>i. Current or proposed major heat supply plants, or networks (for example, industrial uses, data centres)</p> <p>ii. Possible opportunities to utilise energy from waste, or waste heat from an industrial process</p> <p>iii. Opportunities for private wire electricity supply from renewable sources</p> <p>iv. Utilisation of natural and engineered heating or cooling systems.</p> <p>4. On-site renewable energy Where viable, all major development should seek to deliver the following on site renewable energy generation standards.</p> <p>a. On-site annual renewable energy generation capacity to at least equal predicted annual total regulated energy use (residual energy use after policy element 1 has been achieved).</p> <p>b. In buildings subject to Part L's requirement for energy forecasting, that forecasting should be the source of the 'annual total regulated energy' figure. Where an on-site net zero regulated energy balance is not possible or viable<sup>2</sup>, it should be demonstrated that the amount of on-site renewable energy</p>	

<sup>2</sup> Exceptional circumstances where an on-site net zero energy balance is not achieved may only be found acceptable in some cases, for example with taller flatted buildings (4 storeys or above) or where overshadowing significantly impacts solar PV output.

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>generation equates to &gt;114.9 kWh/m<sup>2</sup>projected building footprint/year. Where a building in a multi-building development cannot individually achieve the requirements of Policy EM11 (3), this shortfall is to be made up across other units on-site before carbon offsetting (Policy EM11 (5) is considered.</p> <p>c. Large-scale development (5000 m<sup>2</sup> floorspace) should demonstrate that opportunities for on-site renewable energy infrastructure (on-site but not on or attached to individual dwellings), such as solar PV canopies on car parks have been explored.</p> <p>5. Energy offsetting</p> <p>a. Only in exceptional circumstances and as a last resort where it is demonstrably unfeasible to achieve an on-site net zero regulated energy balance, any shortfall in on-site renewable energy generation that does not match regulated energy use is to be offset via S106 financial contribution, reflecting the cost of the solar PV delivered offsite.</p> <p>b. The energy offset price will be based on cost of solar PV data from the Department for Energy Security and Net Zero. The price should be revised annually. This is set as a one-off payment, where the annual shortfall in</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>on-site renewable energy generation is multiplied by the energy offset price. This is set as a one-off payment, where the shortfall in annual on-site renewable energy generation is multiplied by the energy offset price.</p> <p>6. Reduced performance gap  a. An assured performance method must be implemented throughout all phases of construction to ensure operational energy in practice performs to predicted levels at the design stage.</p> <p>7. Smart energy systems  a. Proposals should demonstrate how they have considered the difference (in scale and time) of renewable energy generation and the on-site energy demand, with a view to maximising on-site consumption of energy generated on site and minimising the need for wider grid infrastructure reinforcement.  b. Where the on-site renewable energy generation peak is not expected to coincide with peak onsite energy demand, resulting in a need to export or waste significant amounts of energy, proposals should demonstrate how they have explored scope for energy storage and/or smart distribution systems. The goal is to optimise on-site or local consumption of the renewable energy (or waste energy) that is generated by the site. Where appropriate,</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>proposals should demonstrate that they have integrated these to optimise carbon- and energy-saving benefits and minimise the need for grid reinforcements.</p> <p>8. Post-occupancy evaluation</p> <p>a. Large-scale development (over 5000 m2 floorspace) should monitor and report total energy use and renewable energy generation values on an annual basis. An outline plan for the implementation of this should be submitted with the planning application. The monitored in-use data are to be reported to the local planning authority for 5 years upon occupation.</p>	
EM13	New Policy	<p><b>Policy EM13 Overheating in new buildings</b></p> <p>All new build residential and non-residential buildings must meet the following requirements:</p> <p>1. Cooling hierarchy:</p> <p>a. Demonstrate that overheating risk measures have been incorporated in accordance with the cooling hierarchy:</p> <p>i. Minimise internal heat generation through energy efficient design.</p> <p>ii. Reduce the amount of heat entering the building in summer using:</p> <ul style="list-style-type: none"> <li>- Building orientation;</li> <li>- Shading;</li> </ul>	<p>New buildings that meet ambitious space heating demand requirements will be at increased risk of overheating due to the ability of the building to retain heat well. Clearly, throughout winter this is a key comfort benefit, yet during summer this can result in the opposite effect if not otherwise mitigated with measures to enhance ventilation and avoid excess solar gain, in warmer months. This policy aims to ensure that overheating risk is sufficiently assessed and</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<ul style="list-style-type: none"> <li>- Albedo;</li> <li>- Fenestration; and</li> <li>- Insulation.</li> </ul> <p>iii. Manage heat within the building through exposed internal thermal mass and high ceilings.</p> <p>iv. Passive ventilation.</p> <p>v. Mechanical ventilation.</p> <p>vi. Active cooling measures.</p> <p>2. Overheating Assessment</p> <p>a. Residential development should complete CIBSE TM59 overheating assessment as their route to compliance with Building Regulations Part O. The simplified Part O route will not be considered acceptable. Non-residential development should complete CIBSE TM52 overheating assessment.</p>	<p>integrated into decisions throughout design stages to ensure high fabric efficiency standards are not achieved at the detriment of internal comfort and temperature levels.</p> <p>In addition to addressing overheating with building-related measures, overheating mitigation measures can also be integrated alongside blue and green infrastructure policies. Benefits here are further intertwined, whereby overheating risks can be mitigated whilst also improving the biodiversity of a site. For example, green roofs, walls and trees are effective at reducing surface temperatures through natural shading and evapotranspiration.</p> <p><b>Evidence:</b> Carbon policy support evidence base and policy recommendations study 2024</p>
EM14	New Policy: Embodied carbon and waste	<p><b>Policy EM14 Embodied carbon and waste</b></p> <p>Residential and non-residential buildings (thresholds given below) must meet the following requirement:</p>	<p>As operational energy and carbon are reduced, the proportion of embodied carbon becomes larger than ever as a share of the building's lifetime carbon</p>



Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>1. Embodied carbon reporting  a. All major new residential (10 dwellings or more) and non-residential (1000 m2 floorspace or more) developments are required to complete a whole-life carbon assessment in accordance with RICS Whole Life Carbon Assessment guidance.</p> <p>2. Limiting embodied carbon  a. All large-scale major development (50 dwellings or more; 5000 m2 non-residential floor space or more) is required to limit embodied carbon (RICS/BS 15978 modules A1 – A5) to 600 kgCO2e/m2 GIA.</p> <p>3. Building end-of-life  a. All new buildings are to be designed to enable easy material re-use and disassembly, subsequently reducing the need for end-of-life demolition.</p> <p>4. Demolition audits  a. All major development that contains existing buildings/structures to carry out a pre-redevelopment and/or pre-demolition audit, following a well-established industry best practice method (e.g. BRE).</p>	<p>emissions. This means that reductions to embodied carbon will require increased attention. This policy addresses aims to ensure that in working towards a wholly net zero carbon building, this policy addresses embodied carbon with equal weight, if not more, than operational energy/carbon policy.</p> <p><b>Evidence:</b> Carbon policy support evidence base and policy recommendations study 2024</p>
EM15	New Policy: Noise	<p><b>Policy EM15 Noise</b></p> <p>1. Development which could result in an unacceptable impact on amenity, biodiversity or the surrounding environment by reason of</p>	<p>This policy aims to address noise issues associated with new development which has been missing in the Coventry context</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>noise pollution and / or increased levels of general disturbance will only be permitted if a noise assessment and associated scheme of mitigation (if necessary) demonstrates that noise and / or general disturbance can be adequately controlled through design, planning conditions or other means of mitigation.</p> <p>2. Proposals for uses which are sensitive to noise will not be permitted close to existing or proposed potentially noise polluting uses unless it can be demonstrated that adequate mitigation measures can be provided to ensure adequate levels of amenity can be provided for future occupiers and the existing potentially noise polluting uses will not be prejudiced by the development proposed.</p> <p>3. Development will not be permitted if mitigation cannot be provided to an appropriate standard with an acceptable design.</p>	<p>from the adopted 2017 Local Plan.</p> <p>In terms of noise mitigation, In assessing such schemes for noise mitigation for either a noise-generating or noise sensitive development, account should be taken of:</p> <ul style="list-style-type: none"> <li>- The location, design and layout of the proposed development</li> <li>- Land levels and existing topographical features</li> <li>- Existing levels of background noise;</li> <li>- Hours of operation and servicing (where relevant);</li> <li>- Potential for cumulative impact with nearby noise-generating uses;</li> <li>- Measures to reduce noise within the development to acceptable levels, including external areas where possible; and</li> <li>- The need to maintain adequate levels of natural light and natural ventilation to habitable areas of the development.</li> </ul>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
			<ul style="list-style-type: none"> <li>- The need to ensure that where ventilation is required in areas of poor air quality, measures do not impact the amenity of end users where open windows may be inappropriate.</li> <li>- The need to ensure mitigation schemes can be satisfactorily verified and adequately maintained for the life of the development.</li> </ul>
C1	<p><b>Policy C1:</b> Broadband and Mobile Internet</p> <p>1. Developers of new developments (residential, employment and commercial) will be expected to facilitate and contribute towards the provision of broadband infrastructure suitable to enable the delivery of broadband services across Coventry to ensure that the appropriate service is available to those who need it.</p> <p>2. Developers must make sure that broadband services that meet the ambitions of the Digital</p>	Delete Policy C1	Delete Policy as it duplicates national policy and serves no local added purpose.

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>Communications Infrastructure Strategy and the European Digital Agenda are available, wherever practicable, to all residents of the development at market prices and with a full choice of all UK service providers.</p> <p><b>3.</b> Developers are required to work with a recognised network carrier to design a bespoke duct network, for the development.</p> <p><b>4.</b> Other forms of infrastructure, such as facilities supporting mobile broadband and Wi-Fi, should be included, wherever possible and viable and should be designed in a sympathetic and appropriate way in order to reflect the character of the surrounding area.</p>		
C2	<p><b>Policy C2:</b> Telecommunications</p> <p><b>1.</b> When considering notifications, planning applications and prior approval applications, regard will be given to the following factors:</p> <p><b>a.</b> operational requirements of the telecommunication networks and the technical limitations of the technology, including any technical constraints on the</p>	Delete	Delete Policy as it duplicates national policy and serves no local added purpose.

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>location of telecommunications apparatus;</p> <p><b>b.</b> the need for the ICNIRP Guidelines (and any other relevant guidance in place at the time of the application) for safe emissions to be met;</p> <p><b>c.</b> the potential for sharing existing masts, buildings and other structures;</p> <p><b>d.</b> the impact of the development on its surroundings with particular regard to the following criteria:</p> <ul style="list-style-type: none"> <li>the visual amenity, character of area, apparatus and associated structures sited and designed in order to</li> <li><b>i.</b> appearance of the host building</li> <li><b>ii.</b> unacceptable effect on conservation areas, historic interest or areas of ecological interest or sites of archaeological importance and landscaping.</li> </ul> <p><b>2.</b> Telecommunications equipment that has become obsolete or that is no longer in use should be removed as soon as practicable and the site restored to its former condition.</p>		

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
City Centre Policy CC1		<p><b>Policy CC1 (Part A) Coventry City Centre – Development Strategy</b></p> <p>The city centre will continue to be developed and regenerated to ensure it is a truly world class city centre, leading in design, sustainability and culture.</p> <p>This will be achieved by:</p> <ul style="list-style-type: none"> <li>•Enhancement of its position as a focus for the entire sub- region and as a national and international destination to live, work and play;</li> <li>•Enhancement of its retail and leisure offer to strengthen the city’s sub-regional role;</li> <li>•Provision of high quality office space;</li> <li>•Becoming a hub for education;</li> <li>•Including a variety of places to live which cater for different needs;</li> <li>•Preserving or enhancing the character and setting of the historic built landscape and the archaeological environment;</li> <li>•A connected public realm including public squares and green spaces, easily accessible through the creation of desirable and legible pedestrian routes;</li> <li>•Accessibility for all;</li> <li>•Providing an attractive and safe environment for pedestrians, cyclists and motorists;</li> <li>•Provide a high-quality public transport system that benefits from seamless</li> </ul>	<p>Policy CC1 Parts A – E incorporate into the core plan content of the previous City Centre Area Action plan, where policies do not duplicate those found elsewhere in the plan, and add locally specific value.</p> <p><b>Whist all of the wording here is new policy to the Local Plan itself, please see the accompanying Area Action Policies matrix for further detail in terms of which AAP policy wording has been ‘pulled through’, which is new and which has been deleted.</b></p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>integration and is well connected to existing and new infrastructure;</p> <ul style="list-style-type: none"> <li>•Being a gigabyte city that offers high speed Wi-Fi and broadband facilities throughout the city centre;</li> <li>•High quality sustainable built design;</li> <li>•Continuing to develop a vibrant and attractive night time economy;</li> <li>•Providing opportunities to improve health and wellbeing;</li> <li>•Continuing to support greater integration of the university within the wider city centre</li> <li>•Respecting key views to the iconic three spires of St. Michaels, Holy Trinity and Christchurch in line with the Tall Buildings Design Guide and View Management Framework SPD</li> <li>•Supporting the reintroduction of green and blue infrastructure throughout the city centre, including opportunities for deculverting wherever possible; and</li> </ul> <p>Contributing to the key aims, vision and objectives of Coventry City Council.</p> <p><b>Policy CC1 (Part B) – Green and Blue Infrastructure</b></p> <ul style="list-style-type: none"> <li>a.New development will be expected to maintain the quantity, quality and functionality</li> </ul>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>of existing green and blue infrastructure. In line with the city's Green Space Strategy and Local Flood Risk Management Strategy, development proposals should enhance blue and green infrastructure, and create and improve linkages between the areas. Any development which is likely to adversely affect the integrity of a blue or green corridor will be required to be robustly justified and where appropriate, mitigation measures put in place. Development shall support meeting the objectives of the Severn River Basin Management Plan through ensuring that no deterioration of the River Sherbourne or its tributaries shall occur that may result in it failing its objectives under the Water Framework Directive.</p> <p>b. Development adjacent to the Ring Road should maximise all opportunities to develop the greening of vertical surfaces as far as reasonably possible. Opportunities to add greenery to areas adjacent to the Ring Road will be encouraged.</p> <p>c. Trees that contribute towards public amenity shall be retained and protected unless they are of poor quality, have a short</p>	



Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>life expectancy (less than 10 years), are dangerous, or the benefits of removing the tree significantly outweighs the harm that would be caused by its removal. Where trees are lost, replacement planting must be provided to a commensurate value to that which is lost.</p> <p>d.Introduction of new, accessible green spaces in the City Centre will be encouraged. Proposals which positively contribute toward the open space objectives of Coventry City Council will be encouraged.</p> <p><b>CC1 (Part C) Drainage &amp; Flood Risk</b></p> <p>a.Development shall be designed in line with the requirements of policy EM4 and located to minimise the risk of flooding and if permitted development, be resilient to flooding. The opportunity must be exercised to maximise the absorption of surface water run-off by the ground. Sustainable Drainage methods shall be incorporated into new developments including treatment for water quality. Such provisions should consider opportunities to reflect the alignment of the River Sherbourne and/or its tributaries.</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>b. When development occurs, a Flood Risk Assessment will need to be produced to appropriately consider the risk of flooding from all sources.</p> <p>c. When development occurs, it must consider the evidence in the Local Flood Risk Management Strategy, Surface Water Management Plan and Strategic Flood Risk Assessment. This includes all sites being treated as a Greenfield site when calculating permissible discharge rates in line with Policy EM5 of the Local Plan.</p> <p>d. When development is proposed it should utilise water use reduction systems such as grey water harvesting to reduce the water usage within the proposed developments.</p> <p>e. Where a development proposal lies adjacent to the existing de-culverted river Sherbourne, a natural sinuous river channel should be retained. Consideration should also be given to removing water bodies from culverts wherever possible and viable. This will be of particular importance along Fairfax Street and will be vital to create multi-</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>functional green and blue spaces within the city centre.</p> <p><b>Policy CC1 (Part D) – Environmental Management</b></p> <p>New development must be designed to minimise environmental impact within the city centre and ensure that any impacts of pollution are appropriately considered and mitigated. In doing so new development schemes (including conversions and changes of use where appropriate) must ensure that:</p> <p>a)All construction and demolition schemes adhere to a construction environmental management plan which must be submitted to and approved by the council before works commences. The CEMP must specify how the developer will mitigate noise and dust emissions from the works.</p> <p>b)All opportunities to connect to heat line or implement renewable energy generation have been explored and included as part of new development unless shown to be unviable or inappropriate.</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>c)Ground contamination needs have been assessed and remediated using the Environment Agency Model Procedures for the Management of Land Contamination.</p> <p>d)Proposals for site investigation and remediation schemes (where appropriate) utilise appropriate risk assessment and are approved by the Council in advance of development. Such measures should ensure that sites are 'fit for purpose'.</p> <p>e)New residential and commercial development schemes and the introduction of fixed plant machinery have been designed to meet internal and external noise levels specified in BS4142 and BS8223, or subsequent replacement standards.</p> <p>f)Appropriate odour extraction systems are incorporated where the sale / preparation / consumption of food takes place within the relevant buildings. Appropriate consideration has been given to the West Midlands LETC Air Quality guidance (or replacement guidance) and necessary mitigation measures incorporated into schemes.</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>g)Have regard to all other relevant polices within the Local Plan.</p> <p><b>Policy CC1 (Part E) – City Centre Character Area</b></p> <ul style="list-style-type: none"> <li>• All Development within the City Centre should reference the individual character area of its location and deliver high quality, contextually responsive proposals.</li> <li>• All development proposals within, or with the setting of, Conservation Areas will only be considered acceptable if they demonstrate that they preserve and enhance the historic environment of the area and are in adherence with the policies of the respective Conservation Area Appraisals and Management Plans.</li> </ul> <p><b>The Friargate Area</b></p> <ol style="list-style-type: none"> <li>a. Development within this area should deliver high quality office and residential development, alongside a mix of uses within its highly sustainable location. Uses considered to be acceptable include:</li> </ol>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<ul style="list-style-type: none"> <li>• Office Development</li> <li>• High quality City Centre Residential Dwellings</li> <li>• Leisure and recreation uses, including hotels;</li> <li>• Social and community uses;</li> <li>• Provisions for public transport infrastructure.</li> </ul> <p>b. Improvements to and expansion of the Coventry Railway Station will be supported so long as it does not negatively affect heritage assets.</p> <p><b>Cathedral and Cultural Area</b></p> <ul style="list-style-type: none"> <li>a. Development in areas adjoining Conservation Areas should enhance their setting and improve linkages between them and other areas of the city centre.</li> <li>b. Development proposals must reference inter-relationships to heritage assets and ensure the primacy of Coventry Cathedral is retained in townscape.</li> </ul>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>c. Development proposals must fully explore opportunities to reinforce the cultural offering of the City</p> <p><b>Civic Area</b></p> <p>a. New development within the Civic Area must have regard to its historic characteristics of public service provision. As such, the following uses are encouraged :</p> <ul style="list-style-type: none"> <li>• High Quality Residential Dwellings</li> <li>• Social and community uses;</li> <li>• Leisure and recreation uses;</li> <li>• Educational uses, including new university and research provisions;</li> <li>• Office use;</li> </ul> <p>b. Other commercial activities will be supported where they support the provision of active frontages within a mixed use development.</p> <p>c. The provision of new retail development is unlikely to be supported within the Civic Area unless it can be demonstrably shown to form an integral part of a mixed-use scheme.</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>d. Opportunities to expand the programme of public realm improvements will be supported</p> <p><b>Far Gosford Street Area</b></p> <p>a. New developments, changes of use and conversions within the Far Gosford Street Area must respect and reflect the area's historic character. As such all development proposals, including applications for signage and the provision of new and improved parking (for cars and cycles), within the area will only be considered acceptable if they demonstrate that they respect the historic environment of the area.</p> <p>b. To support the local centre designation a mix of creative industries, employment, residential and social and community uses will be supported within the Far Gosford Street Area.</p> <p>c. The use of upper floors of buildings for residential or office use will be supported and encouraged providing that appropriate noise insulation is</p>	



Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>included to ensure that the use is compatible with ground floor commercial activity.</p> <p>d. Opportunities to enhance the setting of the exposed River Sherbourne within this Area through improvements to green infrastructure will be encouraged. This should include opportunities to improve wider green linkages beyond the city centre boundary, especially towards the Heritage Park at Charterhouse.</p> <p><b>Stoney Stanton Road Area.</b></p> <p>a. New developments within the Stoney Stanton Road Area must have regard to its established character; respond to the environmental issues associated with its proximity to the Ring Road and deliver high quality buildings and public space which reflect this areas position as a gateway to the city centre.</p> <p>b. All prospective developments should:</p> <ul style="list-style-type: none"> <li>• reflect and enhance the area's character through mixed-use developments;</li> </ul>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<ul style="list-style-type: none"> <li>•improve and introduce high quality buildings;</li> <li>•Promote active travel and ensure it becomes easier and safer to move within the area and into adjoining parts of the city centre</li> <li>•Mitigate the negative environmental impacts of the Ring Road;</li> </ul> <p>c.The conversions of existing buildings, where appropriate, and the development of small infill opportunities for new residential developments will be encouraged and supported in principle.</p> <p><b>Corporation Street Area</b></p> <p>a. All development proposals within the Spon Street Conservation Area, including applications for signage, will only be considered acceptable if they demonstrate that they respect the historic environment of the area.</p> <p>b. Spon Street will be encouraged as a suitable and attractive location for specialist and independent retailers. In order to protect</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>the availability of property for such use, further hot food takeaways will be resisted.</p> <p>c. Development must be of high-quality design that both relates well to the modern Belgrade Plaza development whilst ensuring the setting of adjacent listed buildings and Spon Street Conservation Area is preserved</p> <p>d. Opportunities to improve the linkages into the precinct area will be encouraged from Corporation Street, Spon Street and Belgrade Plaza</p> <p>e. Opportunities to improve the linkages into the Corporation Street Area from the West will be encouraged.</p> <p><b>Mixed Use Core</b> Including the Primary Shopping Area</p> <p>a. The primary shopping area is defined as per core Retail policy R2.</p> <p>b Other proposals that would introduce new town centre uses within the PSA will be encouraged and supported where they do not</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>undermine or conflict with this or any other policy.</p> <p>c. Opportunities for new residential provision above new or existing ground floor town centre uses will be supported with a view to supporting the vitality and viability of the city centre as a whole.</p> <p>d. Opportunities to reinforce the original design concept of the Gibson plan and the precinct cross will be encouraged and supported</p> <p>e. Development proposals should reference the variety of typologies found in the surrounding context, including the heritage assets of the precinct area.</p> <p><b>Parkside Area</b></p> <p>a. Development proposals within the Parkside area, should support the hi-tech character that has been developed within this part of the city centre. As such, the following uses will be acceptable:</p> <ul style="list-style-type: none"> <li>•Hi-Tech industry use;</li> </ul>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<ul style="list-style-type: none"> <li>•Research and Development activity;</li> <li>•Other Education facilities;</li> <li>•Residential provision;</li> <li>•Leisure and recreation uses;</li> <li>•Social and community uses;</li> <li>•Office use;</li> <li>•Car parking;</li> </ul> <p>b. Improvements in pedestrian connections from the area around Junction 5 toward London Road Cemetery to the South will be encouraged</p> <p><b>University and Enterprise Area</b></p> <p>a. Within the University and Enterprise Area, proposals for redevelopment, refurbishment, extension or conversion of buildings for the following uses will be supported subject to high quality building and landscape design:</p> <ul style="list-style-type: none"> <li>I.Education and faculty buildings;</li> <li>II.University administrative facilities;</li> <li>III.Supporting ancillary sport, recreation, retail and maintenance facilities;</li> <li>IV.Research facilities;</li> <li>V.Residential provision including student accommodation.</li> </ul>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>b. Proposals to bring the Grade I listed Whitefriars Monastery into appropriate and regular use will be strongly supported subject to that use not having a detrimental impact upon the architectural and historic interest of the building and surrounding public realm. Proposals shall respect the design unity of this part of the University and Enterprise area.</p> <p>c . University Square shall remain as an attractive public square at the interface of Coventry Cathedral, the Herbert Art Gallery and Museum and Coventry University.</p> <p><b>Northern Regeneration Area</b></p> <p>a. Proposals supporting the aims of mixed-use redevelopment of the Area will be encouraged.</p> <p>b. The area will be primarily promoted for new residential development in a range of types and tenures although a range of other uses will be acceptable subject to conformity with other parts of this Local Plan These include:</p> <ul style="list-style-type: none"> <li>•Office;</li> <li>•Retail and commercial;</li> <li>•Social, community and leisure uses;</li> </ul>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>•Education uses (including those linked to the university); Such uses should contribute towards active frontages at ground floor level.</p> <p>c. Green and blue infrastructure should form an integral part of all development proposals within the area. This should include the consideration of deculverting where possible and viable.</p> <p>d. New development opportunities should not conflict with any other policies within this AAP.</p> <p>e. Swanswell Pool is of historic importance to the local area and the city centre as a whole. Opportunities to expand the park and enhance its quality will be supported. This should include opportunities to improve its linkages to the wider city centre.</p> <p>f. Proposals for the redevelopment of White Street Coach Park will be encouraged, where they are linked to appropriate amendments to Ring Road junction 2</p> <p><b>The Warwick Row Area</b></p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>a. Proposals for limited and sympathetic infill development in the Warwick Row area will be encouraged and supported where appropriate.</p> <p>b. Applications for conversions or changes of use will be considered on the basis of their relationship with adjoining buildings and uses. Where appropriate, proposals should complement existing styles and designs of adjoining buildings.</p> <p>c. Proposals should enhance the character and quality of the local environment and be compatible with other Local Plan policies.</p> <p>d. Greyfriars Green will continue to be protected as a conservation area and an important 'green' asset to the city centre. Any development proposals that would erode the character of the Green and damage the setting of the listed buildings will not be accepted.</p>	



Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
IM1	<p><b>Policy IM1: Developer Contributions for Infrastructure</b></p> <p>1. Development will be expected to provide, or contribute towards provision of:</p> <p>a. Measures to directly mitigate its impact and make it acceptable in planning terms;</p> <p>b. Physical, social and green infrastructure to support the needs associated with the development</p> <p>2. Infrastructure and mitigation measures will be provided in a timely manner to support the objectives of the Plan.</p> <p>3. The Council will, where appropriate, seek to secure site-specific infrastructure investments and/or contributions as well as off-site contributions and/or investments. The nature and scale of these will be related to the form of development and its potential impact on the site and surrounding area. The cumulative impact of developments will also be taken into account.</p> <p>4. Developer contributions in the form of Planning Obligations</p>	<p><b>Policy IM1: Developer Contributions for Infrastructure</b></p> <p>1. Development will be expected to provide, or contribute towards provision of:</p> <p>a. Measures to directly mitigate its impact and make it acceptable in planning terms;</p> <p>b. Physical, social and green and blue infrastructure to support the needs associated with the development</p> <p>2. Infrastructure and mitigation measures will be provided in a timely manner to support the objectives of the Plan.</p> <p>3. The Council will, where appropriate, seek to secure site-specific infrastructure investments and/or contributions as well as off-site contributions and/or investments. The nature and scale of these will be related to the form of development and its potential impact on the site and surrounding area. The cumulative impact of developments will also be taken into account.</p> <p>4. Developer contributions will contribute towards strategic infrastructure required to support the overall development in the Plan as defined in the Infrastructure Delivery Plan.</p> <p>5. Where site specific issues generate viability concerns, applicants should discuss these with the Council at the earliest possible stage in the development process. Proposals that are unable to comply with the Plan's policies</p>	<p>Minor changes to update the policy text in line with current national policy and to provide resilience to any future national changes in the way in which developer contributions operate</p>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>and/or Community Infrastructure Levy (CIL) will contribute towards strategic infrastructure required to support the overall development in the Plan.</p> <p>This will focus primarily on category 1 infrastructure as identified in the IDP and/or Regulation 123 list.</p> <p><b>5.</b> Where site specific issues generate viability concerns, applicants should discuss these with the Council at the earliest possible stage in the development process. Proposals that are unable to comply with the Plan's policies on viability grounds must be accompanied by a detailed Viability Assessment.</p> <p><b>6.</b> The Council will work in partnership with infrastructure providers and other delivery agencies in updating the Infrastructure Delivery Plan to ensure an up to date evidence base regarding infrastructure requirements and costs is maintained.</p>	<p>on viability grounds must be accompanied by a detailed Viability Assessment.</p> <p><b>6.</b> The Council will work in partnership with infrastructure providers and other delivery agencies in updating the Infrastructure Delivery Plan to ensure an up to date evidence base regarding infrastructure requirements and costs is maintained.</p>	

## Local Plan Review Proposed Policy updates and changes guidance note – City Centre Area Action Plan

**Key – middle column** proposed new wording – any **changes to existing policy wording highlighted yellow**. If no change proposed, the column will state no change

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
CC1	<p><b>Policy CC1: Coventry City Centre – Development Strategy</b></p> <p>The city centre will continue to be developed and regenerated to ensure it is a truly world class city centre, leading in design, sustainability and culture.</p> <p>This will be achieved by:</p> <ul style="list-style-type: none"> <li>•Enhancement of its position as a focus for the entire sub- region and as a national and international destination to live, work and play;</li> <li>•Enhancement of its retail and leisure offer to strengthen the city’s sub-regional role;</li> <li>•Provision of high quality office space;</li> <li>•Becoming a hub for education;</li> <li>•Including a variety of places to live which cater for different needs;</li> <li>•Preserving or enhancing the character and setting of the historic built landscape and the archaeological environment;</li> <li>•A connected public realm including public squares and green spaces, easily</li> </ul>	<p><b>Policy CC1 (Part A) Coventry City Centre – Development Strategy</b></p> <p>The city centre will continue to be developed and regenerated to ensure it is a truly world class city centre, leading in design, sustainability and culture.</p> <p>This will be achieved by:</p> <ul style="list-style-type: none"> <li>•Enhancement of its position as a focus for the entire sub- region and as a national and international destination to live, work and play;</li> <li>•Enhancement of its retail and leisure offer to strengthen the city’s sub-regional role;</li> <li>•Provision of high quality office space;</li> <li>•Becoming a hub for education;</li> <li>•Including a variety of places to live which cater for different needs;</li> <li>•Preserving or enhancing the character and setting of the historic built landscape and the archaeological environment;</li> <li>•A connected public realm including public squares and green spaces, easily</li> </ul>	<p>This policy provides an overarching framework for Coventry City Centre and is considered relevant to retain and include in the reviewed Local Plan.</p> <p>The wording has been updated slightly to remove references to the AAP as this is no longer be relevant.</p> <p>The wording relating to views of the spires has been revised to accord with SPD and now links to the Tall Buildings Design Guide and View Management Framework SPD which was adopted on 13<sup>th</sup> December 2022.</p>

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>accessible through the creation of desirable and legible pedestrian routes;</p> <ul style="list-style-type: none"> <li>•Accessibility for all;</li> <li>•Providing an attractive and safe environment for pedestrians, cyclists and motorists;</li> <li>•Provide a high-quality public transport system that benefits from seamless integration and is well connected to existing and new infrastructure;</li> <li>•Being a gigabyte city that offers high speed Wi-Fi and broadband facilities throughout the city centre;</li> <li>•High quality sustainable built design;</li> <li>•Continuing to develop a vibrant and attractive night time economy;</li> <li>•Providing opportunities to improve health and wellbeing;</li> <li>•Continuing to support greater integration of the university within the wider city centre in accordance with the policies in the Area Action Plan;</li> <li>•Recognising and preserving key views to the iconic three spires of St. Michaels, Holy Trinity and Christchurch; and</li> </ul>	<p>accessible through the creation of desirable and legible pedestrian routes;</p> <ul style="list-style-type: none"> <li>•Accessibility for all;</li> <li>•Providing an attractive and safe environment for pedestrians, cyclists and motorists;</li> <li>•Provide a high-quality public transport system that benefits from seamless integration and is well connected to existing and new infrastructure;</li> <li>•Being a gigabyte city that offers high speed Wi-Fi and broadband facilities throughout the city centre;</li> <li>•High quality sustainable built design;</li> <li>•Continuing to develop a vibrant and attractive night time economy;</li> <li>•Providing opportunities to improve health and wellbeing;</li> <li>•Continuing to support greater integration of the university within the wider city centre</li> <li>•Respecting key views to the iconic three spires of St. Michaels, Holy Trinity and Christchurch in line with the Tall Buildings</li> </ul>	

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<ul style="list-style-type: none"> <li>•Supporting the reintroduction of green and blue infrastructure throughout the city centre, including opportunities for deculverting wherever possible.</li> </ul>	<p><b>Design Guide and View Management Framework SPD</b></p> <ul style="list-style-type: none"> <li>•Supporting the reintroduction of green and blue infrastructure throughout the city centre, including opportunities for deculverting wherever possible; and</li> <li>*Contributing to the key aims, vision and objectives of Coventry City Council</li> </ul>	
CC2	<b>Policy CC2: Enhancement of Heritage Assets</b>	Policy deleted	This policy has been deleted with content which did not

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>a.All development within, or affecting the setting of, a Conservation Area (as highlighted in Figure 2) shall preserve or enhance its character and appearance and adhere to the policies of the relevant Conservation Area Appraisal and Management Plan.</p> <p>b.All development relating to or in close proximity to heritage assets such as statutory and locally listed buildings, Scheduled Monuments, public artwork and non-designated heritage assets (Figure 2) shall be undertaken sympathetically to those heritage assets and seek to preserve or enhance their setting.</p> <p>c.New developments which include or take place adjacent to the remaining sections of the medieval City Wall must enhance the setting of the wall and to incorporate it into the landscape design. Where appropriate the Council will seek contributions from developers for the repair and maintenance of the wall. Archaeological investigations</p>		duplicate other plan policies now contained within heritage policy HE2 and new plan policy HE4 Archaeology

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>must be undertaken where development is proposed on the former site of the City Wall. Opportunities to reflect the line of the medieval Wall should also be incorporated into such developments.</p> <p>d. New developments must retain and where possible re-instate the street plan of the medieval city where it can contribute to accessibility, local character and distinctiveness.</p> <p>e. Within Archaeological Constraint Areas and areas of archaeological potential (Figure 3), appropriate archaeological assessment will be required prior to the determination of a development proposal. Where significant archaeological remains are found they shall be recorded in a manner proportionate to their significance. Remains of high significance shall be preserved and protected.</p> <p>f. The Council will support development proposals that enable the long term</p>		

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>preservation of heritage assets which are considered to be 'at risk' so long as the plans are considered to be sympathetic and respectful to the assets heritage significance.</p> <p>g. Development within the city centre primary shopping area must respect the architectural design principles of the significant elements of the post- World War II reconstruction such as Broadgate and the shopping Precincts.</p>		
CC3	<p><b>Policy CC3: Building Design</b></p> <p>a. High quality design will be required for all new buildings with the criteria set out in the supporting text above forming an integral part of the building design process.</p> <p>b. All new buildings shall be sustainably designed to maximise energy efficiency and limit carbon emissions and the resultant</p>	Policy deleted	Policy deleted to ensure primacy of local plan policy DE1 in respect of building design and EM policies in respect of energy efficiency.



Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>impact upon the environment. Sustainable technologies should form an important part of this approach and should be incorporated wherever possible.</p>		
CC4	<p><b>Policy CC4: Public Art</b></p> <p>a. Public art should, where appropriate, form an integral part of the design process of any future development proposals.</p> <p>b. As an alternative to stand-alone pieces of public art, opportunities should be taken to incorporate this into the design of the buildings e.g. through the use of artist/architectural glass or ironmongery etc. thus giving it more legitimacy and integrity.</p> <p>c. Established public art shall be retained in redevelopment proposals unless the benefits of its removal outweigh the harm of its</p>	Policy deleted	New plan policy DE2 inclusive of Public Art Policy, and now applicable to areas beyond the defined City Centre

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	loss. Where public art is lost replacement works shall be incorporated into new development unless robust justification is provided highlighting that this it is not viable.		
CC5	<p><b>Policy CC5: Lighting</b></p> <p>Carefully considered architectural lighting proposals for new buildings and refurbishment of existing buildings will be encouraged to enhance the overall appearance of the city during the hours of darkness.</p>	Policy deleted	New plan policy DE2 inclusive of lighting policy, and now applicable to areas beyond the defined City Centre
CC6	<p><b>Policy CC6: Public Realm</b></p> <p>a.Where relevant, all development proposals will be required to integrate high quality soft and hard landscape designs.  b.The palette of materials and street furniture for any development proposal will need to accord with the palette that already exists in the city centre and reflect the character of its respective area or adjoining</p>	Policy deleted	New plan policy DE2 inclusive of public realm policy, and now applicable to areas beyond the defined City Centre

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	landscaping where no distinctive landscape character exists.		
CC7	<p><b>Policy CC7: Tall Buildings</b></p> <p>The location of proposed tall buildings will be considered in relation to the views of the three spires. New development proposals should reflect these view cones and seek to enhance the key views identified on plan.</p> <p>Further guidance will be provided in a Tall Buildings SPD.</p>	Policy deleted	This policy has been deleted due to duplication with core plan policy DE1. Revised policy DE1 draws reference to the adopted Tall Buildings Design Guide and View Management Framework SPD.
CC8	<p><b>Policy CC8 – Green and Blue Infrastructure</b></p> <p>a.New development will be expected to maintain the quantity, quality and functionality of existing green and blue infrastructure. In line with the city's Green Space Strategy and Local Flood Risk Management Strategy, development proposals should enhance blue and green infrastructure, and create and improve linkages between the areas. Any development which is likely to adversely affect the integrity of a blue or green</p>	<p><b>Policy CC1 (Part B) – Green and Blue Infrastructure</b></p> <p>a.New development will be expected to maintain the quantity, quality and functionality of existing green and blue infrastructure. In line with the city's Green Space Strategy and Local Flood Risk Management Strategy, development proposals should enhance blue and green infrastructure, and create and improve linkages between the areas. Any development which is likely to adversely affect the integrity of a blue or green</p>	Policy retained and developed to with reference to the emerging Coventry City Vision.

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>corridor will be required to be robustly justified and where appropriate, mitigation measures put in place. Development shall support meeting the objectives of the Severn River Basin Management Plan through ensuring that no deterioration of the River Sherbourne or its tributaries shall occur that may result in it failing its objectives under the Water Framework Directive.</p> <p>b. Developments adjacent to the Ring Road should maximise all opportunities to develop the greening of vertical surfaces as far as reasonably possible. Opportunities to add greenery to the area on a north-south and east-west axis through the city centre, defined on figure 5 as 'Green Spines', will be encouraged and supported.</p> <p>c. Trees that contribute towards public amenity shall be retained and protected unless they are of poor quality, have a short life expectancy (less than 10 years), are dangerous or the benefits of removing the tree significantly outweighs the harm that</p>	<p>corridor will be required to be robustly justified and where appropriate, mitigation measures put in place. Development shall support meeting the objectives of the Severn River Basin Management Plan through ensuring that no deterioration of the River Sherbourne or its tributaries shall occur that may result in it failing its objectives under the Water Framework Directive.</p> <p>b. Development adjacent to the Ring Road should maximise all opportunities to develop the greening of vertical surfaces as far as reasonably possible.  <b>Opportunities to add greenery to areas adjacent to the Ring Road will be encouraged.</b></p> <p>c. Trees that contribute towards public amenity shall be retained and protected unless they are of poor quality, have a short life expectancy (less than 10 years), are dangerous, or the benefits of removing the tree significantly outweighs</p>	

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>would be caused by its removal. Where trees are lost, replacement planting must be provided to a commensurate value to that which is lost.</p>	<p>the harm that would be caused by its removal. Where trees are lost, replacement planting must be provided to a commensurate value to that which is lost.</p> <p>d. Introduction of new, accessible green spaces in the City Centre will be encouraged. Proposals which positively contribute toward the open space objectives of Coventry City Council will be encouraged.</p>	
CC9	<p><b>Policy CC9: Drainage &amp; Flood Risk</b></p> <p>a. Development shall be designed and located to minimise the risk of flooding and if permitted development, be resilient to flooding. The opportunity must be exercised to maximise the absorption of surface water run-off by the ground. Sustainable Drainage methods shall be incorporated into new developments including treatment for water quality. Such provisions should consider opportunities to reflect the alignment of the River Sherbourne and/or its tributaries.</p>	<p><b>CC1 (Part C) Drainage &amp; Flood Risk</b></p> <p>a. Development shall be designed in line with the requirements of policy EM4 and located to minimise the risk of flooding and if permitted development, be resilient to flooding. The opportunity must be exercised to maximise the absorption of surface water run-off by the ground. Sustainable Drainage methods shall be incorporated into new developments including treatment for water quality. Such provisions should consider opportunities</p>	<p>Policy retained noting specific City Centre considerations in regard to higher levels of impermeable areas.</p>

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>b. When development occurs, a Flood Risk Assessment will need to be produced to appropriately consider the risk of flooding from all sources.</p> <p>c. When development occurs, it must consider the evidence in the Local Flood Risk Management Strategy, Surface Water Management Plan and Strategic Flood Risk Assessment. This includes all sites being treated as a Greenfield site when calculating permissible discharge rates in line with Policy EM5 of the Local Plan.</p> <p>d. When development is proposed it should utilise water use reduction systems such as grey water harvesting to reduce the water usage within the proposed developments.</p> <p>e. Where a development proposal lies adjacent to the existing de-culverted river Sherbourne, a natural sinuous river channel should be retained. Consideration should also be given to removing water bodies</p>	<p>to reflect the alignment of the River Sherbourne and/or its tributaries.</p> <p>b. When development occurs, a Flood Risk Assessment will need to be produced to appropriately consider the risk of flooding from all sources.</p> <p>c. When development occurs, it must consider the evidence in the Local Flood Risk Management Strategy, Surface Water Management Plan and Strategic Flood Risk Assessment. This includes all sites being treated as a Greenfield site when calculating permissible discharge rates.</p> <p>d. When development is proposed it should utilise water use reduction systems such as grey water harvesting to reduce the water usage within the proposed developments.</p> <p>e. Where a development proposal lies adjacent to the existing de-culverted river</p>	

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>from culverts wherever possible and viable (having regard to Figure 6). This will be of particular importance along Fairfax Street and will be vital to create multi-functional green and blue spaces within the city centre.</p>	<p>Sherbourne, a natural sinuous river channel should be retained. Consideration should also be given to removing water bodies from culverts wherever possible and viable. This will be of particular importance along Fairfax Street and will be vital to create multi-functional green and blue spaces within the city centre.</p>	
CC10	<p><b>Policy CC10 – Environmental Management</b></p> <p>New development must be designed to minimise environmental impact within the city centre and ensure that any impacts of pollution are appropriately considered and mitigated. In doing so new development schemes (including conversions and changes of use where appropriate) must ensure that:</p>	<p><b>Policy CC1 (Part D) – Environmental Management</b></p> <p>New development must be designed to minimise environmental impact within the city centre and ensure that any impacts of pollution are appropriately considered and mitigated. In doing so new development schemes (including conversions and changes of use where appropriate) must ensure that:</p>	<p>Policy retained with minor revision to referencing at point (g) to ensure read across plan policies</p>

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>a)All construction and demolition schemes adhere to a construction environmental management plan which must be submitted to and approved by the council before works commences. The CEMP must specify how the developer will mitigate noise and dust emissions from the works.</p> <p>b)All opportunities to connect to heat line or implement renewable energy generation have been explored and included as part of new development unless shown to be unviable or inappropriate.</p> <p>c)Ground contamination needs have been assessed and remediated using the Environment Agency Model Procedures for the Management of Land Contamination (CLR11).</p> <p>d)Proposals for site investigation and remediation schemes (where appropriate) utilise appropriate risk assessment and are approved by the Council in advance of</p>	<p>a)All construction and demolition schemes adhere to a construction environmental management plan which must be submitted to and approved by the council before works commences. The CEMP must specify how the developer will mitigate noise and dust emissions from the works.</p> <p>b)All opportunities to connect to heat line or implement renewable energy generation have been explored and included as part of new development unless shown to be unviable or inappropriate.</p> <p>c)Ground contamination needs have been assessed and remediated using the Environment Agency Model Procedures for the Management of Land Contamination. <b>(CLR11)</b>.</p> <p>d)Proposals for site investigation and remediation schemes (where appropriate) utilise appropriate risk assessment and</p>	



Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>development. Such measures should ensure that sites are 'fit for purpose'.</p> <p>e)New residential and commercial development schemes and the introduction of fixed plant machinery have been designed to meet internal and external noise levels specified in BS4142 and BS8223, or subsequent replacement standards.</p> <p>f)Appropriate odour extraction systems are incorporated where the sale / preparation / consumption of food takes place within the relevant buildings. Appropriate consideration has been given to the West Midlands LETC Air Quality guidance (or replacement guidance) and necessary mitigation measures incorporated into schemes.</p> <p>g)Have regard to other relevant polices within this City Centre AAP and its supporting documentation.</p>	<p>are approved by the Council in advance of development. Such measures should ensure that sites are 'fit for purpose'.</p> <p>e)New residential and commercial development schemes and the introduction of fixed plant machinery have been designed to meet internal and external noise levels specified in BS4142 and BS8223, or subsequent replacement standards.</p> <p>f)Appropriate odour extraction systems are incorporated where the sale / preparation / consumption of food takes place within the relevant buildings. Appropriate consideration has been given to the West Midlands LETC Air Quality guidance (or replacement guidance) and necessary mitigation measures incorporated into schemes.</p> <p>g)Have regard to all other relevant polices within the Local Plan.</p>	

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
CC11	<p><b>Policy CC11: Accessibility</b></p> <p>a. Development proposals in the city centre will be required to incorporate improvements to the significant routes and linkages as shown in Figure 8 above.</p> <p>b. Where appropriate, development proposals will be required to incorporate improvements to crossing the Ring Road to ensure enhanced connectivity between the city centre and the wider city for pedestrians and cyclists and should reflect the priorities in the supporting text above. This will be of particular relevance at:</p> <ul style="list-style-type: none"> <li>• Ring Road Junctions 1, 2, 4 and 5</li> <li>• The Canal Basin crossing between Ring Road junctions 9 and 1</li> <li>• Connectivity between Parkside and Much Park Street.</li> </ul> <p>Development proposals should support the needs of pedestrians and cyclists by incorporating new dedicated safe and direct pedestrian and cycle routes which integrate</p>	Policy Deleted	Policy deleted in respect of primacy of core local plan accessibility policies within Chapter 12 - Accessibility

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>seamlessly into established networks including connecting to the public transport network, interchanges and stops to deliver seamless integration together with provision of high quality cycle parking.</p> <p>c.City centre cycling and walking routes should be connected to the wider Metropolitan Strategic Cycle Network and be in partnership with TfWM.</p> <p>d.Development proposal should have regard to, and where appropriate, make provision for:</p> <ul style="list-style-type: none"> <li>a.Infrastructure which supports the intelligent mobility agenda;</li> <li>b.The inclusion of public transport infrastructure;</li> <li>c.The development of Mobility Hubs;</li> <li>d.The delivery of the Coventry Station Masterplan;</li> <li>e.The provision of high quality cycle parking; and</li> <li>f.The development of Rapid Transit.</li> </ul>		

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>e. Proposals for the redevelopment, intensification and enhancement of the following car parks will be encouraged as part of the wider regeneration of the city centre.</p> <ul style="list-style-type: none"> <li>• Salt Lane car park (See policy CC13);</li> <li>• Cheylesmore / New Union Street car parks (See policy CC14);</li> <li>• Bishop St car park (See policy CC25);</li> <li>• Whitefriars St car park (See policy CC14);</li> <li>• Leicester Row Car Park;</li> <li>• Cox St Car Park (See policy CC25);</li> <li>• Christchurch House Car Park (See policy CC14).</li> </ul> <ul style="list-style-type: none"> <li>• Far Gosford St car park;</li> <li>• *Gosford Street car park;</li> <li>• Grosvenor Road car park (See policy CC12);</li> <li>• *Grove Street car park;</li> <li>• Barracks Car Park (See policy CC19)</li> <li>• City Arcade car park</li> </ul> <p>* Partial redevelopment</p>		

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>Redevelopment proposals must consider the following factors:</p> <ul style="list-style-type: none"> <li>•Changes which affect the provision of public car parking spaces must be clearly justified as part of an on-going strategic review process and shown to have an acceptable impact on the performance and accessibility of the city centre and overall car parking provision.</li> <li>•The redevelopment and improvement of surface level car parks will be prioritised.</li> <li>•New car parking should be accommodated in a multi-storey format.</li> <li>•Proposals for multi storey car parks should respect the character and scale of the surrounding environment and maximise opportunities for high quality aesthetics.</li> </ul> <p>f.Changes should have regard to other relevant policies including the Coventry Connected SPD, Coventry Car Parking Strategy and TfWM Strategic Transport Plan parking policy objectives, including any future metropolitan wide parking strategy. Parking needs and the role of the</p>		

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>car will also be balanced with promoting the use of public transport, cycling and walking. The provision of new surface level car parking will not be supported within the city centre unless its provision is to support the implementation of longer term regeneration schemes. In such cases surface level provision will only be allowed on a temporary basis.</p> <p>g. Development proposals which result in significant changes to the location or supply of public car parking spaces will be required to address any associated necessary changes to associated car park signing and management systems.</p> <p>h. Proposals for the redevelopment of White Street Coach Park will be encouraged, where they are linked to appropriate amendments to Ring Road junction 2.</p>		
CC12	<p><b>Policy CC12 Friargate</b></p> <p>a. Development proposals within this area must be informed by the approved</p>	Policy Deleted	Policy deleted and superseded by new policy CC1 – Part E

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>Masterplan (as identified in the supporting text or any approved amendment thereafter).</p> <p>b.The business area will be the primary location within the city centre for new office development. As such, at least 176,000sq.m of office space is to be allocated within this area.</p> <p>c.The provision of up to 20,500sq.m of A1-A5 retail based floor space will be allowed as part of mixed use buildings and to support the creation of active frontages. Any individual unit should not exceed 500sq.m gross and should not be of a scale that would cause inappropriate competition with the Primary Shopping Area.</p> <p>d.Within the area an allocation is to be made for the provision of at least 400 new homes</p>		<p>Reference to City Centre character areas now contained within CC1E</p>

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>e. Other uses that are considered acceptable within the business area include:</p> <ul style="list-style-type: none"> <li>• Leisure and recreation uses, including hotels;</li> <li>• Social and community uses;</li> <li>• New multi-storey car parking; and</li> <li>• Provisions for public transport infrastructure delivered in accordance with the Station Masterplan and NUCKLE project</li> </ul> <p>f. Improvements to and expansion of the Coventry Railway Station will be supported in accordance with the Station Masterplan so long as it does not negatively affect the listed building.</p> <p>g. Greyfriars Green will continue to be protected as a conservation area and an important 'green' asset to the city centre. Any development proposals that would erode the character of the Green and damage the setting of the listed buildings will not be accepted.</p>		



Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
CC13	<p><b>Policy CC13 Cathedrals and Cultural Area</b></p> <p>a.All development proposals within the Hill Top and Lady Herbert’s Garden and The Burges Conservation Areas will only be considered acceptable if they demonstrate that they preserve and enhance the historic environment of the area and are in adherence with the policies of the respective Conservation Area Management Plans.</p> <p>b.Development in areas adjoining the Conservation Areas should enhance their setting and improve linkages between them and other areas of the city centre.</p> <p>c.Mixed use development including active ground floor uses (A1, A2, A3, A4) with upper floor residential provision of at least 60 homes will be promoted on the land at the junction of Hales Street and Trinity Street (1). As part of any development opportunities should be taken to enhance</p>	Policy Deleted	<p>Policy deleted and superseded by new policy CC1 – Part E</p> <p>Reference to City Centre character areas now contained within CC1E</p>

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	the setting of the exposed River Sherbourne at Palmer Lane.		
CC14	<p><b>Policy CC14 Civic Area</b></p> <p>a. New developments within the Civic Area must have regard to its historic characteristics of public service provision. As such, the following uses will be acceptable:</p> <ul style="list-style-type: none"> <li>• Social and community uses;</li> <li>• Leisure and recreation uses;</li> <li>• Educational uses, including new university and research provisions;</li> <li>• Office use;</li> <li>• Residential development; and</li> <li>• New multi-storey car parking.</li> </ul> <p>b. New developments must also respect and enhance the setting of the areas heritage assets, and where appropriate incorporate them into the design of new buildings and landscape.</p> <p>c. Other commercial activities (excluding A1 retail) will be supported where they support</p>	Policy Deleted	<p>Policy deleted and superseded by new policy CC1 – Part E</p> <p>Reference to City Centre character areas now contained within CC1E</p>

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>the provision of active frontages within a mixed use development.</p> <p>d.The provision of new retail development is unlikely to be supported within the Civic Area unless it can be demonstrably shown to form an integral part of a mixed use scheme.</p> <p>e.Opportunities to expand the programme of public realm improvements will be supported</p> <p>f.The existing surface level car park at Cheylesmore (1) is encouraged to be redeveloped for a multi-storey provision and incorporated into the adjoining New Union Street multi storey car park. As part of this scheme the overall quality of the parking provision must be improved.</p> <p>g.The site of the Spire house and Christchurch House office buildings (2) is to be allocated for at least 6,500sq.m of new</p>		

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	leisure uses, including a new swimming pool and fitness suite.		
CC15	<p><b>Policy CC15 Far Gosford Street Area</b></p> <p>a. New developments, changes of use and conversions within the Far Gosford Street Area must respect and reflect the area's historic character. As such:</p> <p>I. All development proposals, including applications for signage and the provision of new and improved parking (for cars and cycles), within the area will only be considered acceptable if they demonstrate that they respect the historic environment of the area and are in keeping with the aims of the Far Gosford Street Conservation Area Appraisal and Management Plan, published 2013 (or any subsequently published updated documents).</p> <p>II. All new build development within the area must be accompanied by an initial archaeological assessment of the site's potential.</p>	Policy deleted	<p>Policy deleted and superseded by new policy CC1 – Part E</p> <p>Reference to City Centre character areas now contained within CC1E</p>

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>b. Far Gosford Street will be regarded as a local centre meaning proposals for local shopping provisions will be supported. This will however exclude the provision of any further hot food takeaways (use class A5), which will not be permitted.</p> <p>c. To support the local centre designation a mix of creative industries, employment, residential and social and community uses will be supported within the Far Gosford Street Area.</p> <p>d. The use of upper floors of buildings for residential or office use will be supported and encouraged providing that appropriate noise insulation is included to ensure that the use is compatible with ground floor commercial activity.</p> <p>e. Opportunities to enhance the setting of the exposed River Sherbourne within this Area through improvements to green infrastructure will be encouraged. This should include opportunities to improve</p>		

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	wider green linkages beyond the city centre boundary, especially towards the Heritage Park at Charterhouse.		
CC16	<p><b>Policy CC16 Health and Education Area</b></p> <p>a.New developments within the Health and Education Area must have regard to its established character; respond to the environmental issues associated with its proximity to the Ring Road and deliver high quality buildings and public space which reflect this areas position as a gateway to the inner city centre. As such, the following uses will be acceptable:</p> <ul style="list-style-type: none"> <li>•Education provisions;</li> <li>•Public Health provisions;</li> <li>•Residential development;</li> <li>•Social and community uses; and</li> <li>•Green and blue infrastructure</li> </ul> <p>b.All prospective developments should:</p> <ul style="list-style-type: none"> <li>•reflect and enhance the area's character through mixed-use developments;</li> <li>•ensure a mix of residential densities where appropriate;</li> </ul>	Policy Deleted	<p>Policy deleted and superseded by new policy CC1 – Part E</p> <p>Reference to City Centre character areas now contained within CC1E</p>

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<ul style="list-style-type: none"> <li>•improve and introduce high quality buildings;</li> <li>•Promote active travel and ensure it becomes easier and safer to move within the area and into adjoining parts of the city centre</li> <li>•Mitigate the negative impacts of the Ring Road;</li> </ul> <p>c.The conversions of existing buildings, where appropriate, and the development of small infill opportunities for new residential developments will be encouraged and supported in principle.</p> <p>d.The reuse of the listed buildings (1) which remain as part of the former Coventry and Warwickshire Hospital site will be allocated for conversion to residential use, with the provision of up to 95 units.</p> <p>Remaining land at the former Hospital site or to the rear of Primrose Hill Street (2) should be retained for the provision of a new 2 form entry primary school to serve</p>		

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>the needs generated from wider housing provision across the city centre.</p> <p>e. The sympathetic conversion of the former St Mark's church (3) will be supported for the delivery of uses appropriate to this area of the city centre.</p> <p>f. Swanswell Pool is of historic importance to the local area and the city centre as a whole. Opportunities to expand the park and enhance its quality will be supported. This should include opportunities to improve its linkages to the wider city centre.</p>		
CC17	<p><b>Policy CC17 Leisure and Entertainment Area</b></p> <p>a. All development proposals within the Spon Street Conservation Area, including applications for signage, will only be considered acceptable if they demonstrate that they respect the historic environment of the area and are in keeping with the aims of the Spon Street Conservation Area</p>	Policy deleted	<p>Policy deleted and superseded by new policy CC1 – Part E</p> <p>Reference to City Centre character areas now contained within CC1E</p>



Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>Appraisal and Management Plan, published 2015 (or any subsequently updated documents).</p> <ul style="list-style-type: none"> <li>b. Spon Street will be encouraged as a suitable and attractive location for specialist and independent retailers. In order to protect the availability of property for such use, further hot food takeaways (use class A5) will not be permitted within this Area.</li> <li>c. Development for at least 325 homes on vacant land between Bond Street, Hill Street and Ryley Street (1) will be supported subject to:</li> <li>d. The development providing an active frontage at ground floor to Belgrade Plaza. To provide this activity approximately 1,000sq.m of A1-A4 uses will be considered appropriate</li> <li>e. High quality design that both relates well to the modern Belgrade Plaza development whilst ensuring the setting of adjacent listed buildings and Spon Street Conservation Area is preserved</li> </ul>		

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>f. Satisfactory noise mitigation measures, where required.</p> <p>g. Proposals for a hotel or residential use on the vacant site bounded by Ringway Hill Cross, Upper Well Street and Ryley Street (2) will be supported and encouraged. The development will be expected to be high density and well-designed reflecting its prominent position adjacent to the Ring Road and its location adjacent to the sizeable Belgrade Plaza development. Active frontages (where appropriate) providing for no more than 1,000sq.m, will be encouraged within use classes A1-A4.</p> <p>h.</p> <p>i. Redevelopment proposals for land on Watch Close abutting Ringway Rudge</p> <p>j. (3) for approximately 55 new homes will be considered acceptable subject to high quality design and noise and air quality mitigation.</p>		

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	<p>Development proposals should ensure the setting of adjacent listed buildings and Spon Street Conservation Area is preserved</p> <p>k.</p> <p>l. The re-development or conversion of the property known as Ringway House on Hill Street (4) will be encouraged for residential use of up to 30 units subject to high quality design that respects the amenities of neighbouring residential properties</p> <p>m.</p> <p>n. The redevelopment of the former Evening Telegraph Offices at the junction of Upper Well Street and Corporation Street (5). Will be supported for at least 230 new homes and up to 1,500sq.m of A1-A4 uses in order to support active ground floor frontages subject to high quality design and noise and air quality mitigation. Development of this site should also incorporate the remaining parts of the city wall into</p>		

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	<p>its landscaping proposals and enhance its setting.</p> <ul style="list-style-type: none"> <li>o.</li> <li>p. Opportunities to improve the linkages between:</li> <li>q. Spon Street and the Primary Shopping Area;</li> <li>r. Belgrade Plaza and the Primary Shopping Area; and</li> <li>s. Belgrade Plaza with the Northern Regeneration Area</li> <li>t. Improvements to the Ring Road underpass and Spon End.</li> <li>u. will be promoted and encouraged. Where appropriate these improved linkages should be incorporated into, or supported by, new development proposals.</li> </ul>		
CC18	<p><b>Policy CC18: The Primary Shopping Area</b></p> <p>a. The Primary Shopping Area is identified by the red line in Figures 17a and 17b and again in Appendix 1. This will be the principal focus for all new shopping</p>	Policy deleted	<p>Policy deleted and superseded by new policy CC1 – Part E Reference to City Centre character areas now contained within CC1E</p>

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>developments including redevelopment, refurbishment, extension or conversion of buildings for shopping uses.</p> <p>b.This area is expected to accommodate at least 40,000sq.m of gross new floor space up to 2031, covering a range of retail needs (A1-A5) in accordance with Table 3 of this AAP.</p> <p>c.Opportunities to provide a new purpose built convenience food offer of up to 10,000sq.m within or in close proximity to the PSA will also be encouraged.</p> <p>d.Other proposals that would introduce new town centre uses within the PSA will be encouraged and supported where they do not undermine or conflict with this or any other policy within this AAP.</p> <p>e.Opportunities for new residential provision above new or existing ground floor town centre uses will be supported with a view to supporting the vitality and viability of the city centre as a whole. This</p>		

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	<p>will be subject to appropriate design and appropriate mitigation of environmental concerns outlined in policy CC10.</p> <p>f.Opportunities to reinforce the original design concept of the Gibson plan and the precinct cross will be encouraged and supported. This could include the removal the central fountain as well as the external escalators and the ramp within Upper Precinct leading to West Orchards, which should be replaced with attractive and less intrusive structure(s) (1).</p> <p>g.The removal of the building, at ground level below Broadgate House, between Broadgate and Hertford Street, currently occupied by the Nationwide Building Society (2) will be supported. The removal of this structure will improve linkages between Broadgate and Hertford Street and thus enhance and encourage pedestrian movement through the city centre.</p>		

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
CC19	<p><b>Policy CC19: Primary Shopping Area regeneration – South</b></p> <p>The regeneration of the Southern part of the Primary Shopping Area (3), for predominantly comparison shopping will be promoted, encouraged and supported. This should be delivered in accordance with a Masterplan which supports the approved planning permission (outlined above) or replacement document. This will provide for:</p> <ul style="list-style-type: none"> <li>•An increase of at least 10,000sq,m gross retail floor space</li> <li>•A range of shop sizes that reflect market requirements;</li> <li>•High quality entrances from the Precinct, Queen Victoria Road and Bull Yard;</li> <li>•The redevelopment of the Barracks car park and the relocation of the parking spaces as part of a new multi storey car park incorporated within the development;</li> <li>•The relocation of the listed mural situated in Bull Yard to a new and prominent site situated within the new development; and</li> </ul>	Policy deleted	<p>Policy deleted and superseded by new policy CC1 – Part E</p> <p>Reference to City Centre character areas now contained within CC1E</p>

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<ul style="list-style-type: none"> <li>•The retention of the listed market building, with improvements made to its setting and connectivity to Queen Victoria Road and Market Way</li> <li>•Associated residential provision of at least 40 homes as part of upper floors above retail uses.</li> <li>•Complimentary leisure, office and hotel uses as part of upper floors above retail uses.</li> </ul>		
CC20	<p><b>Policy CC20: Primary Shopping Area regeneration – North</b></p> <p>The regeneration of the northern part of the Primary Shopping Area, focused around Smithford Way (4), will be promoted and encouraged for predominantly comparison shopping. This will provide for:</p> <ul style="list-style-type: none"> <li>•An increase of at least 10,000sq,m gross retail floor space</li> <li>•A range of shop sizes that reflect market requirements;</li> <li>•High quality entrances at Smithford Way and Corporation Street;</li> </ul>	Policy deleted	<p>Policy deleted and superseded by new policy CC1 – Part E</p> <p>Reference to City Centre character areas now contained within CC1E</p>



Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<ul style="list-style-type: none"> <li>•Enhanced linkages to Belgrade Plaza and Spon Street.</li> <li>•Associated residential provision of at least 300 homes as part of upper floors above retail uses.</li> <li>•Associated leisure, office and hotel uses on upper floors above retail uses.</li> </ul>		
CC21	<p><b>Policy CC21: Cathedral Lanes</b></p> <p>Cathedral Lanes (5) will continue to be promoted for a change of use to café and restaurant uses, with such uses encouraged to spill out onto Broadgate Square to help reflect the new public realm. Opportunities should also be taken to enhance the façade of the building and create a new link through the building in order to improve the connectivity from Broadgate/Upper Precinct to Coventry Cathedral and the Hill Top Conservation Area.</p>	Policy deleted	<p>Policy deleted and superseded by new policy CC1 – Part E</p> <p>Reference to City Centre character areas now contained within CC1E</p>
CC22	<p><b>Policy CC22: Primary and Secondary Frontages</b></p> <p>a.Primary Frontages, shown in appendix 1, are expected to include a high proportion of</p>	Policy deleted	Policy deleted and superseded by new policy CC1 – Part E

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>retail uses which may include food, drink, clothing and household goods. A clear majority of A1 retail uses should remain within all Primary Frontages at all times. Where proposals would result in less than 60% of primary frontages being classed as A1 retail then the applicant will be expected to demonstrate exceptional circumstances to justify a change of use. Under no circumstances though will A1 retail be allowed to fall below 51% of primary frontages. Class A5 and sui-generis uses will only be permitted in exceptional circumstances.</p> <p>b.Secondary frontages are defined as any frontage situated within the PSA that is not identified as a Primary Frontage in appendix 1. Within such frontages a mix of Class A uses will be permitted as well as D1, D2 and sui generis uses.</p>		Reference to City Centre character areas now contained within CC1E
CC23	<b>Policy CC23: Technology Park Area - Parkside</b>	Policy deleted	Policy deleted and superseded by new policy CC1 – Part E

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>a. Development proposals within the Parkside area, should support the hi-tech character that has been developed within this part of the city centre. As such, the following uses will be acceptable:</p> <ul style="list-style-type: none"> <li>•Hi-Tech industry use;</li> <li>•Research and Development activity;</li> <li>•Other Education facilities;</li> <li>•Residential provisions;</li> <li>•Leisure and recreation uses;</li> <li>•Social and community uses;</li> <li>•Office use;</li> <li>•New multi-storey car parking;</li> </ul> <p>b. The area of land situated north of Parkside and Deasy Road, South of Ring Road St Johns and West of London Road (1) will be allocated as the London Road Gateway. This area must create a high quality frontage to the Ring Road and London Road, including high quality landscaping and more efficient use of land. The area will benefit from comprehensive redevelopment and should be supported by a Gateway Masterplan.</p>		Reference to City Centre character areas now contained within CC1E

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>c.Developments within the London Road Gateway as well as the vacant sites identified below should make provision for in excess of 400 new homes and a minimum of 30,000sq.m of gross floor space linked to the Technology Park:</p> <ul style="list-style-type: none"> <li>•land East of Cheetah Road (2);</li> <li>•land situated bounded by Mile Lane and Puma way (3);</li> <li>•The site of the former Formula One hotel (4)</li> <li>•Land south of Parkside (5)</li> </ul> <p>d.Opportunities to improve the linkages and connectivity across the Ring Road, especially at junctions 4 and 5 of the Ring Road and the subway linking Short Street with Much Park Street (6) will be promoted. Improvement to these links should also include connectivity to the wider green infrastructure assets along London Road, including the cemetery and Charterhouse.</p> <p>e.The provision of a well-designed multi-story car park will be supported within a suitable location within the Parkside area subject to appropriate design and access.</p>		

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
CC24	<p><b>Policy CC24 University and Enterprise Area</b></p> <p>a. Within the University and Enterprise Area, proposals for redevelopment, refurbishment, extension or conversion of buildings for the following uses will be supported subject to high quality building and landscape design:</p> <ul style="list-style-type: none"> <li>I. Education and faculty buildings;</li> <li>II. University administrative facilities;</li> <li>III. Supporting ancillary sport, recreation, retail and maintenance facilities;</li> <li>IV. Research facilities;</li> <li>V. Residential provision including student accommodation; and</li> <li>VI. Multi-story car parks (subject to evidence of need).</li> </ul> <p>b. Land to the east of The Computer and Engineering Building on Gulson Road (1) will be allocated for the development of new building(s) to support this faculty or an alternative faculty. High quality building(s) will be supported on the site.</p>	Policy deleted	<p>Policy deleted and superseded by new policy CC1 – Part E</p> <p>Reference to City Centre character areas now contained within CC1E</p>

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>c.The demolition of the Priory Halls and Foundation Campus building at Priory Street (2) will be supported with new high quality buildings being introduced to support the setting of the Cathedrals and improving pedestrian routes and vistas along Priory Street.</p> <p>d.Proposals to bring the Grade I listed Whitefriars Monastery (3) into appropriate and regular use will be strongly supported subject to that use not having a detrimental impact upon the architectural and historic interest of the building and surrounding public realm. Proposals shall respect the design unity of this part of the University and Enterprise area.</p> <p>e.Any redevelopment proposals for the Sir John Laing building (4) will be supported only if they include measures to enhance the setting of the adjacent Grade II* listed 'Medieval stonehouse' sandstone building.</p>		

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>f.Any redevelopment proposals for the James Starley building (5) will be supported subject to high quality design and measures to significantly improve the pedestrian environment along the western side of Cox Street adjacent to the site.</p> <p>g.University Square (6) shall remain as an attractive public square at the interface of Coventry Cathedral, the Herbert Art Gallery and Museum and Coventry University.</p> <p>h.Within this area new development, where applicable, shall seek to improve and enhance the following pedestrian routes:</p> <ul style="list-style-type: none"> <li>•Jordan Well/Gosford Street to Far Gosford Street (7);</li> <li>•Gulson Road and the River Sherbourne (8); and</li> <li>•Cox Street between the junction with Fairfax Street and junction with Jordan Well (9)</li> </ul>		
CC25	<b>Policy CC25: Regeneration Areas</b>	Policy deleted	

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>a. Proposals for comprehensive redevelopment within the Bishop Street and Fairfax Street regeneration areas for a mix of uses including a significant proportion of residential development will be encouraged and supported.</p> <p>b. Both areas will be primarily promoted for new residential development in a range of types and tenures although a range of other uses will be acceptable subject to conformity with other parts of this AAP. These include:</p> <ul style="list-style-type: none"> <li>• Office;</li> <li>• Retail and commercial;</li> <li>• Social, community and leisure uses;</li> <li>• Education uses (including those linked to the university);</li> </ul> <p>Such uses should, where practicable and viable will be supported where they contribute towards active frontages at ground floor level.</p> <p>c. Green and blue infrastructure should form an integral part of all development</p>		<p>Policy deleted and superseded by new policy CC1 – Part E</p> <p>Reference to City Centre character areas now contained within CC1E</p>



Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>proposals within these areas. This should include the consideration of deculverting where possible and viable.</p> <p>d. Proposals for the redevelopment and reconfiguration of existing parking facilities at Cox Street and Bishop Street will be supported, subject to forming part of a comprehensive scheme that does not reduce the overall level of city centre parking, unless otherwise shown to have an acceptable impact on the city centre as a whole. As part of this, new Multi Storey car parking within these areas will be supported where it relates positively to the highway network.</p> <p>e. The removal of the slip roads around Junction 2 of the Ring Road will be supported alongside the development of the White Street car and coach park. Any proposals should come forward as a comprehensive scheme, include significant green infrastructure and create a new high</p>		

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>quality route between Fairfax Street and Swanswell Pool.</p> <p>f.The replacement of the existing Canal Bridge with a new form of crossing will be supported to help improve the connectivity between the Canal Basin and the wider city centre.</p> <p>g.New development opportunities should not conflict with any other policies within this AAP.</p>		
	<p><b>Policy CC26: The Warwick Row Area</b></p> <p>a.Proposals for limited and sympathetic infill development in the Warwick Row area will be encouraged and supported where appropriate.</p> <p>b.Applications for conversions or changes of use will be considered on the basis of their relationship with adjoining buildings and uses. Where appropriate, proposals should complement existing styles and designs of adjoining buildings.</p>	Policy deleted	<p>Policy deleted and superseded by new policy CC1 – Part E</p> <p>Reference to City Centre character areas now contained within CC1E</p>

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
	<p>c.The site at the junction of St. Patricks Road and Friars Road (1) is to be allocated for at least 65 new homes and should provide a high quality building, fronting the Ring Road. Proposals should also incorporate opportunities to provide a green frontage to the Ring Road and relate positively to the pedestrian routes between Friars Road and the Railway Station.</p> <p>d.Proposals should enhance the character and quality of the local environment and be compatible with other AAP policies.</p>		
		<p><b>AAP Policy CC1 (Part E) – City Centre Character Areas</b></p> <ul style="list-style-type: none"> <li>• All Development within the City Centre should reference the individual character area of its location and deliver high quality, contextually responsive proposals.</li> <li>• All development proposals within, or with the setting of, Conservation Areas will only be considered acceptable if they demonstrate that</li> </ul>	<p>New policy introduced to supersede previous AAP policies CC12 – CC12. Referencing updated City Centre character areas.</p>

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
		<p>they preserve and enhance the historic environment of the area and are in adherence with the policies of the respective Conservation Area Appraisals and Management Plans.</p> <p><b>The Friargate Area</b></p> <p>a. Development within this area should deliver high quality office and residential development, alongside a mix of uses within its highly sustainable location. Uses considered to be acceptable include:</p> <ul style="list-style-type: none"> <li>• Office Development</li> <li>• High quality City Centre Residential Dwellings</li> <li>• Leisure and recreation uses, including hotels;</li> <li>• Social and community uses;</li> <li>• Provisions for public transport infrastructure.</li> </ul>	

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
		<p>b. Improvements to and expansion of the Coventry Railway Station will be supported so long as it does not negatively affect heritage assets.</p> <p><b>Cathedral and Cultural Area</b></p> <p>a. Development in areas adjoining Conservation Areas should enhance their setting and improve linkages between them and other areas of the city centre.</p> <p>b. Development proposals must reference inter-relationships to heritage assets and ensure the primacy of Coventry Cathedral is retained in townscape.</p> <p>c. Development proposals must fully explore opportunities to reinforce the cultural offering of the City</p> <p><b>Civic Area</b></p> <p>a. New development within the Civic Area must have regard to its</p>	

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
		<p>historic characteristics of public service provision. As such, the following uses are encouraged :</p> <ul style="list-style-type: none"> <li>• High Quality Residential Dwellings</li> <li>• Social and community uses;</li> <li>• Leisure and recreation uses;</li> <li>• Educational uses, including new university and research provisions;</li> <li>• Office use;</li> </ul> <p>b. Other commercial activities will be supported where they support the provision of active frontages within a mixed use development.</p> <p>c. The provision of new retail development is unlikely to be supported within the Civic Area unless it can be demonstrably shown to form an integral part of a mixed-use scheme.</p> <p>d. Opportunities to expand the programme of public realm improvements will be supported</p>	

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
		<p><b>Far Gosford Street Area</b></p> <p>a. New developments, changes of use and conversions within the Far Gosford Street Area must respect and reflect the area's historic character. As such all development proposals, including applications for signage and the provision of new and improved parking (for cars and cycles), within the area will only be considered acceptable if they demonstrate that they respect the historic environment of the area.</p> <p>b. To support the local centre designation a mix of creative industries, employment, residential and social and community uses will be supported within the Far Gosford Street Area.</p> <p>c. The use of upper floors of buildings for residential or office</p>	

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
		<p>use will be supported and encouraged providing that appropriate noise insulation is included to ensure that the use is compatible with ground floor commercial activity.</p> <p>d. Opportunities to enhance the setting of the exposed River Sherbourne within this Area through improvements to green infrastructure will be encouraged. This should include opportunities to improve wider green linkages beyond the city centre boundary, especially towards the Heritage Park at Charterhouse.</p> <p><b>Stoney Stanton Road Area.</b></p> <p>a. New developments within the Stoney Stanton Road Area must have regard to its established character; respond to the environmental issues associated with its proximity to the Ring Road</p>	



Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
		<p>and deliver high quality buildings and public space which reflect this areas position as a gateway to the city centre.</p> <p>b.All prospective developments should:</p> <ul style="list-style-type: none"> <li>•reflect and enhance the area's character through mixed-use developments;</li> <li>•improve and introduce high quality buildings;</li> <li>•Promote active travel and ensure it becomes easier and safer to move within the area and into adjoining parts of the city centre</li> <li>•Mitigate the negative environmental impacts of the Ring Road;</li> </ul> <p>c.The conversions of existing buildings, where appropriate, and the development of small infill opportunities for new residential</p>	

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
		<p>developments will be encouraged and supported in principle.</p> <p><b>Corporation Street Area</b></p> <p>a. All development proposals within the Spon Street Conservation Area, including applications for signage, will only be considered acceptable if they demonstrate that they respect the historic environment of the area.</p> <p>b. Spon Street will be encouraged as a suitable and attractive location for specialist and independent retailers. In order to protect the availability of property for such use, further hot food takeaways will be resisted.</p> <p>c. Development must be of high-quality design that both relates well to the modern Belgrade Plaza development whilst ensuring the setting of adjacent listed buildings and Spon Street Conservation Area is preserved</p>	

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
		<p>d. Opportunities to improve the linkages into the precinct area will be encouraged from Corporation Street, Spon Street and Belgrade Plaza</p> <p>e. Opportunities to improve the linkages into the Corporation Street Area from the West will be encouraged.</p> <p><b>Mixed Use Core</b> - Including the Primary Shopping Area</p> <p>a. The primary shopping area is defined as per core Retail policy R2.</p> <p>B Other proposals that would introduce new town centre uses within the PSA will be encouraged and supported where they do not undermine or conflict with this or any other policy.</p> <p>c. Opportunities for new residential provision above new or existing ground floor town centre uses will be supported</p>	

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
		<p>with a view to supporting the vitality and viability of the city centre as a whole.</p> <p>d. Opportunities to reinforce the original design concept of the Gibson plan and the precinct cross will be encouraged and supported</p> <p>e. Development proposals should reference the variety of typologies found in the surrounding context, including the heritage assets of the precinct area.</p> <p><b>Parkside Area</b></p> <p>a. Development proposals within the Parkside area, should support the hi-tech character that has been developed within this part of the city centre. As such, the following uses will be acceptable:</p> <ul style="list-style-type: none"> <li>•Hi-Tech industry use;</li> <li>•Research and Development activity;</li> <li>•Other Education facilities;</li> <li>•Residential provision;</li> <li>•Leisure and recreation uses;</li> <li>•Social and community uses;</li> </ul>	

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
		<ul style="list-style-type: none"> <li>•Office use;</li> <li>•Car parking;</li> </ul> <p>b. Improvements in pedestrian connections from the area around Junction 5 toward London Road Cemetary to the South will be encouraged</p> <p><b>University and Enterprise Area</b></p> <p>a. Within the University and Enterprise Area, proposals for redevelopment, refurbishment, extension or conversion of buildings for the following uses will be supported subject to high quality building and landscape design:</p> <ul style="list-style-type: none"> <li>I.Education and faculty buildings;</li> <li>II.University administrative facilities;</li> <li>III.Supporting ancillary sport, recreation, retail and maintenance facilities;</li> <li>IV.Research facilities;</li> <li>V.Residential provision including student accommodation.</li> </ul> <p>b. Proposals to bring the Grade I listed Whitefriars Monastery into appropriate</p>	

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
		<p>and regular use will be strongly supported subject to that use not having a detrimental impact upon the architectural and historic interest of the building and surrounding public realm. Proposals shall respect the design unity of this part of the University and Enterprise area.</p> <p>c . University Square shall remain as an attractive public square at the interface of Coventry Cathedral, the Herbert Art Gallery and Museum and Coventry University.</p> <p><b>Northern Regeneration Area</b></p> <p>a. Proposals supporting the aims of mixed-use redevelopment of the Area will be encouraged.</p> <p>b. The area will be primarily promoted for new residential development in a range of types and tenures although a range of other uses will be acceptable subject to conformity with other parts of this AAP. These include:</p>	

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
		<ul style="list-style-type: none"> <li>•Office;</li> <li>•Retail and commercial;</li> <li>•Social, community and leisure uses;</li> <li>•Education uses (including those linked to the university);</li> </ul> <p>Such uses should contribute towards active frontages at ground floor level.</p> <p>c. Green and blue infrastructure should form an integral part of all development proposals within the area. This should include the consideration of deculverting where possible and viable.</p> <p>d. New development opportunities should not conflict with any other policies within this AAP.</p> <p>e. Swanswell Pool is of historic importance to the local area and the city centre as a whole. Opportunities to expand the park and enhance its quality will be supported. This should include opportunities to improve its linkages to the wider city centre.</p>	

Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
		<p>f. Proposals for the redevelopment of White Street Coach Park will be encouraged, where they are linked to appropriate amendments to Ring Road junction 2</p> <p><b>The Warwick Row Area</b></p> <p>a. Proposals for limited and sympathetic infill development in the Warwick Row area will be encouraged and supported where appropriate.</p> <p>b. Applications for conversions or changes of use will be considered on the basis of their relationship with adjoining buildings and uses. Where appropriate, proposals should complement existing styles and designs of adjoining buildings.</p> <p>d. Proposals should enhance the character and quality of the local environment and be compatible with other Local Plan policies.</p>	



Policy Ref	Adopted Area Action Plan (AAP) Wording	Proposed wording / action for the new Local Plan chapter: Coventry City Centre	Explanation
		<p>e. Greyfriars Green will continue to be protected as a conservation area and an important 'green' asset to the city centre. Any development proposals that would erode the character of the Green and damage the setting of the listed buildings will not be accepted.</p>	

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Coventry City Council

## Briefing note

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**To:** Scrutiny Coordination Committee

**Date:** 18<sup>th</sup> December 2024

**Subject:** Results of Crime survey and partner consultation for the development Community Safety Partnership Plan.

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### **1 Purpose of the Note**

- 1.1 To provide an update on the consultation process to develop the Community Safety Partnership Plan and to enable Scrutiny Co-ordination Committee to contribute to the consultation and shape the final plan.

### **2 Recommendations**

2.1 Scrutiny Co-ordination Committee are recommended to:

- 1) Consider the consultation questions provided at Appendix 3;
- 2) Identify responses to the consultation.
- 3) Note that all Members will be provided with an opportunity to respond and contribute to the consultation process, and
- 4) Note that Cabinet will consider the draft report at their meeting on the 18<sup>th</sup> March 2025.

### **3 Information and Background**

3.1 Under the Crime and Disorder Act 1998, the Council along with the Police have a joint responsibility for preventing and reducing crime and disorder within their area. They are “Responsible Authorities” and have a duty to cooperate through “Community Safety Partnership” (CSP).

3.2 CSPs are required to develop an overarching Community Safety Partnership Plan under the Crime and Disorder Act 1998. The plan provides an overview of the work and priority areas that fall under the responsibility of the CSP. The plan is intended to focus upon those issues of most concern to residents, that cause the most harm to communities and require a coordinated approach to deliver lasting change.

3.3 The plan will be informed by:

- the views of stakeholders, including those who have been affected by crime and/or accessing services;

- analysis of the problem, drawing on data and information from a breadth of partners;
- evidence of “what works” in tackling crime and disorder; and
- the views of professionals and stakeholders working locally.

- 3.4 A list of stakeholders invited to participate can be found at Appendix 2.
- 3.5 On the 9<sup>th</sup> July 2024, Cabinet considered the requirements of the Crime and Disorder Act 1998 and the need to create a Community Safety Partnership Plan. Cabinet authorised a 12-week public consultation beginning on the 10<sup>th</sup> July 2024 to the 2<sup>nd</sup> October 2024.
- 3.6 Workshops have also been held by sub-groups of the Police Crime Board to obtain the views of partners and other stakeholders.
- 3.7 Coventry Community Safety Partnership collaborates with the West Midlands Police Crime Commissioner. The Office of the Police Crime Commissioner (OPCC) is finalising the Police Crime Commissioner’s Plan for the region and the priorities of that plan will be considered in the consultation. A summary of the OPCC priorities can be found in Appendix 1.

#### **4 Initial findings of the Public Consultation**

- 4.1 A total of 696 responses were received from the Council’s consultation (Crime Survey). One of the main emerging themes is that residents generally felt safer during the daytime than at night in Coventry.
- 4.2 Other emerging key issues are concerns with Environmental ASB (fly tipping), Anti-Social Behaviour (ASB), Vehicle Crime and Drug offences.

#### **5 Partnership Consultation**

- 5.1 Workshops were undertaken with stakeholders and various partners (Appendix 2) who reviewed the findings of the Strategic Assessment and gave their professional perspective on what considerations should be in the Community Safety Partnership Plan.
- 5.2 These workshops were organised in the theme of Place, Victim and Offender.
- 5.3 Some of the key themes emerging from these workshops included lack of resources being a challenge and the need to support vulnerable people and protect them from exploitation. The partners felt improvements could be made by improving multi-agency networks, engaging with communities and making it easier to report crime. They also felt that there was a need to provide more information on success stories.

#### **6 Key Themes**

- 6.1 Good practice guidance recommends that Community Safety Partnerships consider various aspects of crime. The primary elements of a crime include the victim, offender, and location. Analysing crime from this perspective assists partners in pooling resources to set priorities and allocate resources effectively to reduce crime and disorder in their area. The plan therefore addresses three key themes:
- The reduction of Offending, Re-Offending and Serious Organised Crime:

- Public Place Safety and Reassurance; and
- Tackling Exploitation and Protecting Victims of Crime.

6.2 Under these themes we will develop a range of priorities, based on the feedback from the consultation.

## **7 Next Steps**

7.1 Feedback from the Scrutiny Coordination Committee and the consultation exercise will be used to develop the plan. A survey has also been developed for members to complete so that the results can be integrated into the plan. The full set of results and recommendations for the plan will be submitted to Cabinet on the 18<sup>th</sup> March 2025.

## **8 Health Inequalities Impact**

8.1 A draft Health Inequalities Impact was created as part of the consultation process. This will be updated and will be included in the final report presented to Cabinet on the 18<sup>th</sup> of March 2025.

Appendix 1: OPCC priorities

Appendix 2: Stakeholders

Appendix 3: Survey for Members

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**Organisation** Coventry City Council

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## My Priorities...

### REBUILD COMMUNITY POLICING

- Make neighbourhoods safer
- More officers visible in communities
- Solve local problems with communities
- Work with local businesses
- Combat anti-social behaviour
- Tackle hate crime

### TACKLE VIOLENCE

- Violence Against Women and Girls
- Domestic Abuse, including children
- Serious Youth Violence and knife crime
- Organised Crime Gangs and guns
- County lines and criminal exploitation
- Violence against retail workers

### IMPROVE ROAD SAFETY

- Increase prevention and enforcement against speeding, phone use, drink/drug driving and failure to wear a seatbelt (the fatal 4)
- Increase 3rd party reporting
- Tackle organised street racing
- Clamp down on uninsured vehicles

### REDUCE NEIGHBOURHOOD CRIME

- House burglary
- Street robbery
- Car theft and theft from vehicles
- Fraud
- Online crimes

### PROTECT VICTIMS AND WITNESSES

- Victim's Rights and Welfare
- Access to justice
- High quality support services for victims
- Support 'by and for' specialist services
- Amplify the voice of victims

### MAKE WEST MIDLANDS POLICE EXCELLENT

- Fair funding and efficient use of resources
- High quality, well trained, well supported and representative workforce
- High performing, trusted Force
- Effective and ethical use of data/new technology
- Decarbonisation: Net Zero

## My Principles...

### BRINGING OFFENDERS TO JUSTICE

- Crimes accurately recorded
- Efficient and effective investigations
- More crimes detected and positive outcomes
- Greater use of Out of Court Disposals and Civil Orders
- Efficient and effective criminal justice system

### PREVENTION & REHABILITATION

- Protecting the vulnerable
- Children and young people focus
- Reduce harm from illegal drugs
- Support and challenge people to turn their lives around

### PARTNERSHIPS

- Bring WM partners together to make a real difference
- Work with government to deliver change
- Effective local, regional and national collaboration

### BUILDING TRUST AND CONFIDENCE

- Fairness and belonging
- Best policing for people and in places that need it most
- Listening and responding to the public
- Understanding and addressing disproportionality
- Learning from our history

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## Appendix 2 – Stakeholders

General Target Group	Examples of Individuals/Organisations
Organisations that represent residents in the city	<ul style="list-style-type: none"> <li>• Acorn Union</li> <li>• The Tenants Voice</li> <li>• Belgrave Road &amp; Neighborhood Watch Association</li> <li>• Cannon Park Residents Association</li> <li>• Bell Green Area Tenants and Residents Association</li> <li>• Chapelfields Area Residents and Traders Association (CARTA)</li> <li>• Charterhouse Resident's Association</li> <li>• Cheylesmore Good Neighbours</li> <li>• Clifford Bridge Community Association</li> <li>• Deedmore Residents Association</li> <li>• Gosford Park Residents Association</li> <li>• Manor Farm Residents Association</li> <li>• Paradise Community Action Group (PCAG)</li> <li>• Princess Street Residents' Association</li> <li>• Singer Residents Group</li> <li>• St. Catherine's Resident's Association</li> <li>• Stoke Aldermoor Resident's Association</li> <li>• Stoke Heath Resident's Association</li> <li>• Styvechale Grange Resident's Association</li> <li>• Tile Hill South Resident's Association</li> <li>• Tile Hill Village Residents Group</li> <li>• Upper Stoke Resident's Association</li> <li>• Wood End Residents and Friends (WERAF)</li> <li>• Wood End, Henley Green and Manor Farm (WEHM)</li> <li>• Frontline Network</li> </ul>
Universities/Colleges	<ul style="list-style-type: none"> <li>• Coventry University</li> <li>• Warwick University</li> <li>• Arden University</li> <li>• Coventry Students' Union</li> <li>• Warwick Students' Union</li> <li>• City College</li> <li>• Herewood College</li> </ul>
Youth Groups	<ul style="list-style-type: none"> <li>• Guiding Young Minds</li> <li>• Positive Youth Foundation</li> <li>• Sky Blues in the Community</li> <li>• Bardsley Youth Project</li> </ul>

Charities	<ul style="list-style-type: none"> <li>• CW Mind</li> <li>• Shelter</li> <li>• Crisis</li> <li>• Citizens Advice</li> <li>• City YMCA</li> <li>• Cyrenians</li> <li>• Steps For Change</li> <li>• Emmaus</li> <li>• Valley House</li> <li>• Haven</li> <li>• Grapevine</li> </ul>
Local Business	<ul style="list-style-type: none"> <li>• Business Improvement District</li> <li>• Federation of Business Owners</li> </ul>
Other	<ul style="list-style-type: none"> <li>• Coventry Pride</li> <li>• DEN (Internal)</li> <li>• Local Councillors</li> </ul>
Advice groups	<ul style="list-style-type: none"> <li>• Citizens Advice Bureau</li> <li>• Coventry Independent Advice Service</li> <li>• Age UK Coventry and Warwickshire</li> <li>• Coventry Refugee and Migrant Centre</li> </ul>
Emergency Services	<ul style="list-style-type: none"> <li>• West Midlands Police</li> <li>• West Midlands Fire and Rescue Service</li> </ul>

Partner Workshop – stakeholders invited to workshops

Place Based	<p>West Midlands Police  West Midlands Fire Service  City BID  Citizen Housing  Midland Heart  Child Exploitation Team  Licensing team  Trading Standards  Change Grow Live  Prevent  Housing and Homelessness team  Environmental Services  Noise Enforcement  Street Scene Enforcement  Transport of the West Midlands  Public Health  Community Safety</p>
Offender	<p>West Midlands Police  Community Rehab Services  National Probation Services  Housing and Homelessness Team</p>

	<p>Change Grow Live  Coventry and Warwickshire Partnership Trust.  Youth Offending Services  Youth Services  Public Health  Community Safety</p>
Victim	<p>West Midlands Police  Adult Services  Public Health  Integrated Care Board  Coventry and Warwickshire Partnership Trust  CRASAC  Prevent  Community Resilience Team  Coventry Haven  Housing and Homelessness team  West Midlands Fire Service  Change Grow Live</p>

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### Appendix 3 - Survey for members

A survey will be distributed to elected members to collect their perspectives on the priorities of the Community Safety Partnership. Below is a summary of the questions.

<b>Overall Priorities</b>	
<b>1</b>	<b>What topics do you think should be a priority for the Community Safety Partnership? (Please rank in order of Priority (1 being the most important – 10 being the least important))</b>
	Tackling Serious Organised Crime (Gangs)
	Tackling Serious Violence (knife crime)
	Tackling Violence in the Night-Time Economy
	Taking action against Anti-Social Behaviour
	Tackling Environmental Crime (Fly tipping, littering )
	Tackling Exploitation and supporting victims of crime (Modern Slavery/Hate crime /other hidden crimes)
	Hate Crime
	Tackling and Preventing Terrorism
	Taking Action on Domestic Abuse/violence
	Tackling Drugs and Alcohol
	Tackling Youth Violence

<b>Place-Based Issues</b>	
2	<b>What are your biggest concerns within Coventry City Centre? (ranking question) (Please rank in order of Priority (1 being the most important – 10 being the least important))</b>
	Drug dealing
	Retail theft
	Begging
	Public Place Violence
	Street robbery
	Ebike in the City Centre
	Busking
	Environmental issues (litter/Graffiti/waste)
	Rough Sleeping
	Safety in the Night Time Economy

3	<b>What is the biggest challenge to the Local Authorities and partners in dealing with location based issues? ( please rank in the order of priority)</b>
	Available resources to enforce issues
	Obtaining evidence of those responsible for the crime
	Lack of reporting of issues
	Lack of joint working between partners
	Poor design and infrastructure which contributes to crime
	Public confidence in services provided by the Local Authority and Partners

4	<b>Do you agree or disagree with the following statements ( 1 strongly agree, 2 agree, 3 neither agree or disagree, 4 disagree , 5 strongly disagree)</b>				
	Agencies work collaboratively to address location-based issues.				
	1	2	3	4	5
	There are sufficient resources across agencies to address location-based issues				
	1	2	3	4	5
	More CCTV is required across the city				
	1	2	3	4	5
	Resources are too heavily weighted to impact areas (areas with more demand) within the City				
	1	2	3	4	5
	More investment is required to support services to tackle the underlying issues to why people commit crime.				
	1	2	3	4	5

5	<b>What would you like to see from Coventry City Council and its partners to address location-based issues ( please enter comments below) ?</b>

<b>Supporting Victims</b>	
6	<b>What are the biggest challenges facing victims of crime in Coventry ?</b> (Please rank in the order of priority)
	A lack of faith in services being provided.
	Lack of professional curiosity to identify of hidden crimes.
	Victim blaming attitudes
	Being able to seek appropriate support for help and support.
	Being able to easily report crime
	Preventing re-victimisation
	Recognising themselves as victims of crime

7	<b>Do you agree or disagree with the following statements</b> ( 1 strongly agree, 2 agree, 3 neither agree or disagree, 4 disagree , 5 strongly disagree)				
	I believe that the victims I support know how to report crime and access services				
	1	2	3	4	5
	I believe that services are victim-centred				
	1	2	3	4	5
	I believe that services provided by the partners of the Community Safety Partnership have sufficient resources to support victims				
	1	2	3	4	5
	I believe that the Coventry City Council and its partners prioritise vulnerable people in the City				
	1	2	3	4	5
	I believe that vulnerable people are falling through cracks in service provision.				
	1	2	3	4	5



8	<b>How can we better support victims? (Please rank in order of priority)</b>
	Making it for easier to report crime or ask for help.
	Providing better information to victims on support services
	Develop better reporting pathways to enable professionals and front line workers to identify victims of exploitation.
	Better joint up working amongst agencies
	Stronger workforce development on identifying /supporting victims

9	<b>What are your biggest concerns when considering vulnerable people/groups in the city ( open text)</b>

<b>Reducing Reoffending</b>	
10	<b>What measures should be taken to reduce reoffending? (Please rank in order of priority)</b>
	Providing settled and stable accommodation
	Providing Mental health support
	Early intervention through mentoring and family support schemes
	Schemes to provide Education and employment to newly released offenders.
	Rehabilitation programmes to target perpetrators of crime.
	Providing Support with substance misuse.
	Restorative and reparative work (unpaid work , restorative justice)
	Diverting young people away from the criminal justice system.
	Mentoring and support to prevent young perpetrators from transitioning to adult crime.
	Aiming support at young people vulnerable to criminal exploitation
	Better use of Out of Court Disposals and Community Orders

11	<b>Tell us what you think (sliding scale) Do you agree or disagree with the following statements ( 1 strongly agree, 2 agree, 3 neither agree or disagree, 4 disagree , 5 strongly disagree)</b>				
	The public have a good understanding of the work being done to prevent reoffending?				
	1	2	3	4	5
	There are sufficient resources available between agencies to support offenders				
	1	2	3	4	5
	Prison leavers should receive increased priority for housing on homefinder programme.				
	1	2	3	4	5
	Coventry has strong partnerships to prevent and reduce the number of children and young people entering the criminal justice system.				
	1	2	3	4	5
	I believe that vulnerable people are falling through cracks in service provision.				
	1	2	3	4	5

12	<b>What are the biggest concerns you have about reducing reoffending in Coventry?</b>				

<b>Communications</b>					
13	<b>Tell us what you think (sliding scale) Do you agree or disagree with the following statements</b>				
	I have a clear understanding of the roles and responsibilities of the Community Safety Partnership				
	1	2	3	4	5
	I have a good understanding of the structures underneath the Community Safety Partnership and the accountabilities each group has.				
	1	2	3	4	5
	I understand the priorities of the board and how it monitors the performance of its priorities.				
	1	2	3	4	5
	I know how to raise issues through the Community Safety Partnership if I have concerns.				
	1	2	3	4	5
	The public has access to information regarding the Community Safety Partnership and its priorities as a partnership.				
	1	2	3	4	5

14	<b>Have you got any additional comments you would like to make.</b>				

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# Agenda Item 7

SCRUCO Work Programme 2024-25

Last updated 5<sup>th</sup> December 2024

Please see page 2 onwards for background to items

<b>10<sup>th</sup> June 2024</b>
LGA Peer Review Findings Draft Scrutiny Annual Report 2023-24
<b>26<sup>th</sup> June 2024</b>
Serious Violence Duty Proposed Consultation for the Community Safety Partnership Plan 2024-2027
<b>21<sup>st</sup> August 24</b>
City Centre PSPO Monitoring City-wide PSPO Consultation Additional Licensing of HMO's (Cabinet Report) Dog Control PSPO (Cabinet Report)
<b>19<sup>th</sup> September 24</b>
National Planning Policy Framework Consultation
<b>25<sup>th</sup> September 24 (moved from 18<sup>th</sup> September)</b>
One Coventry Plan Performance report (Cabinet Report) City-wide PSPO (Cabinet Report)
<b>31<sup>st</sup> October 2024 (moved from 23<sup>rd</sup> October)</b>
Climate Change Strategy (Cabinet Report) Temporary Accommodation (Cabinet Report)
<b>14<sup>th</sup> November 2024</b>
Coventry City Council Transformation Programme
<b>20<sup>th</sup> November 2024</b>
Shareholder Committee Reports Strategic Energy Partnership Performance Update
<b>18<sup>th</sup> December 2024</b>
Community Safety Plan 2024-27 WMCA Corporate Update and Scrutiny Annual Report Regulation 19 Local Plan
<b>30<sup>th</sup> January 2025 (moved from 29<sup>th</sup> January)</b>
Peer Review Progress Update Complaints Reports Coventry Cultural Strategy – progress report including major Cultural Events
<b>6<sup>th</sup> March 2025 (moved from 5<sup>th</sup> March)</b>
Communications Strategy Artificial Intelligence
<b>10<sup>th</sup> April 2025 (moved from 9<sup>th</sup> April)</b>
Health Inequalities and Marmot HDRC
<b>2024-25</b>
Refreshed Complaints Policy and Process Domestic Abuse Adaption and Resilience Plan Cost of Living and Poverty Planning Performance Fly-tipping Overview Strategic Energy Partnership Projects External Partnerships

SCRUCO Work Programme 2024-25

Offender Management

**2025-26**

PSPO reviews – 2027-28

One Coventry Plan Performance Report (24/25 pt 2)

SCRUCO Work Programme 2024-25

<b>Date</b>	<b>Title</b>	<b>Detail</b>	<b>Cabinet Member/ Lead Officer</b>
<b>10<sup>th</sup> June 2024</b>	LGA Peer Review Findings	Following a visit by a peer review team in January 2024 Scruco will consider the recommendations and actions	Vanessa Millar / Michelle McGinty Cllr Duggins
	Draft Scrutiny Annual Report 2023-24	To consider the draft report before it is presented to Council	
<b>26<sup>th</sup> June 2024</b>	Serious Violence Duty	At their meeting in November 2023 the Committee requested a 6-month progress update, including the measurables identified by the Police and Crime Board to measure success. Check whether guidance has been sent to schools. Including the inspection report on tackling the risk of serious youth violence and criminal exploitation	Cllr AS Khan Allison Duggal Caroline Ryder Neil Macdonald WMP
	Proposed Consultation for the Community Safety Partnership Plan 2024-2027	To consider the consultation plan for the Community Safety Partnership Plan 2024-27	Joy Adams Cllr AS Khan
<b>21<sup>st</sup> August 24</b>	City Centre PSPO Monitoring	As requested, Scruco will consider progress on implementation of the new PSPO agreed at Cabinet 13 <sup>th</sup> June 2023	Liam Nagle Cllr AS Khan
	City-wide PSPO Consultation	Summary of findings from the Public Consultation and opportunity for members to be part of the consultation process which will form part of the final report to Cabinet.	Joy Adams Cllr AS Khan
	Additional Licensing of HMO's (Cabinet Report)		Adrian Chowns Cllr Welsh
	Dog Control PSPO (Cabinet Report)		Cllr A Khan
<b>19<sup>th</sup> September 24</b>	National Planning Policy Framework Consultation	To consider the response from the Council to the governments consultation on the National Planning Policy Framework	Rob Back Cllr N Akhtar

<b>Date</b>	<b>Title</b>	<b>Detail</b>	<b>Cabinet Member/ Lead Officer</b>
<b>25<sup>th</sup> September 24 (moved from 18<sup>th</sup> September)</b>	One Coventry Plan Performance report (Cabinet Report)		Valerie De Souza Cllr Duggins
	City-wide PSPO (Cabinet Report)		Joy Adams Cllr AS Khan
<b>31<sup>st</sup> October 2024 (moved from 23<sup>rd</sup> October)</b>	Climate Change Strategy (Cabinet Report)		Rhian Palmer Cllr O'Boyle
	Temporary Accommodation (Cabinet Report)	Referred from SB4 as meeting schedules do not match with Cabinet.	Jim Crawshaw Cllr N Akhtar
<b>14<sup>th</sup> November 2024</b>	Coventry City Council Transformation Programme	To review the progress and implementation of the CCC Transformation Programme and funding associated with it.	Cllr Brown Michelle McGinty
<b>20<sup>th</sup> November 2024</b>	Shareholder Committee Reports	A chance for Scrucoco to consider the reports ahead of the Shareholder Panel. The Board asks that future reports are shared after the audited accounts are published.	Cllr Duggins Andrew Walster
	Strategic Energy Partnership Performance Update	Shareholder Panel Report	Anna Livesey Cllr O'Boyle
<b>18<sup>th</sup> December 2024</b>	Community Safety Plan 2024-27	To consider the results of crime survey and to feed into the development of the community safety partnership plan.	Joy Adams Cllr AS Khan
	WMCA Corporate Update and Scrutiny Annual Report		James Hughes
	Regulation 19 Local Plan		Chris Styles, Rob Back



SCRUCO Work Programme 2024-25

<b>Date</b>	<b>Title</b>	<b>Detail</b>	<b>Cabinet Member/ Lead Officer</b>
			Cllr N Akhtar
<b>30<sup>th</sup> January 2025 (moved from 29<sup>th</sup> January)</b>	Peer Review Progress Update	12-month progress review report	Cllr Duggins Michelle McGinty
	Complaints Reports	To consider the progress on implementing recommendations and lessons learned identified as a result of formal complaint investigations to the Ombudsman, as well as Adults and Children's Social Care	Adrian LeCras Mandeep Chouhan Cllr Brown
	Coventry Cultural Strategy – progress report including major Cultural Events	Following their meeting on 20 <sup>th</sup> December 2023, the committee requested a further update on progress in delivering the Cultural Works model, including communication with Members.	David Nuttall/ Salla Virman Cllr N Akhtar
<b>6<sup>th</sup> March 2025 (moved from 5<sup>th</sup> March)</b>	Communications Strategy		Matt Burrows Cllr Duggins
	Artificial Intelligence	To consider how AI is prioritised and utilised across the Council, including improving services and reducing budget pressures. To invite SB1 Members)	Cllrs Brown/ Hetherton Paul Ward
<b>10<sup>th</sup> April 2025 (moved from 9<sup>th</sup> April)</b>	Health Inequalities and Marmot	To look at what the Council is doing to address health inequalities and to monitor progress. Raised at OCP progress item on 25 <sup>th</sup> September OCP Indicators for Male/Female Life expectancy	Allison Duggal Cllr Caan
	HDRC	An update and progress on the project	Sue Frossell Cllr Caan
<b>2024-25</b>	Refreshed Complaints Policy and Process		

Date	Title	Detail	Cabinet Member/ Lead Officer
	Domestic Abuse	A regular update item on the progress of delivery on the Domestic Violence and Abuse Strategy	Jayne Ross Cllr AS Khan Cllr P Akhtar
	Adaption and Resilience Plan	To consider what the Council is doing to protect the city from the impact of climate change, including partners involved in the delivery and represented on the Climate Change Board	Cllr O'Boyle Colin Knight Rhian Palmer Bret Willers
	Cost of Living and Poverty	To update on support offered to low -income families as well as the OCP indicator of % of children living in relatively low-income families.	Cllr Duggins
	Planning Performance	Development Management function - overall performance against Government targets. Annual monitoring report (AMR).	Cllr N Akhtar, Rob Back
	Fly-tipping Overview	To review the impact of increased fines on reducing fly-tipping	Cllrs AS Khan / Hetherton Martin McHugh / Sarah Elliott
	Strategic Energy Partnership Projects	Further from 11 <sup>th</sup> of March SB meeting to refer future Cabinet Reports for projects that reach Gateway 4 (Detailed Business Case) to the relevant Scrutiny Board. And regular updates from the SEP (a) Data on the criteria and priority of retrofitting homes (b) Data on EPC ratings (including privately owned properties) (c) Possibility of installation of charging points for mobility scooters (d) Possibility of generating energy from Coventry's rivers. (e) How value for money is ensured at each stage of the process	Cllr O'Boyle Rhian Palmer

Date	Title	Detail	Cabinet Member/ Lead Officer
		(f) Income generation from EV charging (noted that this would be considered by Scrutiny Board 3) (g) Future investment from Severn Trent in water quality	
	External Partnerships		Cllr G Duggins
	Offender Management	Following an item on Local Policing Update at their meeting 21 <sup>st</sup> February 24 the committee agreed to consider a further item on Offender Management	Cllr A Khan
<b>2025-26</b>			
	PSPO reviews – 2027-28	To be considered by scrutiny as part of the 3 year review	
	One Coventry Plan Performance Report (24/25 pt 2)		Valerie De Souza Cllr Duggins

### Work Programme Decision Flow Chart

