

**Time and Date**

2.00 pm on Tuesday, 10th December 2024

Place

Committee Room 3 - Council House, Coventry. CV1 5RR

Public business

1. **Apologies**
2. **Declarations of Interest**
3. **Minutes** (Pages 3 - 10)
 - (a) To agree the minutes from the meeting of Cabinet on 5th November 2024
 - (b) Matters arising
4. **PFI Street Lighting LED Upgrade** (Pages 11 - 26)

Report of the Director of Innovation
5. **Pre-Budget Report 2025/26** (Pages 27 - 74)

Report of the Director of Finance and Resources
6. **2024/25 Second Quarter Financial Monitoring Report (to September 2024)** (Pages 75 - 100)

Report of the Director of Finance and Resources
7. **Local Development Scheme (LDS) update** (Pages 101 - 120)

Report of the Director of City Services and Commercial
8. **Local Plan Review - Regulation 19 Stage** (Pages 121 - 1038)

Report of the Director of City Services and Commercial
9. **Agreement and Adoption of the Homelessness and Rough Sleeping Strategy 2025-29** (Pages 1039 - 1164)

Report of the Director of Adults Services and Housing

10. **Outstanding Issues**

There are no outstanding issues

11. **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

Julie Newman, Director of Law and Governance, Council House, Coventry
Monday, 2 December 2024

Note: The person to contact about the agenda and documents for this meeting is Michelle Salmon, Governance Services, Email: michelle.salmon@coventry.gov.uk

Membership:

Cabinet Members:

Councillors N Akhtar, L Bigham, R Brown, K Caan, G Duggins (Chair), P Hetherington, A S Khan (Deputy Chair), J O'Boyle, K Sandhu and P Seaman

Non-voting Deputy Cabinet Members:

Councillors P Akhtar, S Agboola, G Hayre, D Toulson and S Nazir

By invitation:

Councillors P Male, E Reeves and G Ridley (Non-voting Opposition representatives)

Public Access

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Michelle Salmon, Governance Services

Email: michelle.salmon@coventry.gov.uk

Agenda Item 3

Coventry City Council

Minutes of the Meeting of Cabinet held at 2.00 pm on Tuesday, 5 November 2024

Present:

Members:

Councillor G Duggins (Chair)
Councillor AS Khan (Deputy Chair)
Councillor N Akhtar
Councillor L Bigham
Councillor R Brown
Councillor K Caan
Councillor J O'Boyle
Councillor P Seaman
Councillor K Sandhu

Non-Voting Deputy
Cabinet Members:

Councillor S Agboola
Councillor P Akhtar
Councillor G Hayre
Councillor S Nazir
Councillor D Toulson

Non-Voting Opposition
Members:

Councillor P Male
Councillor E Reeves
Councillor G Ridley

Other Non-Voting
Members:

Councillor R Lakha
Councillor C E Thomas

Employees: (by Service)

Chief Executive

Julie Nugent (Chief Executive)

Adult Services and Housing

P Fahy (Director of Adult Services and Housing),
M Donovan

City Services and Commercial

C Styles

Policy and Communications

N Hart

Finance and Resources

B Hastie (Director of Finance and Resources)

Law and Governance

J Newman (Director of Law and Governance), M Salmon

Regeneration and Economy

A Williams (Director of Regeneration and Economy),
R Palmer

Apologies: Councillor S Gray
Councillor L Harvard
Councillor P Hetherton
Councillor A Jobbar
Councillor G Lloyd

Public Business

31. **Declarations of Interest**

There were no disclosable pecuniary interests.

32. **Minutes**

The minutes of the meeting held on 1st October 2024 were agreed and signed as a true record. There were no matters arising.

33. **Exclusion of Press and Public**

RESOLVED that the Cabinet 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 39 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.

34. **Climate Change Strategy**

The Cabinet considered a report of the Director of Regeneration and Economy, that had been considered by Scrutiny Co-ordination Committee at their meeting on 31st October 2024 and would also be considered by Council at their meeting on 3rd December 2024, on the Council’s Climate Change Strategy for 2024 – 2030. Appendices to the report provided the Climate Change Strategy 2024 to 2030 and the Climate Change Action Plan.

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

- **Adaptation and resilience** – how we adapt to weather changes caused by climate change and create more resilience in our infrastructure, services and systems.
- **Route to net zero** – how we decarbonise our city including buildings, transport and industry and create a green economy
- **A circular economy** – how we use resources more efficiently
- **Fairer green future** – how we tackle inequalities and deliver a just transition
- **Nature** – how we address the ecological emergency, reverse the decline in nature and create a greener city

Due to unprecedented challenges with the climate and natural environment, climate change was no longer something happening in the future, impacts are being seen now - in Coventry there were over 10,500 properties at risk of flooding and rising. Rising energy costs and energy inefficient homes meant that over 22% of households were in fuel poverty, and the rising cost of living meant 20% of the city was in food poverty. There was a global nature emergency, with the UK one of the world's most nature depleted countries. In Coventry over 20% of households lived more than 300 metres from green space.

Moving towards a green economy, and the need to ensure that local people and businesses were equipped with the right skills to access jobs and opportunities, tackling climate change could help to address these issues. It presented a huge opportunity to create positive change that could improve the quality of life, health and well-being of residents and a create a more prosperous and vibrant future city.

The Strategy went well beyond the Council, it was citywide. It had been developed with expert input from the city's independent Climate Change Board and pathway groups which was made up of over 25 public, private and third sector organisations from across Coventry. The Strategy also considered feedback to public consultation undertaken last year and was guided by Coventry's Net Zero Carbon Routemap which was produced to help better understand the city's biggest sources of emissions and where it needed to prioritise action.

There was already a tremendous amount of activity happening across the city to tackle climate change which included:

- The creation of a UK-first Strategic Energy Partnership with E.ON to help decarbonise the city developing a 15 year programme which supported net zero ambitions.
- The development of Greenpower Park. With West Midlands Gigafactory as its anchor tenant, it would foster world-leading collaborations between industry, major academic institutions and stakeholders to drive the UK's ambitions in leading the transition to a cleaner, more sustainable energy future.
- The pioneering of Coventry Very Light Rail, a net zero affordable battery powered tram system which would help to reduce carbon emissions and provide a comfortable hassle-free means of travel as an alternative to the car.
- Coventry would be the UK's first Electric Bus City by 2025 and has the largest number of electric car charging points outside of London, in the UK.
- The launch of a state-of-the-art Materials Recycling Facility 'Sherbourne Resource Park', the first of its kind in the UK, to support a growing circular economy.
- Working with the Warwickshire Wildlife Trust, Severn Trent and the Environment Agency in opening up the river Sherbourne, providing benefits to nature and local communities.

Whilst good progress had been made, it needed to go much further. The Strategy provided a foundation for how the Authority would work with partners, businesses,

organisations and communities to address climate change. It recognised that the Council had a role as leader and enabler but recognised that it could not do this alone and citywide action was needed. The accompanying Climate Change Action Plan set out the key actions that Council aimed to deliver, in partnership to help meet the significant challenges and opportunities. It was noted that whilst approval was sought for the Strategy and Action Plan, individual projects would be subject to further governance and approvals in line with the Constitution.

The work of the Climate Change Board and delivery of the Strategy was underpinned by a commitment to ensure a 'just transition'. The impacts of climate change and measures taken to address it could often affect the most vulnerable communities, the Council must ensure that it used this opportunity to prioritise action to reduce inequalities in the city and improve the quality of life for all.

Cabinet considered a briefing note detailing Scrutiny Co-ordination Committee's consideration of the report (their Minute 41/24 referred), which had been circulated, setting out the areas of discussion at their meeting and their recommendation for Cabinet's consideration. The Committee recommended that Cabinet agree the recommendation in the report.

RESOLVED that Cabinet:

- 1) Approves the recommendation from Scrutiny Co-ordination Committee following their consideration of the report at their meeting on 31st October 2024.**
- 2) Recommends that Council approves the Climate Change Strategy and Action Plan.**
- 3) Recommends that Council delegates authority to the Director for Regeneration and Economic Development and the Director of Finance and Resources, following consultation with the Cabinet Member for Jobs, Regeneration and Climate Change, to make variations from time to time to the Climate Change Strategy and Action Plan.**

35. University of Warwick Campus Framework Masterplan Supplementary Planning Document (SPD) - Consultation Update and Proposed Adoption

Cabinet considered a report of the Director of City Services and Commercial, that would also be considered by Council at their meeting on 3rd December 2024, that sought approval of the adoption of the University of Warwick Campus Framework Masterplan Supplementary Planning Document (SPD), following statutory public consultation. The SPD provided a framework for guiding the level and broad location of growth on the main University of Warwick campus as well as design principles to be considered when assessing future planning applications on the campus. Appendices to the report provided the Statement of Consultation, the Schedule of Proposed Amendments, the Amended University of Warwick Campus Framework Masterplan Supplementary Planning Document (SPD), and the Equalities Impact Assessment.

The SPD provided supplementary guidance to Policy JE1 (Overall Economy and Employment Strategy) and CO1 (New or Improved Social, Community and Leisure Premises) - of the adopted Coventry Local Plan.

The SPD could only be adopted as an SPD following statutory public consultation and then subsequent formal adoption by Cabinet and Council. Following initial approval by Cabinet Member for Housing and Communities in April 2024 (their minute 16/23 referred), a public consultation was held from Friday 24th May to 5th July 2024. It was intended that the SPD was now adopted so that it could be used to help assist with decision making on planning applications.

RESOLVED that Cabinet recommends that Council:

- 1) Notes the Statement of Consultation Report attached as Appendix 1 to the report and the Schedule of Proposed Amendments attached as Appendix 2 to the report.**
- 2) Adopts the amended University of Warwick Campus Framework Masterplan Supplementary Planning Document (SPD) attached as Appendix 3 to the report.**

36. Temporary Accommodation - Lease Renewal of Caradoc Hall, Coventry

Cabinet considered a report of the Director of Adult Services and Housing, that had been considered by Scrutiny Co-ordination Committee at their meeting on 31st October 2024 and would also be considered at Council at their meeting on 3rd December 2024, that sought approval to enter into a new lease for Caradoc Hall, for use as temporary accommodation for homeless households.

A corresponding private report detailing confidential financial matters was also submitted for consideration (Minute 39 below referred).

The Housing Act 1996 (as amended) placed a statutory duty on Local Authorities to provide Temporary Accommodation (TA) to homeless households who were eligible and had a priority need.

Nationally the number of households living in temporary accommodation had increased significantly over the last 3 years and as of 31st March 2024 the Government's quarterly publications showed this was the highest recorded figure ever. Coventry had also seen an increase in demand with 1329 households living in temporary accommodation as at the 23 September 2024.

The Housing and Homelessness Service had taken steps to reduce the cost of temporary accommodation against a background of increasing demand, increasing private sector rents and the cost-of-living crisis.

The report set out the options to enter into a new lease for Caradoc Hall for 10 years. As part of the proposed lease agreement the managing agent would commit to a refurbishment of the 103 flats in line with a condition survey agreed with the Council as a well as continued improvements to the building such as replacement of the lifts. The length of the lease term reflected the current demand and included a break clause for the Council to terminate the lease arrangement after five years.

Cabinet considered a briefing note detailing Scrutiny Co-ordination Committee's consideration of the report at their meeting on 31st October 2024 (their Minutes 42/24 and 45/24 referred), which had been circulated, setting out the areas of discussion at their meeting and their recommendation for Cabinet's consideration. The Committee recommended that Cabinet agree the recommendation in the report.

RESOLVED that Cabinet:

- 1) **Approves the recommendation from Scrutiny Co-ordination Committee following their consideration of the report at their meeting on 31st October 2024.**
- 2) **Subject to the consideration of the additional confidential information contained in the corresponding private report (Minute 39 below refers), recommends that Council:**
 - a) **Approves the proposal to enter into a new lease for 103 properties within Caradoc Hall for a period of no more than 10 years for use as temporary accommodation for homeless households.**
 - b) **Approves the annual costs, as detailed in the corresponding private report, for the Caradoc Hall lease over 10 years and for this to form part of the finance revenue budget for the next ten years.**
 - c) **Delegates authority to the Director of Adults and Housing, following consultation with the Director of Finance and Corporate Services, the Director of Law and Governance, and the Cabinet Member for Communities and Housing, to undertake the necessary due diligence and agree the detailed terms of the new 10-year lease agreement of Caradoc Hall with the landlord.**
 - d) **Delegates authority to the Director of Adults and Housing, following consultation with the Director of Finance and Corporate Services, the Director of Law and Governance and the Cabinet Member for Communities and Housing, to vary the lease from time to time.**

37. **Outstanding Issues**

There were no outstanding issues.

38. **Any other items 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.

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

Further to Minute 36 above, Cabinet considered a private report of the Director of Adult Services and Housing, that had been considered by Scrutiny Co-ordination Committee at their meeting on 31st October 2024 and would also be considered by Council at their meeting on 3rd December 2024, which set out the commercially

confidential matters relating to proposals to enter into a new lease for Caradoc Hall, for use as temporary accommodation.

RESOLVED that further to Minute 36 above relating to the public aspects of this report Cabinet:

- 1) Approves the recommendation from Scrutiny Co-ordination Committee following their consideration of the report at their meeting on 31st October 2024.
 - 2) Recommends that Council:
 - e) Approves the proposal to enter into a new lease for 103 properties within Caradoc Hall for a period of no more than 10 years for use as temporary accommodation for homeless households.
 - f) Approve the annual costs of the Caradoc Hall lease in the sum now indicated each year for 10 years and for this to form part of the finance revenue budget for the next ten years.
 - c) Delegates authority to the Director of Adults and Housing, following consultation with the Director of Finance and Corporate Services, the Director of Law and Governance, and the Cabinet Member for Communities and Housing, to undertake the necessary due diligence and agree the detailed terms of the new 10-year lease agreement of Caradoc Hall with the landlord.
 - d) Delegates authority to the Director of Adults and Housing, following consultation with the Director of Finance and Corporate Services, the Director of Law and Governance, and the Cabinet Member for Communities and Housing, to vary the lease from time to time.
40. 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 2.45 pm)

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Public report
Cabinet

Cabinet
Council

10th December 2024
14th January 2025

Name of Cabinet Member:
Cabinet Member for City Services

Director approving submission of the report:
Director of Innovation

Ward(s) affected:
All

Title:
PFI Street Lighting LED Upgrade

Is this a key decision?

Yes - the report relates to an issue which impacts all 18 electoral wards and Council expenditure is greater than £10m.

Executive summary:

This report seeks approval from Cabinet and Council to approve investment of £10.28m to progress with the upgrade of the majority of the city's streetlights (29,500) to LEDs.

In 2023/24 the Authority spent £3.4m on energy for streetlights; based on 38p kwh. We have an opportunity to reduce revenue costs by investing in energy efficient LED street lighting technology, which use approximately 50% less energy than our current lights. LEDs also have a much lower maintenance requirement. Overall, this will result in savings of over £900k based on current consumption which will more than cover the borrowing cost as well as delivering all the other benefits. The lower energy consumption will result in a reduction of our carbon emissions by 1200 tonnes per annum.

LEDs will provide resilience to changes in energy prices which can be impacted by world affairs. LED lighting will provide the City Council with the opportunity to dim the lights to as low as 30% whilst still providing the same quality of our current lighting at 50% dim. This will enable a review of the part night switch off policy and to potentially generate additional savings.

The LED upgrade also offers the opportunity to help make Coventry a 'Smart City' by incorporating smart sensor ports in 1 in 5 of the new lanterns. This will offer opportunity to easily collect environmental data (air quality, noise, or traffic flows for example) across the whole city.

Recommendations:

Cabinet is recommended to request that Council:

- 1) Approves capital expenditure of up to £10.28m to be financed from borrowing, to fund the LED upgrade of up to 29,500 streetlights with up to 1 in 5 having smart sensor ports.
- 2) Delegates authority to the Director of Innovation and the Director of Law and Governance and the Director of Finance and Resources, following consultation with the Cabinet Member for City Services, to enter into and finalise the financial and legal terms necessary to implement the LED upgrade via the appropriate mechanism contained within the PFI Streetlighting Agreement.

Council is requested to:

- 1) Approve capital expenditure of a maximum of up to £10.28m to be financed from borrowing, to fund the LED upgrade of up to 29,500 streetlights with up to 1 in 5 having smart sensor ports.
- 2) Delegate authority to the Director of Innovation, Director of City Services & Commercial and the Director of Law and Governance and the Director of Finance and Resources, following consultation with the Cabinet Member for City Services, to enter into and finalise the financial and legal terms necessary to implement the LED upgrade via the appropriate mechanism contained within the PFI Streetlighting Agreement.

List of Appendices included:

Appendix 1 – Equality Impact Assessment Form

Background papers:

None

Other useful documents

None

Has it or will it be considered by Scrutiny?

No – however the matter will be considered by the Communities and Neighbourhoods Scrutiny Board (4) on 30th January 2025

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

Leadership Board: 09 July 2024
Member Briefing: 25 July 2024
Political Cabinet: 07 October 2024
Labour Group: 21 October 2024

Will this report go to Council?

Yes - 14th January 2025

Report title: PFI Street Lighting LED Upgrade

1. Context (or background)

- 1.1 In 2010 the Authority entered into a 25-year Street Lighting PFI (Private Finance Initiative) to upgrade and manage 38,000 illuminated assets which included 32,000 streetlights. At the time of award, LEDs were considered, but due to the infancy in technology, high unit costs and quality of the light output, it was not seen as a viable option at the time. In the last 14 years the technology used in LEDs has evolved with the Light Emitting Diodes becoming cheaper, more efficient in energy usage and there is now the ability to choose a warmer colour temperature more suitable for residential environments.
- 1.2 Over recent years, global uncertainty has resulted in energy prices more than doubling from 15p/kWh in 2019 to a peak of 38p/kWh in 2023. In order to combat the increasing energy costs, the Authority has had to take tough decisions to keep costs under control by dimming the lights in most streets from switch on and then part night switch off from midnight to 5.30am. The Authority is also facing financial pressure from reduced funding but a demand on its services. This, coupled with the improved efficiency and reduced costs of LEDs, has made the business case for converting the city's street lighting to LED much more compelling. A further consideration is that the manufacture of non-LED lanterns is being discontinued meaning that conversion to LED will be inevitable by the end of the PFI.
- 1.3 LED lanterns have a life that is four times as long as our current street lights. This will result in a maintenance saving of £1.7m during the remainder of the PFI contract. Our PFI provider, Balfour Beatty, has offered the City Council the opportunity to have this saving up front which would enable us to reduce our borrowing requirement by £1.7m (down to £8.52m)
- 1.4 The cost of borrowing for the LED upgrade will be covered by the energy savings made from the reduction in energy used by the LED lanterns with a payback predicted in approximately 10 years; based on an average energy price of 26p/kWh. Overall, this will result in savings of over £908k based on current consumption which will more than cover the borrowing cost and provide a surplus of £18.7k. Refer to table 3.
- 1.5 Another big advantage of LEDs is that they can be dimmed to 30% whilst still offering a light level equivalent to our current lanterns operating at 50%. This offers much greater flexibility in terms of lighting options, meaning the part night light switch off policy can be reviewed. For example, we could explore the savings delivered by dimming the lights to 30% from 10pm and then to leave them at that level for the remainder of the night. Equally additional savings could be derived by dimming to 30% before 10pm. It should be noted that Derby City Council have converted to LEDs and dim to 30% from 11pm every evening.
- 1.6 210 Councils across the UK are in the process of converting streetlights to LED with an annual spend of approximately £1.07 billion nationally. We have not needed to consider upgrading to LED until now due to the advanced lighting technology installed in 2010 which allowed us to control and dim street lights to 55% remotely. As explained in 1.1 the business case for conversion has only recently become positive.

- 1.7 In developing the business case, alternative lighting options have been considered including solar and solar hybrid LED lanterns. These have been discounted for a number of reasons, including cost (more detail is provided in section 2 – options considered).
- 1.8 A successful LED trial has been implemented in the Hillfields area which has received positive feedback from residents and ward councillors. All new street lighting installations are LED in line with our Street Lighting Development Specification document.
- 1.9 The PFI partnership has been very successful and has reduced our energy & CO2 consumption by 73,599,228 kwh, 60,2898 tonnes and a mitigated saving of £14,747,435 to date. The improved efficiency of the LEDs will further reduce annual carbon emissions by 1200 tonnes, furthering the ambition to become a net zero city.
- 1.10 There are additional environmental benefits too. The life of an LED lamp is 4 times that of a conventional lamp. This reduces the use of raw materials including approximately 2.5 tonnes of various materials such as porcelain, Nickel, Aluminium, Stainless Steel, Copper, Non-Ferrous Alloys and plastics. We are working with Warwick Manufacturing Group (WMG) to explore opportunities for recycling the old 29,500 lanterns which will stop parts being sent to landfill. WMG estimate that there are around 125 tonnes of aluminium alone that can be recovered.
- 1.11 There will also be benefits for wildlife. Installing LEDs with a warm colour temperature (3000 kelvin) and the ability to dim means they also have less of an impact on wildlife at night. Blue light impacts wildlife, but the 3000kelvin colour temperature is on the lower scale of the blue light spectrum. Excessive light can disrupt the natural cycle of invertebrates who pupate in the first inch of the topsoil, causing their early emergence. This has a knock-on effect up the food chain and the predation cycles in small mammals such as bats. In addition, shields can be fitted to all LED lanterns to combat any unwanted light impacting wildlife or residents.
- 1.12 As part of the LED upgrade it is proposed to incorporate sensor ports in 1 in 5 streetlights as a major step forward towards making Coventry a 'Smart City'. This would enable a variety of sensors to be easily plugged in, thus reducing the current installation costs (drilling lighting columns will no longer be required). These sensors can collect a wide variety of data such as traffic flows, air quality and noise. The sensors can also be interchanged between locations allowing the Authority to collect data where it is required. The use of multi-sensors collects multiple data sets from one location, using one sensor. This removes the need for individual sensor per application, thus saving on further installation cost. Other innovations include the use of lighting columns to accommodate Electric Vehicle charge points in association with 'Charge Gully', so that there are no charging cables running across pavements (as most lighting columns are located at the back of the pavement).

2. Options considered and recommended proposal

- 2.1 Do Nothing: This option is not preferred as ultimately the current streetlights will become redundant and the Council will be faced with having to replace all of them at the end of the PFI contract at the latest. Not proceeding with the upgrade would also forgo the opportunity to reduce carbon emissions and to achieve the greater flexibility

LEDs offer, including the opportunity to explore other part night lighting options that could deliver more savings for the Council, whilst also offering better quality lighting.

- 2.2 Alternative Technologies: Solar and Solar Hybrid LED lanterns have been considered, but the costs of the lanterns and associated additional materials makes this option too costly (Approximately £1400 additional per unit). Furthermore, the extra weight of the equipment could mean many existing lighting columns, which still have a 25-year lifespan, are having to be replaced. Solar energy can only be used for a maximum of eight months of the year and does not provide enough energy to power streetlights all night long, except potentially the shorter summer nights. To operate for the longer nights there would not be enough stored energy and would have to revert to using energy from the Grid. We would also need to reconsider the location of some of the streetlights, as solar power requires streetlights to be positioned in places to get as much light as possible to be effective. This would also mean increased costs.
- 2.3 LED upgrade: this option is recommended as it will lengthen the life of the City's streetlighting assets to 2050 and deliver further financial and carbon savings, including the opportunity to review the part night switch off policy by exploring the ability to dim to 30%. The Authority's energy usage before part night is 8,460,570kwh, energy saving from part night is estimated at 2,058,808kwh. However, a projected 4,899,785 kwh reduction in energy usage can be realised from converting to LED and operating in line with the current policy. The improved efficiency of the LEDs will further reduce annual carbon emissions by 1200 tonnes. In addition to energy saving, LED lanterns allow for the integration of sensor ports. It will provide an infrastructure to install sensors on almost every street in the city, thereby moving the Authority closer to becoming a "Smart City". This will enable the Authority to explore other innovation now being used with street lighting.

3. Results of consultation undertaken

There has been no consultation.

4. Timetable for implementing this decision

Cabinet Approval	December 2024
Design Work	January to April 2025
Legal Framework Agreement	February to July 2025
Finalise Commercial Agreement	April to July 2025
Council Sign & Seal	July 2025
Material Order	July to November 2025
Installation	November 2025 to November 2027

Timeline is subject to approval. There may be options to accelerate the programme that can be discussed with the PFI provider.

5. Comments from the Director of Finance and Resources and the Director of Law and Governance

5.1. Financial Implications

The following assumptions have been built into the revenue calculation:

Table1: Assumptions

	Assumption	Comments
2023/24 KWH usage (pre part night)	8,460,570	Data taken from 2024/25 bills
KWH saved – part night only	2,058,808	Estimated reduction in energy usage from implementation of part night (as 2024/25 budget setting). Assumes no LED investment
KWH saved from LED + part night	4,899,785	Total estimated reduction in energy usage from investment in LED <u>and</u> implementation of part night
£ per kwh	£0.26	Current price is £0.22. £0.34 was assumed in calculating the existing £0.7m target and allows us to compare the LED proposal to Part night switch off only and reduce the risk of overstating the additional saving in comparison to the do minimum.
Part night	2/3	Switching off two in every three streetlights
Lighting level	63%	Current lighting level is 63% brightness (Flexibility to dim further to 30%)
Interest rate	5.5%	Based on current interest rate

5.1.1 Capital impact

It is estimated that the LED project would require a total capital cost of £10.28m, which is the cost of converting 29,500 streetlights to LED, installing sensors on 1 in 5 streetlights and legal cost for updating existing contract with our PFI provider. The project is expected to be financed from borrowing at 5.5% over 20 years. See Table 2 below for full breakdown of capital cost.

Table2: Capital expenditure

Capital Expenditure	Cost £'000
LED Conversion	9,886.5
Design Cost	63.1
	145.7
Extended Warranty	
Smart City	84.6
	100.0
Legal Cost	

Total borrowing requirement	10,279.9
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5.1.2 Revenue impact

The Council's energy budget for Streetlighting has an existing saving target of £0.7m as a result of the decision made to implement the part night switch off. If energy prices reduce, this saving will be met from a combination of price reduction and reduction in kwh used from the part night switch off. The table below intends to show the additional saving per annum that could be generated if the decision is made to invest in LED streetlights in comparison to existing scenario where streetlights are on Part Night switch off only.

Table3: Revenue impact

Revenue implications	<u>Option A</u>	<u>Option B</u>
	Do minimum - part night only (Current scenario) £'000	LED investment + part night (Recommended option) £'000
Cost of energy (26p per kwh)	2,199.7	2,199.7
Energy saving from Part Night	-535.3	-535.3
Additional energy saving from LED replacement	0.0	-738.7
Maintenance saving	0.0	-170.0
Energy cost of option	1,664.4	755.7
Repayment cost (20 years at 5.5%)	0.0	889.9
Total cost of option	1,664.4	1,645.6
Total saving at revised unit cost of energy	-535.3	-554.0
Additional saving compared to Part night only		18.7

Based on the options presented in Table 3, and the assumptions set out in Table 1, the LED project is expected to deliver an additional saving to the Council of £0.02m per annum when combined with the part night switch off.

5.1.3 Comments on energy price assumptions

The business case for LED investment is heavily reliant on energy price, which has been very volatile in recent years. Energy price per KWH has risen by 153% between 2019 (£0.15) and 2023 (£0.38). Although unit price per KWH is beginning to come down,

it is still very unpredictable. A reduction in energy price would provide the Authority with an increased inflationary saving but lower additional saving for LED investment when compared with the “do minimum” option. If energy price falls (and stays) below £0.26p, the Council will be better off financially with the “do minimum” option.

Conversely, an increase in energy price would create an inflationary pressure for the Council to manage, and investing in LED streetlights would serve as a buffer against such future inflationary pressure.

5.1.4 Other options

There could be an option for the Council to take the maintenance saving upfront. The terms of this option will be reviewed along with the benefit, to determine its suitability.

5.2. Legal Implications

The implementation of the LED upgrade will be contractually agreed via the appropriate mechanism contained within the PFI Streetlighting Agreement with the Council’s legal services providing the necessary oversight and input.

6. Other implications

6.1. How will this contribute to the One Coventry Plan?

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

The LED proposal contributes to the Plan’s Vision - **Working together to improve our city and the lives of those who live, work and study here**”:

Tackling the causes and consequences of climate change

By consuming less electricity to produce the same or even better lighting output, LED lights directly contribute to lowering the carbon footprint of urban areas.

Other than the straight energy and carbon saving from energy production, environmental benefits such as reduction in light pollution and saved raw materials can also be realised.

Carbon can also be saved in not producing and recycling lamps. The use of approximately 2.5 tonnes of various materials such as porcelain, Nickel, Aluminium, Stainless Steel, Copper, Non-Ferrous Alloys and plastics, can all be avoided.

Continued financial sustainability of the Council

In addition to the energy cost saving, the conversion would also lead to operations and maintenance (O&M) cost saving as LED luminaires last at least four times longer than traditional bulbs, thereby requiring less frequent replacement. The Authority has the option to take the maintenance savings upfront or on a monthly/annual basis. This can help ease the Authority’s financial burden.

The efficient modern technology of LED Lanterns and energy efficient lamps will reduce the burden of the electricity bill.

The reduced energy consumption provides an element of resilience to future energy price increases.

Council's role as a partner, enabler and leader

LED street lighting enables the Authority to demonstrate we are leading and co-ordinating Coventry's response on how the city tackles challenges and opportunities associated with climate change and working with partner organisations to improve the quality of the lives of local residents.

6.2. How is risk being managed?

6.2.1 There are no risks associated to the lighting with the LED upgrade; it actually provides the Authority with a better-quality inventory when the PFI comes to an end and options to review the current street lighting policy. The lighting will still be managed and maintained by our PFI street lighting team until the end of the contract.

6.2.2 The risk of delivering the project on time sits with Balfour Beatty as long as the Authority signs off in line with the timescales provided.

6.2.3 There is a risk that energy prices could fall below a level that makes the LED investment not financially viable when compared to the "do minimum" scenario. However, the long-term nature of the investment gives it the ability to ride out market fluctuations.

6.3. What is the impact on the organisation?

There will be no Impact on staffing / human resources, information and communications technology, accommodation, assets, or the council's corporate parenting responsibilities. The management & implementation will be handled by our PFI street lighting partner.

6.4. Equalities / EIA?

An equality impact assessment has been undertaken to inform this decision; the introduction of LED lighting will have a positive impact on all groups in society by providing better lighting.

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

The calculated annual reduction in CO₂ emissions is 1200 tonnes with approximately 13,200 tonnes of carbon to be eliminated over the remainder of the PFI project. LEDs allow a reduction in wasted light or cutting out nuisance light into properties and into green spaces such as hedgerows therefore not disrupting the natural cycle of invertebrates who pupate in the first inch of the topsoil, causing their early emergence. Carbon can also be saved in not producing and recycling lamps. The use of approximately 2.5 tonnes of various materials such as porcelain, Nickel, Aluminium, Stainless Steel, Copper, Non-Ferrous Alloys and plastics, can all be avoided.

6.6 Implications for partner organisations?

The LED upgrade will provide all stakeholders with a better quality of street lighting.

Report author:

Ravinder Sekhon
Principal Officer Street Lighting & Support Services

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City Services and Commercial
Innovation

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Andrew Walster	Director of City Services and Commercial	-	27.11.24	27.11.24
Councillor P Hetheron	Cabinet Member for City Services	-	15.11.24	15.11.24

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

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BUDGET SETTING 2024-25 EQUALITY IMPACT ASSESSMENT

Title of EIA		PFI Street Lighting LED Upgrade
EIA Author	Name	Ravinder Sekhon
	Position	Principal Officer
	Date of completion	14.11.2024
Head of Service	Name	Mark Adams
	Position	Strategic Lead for Highway Operations & Delivery
Cabinet Member	Name	Councillor Patricia Hetherton
	Portfolio	City Services

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*)

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

This EIA examines the upgrading 29,500 of the PFI Street Lights to LED lighting

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

BUDGET SETTING 2024-25 EQUALITY IMPACT ASSESSMENT (EIA)

2.1 Baseline data and information

Upgrading 29,500 street lights to energy efficient LED lighting will reduce the energy consumption by approximately 50%. The reduction in energy consumption will cover the cost of the upgrade over a 20 year period with additional savings.

A LED trial has been undertaken in the Hillfields area which has been successful with no issues raised

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)
- Unknown impact (UI)

**Any impact on the Council workforce should be included under question 5.0 – not below*

Protected Characteristic	Impact type P, N, PN, NI	Nature of impact and any mitigations required
Age 0-18	P	Lighting will operate as previously but with better quality energy efficient LED Lights therefore allows for better quality of lighting
Age 19-64	P	Lighting will operate as previously but with better quality energy efficient LED Lights therefore allows for better quality of lighting
Age 65+	P	Lighting will operate as previously but with better quality energy efficient LED Lights therefore allows for better quality of lighting
Disability	P	Lighting will operate as previously but with better quality energy efficient LED Lights therefore allows for better quality of lighting
Gender reassignment	P	Lighting will operate as previously but with better quality energy efficient LED Lights therefore allows for better quality of lighting
Marriage and Civil Partnership	P	Lighting will operate as previously but with better quality energy efficient LED Lights therefore allows for better quality of lighting
Pregnancy and maternity	P	Lighting will operate as previously but with better quality energy efficient LED Lights therefore allows for better quality of lighting
Race (Including: colour, nationality, citizenship ethnic or national origins)	P	Lighting will operate as previously but with better quality energy efficient LED Lights therefore allows for better better quality of lighting
Religion and belief	P	Lighting will operate as previously but with better quality energy efficient LED Lights therefore allows for better quality of lighting
Sex	P	Lighting will operate as previously but with better quality energy efficient LED Lights therefore allows for better quality of lighting

BUDGET SETTING 2024-25 EQUALITY IMPACT ASSESSMENT (EIA)

Sexual orientation	P	Lighting will operate as previously but with better quality energy efficient LED Lights therefore allows for better quality of lighting
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2.3 Will there be any potential impacts in relation to health and/or digital inequalities?

Lighting will operate as previously but with better quality energy efficient LED Lights therefore allows for better quality of lighting.

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

No

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

Annual Customer Satisfaction survey and through number of enquiries raised by residents

5.0	Action Planning	
Issue Identified	Planned Action	Timeframe
n/a		

6.0 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

7.0 Approval

Signed: Head of Service: Mark Adams	Date: 15.11.24
Name of Director: Colin Knight	Date sent to Director: 14.11.24
Name of Lead Elected Member: Councillor Patricia Hetherton	Date sent to Councillor: 14.11.24

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Cabinet

10th December 2024

Name of Cabinet Member:

Cabinet Member for Strategic Finance and Resources - Councillor R Brown

Director Approving Submission of the report:

Director of Finance and Resources (Section 151 Officer)

Ward(s) affected:

City wide

Title:

Pre-Budget Report 2025/26

Is this a key decision?

Yes - Cabinet is being recommended to approve, as a basis for consultation, the spending and savings and Council Tax proposals for 2025/26 and future financial years

Executive Summary:

This report outlines as a basis for consultation a set of new revenue budget proposals for 2025/26 to 2027/28, which represent changes to the Council's existing Budget. Consultation views are also sought on the potential level of Council Tax and Adult Social Care Precept increases for 2025/26. The final Budget proposals and the Council Tax and Adult Social Care Precept increases will be subject to Council approval in February 2025.

The ambition to deliver the Council's overall future strategy continues to be the focus of the Pre-Budget proposals. The strategy is contained within the "One Coventry Plan" which sets out key priorities including: improving the economic prosperity of the city and region; improving outcomes and tackling inequalities within communities; and tackling the causes and consequences of climate change. Implicit within the plan is the Council's commitment to delivering a range of core services to everyone in the city. The Council has sought stakeholder views on these priorities ahead of this pre-budget report, in order to inform the budget consultation process.

The Council's financial plans are heavily dependent on both the allocation of Government grant resources and Government decisions which dictate councils' tax-based income

streams. It continues to be the case that it is difficult to anticipate the final decisions that the Government will make on these matters and as a result, a number of key elements of the Council's financial plans are subject to some uncertainty with a degree of risk that the position presented in this report could be subject to change once the details of the local government financial settlement are published. The Provisional Local Government Settlement for 2025/26 is again expected to be published in late December, which continues to be a very late point in the financial planning cycle. Once received, it will provide a stronger indication of the likely position.

The Chancellor of the Exchequer set out the Government's Autumn Statement on 30th October 2024. The Statement provided a one-year Department Expenditure Limit position for the Ministry of Housing, Communities and Local Government (MHCLG). The Chancellor's statement recognised the need for additional funding in Local Government and also indicated that ahead of more holistic funding reform from 2026/27, the settlement for next year will start to reflect 'need' to a greater degree than current allocations. The Chancellor committed £1.3 billion of additional funding for Local Government nationally, of which at least £600m will be targeted towards Adult Social Care. Whilst some initial assumptions have been made of the financial benefit for Coventry to inform this report, the Council will need to assess the provisional local government finance settlement expected late December 2024 to confirm the position.

The £1.3bn allocation is contributing to a Local Government Core Spending Power (CSP) real terms increase (announced in the Autumn Statement) of 3.2% nationally, which also assumes that all Local Authorities will increase the Adult Social Care Precept by 2% and raise their Council Tax by 3% (the maximum permitted without a referendum). As a result, this report recommends that the Council should consult on the basis of increasing Council Tax on this basis, an overall combined rise of 5%.

The financial gap identified in this report requires considerable service savings or additional income proposals to address it, some of which will affect services to the public. This report includes proposals on which to consult, which collectively could form the basis of a balanced budget in 2025/26, albeit with financial gaps in future years. The outcome of the final Local Government Settlement will determine the extent of the options required to deliver a balanced budget. The Council is keen to avoid the need to reduce vital services and will seek to explore all possible avenues to do this, however there is currently a strong expectation that some difficult decisions will need to be included as part of the final budget proposals.

A Medium-Term Financial Strategy is intended to be presented alongside the final Budget Report in February 2025. This will include the current financial context facing the Council in relation to a continued impact of the previous high inflation environment and difficult market conditions faced within both adults and children's social care, and pressures on temporary accommodation costs to meet our statutory duties in relation to preventing homelessness. It may not at the point of reporting, however, reflect the Government's stated intentions to reform Local Government finances which is expected could impact subsequent years.

The proposals in this report are made as a basis for public consultation and the results of the consultation will be reflected in the final Budget Report in February and considered as part of the final decisions recommended in that report. Further work will be undertaken to

confirm all the financial assumptions included, between now and the final Budget Report in February.

An outline of the resources and the spending and savings proposals are summarised in Section 2, within Table 1 of the report and detailed on a line-by-line basis in Appendix 1 to the report. The financial proposals assume that the Council will approve an increase in Council Tax and Adult Social Care Precept by the maximum allowed.

Appendix 2 to the report contains details of proposed changes to the Council Tax Support Scheme. This report requests approval to conduct a public consultation on the proposed Council Tax scheme. The budgetary challenges faced by the Council for 2025/26 require the Council to review all areas of discretionary expenditure and potentially the option to reduce the amount of support provided through the CTS Scheme for working age households.

This report also includes an indicative outline of the Council's prospective Capital Programme for 2025/26 based on current knowledge. This will be updated in the February Budget Report, reflecting the most up to date programme information available. The draft programme is based overwhelmingly on pre-existing decisions and patterns of expenditure.

Recommendations:

The Cabinet is requested to:

- 1) Approve as a basis of consultation: the revenue spending and savings options set out in Appendix 1 of the report and the broad Capital Programme proposals in Sections 2.8 to 2.10 of the report.
- 2) Approve as a basis of consultation: the approach in relation to Council Tax and the Adult Social Care Precept in Section 1.10 of the report, including a Council Tax rise of just under 3% and an Adult Social Care Precept of 2%.
- 3) Agree a seven-week public consultation on the 2025/26 budget proposals set out in this report to commence on 11th December 2024 and conclude on 28th January 2025. This includes consultation with residents, partners and business.
- 4) Approve as a basis of consultation the draft council tax support scheme based on the preferred option detailed in Appendix 2 to the report in accordance with The Local Government Finance Act 1992 (as substituted by the 2012 Act).

List of Appendices included:

- Appendix 1 – Pre-Budget Proposals and Financial Position
- Appendix 2 – Consultation on proposed changes to the Council Tax Support Scheme
- Appendix 3 – Cumulative Equality Impact Assessment
- Appendix 4 – EIA Council Tax Support Scheme

Background papers:

None

Other useful documents

None

Has it been or will it be considered by Scrutiny?

No

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

No

Will this report go to Council?

No. The final budget proposals will be considered by Council following the consultation period.

Report title: Pre-Budget Report 2025/26

1. Context (or background)

- 1.1 Proposals for the Council's 2025/26 Budget are set out in this report. The Government's Autumn Budget Statement made on 30th October 2024 announced an additional £1.3billion for Local Government (including at least £600m for social care) as part of a real terms increase in funding package of 3.2%.
- 1.2 Announced increases in NI contributions are expected to be cost neutral to Local Government, but it should be noted that the cost of commissioned services such as adult and children social care could be affected such that providers look to pass cost through to Local Authorities. At the time of writing the Council is still awaiting the 2025/26 Provisional Local Government Finance Settlement which will confirm the funding envelope within which the Council will need to operate next year, subject to decisions around Council Tax levels.
- 1.3 The Provisional Settlement should be received in the week beginning 16th December followed by a final settlement announcement in late January 2025. The starting point of the 2025/26 Budget process, following setting of the 2024/25 Budget was an initial financial gap for 2025/26 of £14m, rising to c£15m the following year. These figures were based on broad assumptions about future income and expenditure projections.
- 1.4 In the period since February 2024, work has been undertaken to update the assumptions that underpin this position with the underlying objective of meeting the immediate budget gap and to address the medium-term financial position. Changes to these initial assumptions are included within Appendix 1 to the report, including the increase in general inflationary pressures.
- 1.5 Prior to setting the final Budget in February, the Council will be required by law to establish the Council Tax and Business Rates tax-bases for 2025/26 and declare projected deficits or surpluses from previous years. Initial estimates of these tax-bases have been included in the financial projections within this report although it is expected that these will be refined in the final Budget Report.
- 1.6 Fundamental to the Council's overall financial approach is its commitment to protect the most vulnerable citizens and to deliver a range of core services to everyone in the city. This has become increasingly difficult in recent years as a result of lower real term resources which do not reflect rises in demand or demographics. Coventry, as a growing and relatively deprived City has been disadvantaged by the current system which does not reflect need and has a 'lower core spending power' than the national average of £78 per person, or £28m per year.
- 1.7 In addition, rising prices and their impact on the cost of living over the past few years has continued to place constraints and pressure on some aspects of Council services meaning that a significant challenge remains to balance the Budget.

- 1.8 The financial position presented in this report includes an assessment of the impact of the recent Autumn statement and the local impacts expected in the forthcoming Government settlement; anticipated additional costs from inflation, activity and demand pressures within some services; and a range of service and technical savings to help balance the bottom-line position. All the changes to the previously approved Budget position are set out in Appendix 1 to the report. The service savings being consulted on as part of this report include ones which could have an impact on front-line services.
- 1.9 The range of resource assumptions is informed to a degree by the 2024 Autumn Statement. These remain planning estimates only and are subject to confirmation by Government. The descriptions set out in Appendix 1 to the report give an indication of the implications of each proposal.
- 1.10 This report proposes that the budget consultation is carried out on the basis that the Council will increase Council Tax levels by just under 5%, the figure which the Council understands will be the maximum amount allowable without triggering a referendum. This is made up of a 2% Adult Social Care Precept and an increase of 3% for other expenditure. It is possible that increases in the Police and Fire precepts could result in a total Council Tax rise above 5%. The financial position in Section 2, Table 1 of the report, assumes that these increases will be approved.

2. Options considered and recommended proposal

- 2.1 The remainder of the report details the financial position facing the Council and the specific proposals put forward for consultation. These proposals are expanded further within Appendix 1 to the report.

Revenue

- 2.2 After taking account of all Council approved decisions, the Council started the 2025/26 Budget process with a shortfall of £14m rising in subsequent years. Overall resources include the Government settlement, amounts in relation to Council Tax and Business Rates and several specific grants that the Government includes within its definition of Core Spending Power. Movements in this category include the following:
- The Autumn Statement gives an indication of some additional resources for local government, although the precise detail will not be known until publication of the Local Government Provisional Settlement. The changes listed in Appendix 1 to the report make some assumptions consistent with previous announcements on local government funding. These are planning assumptions which will be confirmed or amended when the Settlement is released.
 - Additional resources from the proposed combined increase in Council Tax and Adult Social Care precept to 5% from the previously estimated 2%.
 - The Government have confirmed their intention to continue with some business rates reliefs for retail, hospitality and leisure sectors. Local Authorities continue to be fully compensated for any loss of business rates

income as a result of this relief and is therefore cost neutral to the City Council. Small property business rate relief was also announced and will take effect from 26/27.

- It is not clear whether the New Homes Bonus will continue into 2025/26, and if so, in what form or allocation basis. In 2024/25 the City Council received over £4m from the distribution of the New Homes Bonus due to its success in delivery of eligible housing numbers. If the existing basis is rolled forward for 2025/26, it is not anticipated that the Council will receive any, which could reduce our core spending power allocation by c1%, to around 2.1%.

2.3 New resources were announced in the Autumn Statement that indicate an additional £1.1bn of resources for waste disposal authorities nationally, in relation to the 'Extender Producer Responsibility' (EPR) scheme. This is effectively transferring the liability of disposal costs to the manufacturers (producers) of waste to incentivise waste reduction. These costs are already factored into the Councils baseline position, so compensation through the EPR scheme will result in a saving. No detail has been announced on the funding allocation basis; however, the benefit is expected to be significant for the Council.

2.4 A number of expenditure and income pressures have created a revised budget gap over this period. The most significant of these individual pressures are outlined below:

- Although prevailing rates appear now to be returning to more sustainable levels, the Council has faced the impact of continued high inflation in the last 2-3 years, the legacy impacts of which are still impacting both pay and non-pay related costs. It also includes the effect of inflation on a range of its externally procured costs and services.
- Children's Services has seen a significant increase in the average unit cost of placements for looked after children, due to a lack of sufficiency in the market to meet the needs of young people in care and is a local, regional and national issue.
- Adults Social Care has experienced significant increases in expenditure due to growth in the number of care packages across most areas as well as increased complexity. These costs are also directly affected by changes to employers NI contributions and the increase in the National Living Wage.
- The Council is still experiencing growing pressure within Housing Services due to continued significant increases in the number of households requiring temporary accommodation.

2.5 There are technical service savings, the most financially significant ones of which are as follows:

- The Council is forecasting that it will receive a further £2m of revenue generated through the Coventry and Warwickshire Business Rates Pool which is expected to continue for at least one further year.

- Part of the Capital Programme is funded from a revenue budget. There are proposals for some of the funding to come from capital receipts to deliver a one-off revenue saving of £2m.
- Management actions of £3.1m have been identified which will not have any material impact on the front-line services provided by the Council

- 2.6 The items on which this consultation is based provides an opportunity to set a balanced budget in 2025/26 pending confirmation of the Government Settlement and refinement of key technical areas of the Council's budget such as the Council Tax and Business Rates Collection Fund, and estimates of inflationary and other expenditure pressures.
- 2.7 Assuming these estimates are accurate, the items being consulted on would bridge the £10.8m net gap and provide a degree of flexibility for members on the decisions required for the final budget setting in February 2025, as shown below:

Table 1: Financial Position 2025/26 to 2027/28

	2025/26 £000	2026/27 £000	2027/28 £000
Initial Budget Gap	14,310	14,761	14,761
Resources	(23,101)	(21,101)	(21,101)
Expenditure and Income Pressures	19,618	24,387	27,162
Subtotal: Adjusted Budget Gap	10,827	18,047	20,822
Options / Actions to Balance Budget			
Technical Savings	(5,100)	(3,100)	(3,100)
Service Savings	(8,827)	(12,383)	(12,383)
Budget Gap/(Flexibility)	(3,100)	2,564	5,339

Capital

- 2.8 The Council has a draft 5-year capital programme which totals nearly £314 million based on approved decisions and expected resource allocations. Of this, nearly £149m is currently cash-flowed for 2025/26 taking into account an updated position for 2024/25.
- 2.9 The main components of the Council's provisional programme are set out below with the figures quoted representing the projected sums earmarked currently for 2025/26. The five-year programme and an updated cash-flow position will be included in February's final Budget Report. The Programme includes:

- Continued delivery of the Very Light Rail City Centre Demonstrator route within Coventry, which has been allocated £26.6m from the City Region Sustainable Transport Settlement (CRSTS) programme.
- A strategic transportation programme in excess of £21.8m incorporating the CRSTS programme, to deliver Tile Hill Station Park and Ride improvement scheme, Foleshill Transport Package and Coventry South Sustainable Transport Package.
- The latest Local Authority Housing Fund 3 award will continue the delivery of providing high-quality temporary accommodation for homeless families.
- City Centre Regeneration investment in excess of £20m continuing to take forward City Centre South plans.
- Continued investment in the school's capital works including provision for the expansion of secondary places under their One Strategic Plan, to include the new SEND school proposal at Woodlands.
- Continued investment in Adult and Children's Social Care in the form of Disabled Facilities and Pathways to Care, along with the programme of vehicle replacement and ICT.

2.10 The draft programme will be subject to change between now and February with an expectation that some of the proposed expenditure may be shifted to later years. It is also important to be aware that some of the schemes involve a complex mix of funding sources, multi-partner delivery arrangements and challenging planning, technical and approval requirements that do not always lend themselves to smooth project delivery progress. In overall terms, given the large amount of externally funded and driven proposals within the Council's Capital Programme, it is very likely that a fair degree of flux will continue to be experienced in its cash-flow over the next few years.

3. Results of consultation undertaken

3.1 The proposals in the report are subject to statutory consultation requirements. The Council will communicate the report's key messages through usual consultation channels including social and digital media.

4. Timetable for implementing this decision

4.1 This report includes a set of draft budget proposals and does not authorise spending and savings decisions. Following a seven-week public consultation period, full Council will consider the final budget proposals in February 2025 to be implemented from 1st April 2025. An indicative profile is set out in Appendix 1 to the report.

5. Comments from the Director of Finance and Resources (Section 151 Officer) and the Director of Law & Governance

5.1 Financial implications

Following the overarching position set out in the Autumn Statement 2024, the Council's financial circumstances for 2025/26 and beyond will be clarified by the fine detail that will be set out in the forthcoming Provisional Settlement later in December

2024. In order to provide a planning base, this Pre-Budget Report includes assumptions drawn from the Autumn Statement although this contains some degree of uncertainty.

Over recent years a large number of local authorities have reported significant financial difficulties due to a combination of pressure from their underlying financial position, the impact of high inflation levels, significant increases in social care costs and, in a few extreme cases, challenges caused by a failure of commercial ventures. Although Coventry has continued to maintain a relatively stable financial position through this period, a number of significant service pressures continue to create a strain within the City Councils limited resources. Without continued strong action this position could threaten the future financial stability of the Council.

A range of sound financial management practices have continued to be undertaken including: implementing medium-term planning which is not reliant on reserve contributions; making budgeting decisions that recognise fundamental pressures in the financial position; maintaining reserve balances at a level that is sufficient to manage budget risks; addressing issues of governance in decision making in line with external advice; pursuing financial planning approaches which do not place an over reliance on speculative commercial activity but which do incorporate a balanced and forward thinking approach to delivery of modest commercial gains; and exploring a range of savings proposals to be considered as part of this budget consultation process.

It is becoming clear that despite a recent history of robust financial management, the current financial environment is causing greater financial pressure on the Council. Recent announcements in the Chancellors Autumn statement reduce some of this pressure, but do not yet provide sufficient funding, such that further cost reductions are still necessary in order to set a balanced budget. The Council's Medium Term Financial Strategy (MTFS) will be reported to Cabinet along with the final Budget Report in February 2025. It will provide greater coverage of the Council's approach to financial planning and addressing current issues. These continue to be difficult times for local authorities and although the Council is able to identify a balanced position for 2025/26, there are likely to be significant gaps remaining over the medium-term, whilst we await information on the Governments intentions to reform Local Government funding such that need is funded more fairly from 2026/27. In the meantime, in terms of future years, the Council will continue to use prudent assumptions to provide as far as is possible, realistic financial projections in order to maintain a focus on sound financial decision making going forward.

The financial position in Appendix 1 to the report presents, subject to consultation, an opportunity to balance the 2025/26 budget. In the period between now and February, the Council will update its forecasts to reflect the Local Government Finance Settlement and a small number of technical areas, and members will review consultation responses as part of their final decision making.

The Council's recent revenue and capital budgets have maintained a strong focus on helping Coventry become a growing and more prosperous city, both to help protect and increase key tax revenue streams and reduce the reliance of some local residents on Council services. In addition, the Council has adopted more commercial

approaches to identify new and increased revenue streams. This will continue to be required as part of a balanced strategy which pays due regard to the risks and limitations inherent within them. The view of the Director of Finance and Resource (the Section 151 Officer) is that the risk of occasional negative financial consequences of taking such approaches is lower than the risk of not pursuing them at all and failing to attract the sustained financial benefits that they offer.

The indicative level of the Capital Programme set out above is only a guide at this stage although it continues to point towards another significant programme of spend on capital schemes across the city. Much of this spend will continue to deliver benefits to the local economy through infrastructure improvements and enhancement of the city's appeal to private sector investment. The medium-term trajectory of the Capital Programme does not reflect the high levels of expenditure experienced in recent years and will depend on the success of future grant bidding processes and Government announcements.

5.2 Legal Implications

Budget Policy Proposals

The proposals in this report are designed to meet the Council's statutory obligations in relation to setting a balanced 2025/26 budget by mid-March 2025. This includes the duty to report to the Council on the robustness of the estimates provided and the adequacy of the financial reserves in place. Section 31A of the Local Government Finance Act 1992 and Section 25 of the Local Government Act 2003 refer.

Council Tax Support Scheme

The Local Government Finance Act 1992 as amended includes a requirement for the Council to adopt any revisions to its local Council Tax Support scheme by 11 March of the year in which changes are to be implemented.

Failure to do so would result in the Council having to maintain the scheme currently in place.

Section 67(2)(aa) Local Government Finance Act 1992 as amended by the 2012 Act, states that the implementation of a local Council Tax Support scheme and any subsequent revisions to the scheme will be a function reserved to full Council.

The framework within which billing authorities must devise their Council Tax Reduction schemes is contained in Part 1 of Schedule 4 to the Act. This Schedule provides that the following matters must be included in an authority's scheme:

- a. a description of the classes of person entitled to a council tax reduction.
- b. details of the reductions which are to apply to those classes (different classes of persons may be entitled to different reductions);
- c. the procedure under which a person may apply for a Council Tax reduction; and
- d. an appeals procedure covering decisions over entitlement to a reduction and the amount of any reduction due.

These items are all included in the proposed revised schemes.

Consultation must be carried out in accordance with the 2012 Act. The Council must attempt to ensure that all interested parties are able to give a view.

The Council must consider whether there are any groups or individuals that are adversely impacted by any changes when making its final decisions on a local scheme.

6. Other implications

6.1 How will this contribute to the One Coventry Plan?

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

The Council, in common with all local authorities, will continue to be faced with challenging resource constraints although the precise nature and trajectory of this are not yet clear. Individual proposals set out in this report are likely to have an impact on front-line services as set out in Appendix 1 to the report. The Pre-Budget position is presented within the context of the existing Medium Term Financial Strategy, which is aligned with the priorities set out for the City within the One Coventry Plan. In this way Pre-Budget proposals are aligned to existing policy priorities.

6.2 How is risk being managed?

The inability to deliver a balanced budget is one of the Council's key corporate risks. The proposals within this report are aimed directly at trying to mitigate this risk. The new savings and income targets that will be included in the Council's bottom line budget position will be governed robustly to ensure there is no significant risk of non-achievement. The continued budget gaps for future years will need to be addressed as part of the next budget process through 2025.

6.3 What is the impact on the organisation?

The proposals set out in Appendix 1 to the report could result in a relatively small number of post deletions and in some cases, some impact on services as set out. Any new savings and income targets included in the Council's approved budget position will be managed carefully as part of robust governance arrangements as they are implemented, to manage the risk of non-achievement. In addition, the continued budget gaps for future years will need to be addressed as part of the next budget process through 2025, and following the Governments future spending reviews and funding reform as they become known.

6.4 Equalities / EIA

Budget Policy Proposals

A cumulative impact assessment of all the policy proposals contained in this year's pre-budget report has been produced and can be found in Appendix 3 to the report. This cumulative assessment has been produced using data from individual equality impact assessments completed by service areas on the policy proposals. The assessment shows the anticipated impact (on service users with protected characteristics) of all the pre-budget policy proposals taken together, is

likely to be negative. A full cumulative impact report will be produced following the conclusion of the public consultation and ahead of the final Budget setting report in early 2026, with more detailed analysis on the likely equalities impact of the final proposals. This will be based on the equality impact assessments completed for each of the proposals, updated to include any changes or additional information received as part of the public consultation.

Council Tax Support Scheme

An equality impact assessment (EIA) has been carried out to understand the likely impact of implementing the recommendations relating to the Council Tax Support Scheme. This EIA can be found in Appendix 4 to the report. From initial modelling undertaken on the proposed change to reduce maximum support from 80% to 75%, the majority of all working age households will have a reduction in support, regardless of protected characteristics. All working age households in income band 1 will be affected regardless of any protected characteristics.

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

No impact at this stage although climate change and the environmental impact of the Council's decisions are likely to feature more strongly in the future.

6.6 Implications for partner organisations?

Budget Policy Proposals

The options contained within this consultation include potential impact on some of the Council's partner organisations. We will engage with key partners on these matters as appropriate.

Council tax Support Scheme

Reducing entitlement to benefit has potentially significant impacts on partner organisations, particularly for advice agencies and other third sector organisations. The Council is in regular contact with partner organisations to ensure they are kept informed of potential changes and it is expected that these organisations will respond to the public consultation on a draft scheme.

There are implications for major precepting authorities, and the Council has initiated consultation with West Midlands Police, West Midlands Combined Authority and the West Midlands Fire and Civil Defence Authority in respect these implications.

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

Appendix 1: Pre-Budget Proposals and Financial Position

		2025/26 £000	2026/27 £000	2027/28 £000	
	Starting Budget Gap	14,310	14,761	14,761	This position has been carried forward from 2024/25 Budget Setting and reflects all previously approved Budget changes
Resources					
1	Council Tax	(5,100)	(5,100)	(5,100)	The previous assumption has been a 2% increase on Council Tax. This reflects the additional resource from a combined 5% increase, made up of 2% Adult Social Care Precept and a 3% Council tax increase.
2	Local Government Settlement	(4,400)	(4,400)	(4,400)	Assumptions based on anticipated share of additional Local Government funding announced in the Autumn Statement.
3	2024/25 Social Care Grant	(7,101)	(7,101)	(7,101)	Assumptions of ongoing 24/25 Social Care grant to fund additional social care capacity and Coventry's potential share of the additional funding announced in the Autumn Statement. This is a forecast only, pending the Governments Settlement announcement.
4	EPR - Extended Producer Responsibility Grant	(5,000)	(5,000)	(5,000)	Predicted share of the Extended Producer Responsibility Grant announced in the Autumn statement. This is a forecast only, pending the Governments Settlement announcement.
5	Coventry and Warwickshire Business Rates Pool	(2,000)	0	0	The Pool is expected to continue which will enable this income stream to be achieved for a further year
6	Services Grant	500	500	500	Assumes that the remainder of the Local Government Services Grant will be removed following an 84% national reduction in 24/25.
	Subtotal Resources	(23,101)	(21,101)	(21,101)	
Service & Technical Pressures					
7	25/26 Pay Award	1,700	1,700	1,700	An assumed pay award of 3% for 2025/26, which is an additional 1% above previous budget provision. Assume 2% from 26/27 onwards.
8	Non-Pay Inflation	1,618	5,462	7,462	This reflects the continued impact of the inflation environment affecting the Council's supplies and services expenditure.

9	Children's Services - Placements for Children in Care	4,450	4,450	4,450	Children's Services continues to see a significant increase in the average unit cost of placements for children in care. This is due to there being a lack of sufficiency in the market to meet the needs of young people in care and is a local, regional and national issue.
10	Children's Services other	300	300	300	Changes in funding requirements across Children's Disability Service, Adoption Central England and Special Guardianship Orders
11	Education Services - SEND Transport	800	800	800	As is being seen nationally, the number of SEND pupils within Coventry continues to grow, resulting in an increase in the number of commissioned special school placements, and consequently more children and young people requiring specialist transportation to school
12	Education Services - SEND Statutory Assessment	350	350	350	Budget required to permanently fund the existing SEND Statutory Assessment staffing structure on an ongoing basis.
13	Dedicated Schools Grant (DSG) - Historic Commitment Fall Out	200	300	400	Funding provided by the Central School Services Block within the DSG is split into two elements: funding for ongoing responsibilities and funding for historic commitments. Since 2020/21 the DfE has been reducing funding for historic commitments by 20% per annum resulting in a budgetary pressure.
14	Adult Social Care - Additional Package costs	3,500	3,500	3,500	This relates to the estimated additional cost of the National Living Wage and other price rises recently announced in the Governments Autumn Budget 2024 on adult social care packages, over and above previous budget modelling assumptions.
15	Adult Social Care	2,500	2,500	2,500	This represents impacts of demographic change and complexity of care packages
16	Housing - Temporary Accommodation	2,520	2,520	2,520	Expected continued increases in the number of families and single people seeking assistance with housing issues and subsequently being placed in temporary accommodation.
17	ICT Software Licences & systems renewal	650	975	1,150	Anticipated increased costs of software licenses and system renewals
18	Commercial Property Portfolio	600	600	600	Strategic regeneration of the City Centre has resulted in a reduction in the overall level of commercial rent income achievable
19	Insurance Reserve Provision	250	250	250	An actuarial Review of Insurance Reserves has indicated that the annual provision requires an increase to match expected current and future liabilities
20	Waste Disposal	180	680	1,180	Incremental increase in the cost to dispose of domestic waste due to growth in household numbers

	Subtotal Service & Technical Pressures	19,618	24,387	27,162	
Technical Savings					
21	Switch revenue funded highways maintenance spend for alternative grant funding	(1,000)	0	0	Current capital programme schemes within highways are funded from revenue resources. This proposal instead funds this expenditure from Capital receipts releasing a temporary revenue saving for one year
22	Capital Programme Revenue Funding	(1,000)	0	0	Current ICT capital programme schemes are funded from revenue resources. This proposal instead funds this expenditure from one-off capital receipts which releases a temporary revenue saving for one year
23	Management actions to reduce gap	(3,100)	(3,100)	(3,100)	Service Directors have identified a number of actions and efficiencies to reduce overall budgetary pressure within existing approved policies
	Subtotal Technical Savings	(5,100)	(3,100)	(3,100)	
Service Savings					
24	Adult Social Care - Market Management	(1,300)	(1,300)	(1,300)	Managing increases whilst still ensuring National Living Wage increases are funded can reduce the projected cost of growth
25	Adult Social Care - Voluntary Sector Review	(560)	(750)	(750)	Grant Aid agreements with 12 voluntary sector organisations end on 31 March 2025. Commence a tender against a series of service areas for a total value of half of the current spend of £1.5m
26	Adult Social care - Service change, improvement and staffing efficiency	(640)	(1,500)	(1,500)	Applying a similar approach to change as deployed in 2023/24 to deliver the improving lives programme will be used to achieve savings against other areas of high spend including Learning Disability Services and use of technology alongside ensuring staff are deployed to focus on areas of highest impact

27	Childrens Social Care	(2,000)	(4,000)	(4,000)	<p>The peer challenge review in October 2024 identified a number of areas within Children's Services to focus work, in order to create efficiencies and potentially reduce costs in line with the final report. Areas recommended for further consideration that could potentially reduce cost include:</p> <ul style="list-style-type: none"> -An organisational review of children's and education services to ensure a joined-up approach and identification of financial efficiencies through rationalisation of senior managers. -Opportunities to focus early help and prevention services to manage demand and enable intervention in families lives at the lowest possible levels. -Planned withdrawal from services upon the cessation of grant funded projects with drawn up exit plans -Strengthened processes around children coming into care, placement decisions and funding -Continued challenge of partners to provide equitable contributions including for care packages -Seek to maximise digital opportunities
28	Senior Management Capacity	(1,000)	(2,000)	(2,000)	Corporate restructure of senior management following the review of the Director tier
29	City Events	(50)	(50)	(50)	A review of and scaling back of events that can be funded in the City using Council resources.
30	Cultural Services internal provision	(56)	(56)	(56)	A service review of the Cultural Services internal provision, reducing capacity and prioritising resource within the remaining funding envelope
31	Sustainability and Climate Change	(32)	(32)	(32)	A reduction in capacity within the Climate change Team and reprioritisation of resources to maximise benefit
32	Election cost efficiencies	(100)	(100)	(100)	Resources could be saved through a reduction of portacabins; reduced number of polling stations; alternative count location
33	Redesign of Council Tax Support Scheme	(850)	(850)	(850)	Reduce the discount that some residents receive against their Council Tax by 5%. The maximum discount available is currently 80% in 24/25, reduced from 85% in prior years
34	Discretionary Payments	(494)	0	0	Reduce the Community Support Grant support for one year
35	War Memorial Park Car Park price increase	(150)	(150)	(150)	<p>Introduce new parking tariff at the War Memorial Park Car Park which would then be standardised with Coombe Country Park, removing the current 3 hours free period, and introducing the following charges:</p> <ul style="list-style-type: none"> Up to 1 hour - £1 1-2 hours - £3 2-4 hours £3.50

36	Bereavement Services	(350)	(350)	(350)	5% price increase in addition to inflationary increase.
37	Parks & Open Spaces	(150)	(150)	(150)	Reductions in staff across the service would require reductions in activities / services. Risks related to reduced monitoring / maintenance. Opportunities to increase income with introduction of new Commercial and Visitor experience manager to offset some pressures
38	Streetpride	(690)	(690)	(690)	Reduction in the cleansing service, impacting the City Centre and priority neighbourhoods. The reduction in fly tipping clearance response times could lead to an increase in overall fly-tipping. Response times for graffiti removal and emergency cleansing would also increase.
39	Waste Disposal	(340)	(340)	(340)	Removal of Free and/or Subsidised service for schedule 2 properties e.g. charities & religious organisations (income generation)
40	Citivision	(65)	(65)	(65)	Cease the production of Citivision or seek alternative media forms to reduce cost significantly
	Subtotal Service Savings	(8,827)	(12,383)	(12,383)	
	Budget (Surplus)/Deficit	(3,100)	2,564	5,339	

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Appendix 2 - Changes to the Council Tax Support Scheme

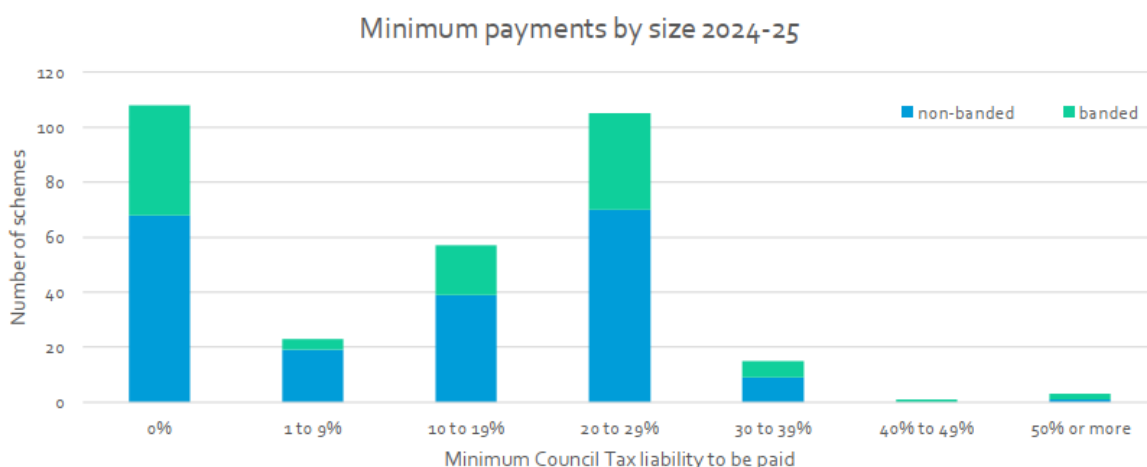
Background

- 1 Council Tax Support (CTS) is a means tested discount to help low-income households with the cost of council tax payments. CTS was previously known as Council Tax Benefit (CTB), and until 2013, was administered by billing authorities on behalf of the Department for Work and Pensions (DWP). The DWP reimbursed local authorities for the cost of CTB in full.
- 2 In 2013 the DWP devolved CTB to local government and required local authorities to design their own schemes of support for working age people. The scheme for people of pension age is administered by local authorities but under a national legislative framework with no local discretion.
- 3 When CTB was localised, the DWP reduced the funding for local authorities by 10 per cent. In Coventry this resulted in a £3 million reduction in funding for a scheme that cost £30 million per annum at the time.
- 4 Like many local authorities, Coventry implemented a scheme in 2013 which broadly mirrored the previous CTB scheme and resisted passing on the 10 per cent cut to recipients of CTS.
- 5 In 2016 Coventry reviewed the scheme, and, due to the ongoing challenges of austerity, reduced the amount of support delivered to working age people. Coventry capped the maximum entitlement that a working age household could receive to 85 per cent of council tax liability. Despite the reduction in support, Coventry's scheme remained one of the more generous schemes with many local authorities having already implemented caps of 80 per cent or less.
- 6 In 2024 Coventry implemented a scheme with a maximum level of support of 80 per cent for people of working age. The Council had consulted on a maximum of 75 per cent support.
- 7 From April 2024, Coventry also implemented a banded CTS scheme with household incomes determining which band of support an applicant would receive. Only those of working age in band 1 would be eligible to receive the maximum 80 per cent support.
- 8 Without changing the current CTS scheme, in 2025/26, Coventry would expect to award approximately £17.3 million in council tax support to 15,300 working age households.
- 9 When the Government initially introduced CTS it was difficult to determine a clear link between the cost of such schemes and the amount of notional funding provided for them within the Local Government Finance Settlement. Due to the passage of time, the degree of funding reductions to local government, the nature of the Local Government Finance Settlement and the Council's status as a 100 per cent Business Rates Pilot authority, any link between the cost and funding for CTS schemes has been further obscured. What is clear is that funding reductions have led to councils having to make difficult decisions on expenditure (such as CTS schemes).

10 The budgetary challenges faced by the Council for 2025/26 requires a review of all expenditure including the option to reduce the amount of support provided through the CTS scheme for working age households.

11 Figure 1 below shows the national profile of CTS schemes by type and minimum payment. The most common level of minimum payment is in the bracket 20 – 29 per cent. Approximately 105 local authorities have no minimum payment.

Figure 1 – CTS schemes by minimum payment and type



12 The consultation will ensure that the Council is compliant with the requirements for any changes to a local CTS scheme. The consultation will also inform any subsequent decision to revise the scheme to facilitate the following (see below paragraph 2.4 – 2.24):

Proposals

Capping maximum support at 75 percent

13 To support the Council to achieve a balanced budget for 2025/26, maximum CTS entitlement for working age households could be reduced from 80 per cent to 75 per cent.

14 A 75 per cent restriction would reduce the notional level of CTS by approximately £1.04 million per annum. The assumed eventual collection rate for balances owed by households in receipt of council tax support is 90 per cent – compared to an eventual collection rate of 98 per cent for all council tax balances. This reduced rate assumption acknowledges the challenge of collecting balances from low-income households. Of the collectible £0.94 million, approximately 13 per cent is shared with precepting authorities and therefore the net benefit for the Council is £0.85 million.

15 Tables 1 and 2 below set out the high-level impact of a reduction in support by income band

Table 1 – CTS reductions by income band

Band	Weekly excess income threshold	CTS award (% of council tax bill)	Number of households
1	£0 to £15	75%	15,336
2	£15 to £40	65%	343
3	£40 to £70	40%	431
4	£70 to £80	20%	151
5	£80 and more	0%	0

Table 2 - Impact of proposed CTS changes

Impact of proposed CTS changes	Total
Number of decreased claims	15,336
Average weekly CTS decrease	£1.31

16 Table 1 shows that reducing support to 75 per cent results in 15,336 households receiving less support with the average household paying an additional £1.31 per week. These figures assume a 5 per cent council tax increase in 2025/26. All of those impacted are in income band one. This is because only people in income band one receive the maximum 80 per cent level of support. Therefore, any reduction in the maximum level of support will only impact those in band one.

Council tax support for two homes

17 The current CTS scheme does not provide for CTS entitlement at more than one property. It is proposed to amend the scheme to make it possible to provide CTS on two homes in certain circumstances. In particular, where a resident has fled domestic abuse or has an unavoidable overlap of tenancies.

18 The proposal is to replicate the CTS award at the second property so that customers are not financially disadvantaged by their council tax liability for two homes.

19 It is difficult to quantify precise numbers, but this proposal is expected to benefit up to 100 customers annually at a cost of up to £75,000.

Governance

20 The Local Government Finance Act 2012 sets out the requirements for any changes to a local CTS scheme. Local authorities must:

- consult any major precepting authority which has power to issue a precept to it.
- publish a draft scheme in such manner as it thinks fit.
- consult such other persons as it considers are likely to have an interest in the operation of the scheme.

21 A revised CTS scheme must be approved at a meeting of the Council by 11 March, prior to the tax year in which the scheme is due to take effect. In designing local

schemes local authorities are also encouraged to give due consideration to equality impacts and work incentives.

- 22 Once the responses to the public consultation have been evaluated and a final equality impact assessment has been completed, the outcome of the consultation and any recommendations will be included in the Council's budget report for Cabinet and Council on 25th February 2025.
- 23 It is recommended that a consultation is initiated on 11th December 2024 for a period of seven weeks closing on 28th January 2025.
- 24 As part of the consultation process, a letter will be sent to every working age household in receipt of CTS to explain the options for change and the high-level impact. The letter will contain a link to the online consultation survey and provide details on how to request a paper copy of the survey.

Finance

- 25 The Council, like many households and organisations, is seeing significant increases in expenditure due to rising prices, and specifically, the rapidly increasing costs of Social Care. The money the Council receives from Government as well as through council tax and business rates, has not increased in line with the increasing cost of providing services. The result is that in 2024/25, the Council's spending is now forecast to exceed its income by over £10million as at quarter 2. The Council must, by law, set a balanced budget each year which means the amount it plans to spend cannot be more than the income it expects to receive. It is therefore looking at ways that it could reduce Council spending, or increase income, to ensure it is able to continue providing its most essential services.
- 26 One of the options is to increase the amount of council tax income the Council receives by reducing the maximum amount of CTS provided to working age households.
- 27 The changes to the scheme recommended in this report will deliver a £1.04 million reduction in the notional level of CTS, by increasing the city's Council Tax Base, which has the effect of increasing the amount of Council Tax that can be collected. The Council needs to consider a reduced eventual collection rate, recognising that collection will prove very challenging given the impact on the individuals affected. Of the collectable balance (circa £0.94 million), the Council will retain circa £0.85 million (approximately 87 per cent), with the remaining being distributed through the precepts for the West Midlands Police and the West Midlands Fire Authority.

Appendix 3 - INITIAL CUMULATIVE EQUALITY IMPACT ASSESSMENT 2025/2026 BUDGET CONSULTATION

Introduction

- 1.1. This report provides an indicative assessment of the overall equalities implications of the 2025/26 pre-budget proposals, based on initial equality impact assessments carried out on individual policy savings proposals included in the pre-budget report.
- 1.2. This report summarises the key cumulative equalities implications for the 2025/26 budget and provides more detail on the potential impact of the specific proposals. It seeks to show that we understand the likely equalities impact of the proposals, ensuring we comply with the Public Sector Equality Duty and are not disproportionately disadvantaging groups who share protected characteristics.
- 1.3. Through examining the likely cumulative impact of the various proposals, the Council can be better assured that any changes involved in the proposals are planned with due regard to our duties under the Equality Act to eliminate discrimination, advance equality of opportunity, and foster good community relations.
- 1.4. The analysis is indicative at this stage as individual budget proposals are being developed further. Once proposals are finalised following the consultation on the budget proposals, the potential equalities impacts will need to be reviewed considering any changes made or additional information that has come to light.

2. Background

- 2.1 The Council has a Public Sector Equality duty under the Equality Act (2010) to have due regard to:
 - Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act.
 - Advance equality of opportunity between people who share protected characteristics and those who do not.
 - Foster good relations between people who share protected characteristics and those who do not.
- 2.2. The equality duty covers the nine protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Council also needs to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status. This means that the first aim of the duty applies to this characteristic but that the other aims (advancing equality and fostering good relations) do not apply.

- 2.3. Equality implications are assessed by reviewing the potential impact on those with protected characteristics as defined in the Equality Act 2010 and then given a score of either no equalities impact, positive impact, negative impact, both positive and negative impact and unknown impact
- 2.4. No equalities impact indicates the proposal has no impact at all (either advantageous or adverse) on those who share protected characteristics.
- 2.5. A positive impact means the proposal is likely to benefit groups who share protected characteristics, leading to better outcomes for some or all these groups, helping to foster good relations between different groups and/or supporting equality of opportunity.
- 2.6. A negative impact means the proposal is likely to have an adverse impact on groups who share protected characteristics, potentially leading to worse outcomes or undermining good relations. In cases where a negative impact is anticipated, services should consider what actions can be taken to reduce or mitigate this impact.
- 2.7. Both positive and negative impact indicates that a proposal might potentially have both types of these impacts i.e. positive and negative impacts.
- 2.8. Unknown impact means that at this pre-budget stage, the potential equalities impact of the proposal is unknown and cannot be predicted. If the proposal is implemented as part of the final budget, the proposal will be developed further, and the equality impact assessment revised accordingly.

3. Key findings

- 3.1 There are 22 policy proposals in the 2025/26 pre-budget report that have had individual equality impact assessments (EIAs) carried out. More detail about the substance of each proposal is included in the full pre-budget report. Initial EIAs undertaken by service areas for these proposals suggest a range of different impacts for those with protected characteristics. The table below outlines the initial assessment of each proposal and some initial analysis to support the outcome of the EIAs.
- 3.2 Of the 22 proposals, 1 proposal is anticipated to have a positive impact, 11 proposals a negative impact, 3 proposals both positive and negative impact and there are 7 proposals where the impact is unknown at this stage.
- 3.3 The 1 proposal that has indicated a **positive impact** is:
 - Children's – Strengthened processes around children coming into care, placement decisions and funding
- 3.4 The 11 proposals that have indicated a **negative impact** include:
 - Adults – Voluntary Sector Review
 - Children's – Planned withdrawal from services upon cessation of grant funded projects with drawn up exit plans
 - City Events

- Sustainability & Climate Change
 - Discretionary Payments
 - War Memorial Park car park price increase
 - Bereavement Services
 - Parks & Open Spaces
 - Streetpride
 - Waste Disposal
 - Your Coventry Magazine (formerly known as Citivision)
- 3.5 The 3 proposals that have indicated **both positive and negative impact** include:
- Children's – Opportunities to streamline early help and prevention services but also focus on intervention in families' lives being at the lowest possible levels
 - Senior Management capacity
 - Council Tax Support Scheme
- 3.6 The 7 proposals which have indicated that the equalities **impact is unknown at this stage** are:
- Adults – Market Management
 - Adults – Service change, improvement and staffing efficiencies
 - Children's – the redesign and restructure of the service to reduce cost through rationalisation of senior managers
 - Children's – Continued challenge of partners to provide equitable contributions including for care packages
 - Cultural Services – internal provision
 - Election Efficiencies
- 3.7 Overall, the anticipated impact (on service users with protected characteristics) of all the pre-budget policy proposals taken together, is likely to be negative.

4. Next Steps

- 4.1 The assessment provided here is an initial assessment of the likely equalities impact of the proposals based on information currently available. The proposals will be finalised over the coming months. This process will involve a formal public consultation on the proposals. As the proposals are developed and amended following the budget consultation, any implications for the equalities impact of the proposals will be considered and the assessments updated.
- 4.2. A full cumulative impact report will be produced ahead of the final Budget setting report in early 2026, with more detailed analysis on the likely equalities impact of the final proposals. This will be based on the equality impact assessments completed for each of the proposals, updated to include any changes or additional information.

Initial Equalities Impact Analysis by proposal

The table below outlines the initial assessment of the likely equalities impact of each proposal with some brief analysis giving further information. This is based on individual equality impact assessments (EIAs) completed for each proposal. EIAs require an assessment to be made against each protected characteristic and that the impact be evaluated as:

- positive
- negative
- both positive and negative
- no impact
- impact unknown

Once the budget proposals have been finalised, each EIA will be revisited and the impact type re-evaluated. This cumulative impact assessment will be revised and finalised accordingly.

Division	Proposal	Initial Assessment	Initial Analysis
Adults	Voluntary Sector Review	Negative	Overall, the reduction of grant funding in this proposal will mean a reduction in the support available for many service users, resulting in largely negative impacts on those with protected characteristics.
	Market Management	Impact unknown at this stage	The impact of this proposal is not yet known and will become clearer after the consultation period, when the equality impact assessment will be revised.
	Service changes, improvement and staffing efficiency	Impact unknown at this stage	The impact of this proposal is not yet known; the equality impact assessment will be revised once the specific workstreams under the proposal are developed.

Division	Proposal	Initial Assessment	Initial Analysis
Childrens	Redesign and restructure of service to reduce cost through rationalisation of senior managers	Impact unknown at this stage	The impact of this proposal is not yet known and will be revisited once the service has been reviewed and further details are available to inform the potential impact on the workforce in Childrens.
	Opportunities to streamline early help and prevention services but also focus on intervention in families' lives being at lowest possible levels	Both positive and negative impact	More children and families will benefit from the right support at the right time, with interventions will be delivered in a timely way to improve their outcomes. However, some children and families needing more than a low level of support may be impacted.
	Planned withdrawal from services upon the cessation of grant funded projects with drawn up exit plans	Negative	There may be a negative impact of this proposal on children and families who are no longer able to receive support through grant funded projects.
	Strengthened processes around children coming into care, placement decisions and funding	Positive	The continuity of care and support through this proposal will positively impact children coming in to care and their transition into adulthood. There are also anticipated to be benefits to children with some protected characteristics within the cohort.
	Continued challenge of partners to provide equitable contributions including for care packages	Impact unknown at this stage	The impact of this proposal is unknown at this stage and is dependent on partners accepting the outcomes of an independent review of multi-agency working practices, eligibility criteria and funding contributions
	Seek to maximise digital opportunities	Impact unknown at this stage	The impact of this proposal is unknown at this stage until work is further developed on the use of digital technology, both corporately and specifically within the service

Division	Proposal	Initial Assessment	Initial Analysis
Corporate	Senior Management capacity	Both positive and negative impact	This proposal could impact both positively and negatively on the cohort of employees subject to any restructures, dependent on individual outcomes of the process.
Regeneration & Economic Development	City Events	Negative impact	A reduction in funding to support events in the city will result in fewer events taking place; this will be a negative impact on communities, visitors and to the economy overall.
	Cultural Services internal provision	Impact unknown at this stage	The impact of this proposal is unknown at this stage; the EIA will be developed further once the review process has concluded.
	Sustainability & Climate Change	Negative impact	As this proposal relates to headcount reduction in the service, there will be a negative impact on the workforce in the area. The impact on delivering the Climate Change Strategy is unknown at this stage.
Legal & Governance Services	Election Efficiencies	Impact unknown at this stage	The impact of this proposal is is unknown at this stage and further analysis will be conducted once the outcome of the Polling review takes place.

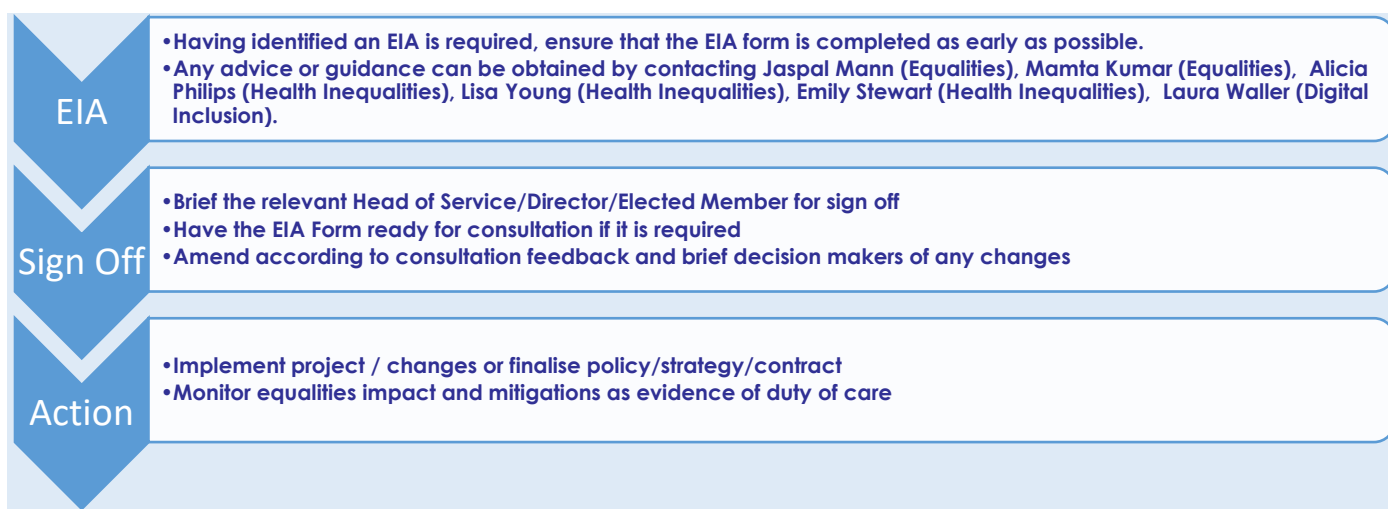
Division	Proposal	Initial Assessment	Initial Analysis
Finance & Corporate Services	Redesign of Council Tax Support Scheme	Both positive and negative impact	In relation to the reduction in maximum support available, the majority of all working age households will be impacted negatively. In relation to the proposed change to give additional support where a resident is made liable for Council Tax for 2 homes in certain circumstances, this will impact positively on some protected characteristics.
	Discretionary payments	Negative	This proposal will impact negatively on prospective applicants to the community support grant discretionary fund.
City Services	War Memorial Park car park price increase	Negative	The proposed increases to car park fees will adversely affect all visitors to the park, across all protected characteristics.
	Bereavement Services	Negative	This proposal to increase bereavement costs will have potentially negative impacts for many groups with protected characteristics.
	Parks & Open Spaces	Negative	The reduction of resources within this team is likely to have a direct impact on the provision, maintenance and replacement of play and other facilities and events across the city. As such there will be a negative impact on residents with protected characteristics.
	Streetpride	Negative	This proposal to reduce street cleaning will have potentially negative impacts on some residents with protected characteristics.

Division	Proposal	Initial Assessment	Initial Analysis
	Waste Disposal	Negative	As this proposal relates to Schedule 2 properties, this includes charity organisations and religious institutions. They may therefore be a negative impact on those using the services of these organisations if they are financially impacted by this new charge.
Policy & Communications	Your Coventry Magazine (formerly known as "Citivision")	Negative	This proposal is likely to have a negative impact on those groups who are less digitally active, including older people, people with disabilities and long-term health conditions, and those in the most socio-economically disadvantaged groups.

Appendix 4 - EQUALITY IMPACT ASSESSMENT (EIA)



Title of EIA		Council Tax Support Scheme 2025/2026	
EIA Authors	Name	K Gist	L Sharma
	Position	Benefits Manager	Benefits Subsidy & Policy Lead
	Date of completion	November 2024	
Head of Service	Name	B Strain	
	Position	Head of Revenues and Benefits	
Cabinet Member	Name	CLlr R Brown	
	Portfolio	Strategic Finance and Resources	



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*)



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

Council Tax Support (CTS) is a means tested assessment to support low-income households with the cost of council tax payments. In 2013, design of the CTS scheme for working age households was devolved to Local Authorities and funding from central government was reduced by 10 per cent.

Budgetary challenges faced by the Council for 2025/26 require the Council to review the potential option to reduce the amount provided through the CTS scheme for working age households.

The proposals would take effect from 1 April 2025.

Note: CTS scheme for people of pension age households is set in law by the Government. Therefore, this document only refers to scheme changes in respect of working age households.

Proposed change 1 - Reduction of maximum support

In Coventry the current maximum support for working age households is 80%.

If the current scheme continues in 2025/26, Coventry expects to award approximately £28.2 million in council tax support to 24,139 households. Approximately £16.8 million relates to working age claims and £11.4 million to pension age.

However, in setting the CTS scheme for 2025/26, the council is managing the competing tasks of balancing the budget, alongside supporting low-income households. Lowering the maximum support would provide the council savings towards the gap in its budget.

Therefore, the proposal is to reduce maximum CTS entitlement from 80% to 75%.

The Council currently (2024-2025) operates an income banded scheme, as shown in the table below:

Table 1: income banded scheme 2024-2025

Band	Weekly excess income threshold	CTS award (% of council tax bill)	Number of households
1	£0 to £15	80%	15,336
2	£15 to £40	65%	343
3	£40 to £70	40%	431
4	£70 to £80	20%	151
5	£80 and more	0%	

The proposal to reduce maximum CTS entitlement from 80% to 75% will only impact those in Income band 1. There will be no impact from this proposal for those in income bands 2 to 5.



Table 2: income banded scheme 2025-2026

Band	Weekly excess income threshold	CTS award (% of council tax bill)	Number of households
1	£0 to £15	75%	15,336
2	£15 to £40	65%	343
3	£40 to £70	40%	431
4	£70 to £80	20%	151
5	£80 and more	0%	

Summary of likely impact of proposed changes

From initial modelling undertaken for the proposed change to the Council Tax Support scheme, the following are some key impacts which have been identified:

- These changes will provide £1million towards the gap in the Council’s budget.
- As maximum support will be reduced from 80% to 75%, the majority of all working age households will have a reduction in support, regardless of protected characteristics.
- All working age households in income band 1 will be affected regardless of any protected characteristics.

Table 3: shows the impact of the proposal to change the CTS scheme

Impact of proposed CTS changes	Total
Number of decreased claims	15,336
Average weekly CTS decrease	£1.31
Number of increased claims	0
Average weekly CTS increase	N/A

Mitigations for protected characteristics

No Mitigations

Table 4: Impact of changes for different groups in Income Band 1

	Average weekly loss	Number of households	%
Households with Children	£1.32	3559	23%
Households no children	£1.31	11777	77%
Households with a disabled adult	£1.35	5898	38%

Table 5: Impact of changes by gender

CTS awarded to males	5899	38%
CTS awarded to females	9437	62%



Proposed Change 2:

Proposal 2 is to give additional support where a resident is made liable for Council Tax for 2 homes if:

They have left their original home through fear of violence.

Changes for disabled people are being made in their new home, like a wet bathroom or stairlift

They have moved within the last 4 weeks and are still liable to pay Council Tax for their original home

This change will mean that where a person is liable for Council Tax at their original home as well as at the property they have moved to, they can claim CTS at both addresses.

Public Engagement

Coventry City Council will undertake a public consultation on the proposals to the Council Tax Support scheme. The results of this will be used to inform decisions about the proposed model.

A variety of methods will be used to ensure the consultation is accessible to all Coventry residents.

Methods will include:

- a mailshot to all working age households currently in receipt of Council Tax Support
- phone support, as alternative method of engagement
- information in an alternative language, if requested
- information through a Let's Talk page on the Council's website
- feedback through a survey
- Stakeholder meeting.

This is not an exhaustive list.

1.3 List of organisations and people who are involved in this area of work

- Coventry residents
- Benefits Service
- Financial Management
- Legal Services
- Council Tax collection and enforcement teams
- Public Health Insight team
- Advice agencies and third sector organisations
- Social landlords
- Precepting authorities
- Policy in Practice
- Airey Consultancy Service Ltd



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 an analysis of the equalities data your service holds. This could include surveys, complaints, compliments, management information and customer profiles. *(Please refer to Diversity Guide)*
- Where possible compare your data to local data using
 - Facts about Coventry
 - Census 2011
 - Census 2021
 - JSNA

Proposed Change 1

In Coventry, Council Tax Support is currently awarded to approximately 16,200 working age households (aged 18 to 65).

Of this, approximately:

23% of households have children (aged 0 to 17).

38% of households have an adult disabled household member.

62% of Council Tax Support is awarded to females and 38% is awarded to males.

For the purposes of Council Tax Support, data is not routinely collected the following equality groups:

- Gender reassignment
- Pregnancy or maternity
- Race
- Religion and Belief
- Sexual orientation



Table 6: Impact of changes by area and deprivation score.

Geography	2015	2019
Bablake	16.85	17.16
Binley and Willenhall	41.00	35.00
Cheylesmore	20.00	17.00
Earlsdon	9.00	9.00
Foleshill	50.00	45.00
Henley	32.00	32.00
Holbrook	28.28	27.59
Longford	32.00	32.00
Lower Stoke	27.00	24.00
Radford	35.00	33.00
Sherbourne	21.00	19.00
St Michael's	30.00	30.00
Upper Stoke	30.00	28.00
Wainbody	9.00	9.00
Westwood	26.00	24.00
Whoberley	18.00	16.00
Woodlands	19.00	18.00
Wyken	20.00	20.00

Table 6 highlights the impacted areas of Coventry by index of deprivation. The higher the score the more deprived the area is. 18 areas of Coventry will be impacted. Over 88% of the areas are where the deprivation score is 10 and above.

Proposed Change 2

The team are unable to share data by protected characteristics and geographical locations due to low number of residents impacted.



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)

**Any impact on the Council workforce should be included under question 5.0 – not below*

Protected Characteristic	Impact type P, N, PN, NI	Nature of impact and any mitigations required
Age 0-17	P N	<p>Proposed Change 1 and 2</p> <p>As covered in section 1.2, Table 4 shows 15,336 households will receive decreased support. However, their protected characteristics are not known.</p> <p>As shown in section 2.1, 23% of the CTS households have dependant members in this age group. So, this group would be impacted through the CTS claim typically made by their parents.</p> <p>The proposed changes will affect all households in income band 1 and 94% of the total number of households in receipt of CTS.</p>
Age 18-65	P N	<p>Proposed Change 1</p> <p>Working age CTS customers are typically aged between 18 and 65, so this group will be directly impacted by the proposed changes. As covered in section 2.1, Table 4 shows 15,336 households will receive decreased support. However, their protected characteristics are not known.</p> <p>Proposed Change 2:</p> <p>Will positively impact residents who</p> <ul style="list-style-type: none"> • Have left their original home through fear of violence. • Are having changes made in their new home for a disabled person, like a wet bathroom or stairlift

Appendix 4 - EQUALITY IMPACT ASSESSMENT (EIA)



		<ul style="list-style-type: none"> Have moved within the last 4 weeks and are still liable to pay Council Tax for their original home
Age 66 and over	NI	Pension age customers are those aged 66 or over. The rules governing CTS for people of pension age households are prescribed nationally by the Government, so will not be affected by the proposed change to the CTS scheme.
Disability	P N	<p>Proposed Change 1 As covered in section 2.1, 15,336 households will receive decreased support.</p> <p>38% of those households in receipt of CTS support have an adult disabled member.</p> <p>Therefore, the proposed changes, are likely to impact people in this group through reduced CTS.</p> <p>Proposed Change 2: Will positively impact residents who</p> <ul style="list-style-type: none"> Have left their original home through fear of violence. Are having changes made in their new home for a disabled person, like a wet bathroom or stairlift Have moved within the last 4 weeks and are still liable to pay Council Tax for their original home
Gender reassignment	NI	This data is not routinely collected for CTS purposes. It is not considered that the change in CTS scheme will impact on people according to their gender reassignment.
Marriage and Civil Partnership	P N	<p>Proposed Change 1 As covered in section 2.1 15,336 households will receive decreased support.</p> <p>Data for marriage and civil partnership is not routinely collected for CTS purposes.</p> <p>Proposed Change 2 Will positively impact residents who</p>

Appendix 4 - EQUALITY IMPACT ASSESSMENT (EIA)



		<ul style="list-style-type: none"> • Have left their original home through fear of violence. • Are having changes made in their new home for a disabled person, like a wet bathroom or stairlift • Have moved within the last 4 weeks and are still liable to pay Council Tax for their original home
Pregnancy and maternity	P N	<p>Proposed Change 1 As covered in section 2.1 15,336 households will receive decreased support.</p> <p>Data by pregnancy and maternity is not routinely collected unless the Benefits Service is specifically notified, so firm conclusions in relation to equality impact cannot be drawn.</p> <p>Females who are pregnant or on maternity leave may be more likely to seek support through the CTS scheme due to low income, but there is no data to confirm this.</p> <p>Proposed Change 2: Will positively impact residents who</p> <ul style="list-style-type: none"> • Have left their original home through fear of violence. • Are having changes made in their new home for a disabled person, like a wet bathroom or stairlift • Have moved within the last 4 weeks and are still liable to pay Council Tax for their original home
Race (Including: colour, nationality, citizenship ethnic or national origins)	NI	This data is not routinely collected for CTS purposes. It is not considered that the change in CTS scheme will impact on people according to their race.
Religion and belief	NI	This data is not routinely collected for CTS purposes. It is not considered that the change in CTS scheme will impact on people according to their religion or belief.
Sex	P N	<p>Proposed Change 1 As covered in section 2.1 15,336 households will receive decreased support.</p>

Appendix 4 - EQUALITY IMPACT ASSESSMENT (EIA)



		<p>As shown in section 2.1, in Coventry, around 68% of CTS support is to females</p> <p>The support for all band 1 households will be reduced, which means females will be impacted to a greater extent.</p> <p>Also, research evidence regarding gender and poverty indicates females are more likely to be living in financial hardship than males. Therefore, the proposed changes are likely to further exacerbate that hardship.</p> <p>Proposed Change 2:</p> <p>Will positively impact residents who</p> <ul style="list-style-type: none"> • Have left their original home through fear of violence. • Are having changes made in their new home for a disabled person, like a wet bathroom or stairlift • Have moved within the last 4 weeks and are still liable to pay Council Tax for their original home
Sexual orientation	NI	This data is not routinely collected for CTS purposes. It is not considered that the change in CTS scheme will impact on people according to their sexual orientation.

SECTION 3 – HEALTH INEQUALITIES - See the health inequalities pre EIA guidance sheet for this section.

3	Further information on health inequalities is available on the Intranet
<p>3.1 Please tell us how the proposal you are submitting this EIA form will reduce health inequalities: <i>Please include which Marmot Principles this work covers.</i></p>	
<p>Coventry is a Marmot City. The proposal to change the Council Tax Support scheme is based upon using a Proportionate Universalism resource allocation approach. This ensures that the Council will allocate its resources across the social gradient, proportionate to people's needs.</p> <ul style="list-style-type: none"> • Council Tax Support scheme primarily supports the Marmot principle: <ul style="list-style-type: none"> - Ensure a healthy standard of living for all • Council Tax Support scheme also supports the Marmot principles: <ul style="list-style-type: none"> - Enable all children, young people, and adults to maximise their capabilities and have control over their lives - Create fair employment and good work for all 	



3.2 What information do you have to show you are going to reduce health inequalities:

The Council, like many households, is seeing significant increases in expenditure as a result of rising prices. So far, the money the Council receives from Government and through council tax and business rates, has not increased in line with the increasing cost of providing services. The result is that in 2025/26, the Council’s spending is now forecast to exceed its income by over£ 10million. The Council must, by law, set a balanced budget each year which means the amount planned to spend cannot be more than the income expected to receive. We are therefore looking at a number of ways that we could reduce Council spending, or increase income, to ensure that we are able to continue providing our most essential services. One of the options is to increase the amount of council tax income the Council receives by reducing the maximum amount of CTS provided to working age households.

Modelling data for CTS claims based upon the proposal, shows the changes will provide £1million towards the gap in the Council’s budget, which will help in setting the above budget and allocation of services and resources.

The outcomes are likely to be:

- As maximum support will be reduced from 80% to 75%, the majority of households will have a reduction in support, regardless of protected characteristics.
- All households in income band 1 will be affected regardless of any protected characteristics.
- Households facing financial hardship who may be adversely impacted by these changes, will be supported if they make early contact with the Council Tax department. The Council will aim to provide households with the right support and agree where possible, affordable payment plans.

3.3 Who/which groups of people might face the biggest health inequalities for your work and why:

Residents in Coventry who are in receipt of Council Tax Support are those groups of people who are more likely to be impacted by the proposed changes.

The Council Tax Support scheme aims to support low-income households and those groups who are known to face the biggest health inequalities.

This is shown by the data for Coventry in section 2.1 – see Table 4

3.4. What can be done to improve health equity for the groups of people you have identified?

Using a proportionate universalism resource allocation approach in calculating CTS award, the level of excess income will identify which households need the most financial support.

We will ensure a One Coventry approach by working with our partners to ensure information and support is available for those groups facing the biggest health inequalities and to support households to engage in the public consultation.

The Benefits Service will actively identify households:



- in which members are entitled to Free School Meals and will auto-enrol eligible households where possible
- who are not maximising welfare support

The Council tax department will aim to put in place individual council tax payment plans for any household who contacts early to explain they are experiencing payment difficulties.

Any information which identifies those groups disproportionately impacted by the CTS change who are known to face health inequalities, will be used to inform decisions as part of ongoing service development.

SECTION 4 - DIGITAL EXCLUSION INEQUALITIES

Please consider the digital exclusion information in the supporting document prior to completing this section.

4.1 Starting point:

Thinking of the main aims of your work area that this EIA is for; does your work area impact digital inequalities or exacerbate them? No

- Does your work assume service users have digital access and skills?
No, CTS processes remain the same as they currently are.
- Do outcomes vary across groups, for example digitally excluded people benefit the least compared to those who have digital skills and access?
Yes. Low household income is an indicator for digital exclusion. Reduced Council Tax Support for low-income households may impact digital access, as this might make connectivity unaffordable. In addition to this, as digital access enables better opportunities across housing, employment and education, these can also be consequently impacted.
- Consider what the unintended consequences of your work might be.
The CTS processes remain the same as they currently are.



4.2 Reducing digital exclusion inequalities

Where are the opportunities for your area to reduce digital exclusion inequalities and embed supports/interventions as part of your work?

Communication about the proposed changes will be made by post. There will be the option to complete a survey and to request this in paper format.

The proposed changes are to the levels of financial support, which could impact finances available for digital connectivity. By collaborating with our partners, these households could be supported through the National Databank.

Revenues and Benefits teams have been briefed to enable them to provide customers with information about the National Databank and will continue to review awareness processes regarding this.

The process for making a Council Tax Support claim and contacting the Benefits Service remain the same. This includes application forms that are online. However, customers who cannot access this continue to have the option to ring the Benefits Customer Services team, who will help complete an application form over the telephone. Customers can still report change in circumstances through email, telephone, online or through the post.

If the award of Council Tax Support changes, customers will continue to be sent a notification letter through the post. They will also receive a revised council tax bill through their usual method, which if they have not opted for electronic means, will be a paper-based bill through the post.

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

There will be no impact on job numbers and no restructure planned as an outcome of these proposals.

Appendix 4 - EQUALITY IMPACT ASSESSMENT (EIA)



Only include the following data if this area of work will potentially have an impact on Council staff. This can be obtained from: Nicole.Powell@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	

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

- Monitor groups requesting council tax hardship support.
- Operate a dedicated section 13a 1 c (hardship fund) policy to support those in the greatest need.
- Capture and analyse data through the Council's complaints process.
- All officers across Revenues and Benefits will flag any complaints regarding the impact of the CTS changes/ability to pay the increased council tax amounts.

Appendix 4 - EQUALITY IMPACT ASSESSMENT (EIA)



- Monitor groups affected by increased council tax and council tax arrears.
- Review the council tax recovery process for those in receipt of CTS.

6.1		
Issue Identified	Planned Action	Timeframe
Capture complaints about the impact of CTS changes	Capture and analyse data through the council's complaints process.	Incorporated into Business as Usual processes.
Ensure households on low income and those disproportionately impacted by inequalities are supported.	Continue to operate a dedicated section 13a 1 c (hardship fund) policy to support those in the greatest need.	Incorporated into Business as Usual processes.
Increase uptake of support available	Continue to work collaboratively with partners to ensure the most vulnerable households are maximising the support available to them.	31/03/2026
Ensure recovery action and additional costs are minimised	Review the council tax recovery process for those in receipt of CTS.	31/03/2026
Ensure households receive the best service and are aware of additional help	Provide training to Revenues, Benefits and Customer Services on changes, to include signposting to other support available.	31/03/2026
Ensure the impact of changes to the scheme are identified and reviewed for 2026/27	Monitor and review the impact of the changes to the scheme for 2025/26 and diarise to review CTS for 2026/27.	30/06/2026

7.0 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

Appendix 4 - EQUALITY IMPACT ASSESSMENT (EIA)



- 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

8.0 Approval

Signed: Head of Service: Barry Strain	Date: 20 November 2024
Name of Director: Barrie Hastie	Date sent to Director: 20 November 2024
Name of Lead Elected Member: Cllr R Brown	Date sent to Councillor: 20 November 2024

Email completed EIA to equality@coventry.gov.uk



Cabinet
Audit and Procurement Committee

10th December 2024
29th January 2025

Name of Cabinet Member:

Cabinet Member for Strategic Finance and Resources - Councillor R Brown

Director Approving Submission of the report:

Director of Finance and Resources (Section 151 Officer)

Ward(s) affected:

City wide

Title:

2024/25 Second Quarter Financial Monitoring Report (to September 2024)

Is this a key decision?

No

Executive Summary:

The purpose of this report is to advise Cabinet of the forecast outturn position for revenue and capital expenditure and the Council's treasury management activity as at the end of September 2024. The net revenue forecast position after management action is for spend in 2024/25 of **£10.2m over budget**. Whilst not a wholly comparable position, at the same point in 2023/24 there was a projected overspend of £11.5m.

The Council continues to face budget pressures within both Adults and Children's social care, Housing, and City Services. Other overspends are also being reported in Property Services and Business Investment & Culture. These financial pressures are being caused by a combination of legacy inflation impacts, continued increases in service demand, complexity of cases and social care market conditions, income shortfalls due to reduced activity, and slippage in the delivery of some service savings.

The Council's position above includes a significant number of one-off actions that have been applied to reduce the overspend. Recognising that the underlying position is significantly higher, further urgent action is required to address the pressure in year and to prevent the 2025/26 position increasing to unmanageable levels.

The Council's capital spending this year is projected to be £143m and includes major schemes progressing across the city. The size of the programme and the nature of the projects within it continue to be fundamental to the Council's role within the city. Although prevailing inflation rates look to be stabilising, legacy inflationary pressures and high borrowing rates continue to affect capital projects. The assumption is that stand-alone projects that are already in-progress will be delivered as planned but that future projects that have not yet started will need to be re-evaluated to determine their deliverability within previously defined financial budgets.

The materiality of the financial pressures, both revenue and capital, has reaffirmed the imperative to maintain strict financial discipline and re-evaluate the Council's medium-term financial position. This will be a priority across all services as the Council develops its future budget plans in the coming months.

Recommendations:

The Cabinet is requested to:

- 1) Approve the Council's second quarter revenue monitoring position.
- 2) Approve that senior officers work in collaboration with portfolio holders to continue to identify further cost reductions to mitigate 24/25 pressures.
- 3) Approve the revised forecast capital outturn position for the year of £143m incorporating: £2.7m net increase in spending relating to approved/technical changes and £53m of net programme rescheduling of expenditure into future years.

The Audit and Procurement Committee is requested to:

- 1) Consider the proposals in the report and forward any recommendations to Cabinet.

List of Appendices included:

Appendix 1 - Revenue Position: Detailed Service breakdown of forecast outturn position
Appendix 2 - Capital Programme: Analysis of Budget/Technical Changes
Appendix 3 - Capital Programme: Analysis of Programme Acceleration/(Rescheduling)
Appendix 4 - Prudential Indicators

Background papers:

None

Other useful documents

None

Has it been or will it be considered by Scrutiny?

No

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

Yes - Audit and Procurement Committee - 3rd February 2025

Will this report go to Council?

No

Report title:

2024/25 Second Quarter Financial Monitoring Report (to September 2024)

1. Context (or background)

- 1.1 Cabinet approved the City Council's revenue budget of £277.5m on the 20th February 2024 and a Capital Programme of £157.5m. This is the second quarterly monitoring report for 2024/25. The purpose is to advise Cabinet of the forecast outturn position for revenue and capital expenditure, recommending any action required, and to also report on the Council's treasury management activity.
- 1.2 The current 2024/25 revenue forecast is for net expenditure to be **£10.2m over budget** (after management action). The reported forecast at the same point in 2023/24 was an overspend of £11.5m. The capital spend for 2024/25 is projected to be £143m.
- 1.3 It is not unusual for the revenue position to reflect a forecast overspend at this stage which then improves over the course of the year. However, as significant management action has already been factored in, the **underlying position is significantly** higher than the £10.2m forecast and will materially impact on future years budget setting.
- 1.4 The overspend is caused partly by factors external to the Council and which can be expected to be ongoing (affecting future years MTFS) if action is not taken urgently. Other pressures included in the forecast reflect slower than expected delivery of some savings approved in the 24/25 budget, although these are expected to be delivered in full in due course.
- 1.5 Following on from the £1.8m reported at the end of 2023/24, the underlying position for which was somewhat higher, this indicates a continued serious financial trend for the Council which is not sustainable over the long-term. Section 2 of the report provides further detail on the revenue position and Section 5 sets out the Council's proposed approach to managing the position.
- 1.6 As a final backstop it should be noted that the Council maintains a strong balance sheet in-part to protect itself from circumstances such as this, although it should be re-iterated that reserves are a finite resource and should only be applied sparingly to mitigate ongoing revenue overspends, and once a medium-term solution is in place.
- 1.7 It is therefore suggested that management consider further actions with member portfolio holders to consider other ways to reduce costs.

2. Options considered and recommended proposal.

- 2.1 This is a budget monitoring report and as such there are no options.

Table1 Revenue Position - The revenue budgets and forecast positions are shown below analysed by service area.

Total Over / (Under) spend at Q1	Service Area	Revised Net Budget	Total Forecast Spend	Total Over/ (Under) Spend at Q2
£m		£m	£m	£m
3.1	Adult Services and Housing	129.8	134.1	4.3
1.7	Childrens and Education	112.7	116.4	3.7
3.0	City Services	40.7	43.7	3.0
(4.4)	Contingency & Central Budgets	(30.8)	(34.6)	(3.8)
0.0	Finance and Resources	12.4	12.1	(0.3)
0.6	Legal and Governance Services	8.2	8.4	0.2
0.6	People and Organisation Development	0.8	1.3	0.5
(0.4)	Planning and Performance	6.3	6.2	(0.1)
0.1	Policy and Communication	0.0	0.1	0.1
2.0	Property Services and Development	(9.3)	(7.3)	2.0
0.0	Public Health	(1.3)	(1.7)	(0.4)
0.8	Regeneration and Economy Dev	8.0	9.0	1.0
7.1	Total	277.5	287.7	10.2

2.2 An explanation of the major forecast variances is provided below, some of which are of an ongoing nature if urgent action is not taken. Further details are provided in Appendix 1 to the report.

Directorate

Adult Services & Housing £4.3m overspend

The largest element of overspend in this area relates to Adult Social Care (£3.6m) which is mainly due to the costs of purchasing packages of care for adults and older people, this is partially offset by increased client fee income. Growth in packages of care continues to be seen in most areas, but particularly in areas of high cost and demand associated with Learning Disability home care, transitions from children to adults, Mental Health, and in general complexity associated with reviewing activity. This increase in spend on packages of care is the main reason for the overall £1.2m increase in the Adult Services and Housing overspend since Q1.

The other significant overspend within this area relates to Housing and Homelessness (£0.7m) which is a result of the number of families and single people seeking assistance with housing issues, and subsequently the number being placed in Temporary Accommodation. A range of different additional temporary accommodation provision is being sought to reduce this cost, however delays to some of the proposed schemes is resulting in a pressure against the delivery target. Management actions are being carried out to help mitigate this.

Children's and Education Services £3.7m overspend

Within Children & Education Services a £4.8m overspend relates to the cost of placements for children in care. This relates to the use of external residential

children's homes and high-cost spot placements due to a lack of sufficiency in the market and some voids across block and internal homes. There is an annual trend of increased numbers of children moving to residential care in the summer and alongside this, we have also seen an increase in the number of children entering care, with total numbers having risen by over 40 children between April and the end of September. This means children in care numbers are currently higher than our financial planning assumptions, which has worsened the position reported at quarter 1 by a further £2.5m.

There is a further overspend of £0.9m in the Children's Disability Team due to an increase in both demand and prices for short breaks and direct payments.

A £0.5m overspend for SEND Home to School Transport is also forecast due to increased demand for travel assistance in the new academic year, together with pressures in the internal passenger service.

These overspends are offset in part by a £0.8m forecast underspend for Special Guardianship allowances, due to lower than budgeted activity. There is also an underspend of £0.7M in Early Help, and the division is also utilising £0.7M of uncommitted earmarked reserves to support the bottom line.

City Services £3.0m overspend

The most significant pressure relates to Highways of £1.3m. The DLO have been deployed onto reactive maintenance work whilst capital grant funded business case approvals are awaited, resulting in a £0.5m short-term pressure which is delivering a greater number of pothole repairs in year. This is in addition to programmed highway's defects and potholes repairs which is under a £0.4m pressure due to the volume of defects reported. During 2024/25, there is no ability to manage reactive overspends through the approved capital programme.

Environmental Services represents £1.1m of the Directorates pressure, with income deficits in Coventry Funeral Service (£0.3m) and parks activities (£0.3m). A further £0.2m pressure is forecast relating to Traveller incursion costs due to eviction prevention and clean-ups. Waste & Fleet are holding c£0.4m pressures relating to additional waste disposal fees & cost of passenger transport.

There is also a £0.5m deficit in Planning and Development, primarily due to reduced income generation caused by the decline in planning applications and the cost of the Local Plan Review.

Property Services and Development £2.0m overspend

There are two main elements that form the forecast overspend, the first being £0.8m short-term costs of holding vacant properties within the City Centre South (CCS) project prior to demolition (which if CCS site is handed over to the contractor, will not be incurred next year). The second relates to a net £0.7m cost of holding voids (e.g. rates, building servicing costs) within the commercial portfolio. In addition, plans in place to bring in new rentals, are taking longer to deliver, however this is being offset in the short-term using earmarked reserves. Work is underway to significantly reduce these in-year deficit, however this cannot be confirmed until the end of this calendar year.

Regeneration and Economy £1.0m

This relates to a pressure in Culture of £0.6m, comprising primarily a Godiva Festival deficit and Cultural Gateway holding costs. Commercial sponsorship income is forecasting c£0.1m achieved to date, leaving a c£0.2m pressure remaining.

Corporate

Contingency and Central (£3.8m Underspend)

Favourable variances within corporate contingency budgets of c£4.0m include the £3.2m grant announced in the final government settlement in February 2024, which was allocated to corporate contingencies. This is being offset by an adverse variance (£1.6m) which is due to a forecast underachievement of 2024/25 savings targets relating to the One Coventry programme, where detailed work is in progress to fully develop the scope and potential impact of the proposals, to inform implementation.

In addition to this there is also a £1.6m surplus forecast on Asset Management Revenue Account, relating to increased planned income from CWSDC dividend income, an increase in temporary investment interest, and reduced service loan interest.

2.3 Capital

The quarter 2 2024/25 capital outturn forecast is £143m compared with the first quarterly outturn of £193.3m. Table 3 below updates the budget at quarter 2 to take account of £2.7m of new approved/technical changes and £53m of programme rescheduling into future years.

The resources available section of Table 3 explains how the Capital Programme will be funded in 2024/25. It shows 75.8% of the programme is funded by external grant monies, whilst 17% is funded from borrowing. The programme also includes funding from capital receipts of £8.9m.

Table 3 – Movement in the Capital Budget

CAPITAL BUDGET 2024/25 MOVEMENT	Qtr 2 Reporting £m
Revised Programme (Reported at Q1)	193.3
Approved / Technical Changes (see Appendix 2)	2.7
“Net” (Rescheduling) (See Appendix 3)	(53.0)
Revised Estimated Outturn 2024-25	143.0

RESOURCES AVAILABLE:	Qtr 2 Reporting £m
Prudential Borrowing (Specific & Gap Funding)	24.5
Grants and Contributions	108.4
Capital Receipts	8.9

Revenue Contributions and Capital Reserve	1.2
Total Resources Available	143.0

The inflationary pressures affecting the Council's revenue budget are also present within capital schemes although the pattern with which this takes affect can be different due to the way in which expenditure is incurred. It is likely that most stand-alone projects that are already in-progress will be delivered within existing agreed contractual sums. However, some future projects that have not yet started may need to be re-evaluated to determine their deliverability within previously defined financial budgets. In addition, where budgets have been established to deliver programmes of expenditure, it is likely that these programmes will need to be reduced in size over time reflecting higher prices.

2.4 Treasury Management

Interest Rates

CPI inflation figures announced on 16th October 2024 fell unexpectedly to 1.7% in the year to September, the lowest rate in three and a half years. There was no increase in the month-on-month inflation figures. Services CPI has fallen from 5.6% to 4.9%. As a consequence of better-than-expected figures, the financial markets have built in a forecast of a decrease in the Bank of England interest rate at each of the next three MPC meetings. These are likely to be in 0.25% increments. The situation could change though after the Chancellor's budget on 30th October 2024.

Throughout the majority of 2024, the Bank of England Monetary Policy Committee (MPC) maintained interest rates at 5.25% although there were reductions of 0.25% in August 2024 and a further reduction of 0.25% in November 2024 following favourable inflation data taking the rate to 4.75%. The latest forecast from the Council's Treasury Management Advisors, Arlingclose, is for the Bank Interest Rate to fall but not as quickly as was first envisaged. Initial thoughts were that it would be in the region of 3% to 3.5% by December 2025 but this has now been updated in response to both the Chancellor's budget and the US election to 3.75%.

Long Term (Capital) Borrowing

The net long-term borrowing requirement for the 2024/25 Capital Programme is £1.9m, considering borrowing set out in Section 2.3 above (total £24.5m), less amounts to be set aside to repay debt, including non PFI related Minimum Revenue Provision (£16.1m). In the current interest rate climate, the Council has no immediate plans to take any further new long-term borrowing although this will continue to be kept under review.

The Public Works Loan Board (PWLB) remains the main source of loan finance for funding local authority capital investment. In August 2021 HM Treasury significantly revised guidance for the PWLB lending facility with more details and 12 examples of permitted and prohibited use of PWLB loans. Authorities that are purchasing or intending to purchase investment assets primarily for yield will not be able to access the PWLB except to refinance existing loans or externalise internal borrowing. Under

the Treasury Management Strategy 2022/23 approved by Cabinet on 22 February 2022 it was agreed the Council will not purchase investment assets primarily for yield.

Interest rates for local authority borrowing from the Public Works Loans Board (PWLB) between 1st July and 30th September 2024 have varied within the following ranges:

PWLB Loan Duration (maturity loan)	Minimum 2024/25 to Q2	Maximum 2024/25 to Q2	As at the End of Q2
5 year	3.38%	4.01%	3.63%
50 year	3.95%	4.36%	4.20%

The PWLB allows qualifying authorities, including the City Council, to borrow at 0.2% below the standard rates set out above. This “certainty rate” initiative provides a small reduction in the cost of future borrowing.

Regular monitoring continues to ensure identification of any opportunities to reschedule debt by early repayment of more expensive existing loans replaced with less expensive new loans. The premiums payable on early redemption usually outweigh any potential savings.

Short Term (Temporary) Borrowing and Investments

The Council’s Treasury Management Team acts daily to manage the City Council’s day-to-day cash-flow, by borrowing or investing for short periods. By holding short term investments, such as money in call accounts, authorities help ensure that they have an adequate source of liquid funds.

Returns provided by the Council’s short-term investments yielded an average interest rate of 5.02% over the last quarter. This rate of return reflects low risk investments for short to medium durations with UK banks, Money Market Funds, Certificates of Deposits, other Local Authorities, Registered Providers, and companies in the form of corporate bonds.

Although the level of investments varies from day to day with movements in the Council’s cash-flow, investments held by the City Council identified as a **snapshot** at the reporting stages were: -

	As at 30th June 2024	As at 30th September 2024
	£m	£m
Banks and Building Societies	0.0	0.0
Local Authorities	27.5	26.0
Money Market Funds	34.1	31.0
Corporate Bonds	0.0	0.0

HM Treasury	0.0	0.0
Total	61.6	57.0

External Investments

In addition to the above in-house investments, there is a core mix of £30m in Collective Investment Schemes or “pooled funds”, where investment is in the form of sterling fund units and not specific individual investments with financial institutions or organisations. The pooled funds are generally AAA rated; are highly liquid, as cash can be withdrawn within two to four days; and have a short average duration. These investments include Certificates of Deposit, Commercial Paper, Corporate Bonds, Floating Rate Notes, Call Account Deposits, Property and Equities. However, they are designed to be held for longer durations allowing any short-term fluctuations in return due to volatility to be smoothed out. In order to manage risk these investments are spread across several funds (Schroders, Ninety-One Investec, Columbia Threadneedle and M&G Investments). In addition, there is an investment in the CCLA property fund. This fund is not as liquid and access to redemption of units in this fund is subject to 6-months notice.

Returns provided by the Council’s pooled funds yielded an average interest rate of 5.30% over the last 12 months. On 30th September 2024 the pooled funds were valued at £27.5m (£27.1m at 30 June 2024), against an original investment of £30m (a deficit of £2.5m). All seven pooled funds show a deficit value but returns on these investments remain strong. As world economies improve, and interest rates become lower, then values should improve. The property market is predicted to have bottomed out, and the fund is being actively managed to provide good returns. There remains an expectation that the full value for each pooled fund will be recovered over the medium term - the period over which this type of investment should always be managed. Current accounting rules allow any ‘losses’ to be held on the Council’s balance sheet and not counted as a revenue loss. The override to the accounting rules is due to expire on 31st March 2025 and thereafter it is likely that capital value losses will have to be taken to revenue. These investments will continue to be monitored closely and are likely to be redeemed when they reach par value.

Prudential Indicators and the Prudential Code

Under the CIPFA Prudential Code for Capital Finance authorities are free to borrow, subject to them being able to afford the revenue costs. The framework requires that authorities set and monitor against Prudential Indicators relating to capital, treasury management and revenue issues. These indicators are designed to ensure that borrowing for capital purposes is affordable, sustainable and prudent. The purpose of the indicators is to support decision making and financial management, rather than illustrate comparative performance.

The indicators, together with the relevant figures as at 30 September 2024 are included in **Appendix 4** to the report. This highlights that the City Council's activities are within the amounts set as Performance Indicators for 2024/25. Specific points to note on the ratios are:

- The Upper Limit on Variable Interest Rate Exposures (indicator 9) sets a maximum amount of net borrowing (borrowing less investments) that can be at variable interest rates. At 30 September 2024 the value is -£61.6m (minus) compared to £99.1m within the Treasury Management Strategy, reflecting the fact that the Council has more variable rate investments than variable rate borrowings at the current time.
- The Upper Limit on Fixed Interest Rate Exposures (indicator 9) sets a maximum amount of net borrowing (borrowing less investments) that can be at fixed interest rates. At 30 June 2024 the value is £223.0m compared to £495.9m within the Treasury Management Strategy, reflecting both the level of actual borrowing and that a significant proportion of the Council's investment balance is at a fixed interest rate.

2.5 Commercial Investment Strategy – Loans and Shares

The Council's Commercial Investment strategy is designed to ensure there are strong risk management arrangements and that the level of commercial investments held in the form of shares, commercial property and loans to external organisations, are proportionate to the size of the Council. In doing this the strategy includes specific limits for the total cumulative investment through loans and shares. The total combined limit for 2024/25 is £125m, against which there are £104m of existing commitments: -

	Limit	Actual 30 th September 2024	Committed and Planned 2023/24	Total	Headroom
	£m	£m	£m	£m	£m
Shares	55.0	52.1	0.0	52.1	2.9
Loans	70.0	51.8	1.9	53.7	16.3
	125.0	103.9	1.9	105.8	19.2

The committed or planned total of £1.9m includes a number of loan facilities to lend which may not necessarily be taken up, although the Council is committed to provide the funds if requested.

3. Results of consultation undertaken

3.1 None

4. Timetable for implementing this decision.

4.1 There is no implementation timetable as this is a financial monitoring report.

5. Comments from the Director of Finance and Resources (Section 151 Officer) and the Director of Law and Governance

5.1 Financial implications

Revenue

The net quarter 2 forecast reflects a continuing serious position for the Council. The net forecast, after significant management action is a **£10.2m revenue overspend** and incorporates a range of intractable ongoing service demand related issues, the persistence of inflationary pressures continuing to impact cost, and the under achievement of a number of income and savings targets. Actions taken so far (set out below), are of a largely one-off nature, meaning the **underlying position remains significantly higher**.

At this stage of the monitoring cycle there is a real and significant threat that the Council will not be able to balance its revenue position by year-end without the use of reserve contributions, and without further urgent and ongoing action, **will also increase the initial 2025/26 MTFS gap approved by Council in February 2024**.

These circumstances continue to be common to councils across the country with instances of financial stress again being widely reported. The failure of the local government finance system to tackle issues around social care funding plus the continued legacy impact of inflation, have placed many councils in a perilous financial position. Recent government funding announcements will help this position in 25/26, but will not solve fully.

The trend for cost-of-service delivery has generally over time reflected an upwards trajectory, reflecting prevailing inflation and market conditions. However, the unprecedented levels of inflation in the last couple of years has affected all service delivery costs such that 2022/23, through to 2024/25 and beyond, reflect a very steep relative upward trend for the Council's key service costs.

The 2024/25 pay offer was accepted in October 2024 by the trade unions in line with budget provisions assumed during the 204/25 Budget Setting process.

Continuing difficulties in the external markets for both children and adults are well documented but issues including the cost of highly complex cases and higher than planned levels of inflationary increases in placement costs have persisted to apply pressure to the budgetary provision included within the Council's budget.

It is necessary therefore to continue to identify and carry out management actions to help reduce the deficit, as discussed below.

Management Action

This difficult position carries on from that faced in 2023/24 when the Council needed to balance its financial outturn position using £1.8m of reserves. Such a solution would be the Council's backstop position for 2024/25 but is one that the Council **should be anxious to avoid**. The Council holds limited unearmarked reserve balances and recognises that such an approach is not sustainable in the medium term. It is therefore imperative to identify and adopt approaches that help the Council to manage its short-term pressures, whilst at the same time supporting the outlook for 2025/26 and medium-term financial problems.

The Council's Leadership Team has already instigated a range of immediate responses and is in the process of taking forward other actions in support of 25/26. The following actions used to mitigate the underlying pressures in year have been taken so far:

- Continued robust challenge and review of forecasts
- Continuation of tight recruitment controls
- Alternative funding opportunities from grant/reserves
- Undertake a comprehensive review of service reserves.
- Continued communication and challenge to all staff to embed a strong financial culture.
- Identification of service management actions to reduce cost

In the lead up to the Budget Report in December 2024, the Leadership Board have been identifying options and service impact of reducing ongoing spend levels to within budget for political decision.

Continued efforts from both officers and portfolio holders are needed in order to minimise overspend. This, together with the above would give sufficient assurance that the Director of Finance and Resources does not need to take any extra-ordinary action at this stage to respond to the financial position (such as issuing a Section 114 Notice) either in respect of 2024/25, or future years. However, **Cabinet should be in no doubt that the underlying position for 2024/25 is again incredibly challenging and will have an impact on Budget Setting for 2025/26.**

Capital

The Council's Capital Programme continues to include a range of strategically important schemes across the city. This continues to be a large mostly grant funded programme continuing the trend of recent years. The programme includes major scheme expenditure on secondary schools' expansion, Very Light Rail, disabled facilities grant (DfG), construction of Woodlands School, City Centre South and delivery of the City Centre Cultural Gateway development.

Legal implications

There are no legal implications arising at this stage.

The Council has a statutory obligation to maintain a balanced budget and the monitoring process enables Cabinet to remain aware of issues and understand the actions being taken to maintain a balanced budget.

6. Other implications

6.1 How will this contribute to the One Coventry Plan

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

The Council monitors the quality and level of service provided to the citizens of Coventry and the key objectives of the One Coventry Plan. As far as possible it will

try to deliver better value for money and maintain services in line with its corporate priorities balanced against the need to manage with fewer resources.

6.2 How is risk being managed?

The need to deliver a stable and balanced financial position in the short and medium term is a key corporate risk for the local authority and is reflected in the corporate risk register. A recent reassessment indicates that the Council now faces a greatly increased level of risk in this area, described in section 5. Good financial discipline through budgetary monitoring continues to be paramount in managing this risk and this report is a key part of the process. A range of urgent actions has been set out in response to the Council's financial position. It is vital that Council officers and members are aware of the current financial challenge and activity across the second quarter of the year including the measures outlined will provide some indication of the direction of travel for the remainder of the year. This in turn will dictate the extent to which the bottom line can be moved significantly closer to a balanced position.

6.3 What is the impact on the organisation?

It remains important for the Council to ensure that strict budget management continues to the year-end. The Council may be forced to make some difficult policy choices over the coming months especially in areas that do not have a strict statutory basis, and which involve material levels of discretionary and flexible expenditure.

6.4 Equalities / EIA

No current policy changes have been proposed but the possibility remains that the Council may need to consider changes to existing services through the year. If this is the case, the Council's equality impact process will be used to evaluate the potential equalities impact of any proposed changes.

6.5 Implications for (or impact on) Climate Change and the environment

No impact at this stage although climate change and the environmental impact of the Council's decisions are likely to feature more strongly in the future.

6.6 Implications for partner organisations?

No impact

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

Appendix 1

Revenue Position: Detailed Directorate Breakdown of Forecasted Outturn Position

Table 1 below shows budget variations analysed between those that are subject to a centralised forecast variance and those that are managed at service level (termed “Budget Holder Variance” for the purposes of this report). The Centralised budget areas relate to salary costs – the Council applies strict control over recruitment such that managers are not able to recruit to vacant posts without first going through rigorous processes. In this sense managers have to work within the existing establishment structure and salary budgets are not controlled at this local level. The Centralised salaries and Overheads under-spend of £5.5m shown below is principally the effect of unfilled vacancies, and are offsetting service (Budget Holder) pressures.

Table 1

Service Area	Revised Net Budget	Forecast Spend	Centralised Variance	Budget Holder Variance	Total Variance
	£m	£m	£m	£m	£m
Adult Services and Housing	129.8	134.1	(2.0)	6.3	4.3
Childrens and Education	112.7	116.0	(1.8)	5.5	3.7
City Services	40.7	43.7	(0.9)	3.9	3.0
Finance and Resources	12.4	12.1	0.0	(0.3)	(0.3)
Legal and Governance Services	8.2	8.4	(0.3)	0.5	0.2
People and Organisation Development	0.8	1.3	0.1	0.4	0.5
Planning and Performance	6.3	6.2	0.1	(0.2)	(0.1)
Policy and Communication	0.0	0.1	0.1	0.0	0.1
Property Services and Development	(9.3)	(7.3)	(0.3)	2.3	2.0
Public Health	(1.3)	(1.7)	(0.3)	(0.1)	(0.4)
Regeneration and Economy Dev	8.0	9.0	(0.2)	1.2	1.0
Contingency & Central Budgets	(30.8)	(34.6)	0.0	(3.8)	(3.8)
Total	277.5	287.3	(5.5)	15.7	10.2

Table 2:

Service Area	Reporting Area	Explanation for variance from budget	Total Forecast variance £m
Adult Services	Strategic Commissioning (Adults)	The underspend relates to New Homes for Old Private Finance Initiative additional client fee income above budget and the continuation of lower transport costs to day opportunities.	(0.7)
Adult Services	Adult Social Care Director	Identified underspend on appointee ships provision and other adult social care projects off-set by an accumulation of salary related overspends and a contribution of £45k to an integrated ICT solution to support the operationalisation of Local Integrated Teams with University Hospital Coventry & Warwickshire.	(0.2)

Adult Services	Adult Social Care Business & Financial Management	The underspend relates to the decommissioning of the Electronic Call Monitoring System and staff vacancies which are in the process of being recruited to.	(0.2)
Adult Services	Localities and Social Care Operational	The overspend relates to additional agency staff costs due to a large number of vacancies. This overspend is only partly offset by underspends due to those staff vacancies which are in the process of being recruited to.	0.3
Adult Services	Community Purchasing Mental Health	The budget for purchasing packages of care for adults and older people in adults social care continues to see significant pressures. We continue to see growth in most areas, but in particular areas of high cost and demand associated with Learning Disability home care, transitions from children to adults, and Mental Health and in general complexity associated with reviewing activity. Increased activity reflects the complexity and acuity of the casework with increased demand projected during the year. Scrutiny continues across all areas where budgets are authorised to ensure cost effectiveness and escalation where appropriate including people with Continuing Health Care (CHC) or joint funding criteria.	4.3
Adult Services	Other Variances Less than 100K		0.1
Housing & Homelessness	Housing and Homelessness	The number of families and single people seeking assistance with housing issues and subsequently the number being placed in Temporary Accommodation increased at a higher level than expected at the start of the year and continues to increase during 24/25 (£0.7M). A range of different additional temporary accommodation provision is being sought as part of the medium-term financial strategy, however delays to one of the proposed schemes means is resulting in a pressure against the delivery target (£0.6M). However, a number of management actions have been taken to mitigate against these pressures which has resulted in a slightly stronger position than at Q1.	0.7
TOTAL Adult Services & Housing			4.3

Children's Services	Corporate Parenting and Sufficiency	<p>There is a £4.8m forecast overspend on placements for children in care. This figure considers income from central government for unaccompanied asylum-seeking children which ensures these children do not contribute to the budgetary pressure. The pressure relates to the use of external residential children's homes and high-cost spot placements due to a lack of sufficiency in the market and some voids across block and internal homes. There is an annual trend of increased numbers of children moving to residential care in the summer and alongside this, we have also seen an increase in the number of children entering care, with total numbers having risen by over 40 children between April and the end of September. This means children in care numbers are currently higher than our financial planning assumptions.</p> <p>In addition to the Residential Strategy & Fostering Excellence program, a number of actions are being taken to address this pressure; increase occupancy in internal and block residential children's homes, recommission Regional frameworks to increase the number of children cared for by framework providers, progress hard to place contracts and move children, when appropriate, to alternative internal / framework provision or a foster home following a review of all children living within a children's home. In addition, children continue to be supported to return home through our reunification project.</p> <p>The overall position is mitigated in part by use of reserves and underspends across other areas of the service including a £0.8m forecast underspend for Special Guardianship allowances, where the activity is below the level anticipated when the budget was set.</p>	3.6
Children's Services	Help & Protection	The variance is predominantly due to a £0.7m forecast underspend across Family Hubs and Early Help, where due to staffing vacancies staff costs are expected to be below budget.	(0.9)
Children's Services	Children in Care, Children with Disabilities & Care Leavers	The variance is predominantly due to an overspend of £0.9m in the Children's Disability Team, due to an increase in both demand and prices for short breaks & direct payments. We are currently in the process of retendering our short breaks contracts to ensure 'best value' and reduce high-cost support spend.	0.7
Education Services	SEND & Specialist Services	SEND Transport is forecasting an overspend of £547k. The forecast demand and cost of home to school travel assistance for the September 2024 academic year, was based on the following assumptions: The increase in EHCPs will mirror demand for the 2023/24 year; the proportionality of placements between mainstream and specialist will not change, and the mode of travel will continue to require taxi provision as Coventry's fleet capacity will be exhausted. As we progress through Autumn Term 2024 service demand forecasts continue to be revised based on actual rather than forecast demand providing more certainty. A mid-year revision of the	0.4

		central costs for the internal passenger service resulted in a £300k budget pressure. The impact of post 16 contributory changes will be evident and strong mitigation action from the service end to end process review will aim to reduce unit costs for eligible travellers in Qtr3 and Qtr4 (2024/25 academic year). This overspend is offset in part by underspends across other areas of the service.	
Education Services	Education Entitlement	This underspend primarily relates to the Virtual School and is linked to staffing vacancies and utilisation of additional grant funding where appropriate.	(0.2)
Education Services	Education Improvement & Standards	An overspend of circa £200K across Schools Trade Union costs is partly offset by an underspend on historic pension costs. The overspend position on Schools Trade Union is linked to inflation and lower amounts of de-delegated funding. Historic pension costs expenditure will continue to reduce over time as there are no new commitments against this.	0.1
Ringfenced Funding - Dedicated Schools Grant (DSG)	SEND & Specialist Services	The forecast for SEND Provision is an overspend of £356k. The increase in demand for EHCPs is mirroring 23/24 activity creating further growth overall. This reflects ongoing provision demand and costs. The availability of specialist school placements is limited, which has resulted in a significant increase in mainstream expenditure. However, this is compensated by a forecast underspend in special school provision. This overspend is offset in part by underspends across central services due to vacancies.	0.3
Ringfenced Funding - Dedicated Schools Grant (DSG)	Schools	This underspend relates to the Council's High Needs holding pot. This is budget that has been earmarked to support the Council's overall SEND Strategy and fund known provision cost pressures that will arise in future years.	(0.9)
Ringfenced Funding - Dedicated Schools Grant (DSG)	Education Entitlement	This underspend is a consequence of staffing vacancies combined with forecast over achievement of income targets.	(0.1)
Ringfenced Funding - Dedicated Schools Grant (DSG)	Financial Strategy	Technical adjustment to remove total Dedicated Schools Grant Variance from the General Fund position.	0.7
TOTAL Childrens and Education			3.7
Finance and Resources	Customer & Business Services	Underspend is due to staff vacancies across the service and additional income generated. However, to meet all the expectations on the service and deliver organisational priorities recruitment to key leadership and essential roles is taking place to drive change forward.	(0.1)
Finance and Resources	Other Variances Less than 100K		(0.2)

TOTAL Finance and Resources			(0.3)
Legal and Governance Services	Legal Services	Agency in Legal Services continues to be reviewed and challenged, but is required to cover caseload capacity need in Children's, Adults and Education. Options to reduce agency usage are being explored.	0.6
Legal and Governance Services	Procurement	Benefits of prompt payment scheme plus vacancies.	(0.2)
Legal and Governance Services	Regulatory Services	Vacant posts across the service with plans to recruit	(0.1)
TOTAL Legal and Governance Services			0.3
People and Organisation Development	Employment Services	The overspend mainly relates to a reduction in income from external organisations totalling £130K and £50K remaining from an MTFS target. Changes to the team structure have taken place in order to reduce costs and further changes are planned.	0.3
People and Organisation Development	HR - People & Culture	This is due to an historic MTFS target and budgetary pressures of apprentice salaries.	0.1
People and Organisation Development	Occupational Health, Safety and Wellbeing Services	Underspends driven by vacancies and additional income from fees and charges	(0.1)
People and Organisation Development	Employment Policy & Practice	The overspend mainly relates to unfunded Job Evaluation Team posts £127K and additional cost of covering sickness	0.2
TOTAL People and Organisation Development			0.5
Property Services and Development	Commercial Property and Development	Commercial property portfolio income has a pressure of £748k due to voids and the associated void costs. There is also a pressure of £802K reflecting annual net holding costs for the City Centre South property (incl. NNDR), which will fall away once the project goes 'unconditional'. The retail market sees a pressure of c. £169k as the costs for supplies and services are exceeding budget provision.	1.9
Property Services and Development	Management & Support	This reflects the slipped delivery of property savings in year, offset by a one off contribution from reserves.	0.1

TOTAL Property Services and Development			2.0
Highways	Highways	This service is forecasting an overspend of £1.3m this due to a number of factors, the key ones being: The DLO have been deployed onto reactive maintenance work whilst capital grant funded business case approvals are awaited, resulting in a £500k short-term pressure which is delivering a greater number of pothole repairs in year. This is in addition to programmed highway's defects and potholes repairs which is under a £400k pressure due to the volume of defects reported. There is no ability to manage reactive overspends through the approved capital programme in year. Other pressures include £203k for Flood risk management and drainage arising from a historic income target and costs of highway inspector regrades	1.2
Highways	Traffic	This includes costs associated with Road Traffic Collisions, which may be recovered through insurance.	0.2
Environmental Services and Development	Planning Services	Q2 Planning Application fee income is broadly in line with projections and ahead of the last two years at the same time. However, the number of applications is still below the forecast required even with the price increase. Total deficit c£370k. There is also a pressure in the current year relating to costs associated with undertaking the Local Plan review of £124k	0.5
Environmental Services and Development	Streetpride & Parks	Decrease in overall income in bereavement across memorialisation and crematorium due to small decrease in death rates and cost of living. Coventry Funeral Services are forecasting £100k loss in year one against an expected £160k surplus. Income across parks is also down due to reduction in visitor numbers and associated parking and activity income.	0.6
Environmental Services and Development	Waste & Fleet Services	Additional costs at Waster Transfer Station associated with third party transport (£150k). Half price bulky waste service estimated to cost approx. £170k. Additional staffing and vehicle costs (spot hires, fuel, avoidable damage) of approx. £170k associated with removal of task and finish (this forecast presumes settlement costs of £324k will be funded corporately). This is partly offset by use of reserves (£188k).	0.5
TOTAL City Services			3.0
Public Health	Public Health - Migration	Underspend represents a release of funding previously held in reserve	(0.4)

TOTAL Public Health			(0.4)
Planning and Performance	Transformation Programme Office	Underspend represents a release of funding previously held in reserve	(0.2)
Planning and Performance	Libraries, Advice, Health & Information Services	Overspend is largely due to non-delivery of staff turnover and income targets. Overspend is reducing as vacant posts impact on actual spend. Traded service is reporting increased up-take.	0.1
TOTAL Planning and Performance			(0.1)
Policy and Communication	Other Variances Less than 100K		0.1
TOTAL Policy and Communication			0.1
Regeneration and Economy Dev	Culture, Sports, Events & Destination	Total overall service pressure mainly comprises Cultural Gateway holding and mobilisation costs (pre-construction) as reported in Q1; forecast Godiva Festival deficit primarily due to lower ticket sales, lower commercials therefore on Food and Bereavages, bad weather and Euro 24 fixture clashes. Service pressures partially mitigated by vacancies in staffing; income generation from wider events; and management actions to reduce costs across Q3-Q4.	0.6
Regeneration and Economy Dev	Regen & Economy Management Support	(£106k) of sponsorship and commercial income has been generated to date and is forecast to achieve (£254k) this year. However, the Q2 position is c£155k due to a shortfall against a challenging income target for sponsorship & advertising, progress is being made but more slowly due to external industry business planning cycles, and internal processes to fulfil procurement, planning and highways obligations.	0.2
Regeneration and Economy Dev	Other Variances Less than 100K		0.2
TOTAL Regeneration and Economy Dev			1.0
Contingency & Central Budgets	Revenue AFC	Favourable variances within corporate contingency budgets of c£4.0m include the £3.2m grant announced in the final government settlement in February 2024, which was allocated to corporate contingencies. This is being offset by an adverse variance (£1.6m) which is due to a forecast underachievement of 2024/25 savings targets relating to the One Coventry programme, where detailed work is in progress to fully develop the scope and potential impact of the proposals, to inform implementation.	(2.2)
Contingency & Central Budgets	Treasury Management	£1.6m surplus forecast on Asset Management Revenue Account, relating to increased planned income from CWSDC dividend income, an increase in temporary investment interest, and reduced service loan interest	(1.6)
TOTAL Contingency & Central Budgets			(3.8)
Total Budget Holder Outturn Variances			10.2

Appendix 2

Capital Programme Approved / Technical Changes

SCHEME	EXPLANATION	£m
Housing - Local Authority Housing Fund 3 (LAHF3)	<p>Briefing taken to the Leader of the Council, Chief Executive, Cabinet Member for Housing & Communities, S151 Officer and Director of Adult Services & Housing on 10th September requesting approval of £3.5m grant from the Department for Levelling Up, Housing and Communities. A retrospective report to be taken to November full Council.</p> <p>LAHF 3 will fund more high-quality temporary accommodation for homeless families and provide housing for those on the Afghan Citizens Resettlement Scheme (ACRS) who supported UK efforts in Afghanistan.</p>	1.0
West Midlands Investment Zone - Greenpower Park	On 12th March 2024 Cabinet approved the report - West Midlands Investment Zone (WMIZ). The report recommendations included approving acceptance of up to £35m in West Midlands Investment Zone (WMIZ) funding, noting that initially £23m will be available for infrastructure provision on the Coventry Airport site. This element of £1.962m of funding from West Midlands Combined Authority for infrastructure works at the WMIZ Greenpower Park.	2.0
Swimming Pool Support Fund - Phase 2	The Council has been successful in securing capital grant funding from Sports England to upgrade Building Management system, replace florescent lighting with LED lighting and photo voltaic (PV) panels at 3 of the city's sports facilities. The works will be carried out at Alan Higgs, AT7 Centre and Exel Arena.	0.6
Duplex Fund	A technical adjustment as the final drawdown of the £2m loan for the Coventry Warwickshire Re-investment Trust run by Duplex project which offers a combination of loan and grant to businesses within Coventry for capital expenditure was processed in March 2023.	(0.8)
Miscellaneous	Schemes below £250k threshold	(0.1)
TOTAL APPROVED / TECHNICAL CHANGES		2.7

Appendix 3

Capital Programme: Analysis of Programme Acceleration/(Rescheduling)

SCHEME	EXPLANATION	£m
Friargate	Change to the budget profile is a result of delays in receiving the Final Account from the developer.	(3.6)
Coventry Very Light Rail	Further to the review of the Q2 forecast, £10.7m has been rescheduled into the next financial year for the following reasons: 1. The City Centre Demonstrator route is now significantly reduced in Scope in the initial phase (220metres from 860metres). The cost movement for this is in the region of £6.5m 2. The procurement of the slabs for the 640m will now slip into next financial year at a cost of £1.3m 3. The works to the vehicle (from Gen 1.0 to 1.5, i.e. to run in the city) will reschedule £1.6m. 4. The remaining £1.3m is for the slippage to the CCTMP works associated with the CVLR route.	(10.7)
Foleshill Transport Package	Following a consultation exercise and junction modelling, the project team are exploring alternative holistic solutions for Foleshill Transport Package. A change request has been approved by WMCA to re-phase programme with delivery expected in 2026.	(1.9)
Coventry South Transport Package	Change request has been approved by WMCA to phase programme into 5 distinct projects, these will be delivered between October 2024 and March 2027. A BJC has been submitted to WMCA for the first of these schemes, London Road North Cycleway for £2.375m, with construction due to commence in October 2024.	(6.7)
Woodlands School	£10m slip to 2025/26 Woodlands – Additional time was required to; verify the main contract with work undertaken to consider value engineering, discharge planning conditions, structural surveys including laboratory assessments to ensure structural stability of the building frame and foundations. The latter was as a requirement to ensure risk is properly managed.	(10.0)
Basic Need School Programme	Delays on 6 education expansion projects have taken place due to extensive feasibility and design considerations to ensure all stakeholders agree with the overall scope and specification. There have also been complex planning requirements to navigate to ensure application is compliant and consultees agree with the proposals.	(5.4)
Collection Centre	The rescheduling of the capital forecast is due to the main contractor entering into Administration at the end of September and the construction project being on hold till a new contractor can be procured.	(14.6)
Miscellaneous	Schemes below £250k threshold	(0.1)
TOTAL RESCHEDULING		(53.0)

Appendix 4

Prudential Indicators

Indicator	per Treasury Management Strategy 2024/25	As at 30 September 2024
Ratio of Financing Costs to Net Revenue Stream (Indicator 1) , This is an indicator of affordability and highlights the revenue implications of existing and proposed capital expenditure by identifying the proportion of the revenue budget required to meet borrowing costs.	14.94%	14.38%
Gross Borrowing should not, except in the short term, exceed the total of the Capital Financing Requirement (CFR) at 31st March 2024 plus the estimates of any additional CFR in the next 3 years (Indicator 2) , illustrating that, over the medium term, net borrowing (borrowing less investments) will only be for capital purposes. The CFR is defined as the Council's underlying need to borrow, after taking account of other resources available to fund the capital programme and is the amount of capital expenditure that has not yet been financed by capital receipts, capital grants or contributions from revenue.	Estimate / limit of £525.9m	£308.0m Gross borrowing within the limit.
Authorised Limit for External Debt (Indicator 5) , This statutory limit sets the maximum level of external borrowing on a gross basis (i.e. excluding investments) for the Council. Borrowing at this level could be afforded in the short term but is not sustainable. The Authorised limit has been set on the estimated debt with sufficient headroom over and above this to allow for unexpected cash movements.	£545.9m	£308.0m is less than the authorised limit.
Operational Boundary for External Debt (Indicator 6) , This indicator refers to the means by which the Council manages its external debt to ensure it remains within the statutory Authorised Limit. It differs from the authorised limit as it is based on the most likely scenario in terms of capital spend and financing during the year. It is not a limit and actual borrowing could vary around this boundary for short times during the year.	£525.9m	£308.0m is less than the operational boundary.
Upper Limit on Fixed Rate Interest Rate Exposures (Indicator 9) , These indicators allow the Council to manage the extent to which it is exposed to changes in interest rates. The Upper Limit for variable rate exposure has been set to ensure that the Council is not exposed to interest rate rises which could impact negatively on the overall financial position.	£495.9m	£223.0m
Upper Limit on Variable Rate Interest Rate Exposures (Indicator 9) , as above highlighting interest rate exposure risk.	£99.1m	-£61.6m
Maturity Structure Limits (Indicator 10) , This indicator highlights the existence of any large concentrations of fixed rate debt needing to be replaced at times of uncertainty over interest rates and is designed to protect against excessive exposures to interest rate changes in any one period, thereby managing the effects of refinancing risks. The maturity of borrowing is determined by reference to the earliest date on which the lender can require payment.		

< 12 months 12 months – 24 months 24 months – 5 years 5 years – 10 years 10 years +	0% to 50% 0% to 20% 0% to 30% 0% to 30% 40% to 100%	5% 17% 5% 16% 57%
Investments Longer than 364 Days (Indicator 11) , This indicator sets an upper limit for the level of investment that may be fixed for a period greater than 364 days. This limit is set to contain exposure to credit and liquidity risk.	£30m	£0.0m



Public report
Cabinet

Cabinet

10th December 2024

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 Development Scheme (LDS) update

Is this a key decision?

Yes – This report effects people living and working in more than 2 wards in the City

Executive Summary:

Further to Cabinet and Councils decision to progress with a full review of the Coventry Local Plan in November 2022, the Local Development Scheme has been updated to indicate the timescales and the ongoing process of the review. The Local Authorities Local Development Scheme should be kept up to date and made publicly available in order enable the local community and interested parties to be informed of progress.

Further to the initial stage of public consultation held in 2023, the timescales have been reviewed and an updated LDS produced, attached at Appendix One to the report to illustrate the progress of the Local Plan Review.

Recommendation:

Cabinet is requested to:

- 1) Approve the adoption of the draft Local Development Scheme attached at Appendix 1 to the report.
- 2) Approve that the draft Local Development Scheme attached at Appendix 1 to the report, will have effect from 11th December 2024.

List of Appendices included:

Appendix 1 - Draft Local Development Scheme December 2024

Background papers:

None

Other useful documents

Adopted Local Development Scheme February 2024
15th November 2022 Cabinet Report - Local Plan Review
2017 Local Plan

Has it been or will it be considered by Scrutiny?

No

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

No – however the Local Plan Review is informed by Local Plan Cabinet Advisory Panel

Will this report go to Council?

No

Report title: Local Development Scheme Update

1. Context (or background)

1.1. The Planning & Compulsory Planning Act 2004, as amended by the Localism Act 2011, requires each local planning authority to prepare and maintain a document setting out the programme for the preparation of planning documents. This is known as the Local Development Scheme (LDS).

1.2. The LDS is a project plan for preparing planning documents, but it is not a policy document itself. It provides a starting point for the local community and stakeholders to find out what planning documents are being prepared by the Council and the timetable for when these documents will be produced. In particular, it sets out the timetable for the review and update of the Council's Local Plan and outlines the dates when there will be formal opportunities to get involved with the plan making process.

1.3. Local Plans must be considered for review at least once every five years, as laid out in Paragraph 33 of the National Planning Policy Framework:

“Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary”

1.2 In November 2022, Cabinet and Council gave authority to progress with a full review of the Local Plan, seeking to assess if the existing suite of policies had proven effective in decision making, and if these policies aligned with the wider corporate objectives of the Local Authority.

1.3 Cabinet authority was then sought in July 2023 in order to undertake the initial stage of public consultation upon the Local Plan Review. Following this, a Regulation 18 'issues and options' public consultation was undertaken between 18th July and 29th September 2023.

1.4 Further to analysis of the representations received from public consultation, which informs the necessary evidence base to progress to further stages of the plan review, the Local Development Scheme has been reviewed to ensure that the timescales presented provide an accurate forecast of the forthcoming stages.

1.5 There are several variables that may lead to that timeline being extended including the unavailability of Inspectors to convene the Examination in Public or a longer time needed to assess and integrate complex representations to the consultations. Any significant delays will be reported to Cabinet in future reports.

1.6 An indicative timeline of the plan review is shown below and is included in a refreshed Local Development Scheme at Appendix One to the report.

	2023						2024												2025											
	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
Reg 18 consultation (Issues & Options)																														
Representation analyses																														
Update and commission evidence base																														
Update Local Development Scheme (LDS)																														
Local Plan Advisory Panel Engagement																														
Policy & Plan preparation																														
Reg 19 (Publication) Plan to Cabinet																														
Update Local Development Scheme (LDS)																														
Reg 19 consultation																														
Representation analysis / prep for submission																														
Council authority to submit plan																														
Submit for examination																														
Examination in public																														
Inspectors report / prep report to Council																														
Local Plan Adoption																														

2. Options considered and recommended proposal.

- 2.1 Cabinet could choose to seek revisions to the LDS and choose not to adopt the draft Local Development Scheme December 2024 at this stage, however publication of the timelines aids local communities and interested parties to monitor the progress of the Local Plan Review, and is informed by public consultation to date. Furthermore, the production of the LDS is a legal requirement and were this course of action to be pursued, the Council would contravene the relevant statutory requirements. It should be noted that the government is monitoring all local authorities to ensure that their Local Plans are prepared in accordance with the published LDS. Failure to have an up-to-date LDS could therefore result in poor national monitoring outcomes with the consequential reputational damage. As such this option is not recommended.
- 2.2 Cabinet could choose to adopt the draft Local Development Scheme December 2024 to update local communities and interested parties of the progress of the local plan review. This option is recommended.

3. Results of consultation undertaken

- 3.1. Whilst no direct consultation has taken place on the LDS, the timelines of the Local Plan Review are informed by regulation 18 consultation which was held between 18th July and 29th September 2023.

4. Timetable for implementing this decision

- 4.1. The decision will be implemented as soon as practicable.

5. Comments from the Director of Finance and Resources and the Director of Law and Governance

5.1. Financial implications

There are no direct financial implications of publication of the updated Local Development scheme, however costs are associated to the ongoing Local Plan Review. An estimation of associated costs was provided within the November 2022 Cabinet Report, whilst the costs of required evidence base and Examination stages will be updated summarised in a future report ahead of proceeding to any submission for examination, this will allow for a more accurate estimation of both time and location costs.

5.2. Legal implications

5.2.1 Local Planning Authorities must prepare and maintain a scheme to be known as their Local Development Scheme (LDS).

5.2.2 The LDS must specify broadly:

- (a) the local development documents which are to be development plan documents;
- (b) the subject matter and geographical area to which each development plan document is to relate;
- (c) which develop plan documents are to be prepared jointly with other local planning authorities; and
- (d) the timetable for preparation and revision of the development plan documents.

5.2.3 If a local planning authority fails to prepare an LDS, the secretary of state may do so and direct that the same is brought into effect.

5.2.4 To bring an LDS into effect, a local planning authority must resolve that the scheme is to have effect and specify the date from which the scheme is to have effect.

5.2.5 A local planning authority must:

- (a) revise an LDS at such time as they consider appropriate; and
- (b) make the following available to the public:
 - (i) the up-to-date text of the LDS,
 - (ii) a copy of any amendments made to the LDS, and,
 - (iii) up-to-date information showing the state of the authority's compliance (or non-compliance) with the timetable for the preparation and revision of the development plan documents.

6. Other implications

6.1. How will this contribute to the One Coventry Plan?

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

Through progressing the timelines within the LDS, the Local Plan will continue to contribute to aims of the Council Plan such as improving the lives of current and future residents, ensuring the delivery of affordable homes, employment opportunities and accessible open space.

6.2. How is risk being managed?

An internal risk log has been developed and will be updated as progress is made or changes occur and will be reviewed at the monthly Plan Review meeting held between officers and the Cabinet Member for Communities and Housing.

6.3. What is the impact on the organisation?

There will be a staffing and resource impact from these proposals in order to deliver upon the stated timelines, however these are anticipated to be absorbed within current staffing provision.

6.4. Equality/ EIA

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

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

The continued development of a reviewed Plan as outlined in the LDS will allow the Council to consider additional policies related to climate change and the environment.

6.6. Implications for partner organisations?

None

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Rob Back	Strategic Lead Planning	City Services and Commercial	11.11.2024	13.11.2024
Names of approvers for submission: (officers and members)				
Cath Crosby	Lead Accountant, Business Partnering, Place	Finance and resources	11.11.2024	12.11.2024
Oluremi Aremu	Head of Legal and Procurement Services	Law and Governance	11.11.2024	11.11.2024
Andrew Walster	Director of City Services and Commercial	-	11.11.2024	17.11.2024
Councillor N Akhtar	Cabinet Member for Housing and Communities	-	11.11.2024	11.11.2024

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Coventry City Council Local Development Scheme

December 2024

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1.0 Introduction

1.1 The Local Development Scheme (LDS) is a project plan which sets out which Local Plan documents are to be prepared, and the timetable for the preparation and completion of these so that local communities and interested parties can keep track of progress.

1.2 It is a legal requirement¹ that an LDS is prepared, kept up to date and made publicly available. This LDS will therefore be published on the Council's website.

1.3 The documents which are covered by this LDS the Local Plan Review and the Houses in Multiple Occupancy (HMO) Development Plan Document (DPD) The LDS sets out the anticipated timing of the forthcoming stages and Examination of the Plan Review and, separately, the HMO DPD. We also include a section upon Neighbourhood Plans which communities can choose to prepare for their local area should they wish to do so.

¹ Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended)

2.0 The previous LDS

2.1 The previous Local Development Scheme was published in February 2024, covering the period February 2024 – March 2025. It is important that the LDS is updated to reflect the progress of implementation of the decision to undertake a full Plan Review.

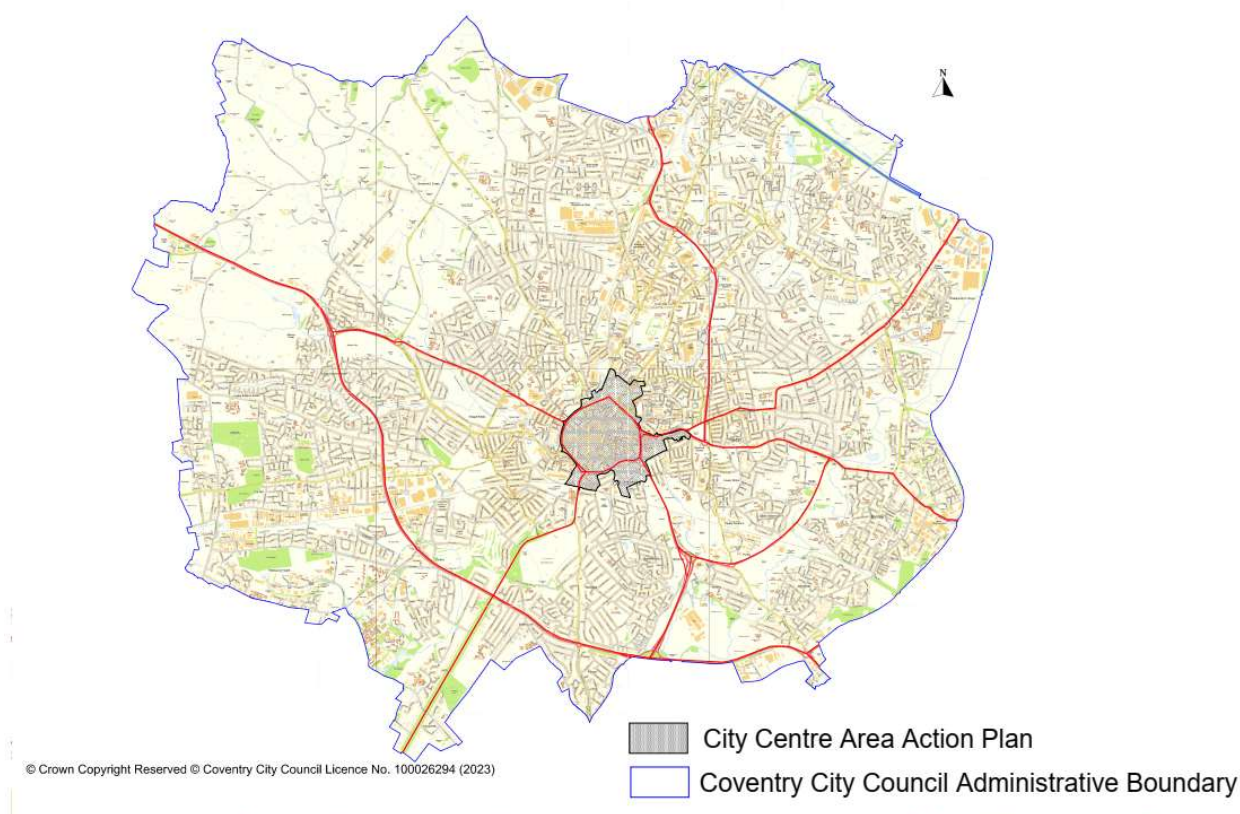
2.2 The previous LDS included the HMO DPD and associated Article 4 Direction which has now been confirmed. An indicative timetable for the adoption of the HMO DPD post examination is now included for clarity.

3.0 Development Plan Documents

3.1 Development Plan Documents (DPDs) are defined in the Local Plan Regulations 2012 (as amended). They address the development and use of land, the allocation of certain sites for particular purposes (for example housing, employment, retail, green space) and they include planning policies against which planning applications are assessed to help determine whether particular proposals are acceptable or not. DPDs have to be prepared in line with strict legal procedures, must be informed by robust evidence to ensure the policies and land allocations are soundly based and justified, and must be publicly examined by an independent Planning Inspector before they can be formally adopted by the Council.

3.2 The adopted DPDs for Coventry City Council are the Local Plan, which covers the entire administrative area of the City Council and the City Centre Area Action Plan which covers the City Centre (Both shown in Figure 1). These were adopted on 6th December 2017 and can be viewed on the Council's website at www.coventry.gov.uk/planningpolicy

Figure 1



3.3 It should also be noted that Neighbourhood Plans can form part of the Development Plan: communities can choose to produce these for their local area should they wish to do so. Further information is contained within Chapter 5.

3.4 The Local Plan Regulations² require that Local Plans must be reviewed every five years, starting with the date of adoption. The review must consider changing circumstances affecting the area, or any relevant changes in national policy³ in order to determine whether any strategic policies need updating.

3.5 Bearing in mind the aforementioned requirement, Table 1 sets out the timetable currently underway for a full review of the Local Plan, this being inclusive of the City Centre Action Plan.

3.6 A more detailed work programme is laid out in the appendix to this document.

² Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012

³ National Planning Policy Framework 2021 paragraph 33

Coventry Local Development Scheme

Table 1: Local Plan review timetable (key milestones – further detail in Appendix 1)

	2023		2024				2025			
	Q3 (July- Sept)	Q4 (Oct- Dec)	Q1 (Jan- Mar)	Q2 (Apr- Jun)	Q3 (July- Sept)	Q4 (Oct- Dec)	Q1 (Jan- Mar)	Q2 (Apr- Jun)	Q3 (July- Sept)	Q4 (Oct- Dec)
Regulation 18 Consultation										
Policy & Plan preparation										
Regulation 19 Consultation										
Submission										
Examination										
Adoption										

3.7 Table 2 below sets out the anticipated timetable for the new Homes in Multiple Occupation DPD and, for clarity, also includes the now concluded delivery timeline for the Article 4 Direction. The DPD covers the same geographical area as the Coventry City Council administrative boundary illustrated in Figure 1.

3.8 The consultations on both the Article 4 Direction and the HMO DPD have both been completed, with the Article 4 now confirmed and in place in the affected Wards, whilst the HMO DPD is currently awaiting examination, scheduled for Q1 of 2024.

Table 2: Houses in Multiple Occupancy DPD timetable (with timeline for Article 4 Direction also included)

	2022		2023				2024				2025			
	Q3 (July- Sept)	Q4 (Oct- Dec)	Q1 (Jan- Mar)	Q2 (Apr- Jun)	Q3 (July- Sept)	Q4 (Oct- Dec)	Q1 (Jan- Mar)	Q2 (Apr- Jun)	Q3 (July- Sept)	Q4 (Oct- Dec)	Q1 (Jan- Mar)	Q2 (Apr- Jun)	Q3 (July- Sept)	Q4 (Oct- Dec)
HMO DPD	C*	C*	P	P			E	E	E		A			
Article 4 Direction	C	C				A4C								

C – Consult

C* - Consultation (Regulation 18)

P – Publication (Proposed submission – Regulation 19)

A – Adopt

E – Examination

A4C – Article 4 Confirmation

Regulations refer to those set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

4.0 Supplementary Planning Documents & Design Codes

4.1 Supplementary Planning Documents (SPDs) can be produced to elaborate upon adopted Local Plan policy where it is helpful to provide more detail to help deliver the policies of an adopted Local Plan. They cannot introduce new policy.

4.2 During the period of plan review, the Council intends to produce an update to its Health Impact Assessment Supplementary Planning Document (HIA SPD), which will cover the administrative area of Coventry City Council.

4.3 In addition, a Supplementary Planning Document has been jointly produced between Coventry City Council and Warwick District Council to support the continued growth and expansion of the University of Warwick. This is set out in policy DS2 of the adopted Coventry Local Plan which supports cross boundary partnership working, including the production of SPDs with growth and expansion of the University of Warwick specifically cited.

4.4 The timetable for producing and consulting upon the anticipated SPDs is set out below.

Table 3: SPD timetable

	2024				2025				2026	
	Q1 (Jan-Mar)	Q2 (Apr-Jun)	Q3 (July-Sept)	Q4 (Oct-Dec)	Q1 (Jan-Mar)	Q2 (Apr-Jun)	Q3 (July-Sept)	Q4 (Oct-Dec)	Q1 (Jan-Mar)	Q2 (Apr-Jun)
University of Warwick SPD			C	A						
Health Impact Assessment SPD Update						C	A			
Shopfront Design Guide SPD						C	A			
Biodiversity Net Gain SPD Update							C	A		
Coventry Connected SPD Update								C	A	
Sustainable Drainage SPD									C	A

Coventry Local Development Scheme

4.5 The Levelling up and regeneration act 2023 introduced at paragraph 15F, a requirement for Local Authorities to produce Design Codes which should be considered for planning permissions to be granted. Coventry City Council aim to meet this requirement in the production of area specific codes commencing 2025, as set out below:

Table 4: Design Code timetable

	2025				2026				2026	
	Q1 (Jan-Mar)	Q2 (Apr-Jun)	Q3 (July-Sept)	Q4 (Oct-Dec)	Q1 (Jan-Mar)	Q2 (Apr-Jun)	Q3 (July-Sept)	Q4 (Oct-Dec)	Q1 (Jan-Mar)	Q2 (Apr-Jun)
CCC Localised Design Code Area One			C	A						
CCC Localised Design Code Area Two					C	A				
CCC Localised Design Code Area Three							C	A		
CCC Localised Design Code Area Four									C	A

5.0 Neighbourhood Plans

5.1 Communities can choose to prepare Neighbourhood Plans for their area should they so wish. These are independently examined and provided they meet a number of 'basic conditions' they can be voted on at referendum and, provided that a majority of the community vote in favour they can then be 'made' (ie adopted) as part of the Development Plan for the area. Planning applications can therefore be assessed to check whether they comply with the policies of the plan. Further information can be found at <https://www.gov.uk/guidance/neighbourhood-planning--2>

5.2 There is one adopted Neighbourhood Plan within Coventry City Council's area, Willenhall. This was made on 18th June 2018.

5.3 Two further Neighbourhood Areas have been designated: Allesley (designated on 4th May 2016) and Finham (designated on 16th March 2017) however these have not reached an advanced stage yet.

5.4 Up to date information on neighbourhood plans, their status and the geographical

areas covered can be found at www.coventry.gov.uk/localplan

6.0 Monitoring and Data Standards

6.1 Progress on the compliance with the timetables contained within the Local Development Scheme will be reported in the Authority Monitoring Report which the Council publishes annually.

6.2 To comply with the legislation⁴ all documents will be produced to accord with any data standards required by Government.

⁴ Planning and Compulsory Purchase Act 2004 as amended by the Neighbourhood Planning Act 2017

Appendix 1 – Detailed timeline for Plan Review

	2023						2024												2025											
	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
Reg 18 consultation (Issues & Options)	█	█	█								█										█									
Representation analyses				█	█	█					█										█									
Update and commission evidence base					█	█					█										█									
Update Local Development Scheme (LDS)							█	█			█										█									
Local Plan Advisory Panel Engagement								█	█	█	█	█									█									
Policy & Plan preparation											█		█	█	█	█	█				█									
Reg 19 (Publication) Plan to Cabinet											█						█	█			█									
Update Local Development Scheme (LDS)											█						█	█			█									
Reg 19 consultation											█								█	█	█									
Representation analysis / prep for submission											█										█									
Council authority to submit plan											█										█	█								
Submit for examination											█										█		█							
Examination in public											█										█		█	█	█					
Inspectors report / prep report to Council											█										█					█	█			
Local Plan Adoption											█										█							█	█	

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Public report Cabinet

Cabinet
Scrutiny Co-ordination Committee
Council

10th December 2024
18th December 2024
14th 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

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

Executive summary:

On 6th 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 (15th November 2022, 6th 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 18th 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 – 14th 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 6th 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 policies 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 15th January 2025 and 3rd 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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Councillor N Akhtar	Cabinet Member for Housing and Communities	-	11.11.2024	11.11.2024

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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
4. Ancient Woodlands Map and List
5. Heritage Park and Route
6. Cycle and Parking Standards for New Development
7. Infrastructure Delivery Plan
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9. Designation & Allocation Maps
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- d. City Centre Boundary & Transition Zone
- e. Centres & Primary Shopping Areas
- f. City Centre Character Areas

Abbreviations

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

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

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

1. Introduction

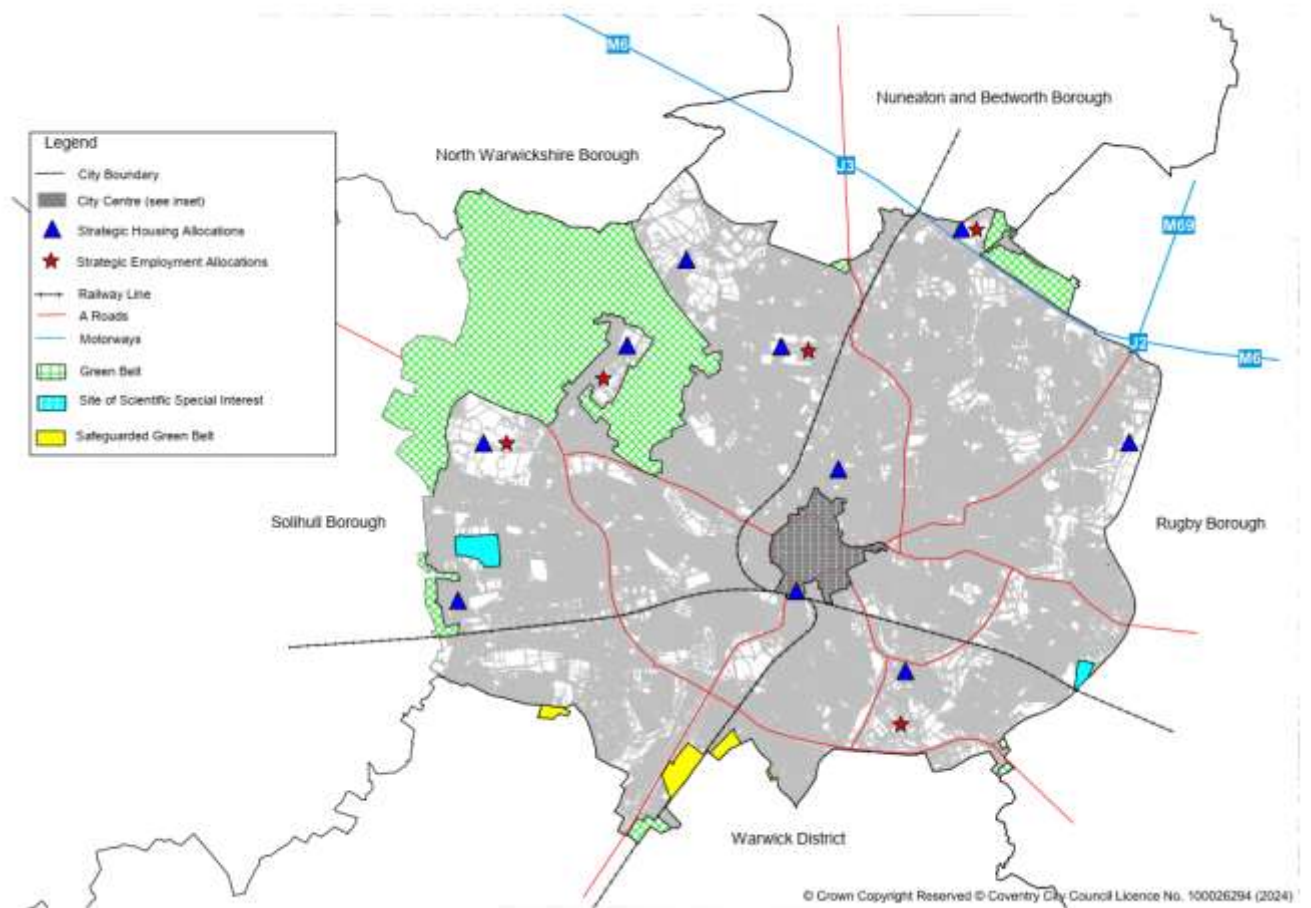
- 1.1 The Local Plan covers the administrative area of Coventry City Council. It sets out where development will go, how much is needed and what kind of development we should provide for, as well as setting out what areas should be protected and improved. It must provide a balance between economic, social 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 6th 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 18th July to 29th 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 & 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 & 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
Total	60.2

*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
Total	74,339

* 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
	Total		107ha	52.35 (excludes Friargate office floorspace figure)	

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, generates¹ 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
Total	31,493

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, now delivered.	
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, now delivered.	
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, now delivered.	

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, now delivered.	
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, now delivered.	
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, now delivered.	
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 12th 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 (NO₂) 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 NO₂ 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)¹ 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 Strategy², 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

¹ <https://www.coventry.gov.uk/onecoventryplan>

² <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 energy³ and district heating⁴ 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;

³ 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.

⁴ 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

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 m²) 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 Landings¹¹⁹, NEF / GHA Assured Performance Process¹²⁰, 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/m²/year
- ii.** Space heating demand: 15 kWh/m²/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 viable⁵, it should be demonstrated that the amount of on-site renewable energy generation equates to >114.9 kWh/m² 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-m² 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:

⁵ 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 m²) 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/m²/year
 - Space heating demand: 15 kWh/m²/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 viable⁶, it should be demonstrated that the amount of on-site renewable energy generation equates to >114.9 kWh/m² 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 m² 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.

⁶ 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 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.

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 m² 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 m² non-residential floor space or more) is required to limit embodied carbon (RICS/BS 15978 modules A1 – A5) to 600 kgCO₂e/m² 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

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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

Policy reference	Policy heading	Policy status (Updated / no change / deleted / new policy)	Strategic policy?
DS1	Overall Development Needs	Updated	Yes
DS2	The Duty to Cooperate and partnership working	Minor update	Yes
DS3	Sustainable Development Policy	Minor update	Yes
DS4 (Part A)	General Masterplan principles	Updated	Yes
DS4 (Part B)	Whitley Specific Masterplan Principles	Minor update	No
DS4 (Part C)	Keresley SUE Specific Masterplan Principles	Minor update	No
DS4 (Part D)	Eastern Green SUE Specific Masterplan Principles	No change	No
HW1	Health and Health Impact Assessment (HIA)	Updated	Yes
JE1	Overall Economy and Employment Strategy	Updated	Yes
JE2	Provision of Employment Land and Premises	Updated	Yes

JE3	Non-Employment Uses on Employment Land	Updated	No
JE4	Location and Type of Office Development	Updated	No
JE5	Industrial and Storage/Distribution Development	Updated	No
JE6	Tourism/Visitor Related Development	Updated	No
JE7	Accessibility to Employment Opportunities	Updated	No
JE8	Location of Research and Development (R&D)	New Policy	No
H1	Housing Land Requirements	Updated	Yes
H2	Housing Allocations	Updated	Yes
H3	Provision of New Housing	Updated	Yes
H4	Securing a Mix of Housing	Updated	No
H5	Managing Existing Housing Stock	Updated	No
H6	Affordable Housing	Updated	No
H7	Gypsy and Traveller Accommodation	Updated	No
H8	Specialist Housing including Specialist Housing with Elements of Care, Older Persons accommodation and hostels	Updated	No

H9	Residential Density	Updated	No
H10	Student Accommodation	Updated	No
H11	Homes in Multiple Occupation (HMOs)	Updated	No
H12	Build to Rent	New policy	No
H13	Co-Living	New policy	No
R1	Delivering Retail Growth	Updated	No
R2	Coventry City Centre – Development Strategy	Updated	No
R3	The Network of Centres	Updated	Yes
R4	Out of Centre Proposals	Updated	Yes
R5	Retail Frontages and Ground Floor Units in Defined Centres	Minor update	No
R6	Restaurants, Bars and Hot Food Takeaways	Minor update	No
CO1	New or Improved Social, Community and Leisure Premises	No change	No
CO2	Re-use of or Redevelopment of Facilities	Minor update	No
CO3	Neighbourhood and Community Planning	No change	No
GB1	Green belt	Updated	Yes
GB2	Safeguarded Land in the Green Belt	Updated	Yes

GB3	Local Green Space	New policy	Yes
GE1	Green and Blue Infrastructure	Updated	Yes
GE2	Green Space	Updated	No
GE3	Biodiversity, Geological, and Landscape Conservation	Updated	No
GE4	Tree Protection	Updated	No
DE1	Ensuring High Quality Design	Updated	Yes
DE2	Delivering High Quality Places	New policy	No
HE1	Conservation Areas	Updated	Yes
HE2	Conservation and Heritage Assets	Updated	Yes
HE3	Heritage Park - Charterhouse	No change	No
HE4	Archaeology	New policy	No
AC1	Accessible Transport Network	Updated	Yes
AC2	Road Network	Updated	No
AC3	Demand Management	Updated	No
AC4	Active Transport Provision including Walking, Cycling and Micro Mobility	Updated	No
AC5	Bus, Demand Response Transit and Rapid Transit	Updated	No
AC6	Rail	Updated	No
AC7	Freight	Updated	No

EM1	Planning for Climate Change Adaptation	Updated	Yes
EM2	Building Standards	Deleted	No
EM3	Renewable Energy Generation	Deleted	No
EM4	Flood Risk Management	Updated	No
EM5	Sustainable Drainage Systems (SuDS)	Updated	No
EM6	Redevelopment of Previously Developed Land	Updated	No
EM7	Air Quality	Updated	No
EM8	Waste Management	No change	No
EM9	Safeguarding Mineral Resources	No change	No
EM10	Non Mineral Development in Mineral Safeguarding Areas	No change	No
EM11	Energy Infrastructure	New policy	No
EM12	Reducing operational carbon in new build non-residential development	New policy	No
EM13	Overheating in new buildings	New policy	No
EM14	Embodied carbon and waste	New policy	No
EM15	Noise	New policy	No
C1	Broadband and Mobile Internet	Deleted	No
C2	Telecommunications	Deleted	No

CC1	City Centre Policy Parts A-E	New policy (see below regarding transfer from the Area Action Plan)	No
IM1	Developer Contributions for Infrastructure	Updated	No

Table 2: Area Action Plan Policies review

Policy reference	Policy heading	Moved / deleted?	Comments (eg if moved, where, if deleted, why - summary)
CC1	Coventry City Centre – Development Strategy	Moved	Retained, updated and included in the core local plan policy CC1 (Part A) - Coventry City Centre Development Strategy.
CC2	City Centre Heritage	Deleted	Deleted and incorporated into core local plan policies HE2 and HE4.
CC3	Building Design	Deleted	Deleted as duplicates core local plan policy.
CC4	Public Art	Deleted	Deleted as relates to the whole area so now in core local plan policy DE2.
CC5	Lighting	Deleted	Deleted as relates to the whole area so now in core plan policy DE2.
CC6	Public Realm	Deleted	Deleted as relates to the whole area so now in core plan policy DE2.
CC7	Tall Buildings	Deleted	Deleted and incorporated into revised core plan policy DE1.
CC8	Green and Blue Infrastructure	Moved	Retained and updated within Policy CC1 (Part B) - Green and Blue Infrastructure.

CC9	Drainage & Flood Risk	Moved	Retained but revised within Policy CC1 (Part C) - Drainage and Flood Risk.
CC10	Environmental Management	Moved	Retained and revised within Policy CC1 (Part D) - Environmental Management.
CC11	Accessibility	Deleted	Deleted and incorporated into AC policies and referenced in CC1 (Part E) - City Centre Character Area.
CC12	Friargate	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
CC13	Cathedrals and Cultural Area	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
CC14	Civic Area	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
CC15	Far Gosford Street Area	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
CC16	Health and Education Area	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
CC17	Leisure and Entertainment Area	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
CC18	The Primary Shopping Area	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
CC19	Primary Shopping Area Regeneration - South	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.

CC20	Primary Shopping Area Regeneration - North	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
CC21	Cathedral Lanes	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
CC22	Primary and Secondary Frontages	Moved	Retained but revised within Policy CC1 (Part e) - City Centre Character Area.
CC23	Technology Park Area - Parkside	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
CC24	University and Enterprise Area	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
CC25	Regenerations Areas	Moved	Retained but revised within Policy CC1 (Part E) - City Centre Character Area.
CC26	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.

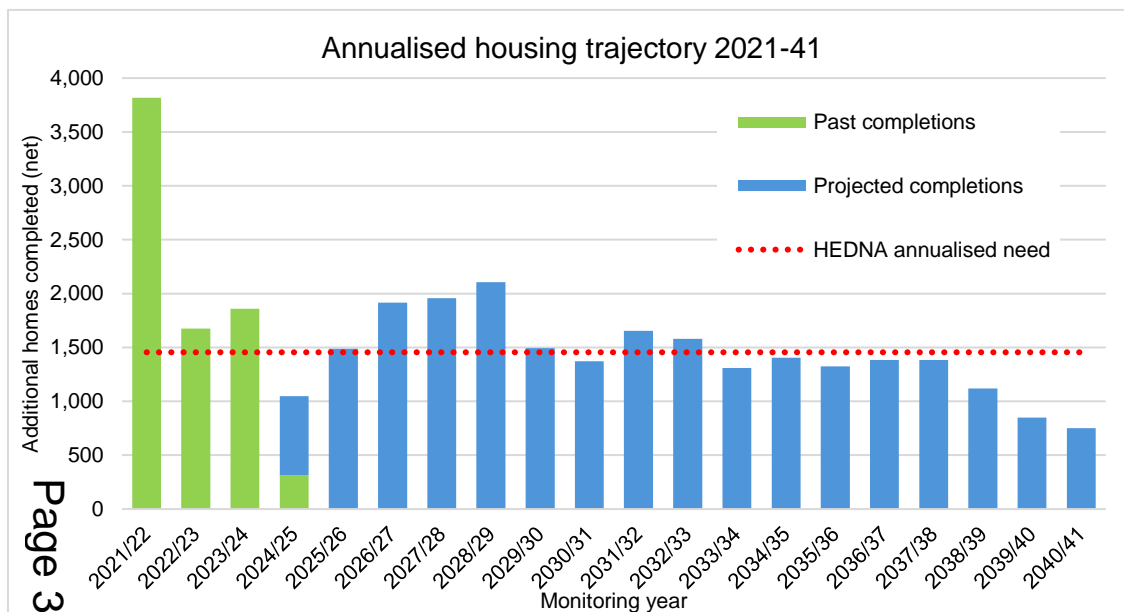
This table itemises the various marketing tools that should typically be used to market the interest.

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
Past completions																				
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
Projections (net)																				
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
Totals																				
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
Projected cumulative completions 2021-41	3,818	5,492	7,351	8,399	9,887	11,802	13,758	15,865	17,359	18,731	20,386	21,965	23,274	24,678	26,003	27,388	28,773	29,893	30,743	31,493
Cumulative local housing need (1455 p/yr)	1,455	2,910	4,365	5,820	7,275	8,730	10,185	11,640	13,095	14,550	16,005	17,460	18,915	20,370	21,825	23,280	24,735	26,190	27,645	29,100
Cumulative +/- performance vs need	2,363	2,582	2,986	2,579	2,612	3,072	3,573	4,225	4,264	4,181	4,381	4,505	4,359	4,308	4,178	4,108	4,038	3,703	3,098	2,393



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	
5YHLS 2024-2029 (in years)	6.75	6.43

*Local housing need established by the Coventry and Warwickshire HEDNA 2022

Appendix 4 - Ancient Woodlands Map and List

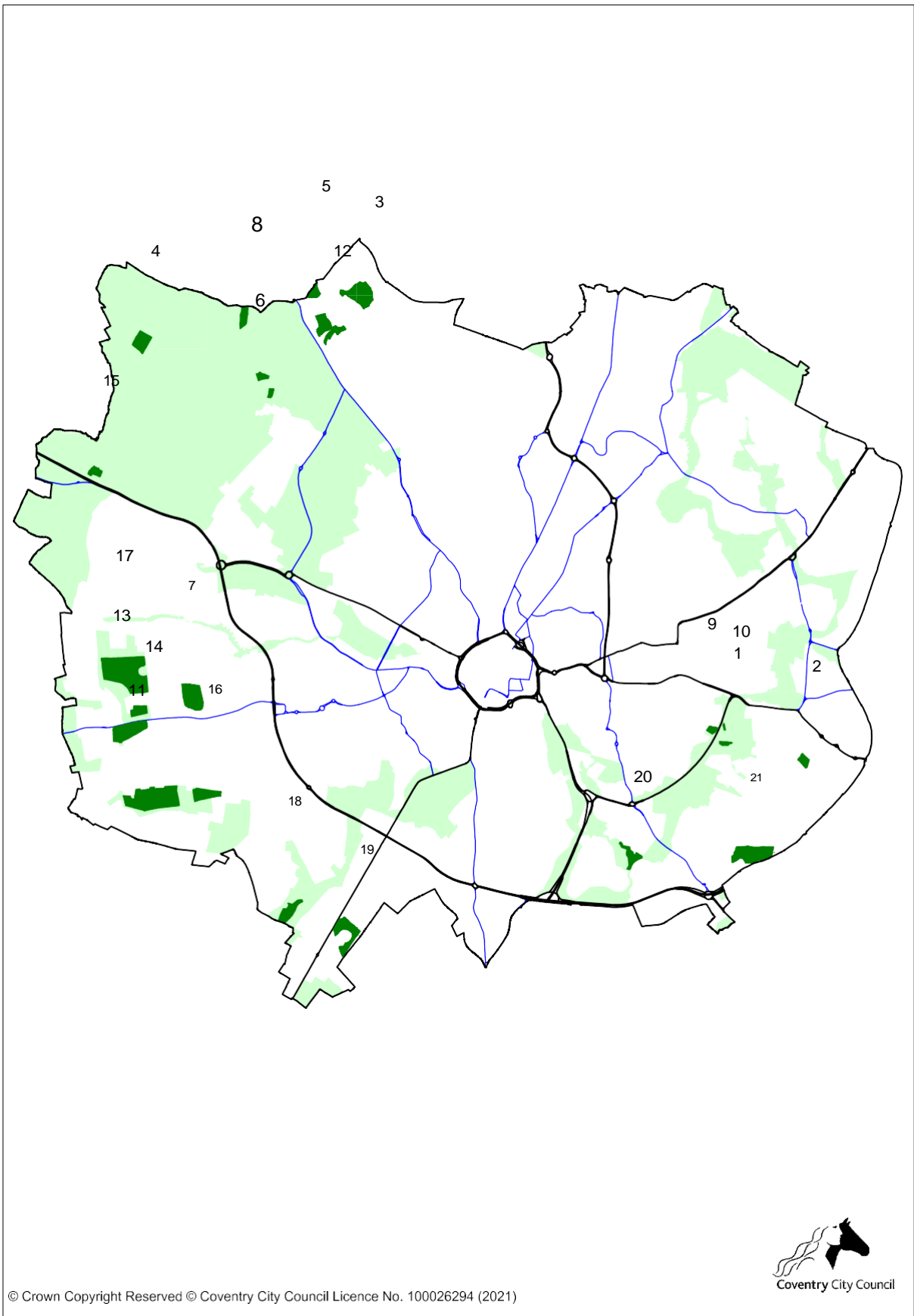
List of Ancient Woodlands

Planted Ancient Woodland (PAWS)

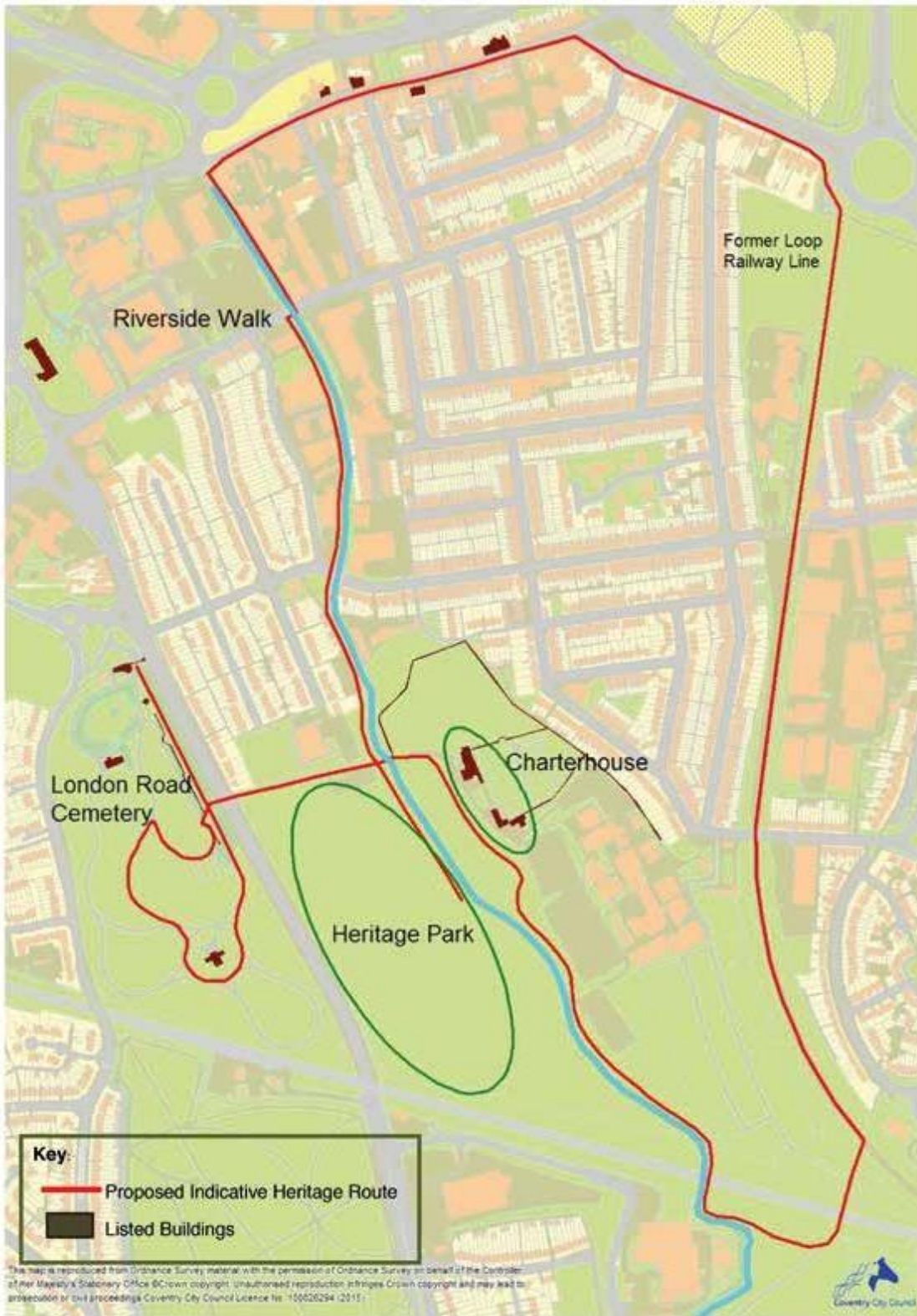
Ancient Semi Natural Woodland (ASNW)

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

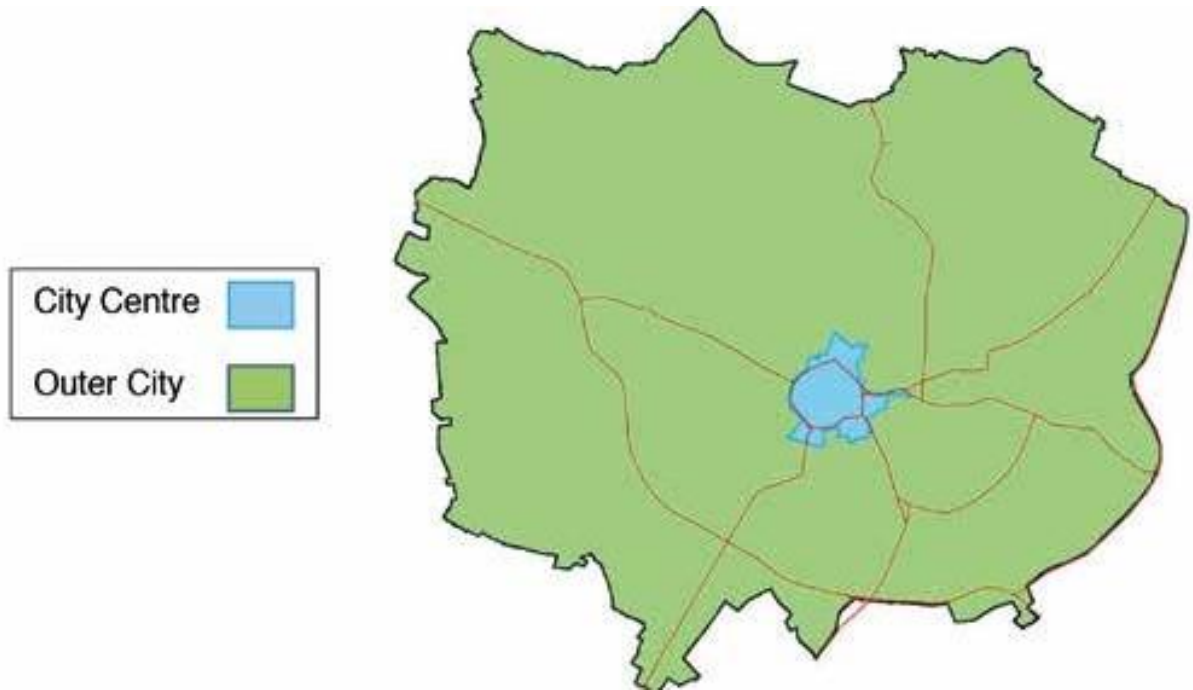
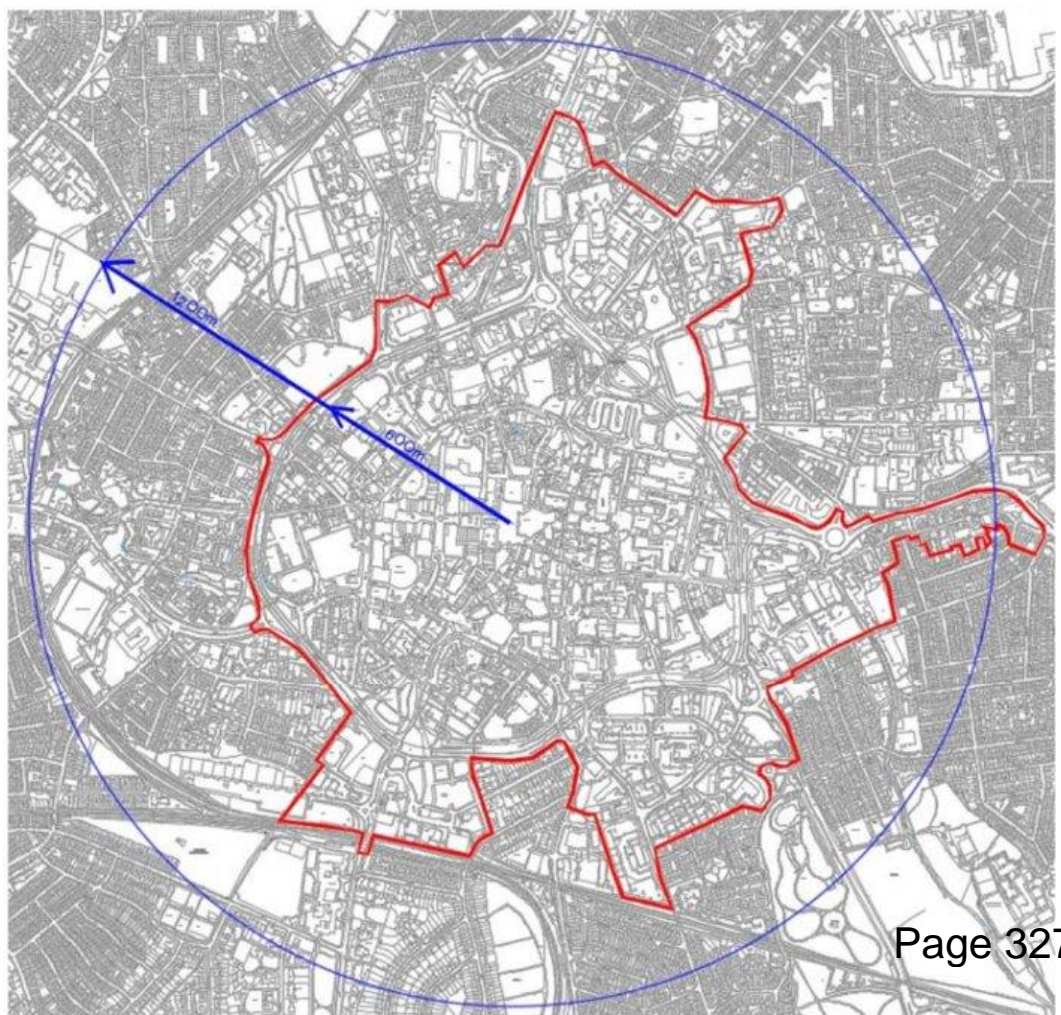


Figure 2 – City Centre and Transition Zone



- 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

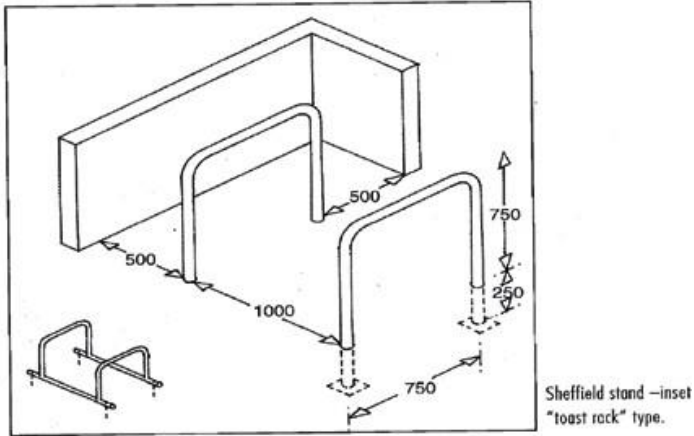
- 2.13 Fear of theft or damage to the cycle is often cited as a major deterrent to cycling. Well-planned and secure cycle parking is therefore an essential element in increasing the level of cycle use. The provision of cycle parking must be considered early in the planning and design process.
- 2.14 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

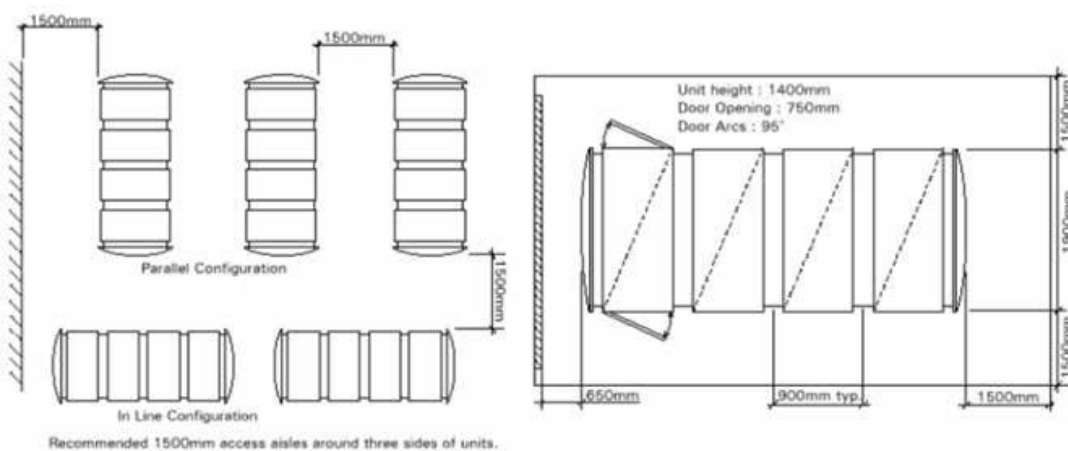
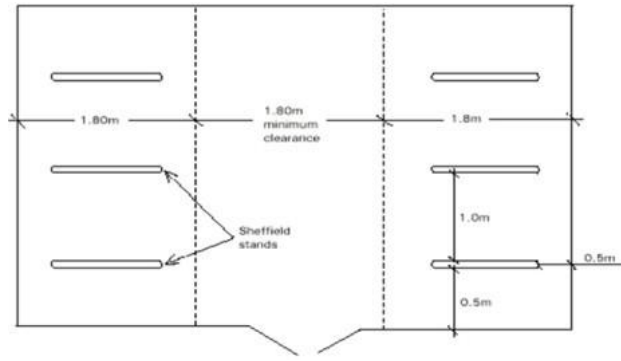


Figure 5: Locked Compound Design



Notes for Table 1

Car Parking Standards

1. All standards should be calculated on external gross floor area (m²) 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
Standard Parking Space	2.5m x 5.0m
Parallel parking Space	2.0m x 6.0m
Disabled Parking Bay	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)
Parking Space with EV Charger	2.8m x 5.0m
Garages (Internal sizes)	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 (m²) 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
E(a) - Shops (m²) Food	1 per 25m ²	Under 2,500m² 1 per 200m ² for customers 1 per 400m ² for staff Minimum of 2 spaces
		Over 2,500m² 1 per 400m ² for customers 1 per 600m ² for staff
E(a) - Shops (m²) Non-food	1 per 35m ²	1 per 400m ² for customers 1 per 400m ² for staff Minimum of 2 spaces
E(c) - Financial and Professional Services	1 per 30m ²	1 per 400m ² for customers 1 per 400m ² for staff A minimum of 2 spaces
E(b) - Restaurants and Cafés (dining area m²)		
E(g)(i) and (ii)- Business/Research & Development	1 per 45m ²	1 per 400m ² for staff 1 per 400m ² for visitors Minimum of 2 spaces

E(g)(iii)/B2 - Light or General Industrial	1 per 60m ²	Under 4,000m² 1 per 400m ² for staff 1 per 750m ² for visitors Minimum of 2 spaces
		Over 4,000m² 1 per 500m ² for staff 1 per 1,000m ² for visitors
B8 - Storage and Distribution	1 per 100m ²	Under 4,000m² 1 per 400m ² for staff 1 per 750m ² for visitors A minimum of 2 spaces
		Over 4,000m² 1 per 500m ² for staff 1 per 1000m ² for visitors

Use Class	Outer City Car Parking spaces	Inner and Outer City Cycle Parking spaces
C1- Hotels	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
C2 - Residential Institutions Care & Nursing Homes	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
C2 - Residential Institutions - Hospital, nursing home, care home,	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
C2A - Secure Residential Institutions	Parking provision will be considered on a site by site basis.	
Sui Generis - Student Accommodation (Halls of Residence) & C2 - Residential Schools/Colleges	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)
C3 - Residential Dwellings (per unit) 1 bedroom house/flat	1 per dwelling + 1 unallocated space per 5 dwellings for visitors (See note 3 above)	1 per dwelling (See notes 11 & 12 above)
C3 - Residential Dwellings (per unit) 2 bedroom house/flat	2 per dwelling + 1 unallocated space per 10 dwellings for visitors (See note 3 above)	1 per dwelling (See notes 11 & 12 above)
C3 - Residential Dwellings (per unit) 3 or more bedroom house/flat	2 per dwelling + 1 unallocated space per 5 dwellings for visitors (See note 3 above)	2 per dwelling (See notes 11 & 12 above)
C4 - Houses in Multiple Occupancy	0.75 per bedroom	1 per 3 bedrooms (See notes 11 & 12 above)

(HiMOs)		
E(e) - Medical or Health Services (Non Residential)	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
E(f) - Creche, Nursery	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
F1(a) - Education Establishment Primary schools	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
F1(a) - Education Establishment Secondary Schools	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
F1(a) - Education Establishment Further / higher education (Colleges and Universities)	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
F1(b), (c), (d), (e) and F2(b) - Art Gallery/ Museum/ Library/Public Hall	1 per 30m ²	1 per 10 staff members (FTE) 1 per 20 people expected to use the facility at any one time
F1(f) - Place of Worship	1 per 10m ²	1 per 10 staff members (FTE) 1 per 20 people expected to use the facility at any one time
E(d) - Gym/ Fitness Centre	1 per 15m ² public areas	1 per 10 staff members (FTE) 1 per 20 people expected to use the facility at any one time
E(d) - Indoor Sports Hall	1 per 20m ² public areas	1 per 10 staff members (FTE) 1 per 20 people expected to use the facility at any one time
F2 (c) and (d) – Outdoor sport or recreation and swimming pool or ice skating rink		
Sui Generis (other than PBSA)	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
Utilities					
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
Air Quality					
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.					
Water and flooding					
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
Sport and recreation					
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>	To meet shortfall	City Council, Football Foundation, FA, schools, clubs	Circa £1m per 3G	2023 onwards

Cricket Wickets Shortfall of pitches SE – 24 sessions SW – 24 sessions	Sites to be identified as part of the playing pitch action plan	Playing Pitch Strategy	City Council, ECB	TBC	TBC
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	Sites to be identified as part of the playing pitch action plan	Playing Pitch Strategy	City Council, RFU	TBC	TBC

City wide – 41.25 match sessions					
Transport					
Coventry Very Light Rail (CVLR) 'demonstration 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 improvements	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 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	Potential further new railway stations at Binley & Willenhall, Coundon, Coventry South and/or Foleshill. Further work is required to determine whether some, or all, of these stations would be viable		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+
Education					
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	<p>"3 modular classrooms and extension of existing classroom to create science room (external extension with internal refurbishment).</p> <p>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.</p>	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	<p>Initial discussions with school indicate that the works will comprise the following element -</p> <p>Provision of new single story sixth form block (6 classrooms) for September 2023</p>	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
Cross Boundary Infrastructure					
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

DS3	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.
DS4 (A-D)	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.
HW1	Number of applications supported by completed HIA's each year.	Submitted HIAs successfully reviewed by Public Health offices to inform decision making outcomes
JE1	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
JE2	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.
JE3	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
JE4	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.
JE5	Monitor and record the supply and delivery of Industrial and Storage/Distribution.	To be monitored as part of DS1, JE1 and JE2.
JE6	Monitor the supply and delivery of Tourism/Visitor Related Development.	To be monitored as part of DS1, JE1 and JE2.
JE7	Monitor how planning applications for employment are ensuring opportunities for local residents.	S106 agreements signed in accordance with JE7
JE8	Monitor and record the supply and delivery of Research and Development (R&D)	To be monitored as part of DS1, JE1 and JE2.
H1	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.
H2	Monitor the supply and delivery of allocated sites	Annual reporting to identify the delivery progress of respective allocations.
H3	Monitor the supply and delivery of new homes that: <ul style="list-style-type: none"> • Comply with NDSS • Meet M4(2) Adaptable and Accessible Dwellings 	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.
H4	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
H5	Monitor schemes which aim to improve, retrofit and regenerate existing stock	Number of successfully completed regeneration schemes approved.
H6	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.
H7	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
H8	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
H9	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)

H10	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.
H11	See separate HMO DPD	See HMO DPD
H12	Build to Rent	Maintain an appropriate supply of sites (as identified within the overall supply position as part of Policy H1 and H2)
H13	Co-living	Number of co-living developments delivered in accordance with policy
R1	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.
R2	Monitor the wider development strategy	Strategy being delivered in accordance with the policy
R3	For each identified centre, monitor and record the occupancy levels (by use class) and levels of vacancy.	100% occupancy with appropriate town centre uses
R4	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"> › outside of defined centres; › as edge of centre; › within a defined centre. 	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
R5	Shop fronts improved in line with the Design Guidance for Shopfronts SPD	100% compliance with the SPD for shop fronts requiring planning consent
R6	Monitor the supply and delivery of new restaurant, bars and hot foot takeaway premises.	100% of uses to be in defined centres

CO1	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.
CO2	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.
CO3	Monitor progress on neighbourhood plans	Where neighbourhood plans are produced, they should meet the Basic Conditions so they can be made (ie adopted)

GB1	Monitor any changes to Green Belt	No inappropriate development in Green Belt
GB2	Monitor any changes to Safeguarded land	No inappropriate development on safeguarded sites
GB3	Monitor any changes to Local Green Space	No inappropriate development on Local Green Space
GE1	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.
GE2	In line with the monitoring of development completions identify the proportion that is completed on greenfield sites.	To be monitored through annual trends.
GE3	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.
GE4	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.
DE1	To ensure delivery of high quality design	100% of developments to comply with design codes in areas where these are in force.
DE2	To ensure delivery of high quality design	100% of developments to comply with design codes in

		areas where these are in force.
HE1	To monitor existing and proposed conservation areas	All conservation areas to have appraisals and management plans in place.
HE2	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.
HE3	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.
HE4	To ensure the policy is successfully ensuring archaeology is taken into account where appropriate	Number of applications where policy has been successfully applied
AC1 - AC3	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.
AC1	To update the Coventry Connected SPD.	To be updated in 2025

AC2	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

AC3	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.
AC4	Monitoring of active transport schemes as set out in policy	Delivery of schemes set out in the IDP
AC5	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
AC6	To monitor rail patronage and footfall through Coventry stations.	Increasing levels of patronage - evidenced from transport data
AC7	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 trends basis
EM1	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
EM2 / EM3	Policies from the 2017 local plan deleted	Deleted
EM4	Monitor the number of homes and amount of employment land completed where built development is located within flood zones	No development in Zone 3b
EM5	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.
EM6	Ensure no development within a groundwater Source Protection Ground 1	No development within a groundwater Source Protection Ground 1
EM7	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).

EM8	Monitor the amount of waste recycled in line with the Council's Waste Strategy targets	Accord with the Council's waste strategy
EM9	Monitor to ensure safeguarding policy is applied	Monitor trends – applications refused on the basis of this policy
EM10	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.
EM11	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
EM12	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%
EM13	Percentage of new build developments demonstrating active solutions in reducing overheating in new buildings	100%
EM14	Percentage of qualifying new build developments demonstrating embodied carbon assessments	Annual increase
EM15	Applications refused on the grounds of inadequate noise mitigation	100%
C1	Policy deleted	
C2	Policy deleted	
CC1	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.

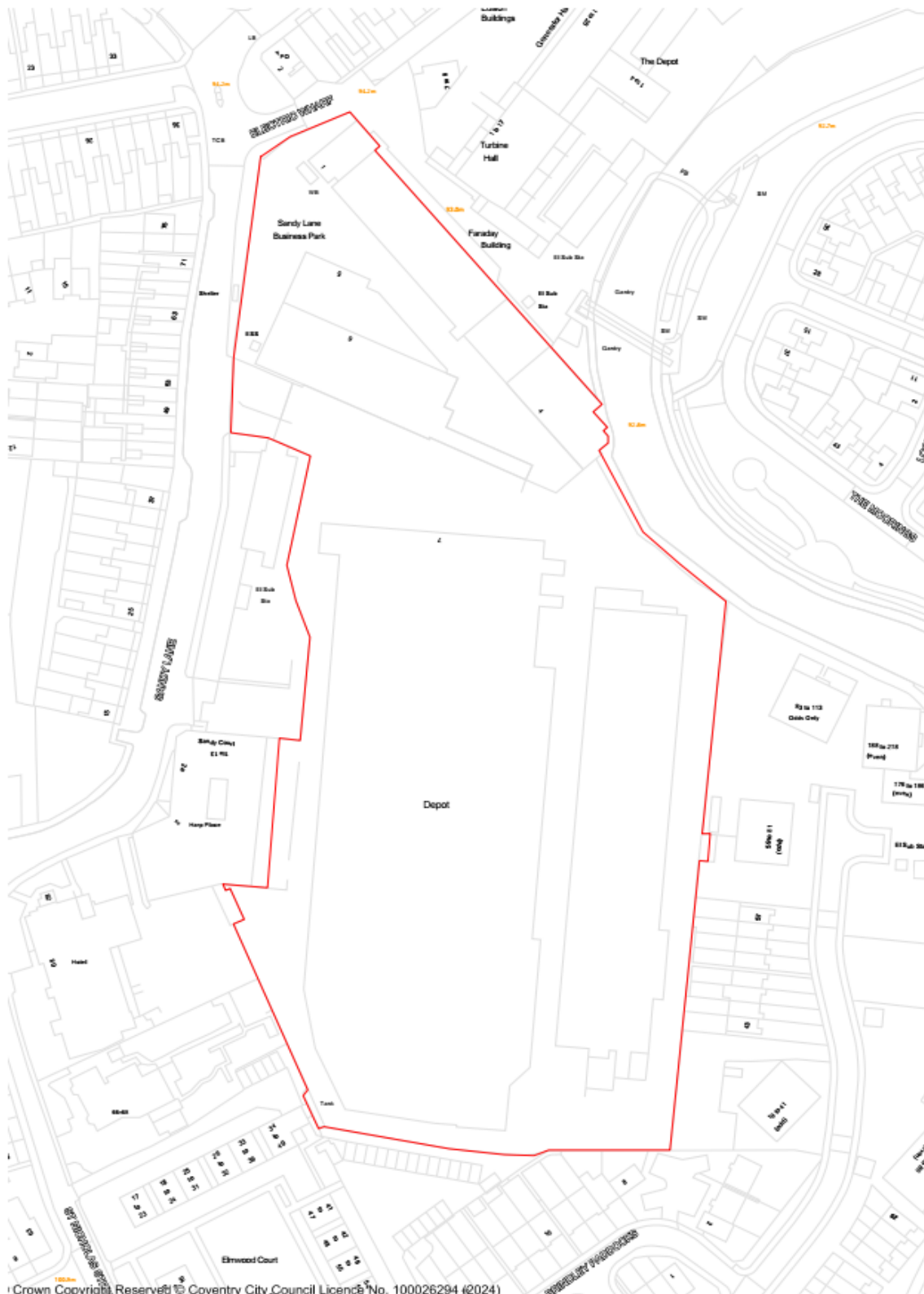
IM1	<p>Monitor the number of applications each year that secure planning obligations.</p> <p>To monitor the amount of secured financial contribution to infrastructure year on year.</p> <p>To monitor the amount of money spent on new infrastructure schemes year on year.</p> <p>To monitor the receipt of 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>
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Appendix 9 – Designations & Allocations Maps

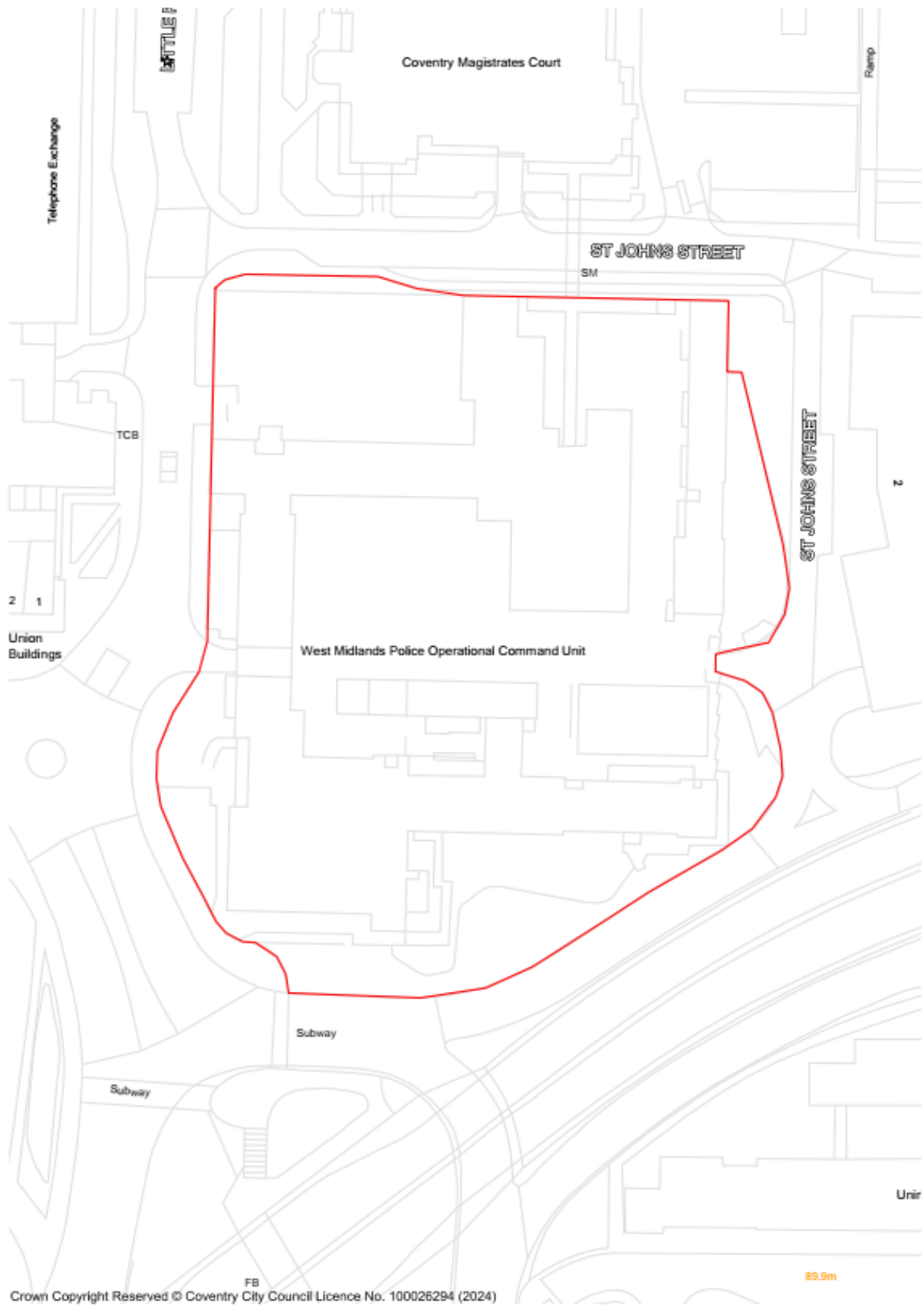
Appendix 9a: Key Employment Sites



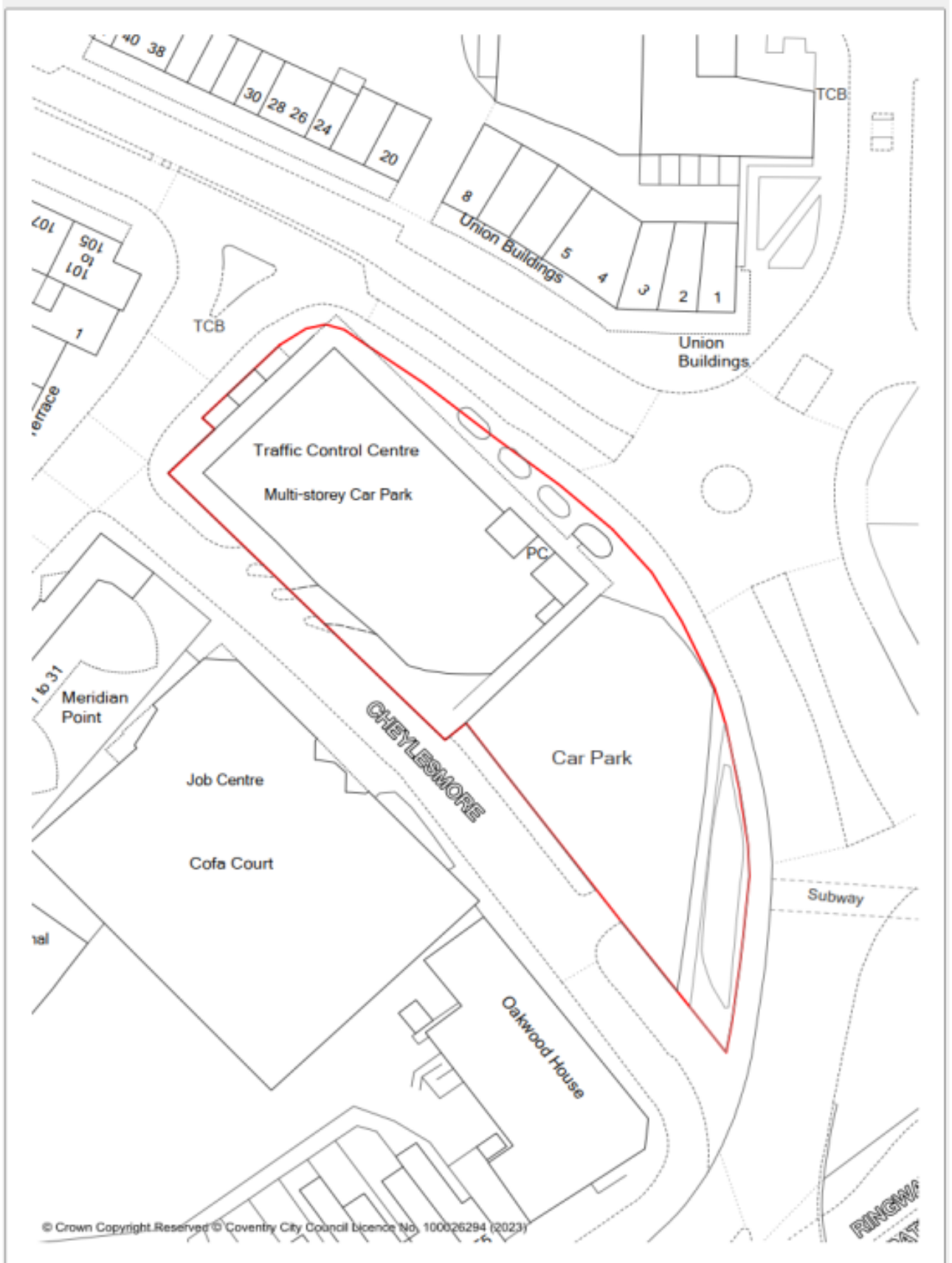
Appendix 9b: New/Amended Housing and Mixed Use Allocations Housing Allocation H2:15 Sandy Lane (as amended)



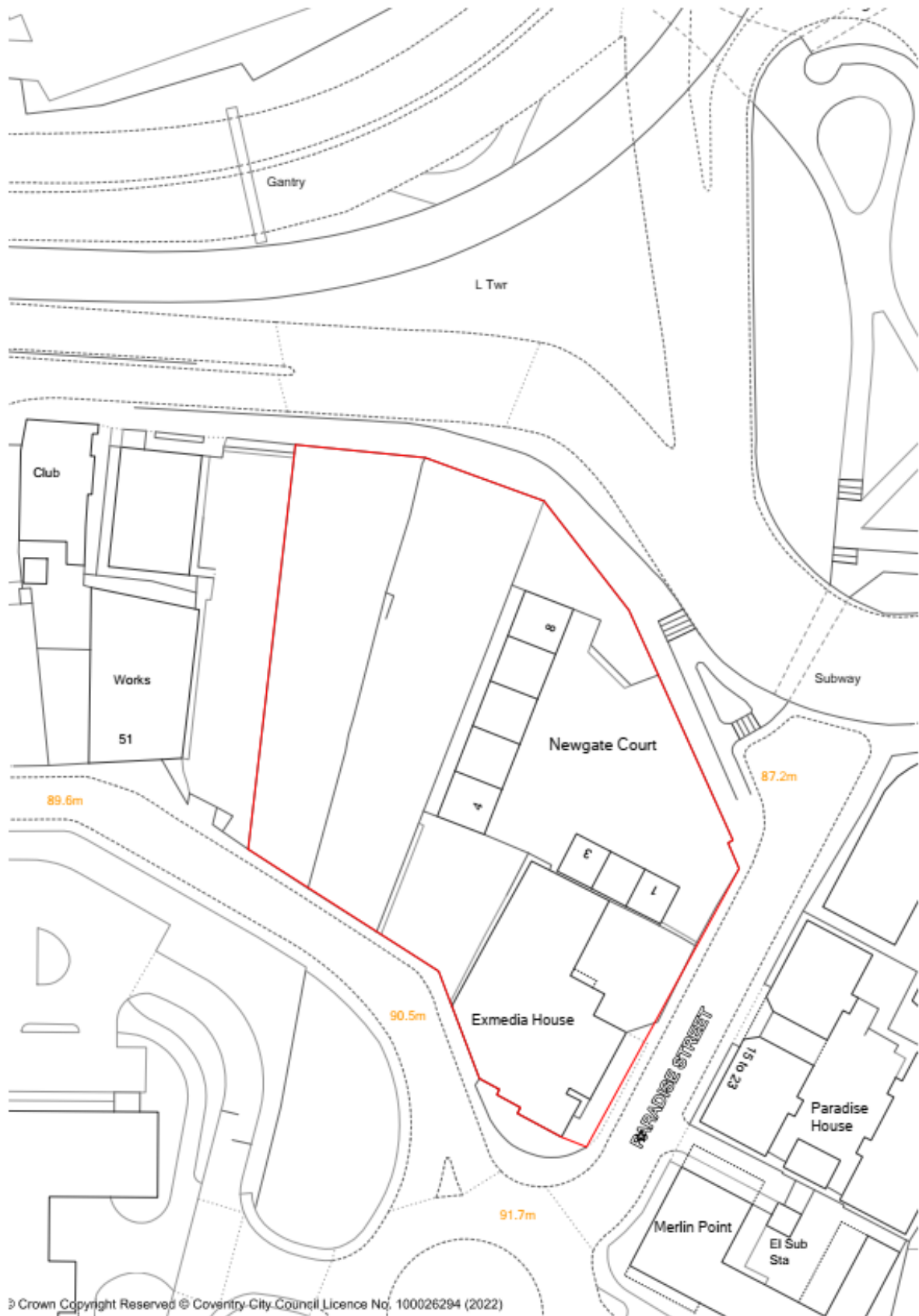
Housing Allocation H2:26: Coventry Central Police Station



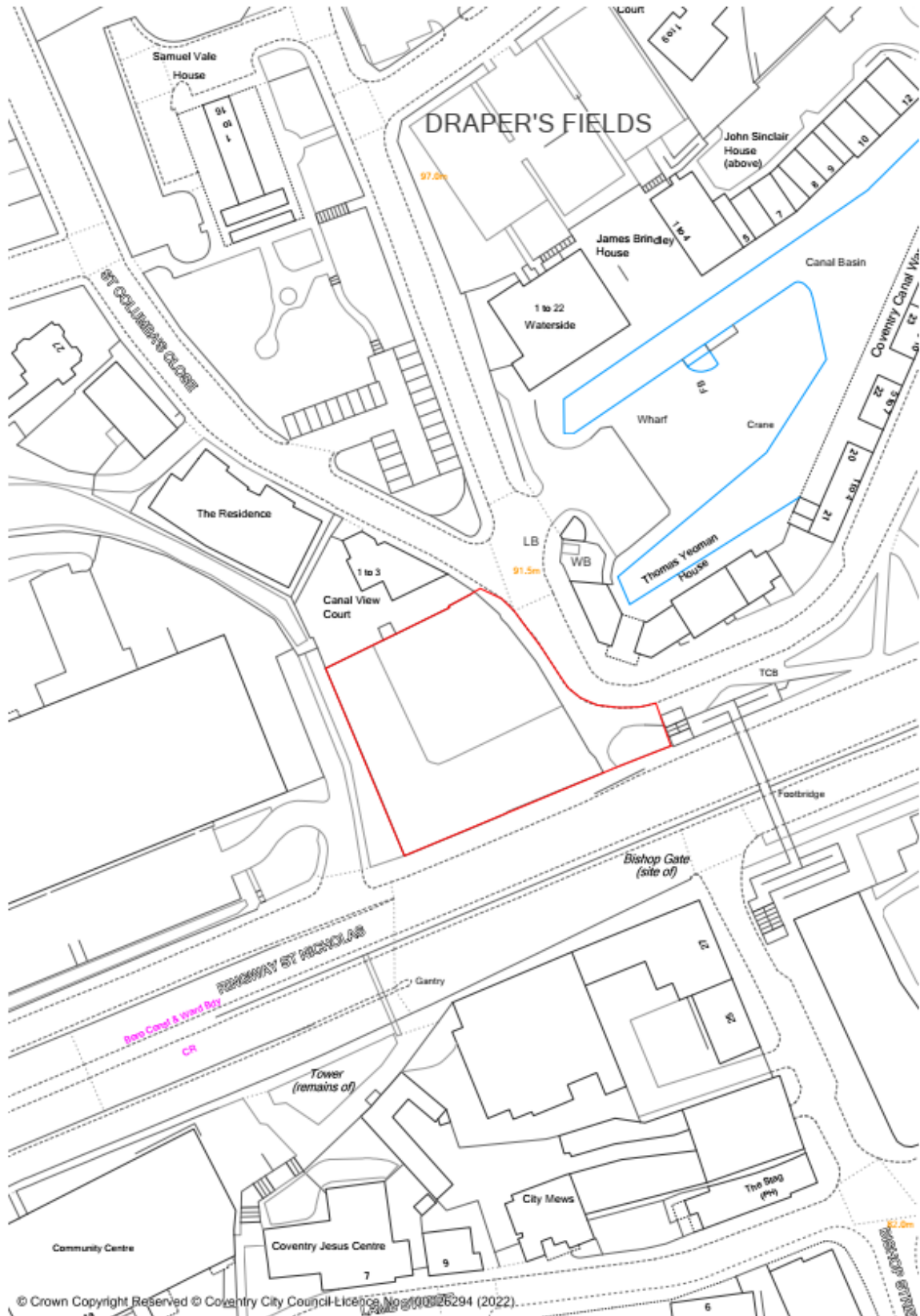
Housing Allocation H2:27: New Union Street Car Park



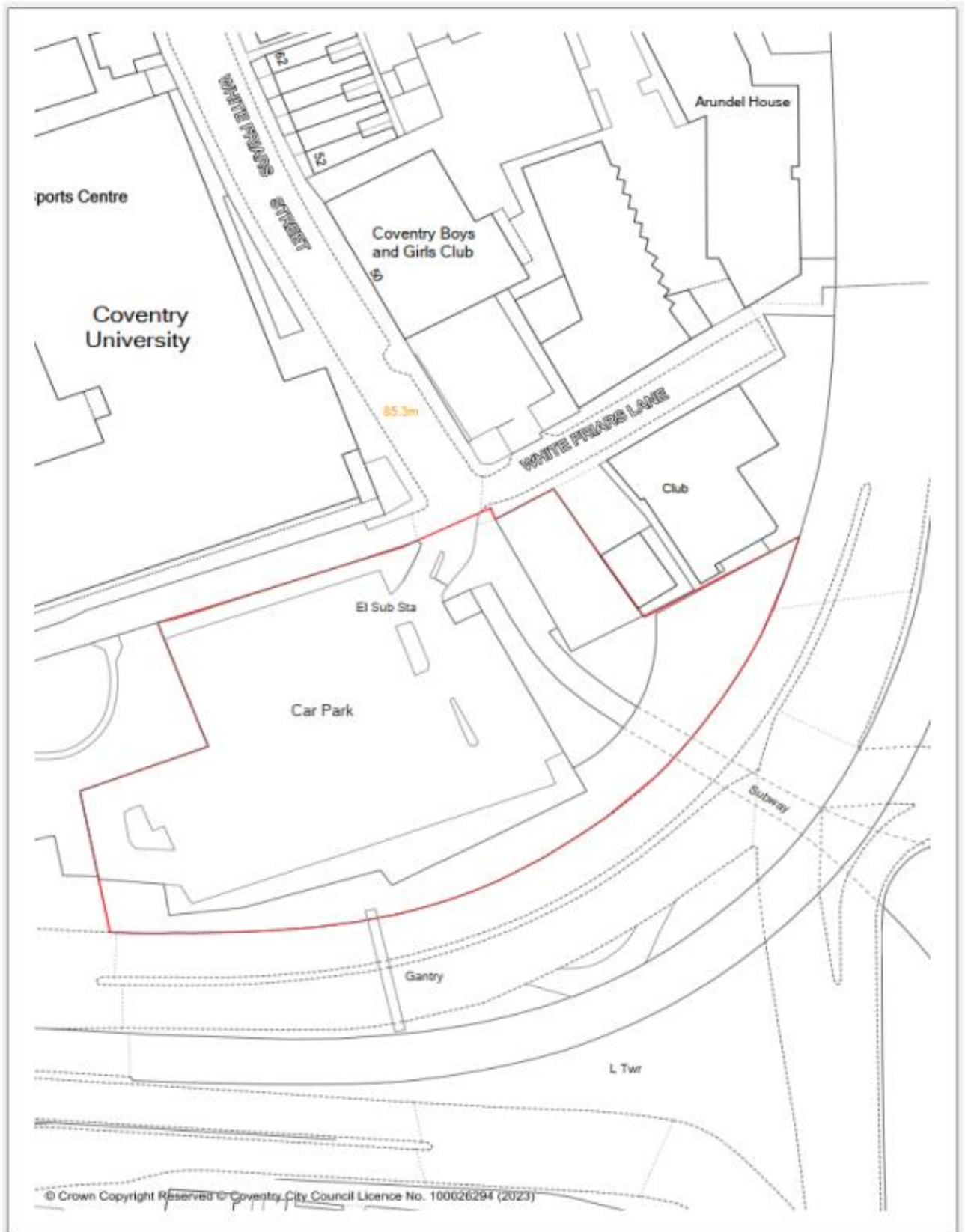
Housing Allocation H2:28: New Gate Court Business Park



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

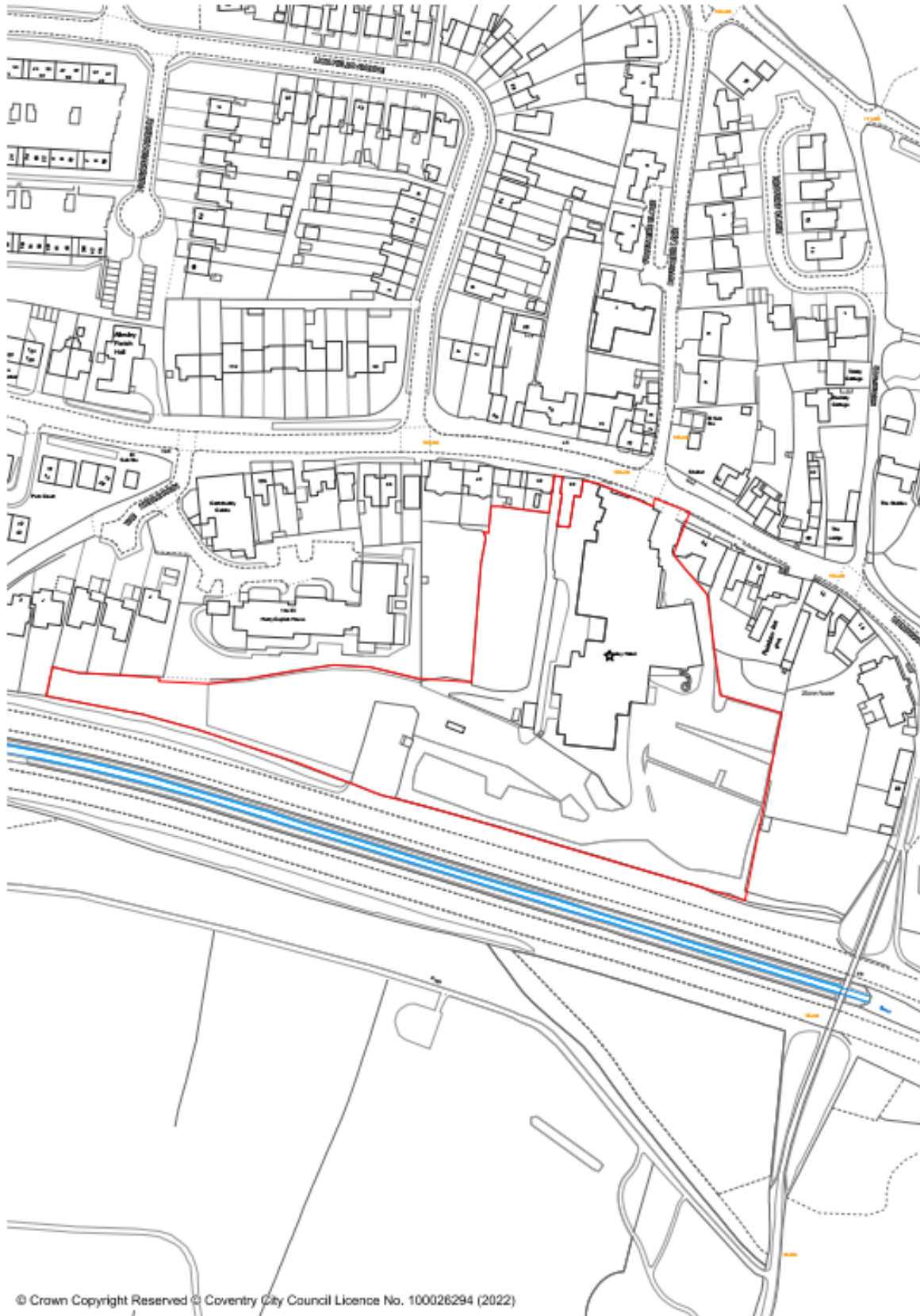


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Housing Allocation H2:32: Dale Buildings, Tower Street



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



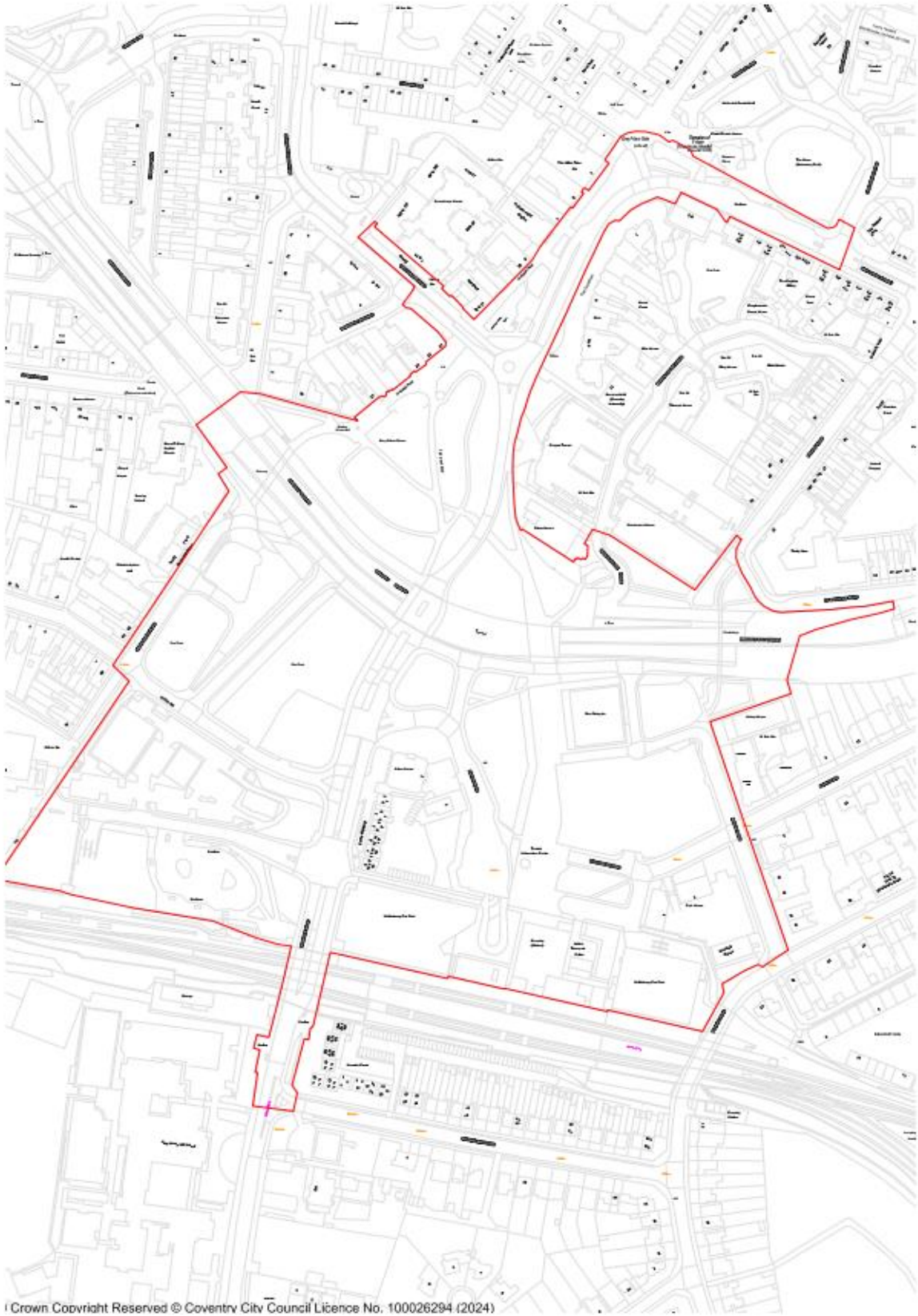
Housing Allocation H2:36: Land at Spon End



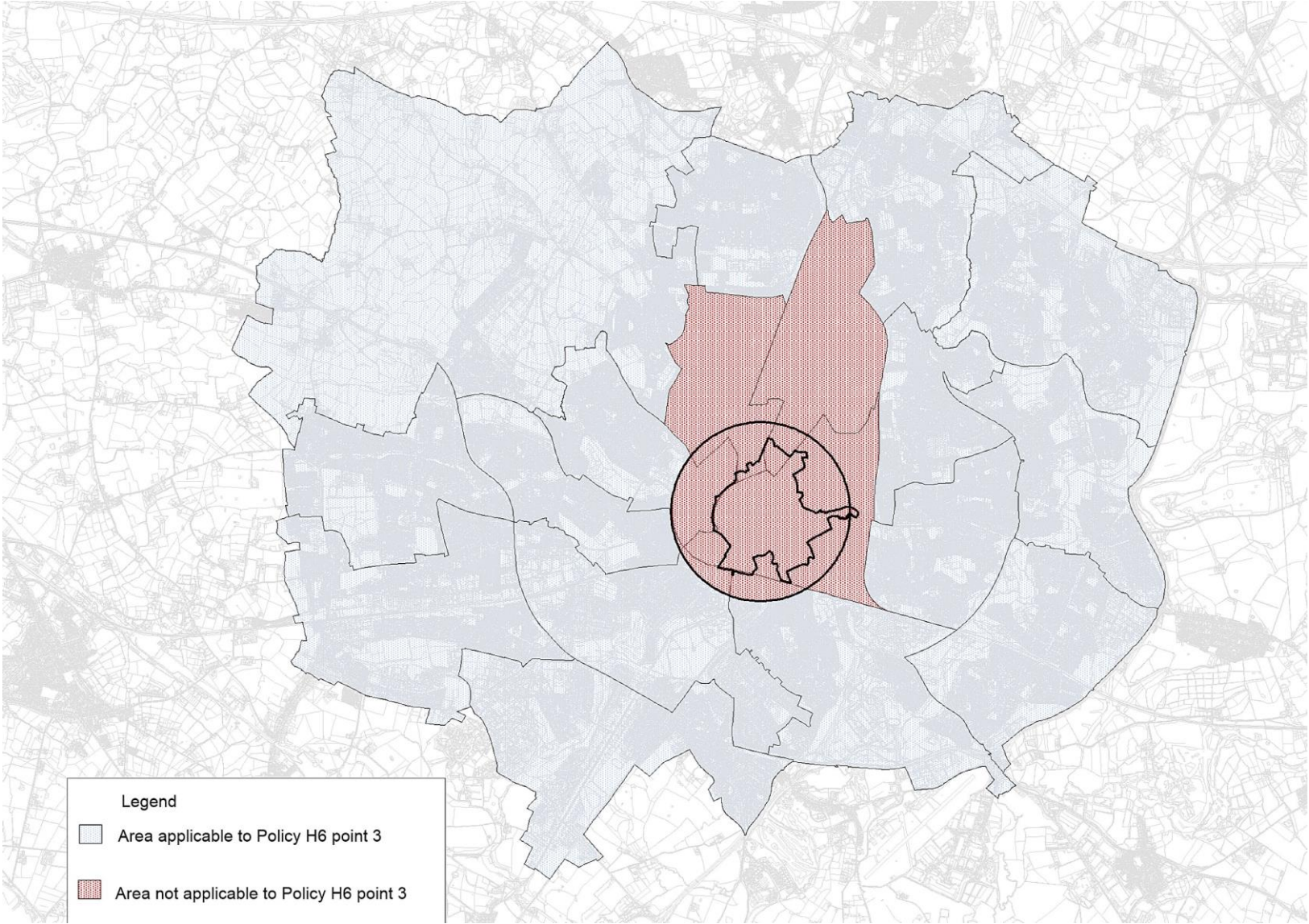
Mixed use Allocation H2:37: City Centre South



Mixed Use Allocation H2:38: Friargate



Appendix 9c: Affordable Housing Policy H6

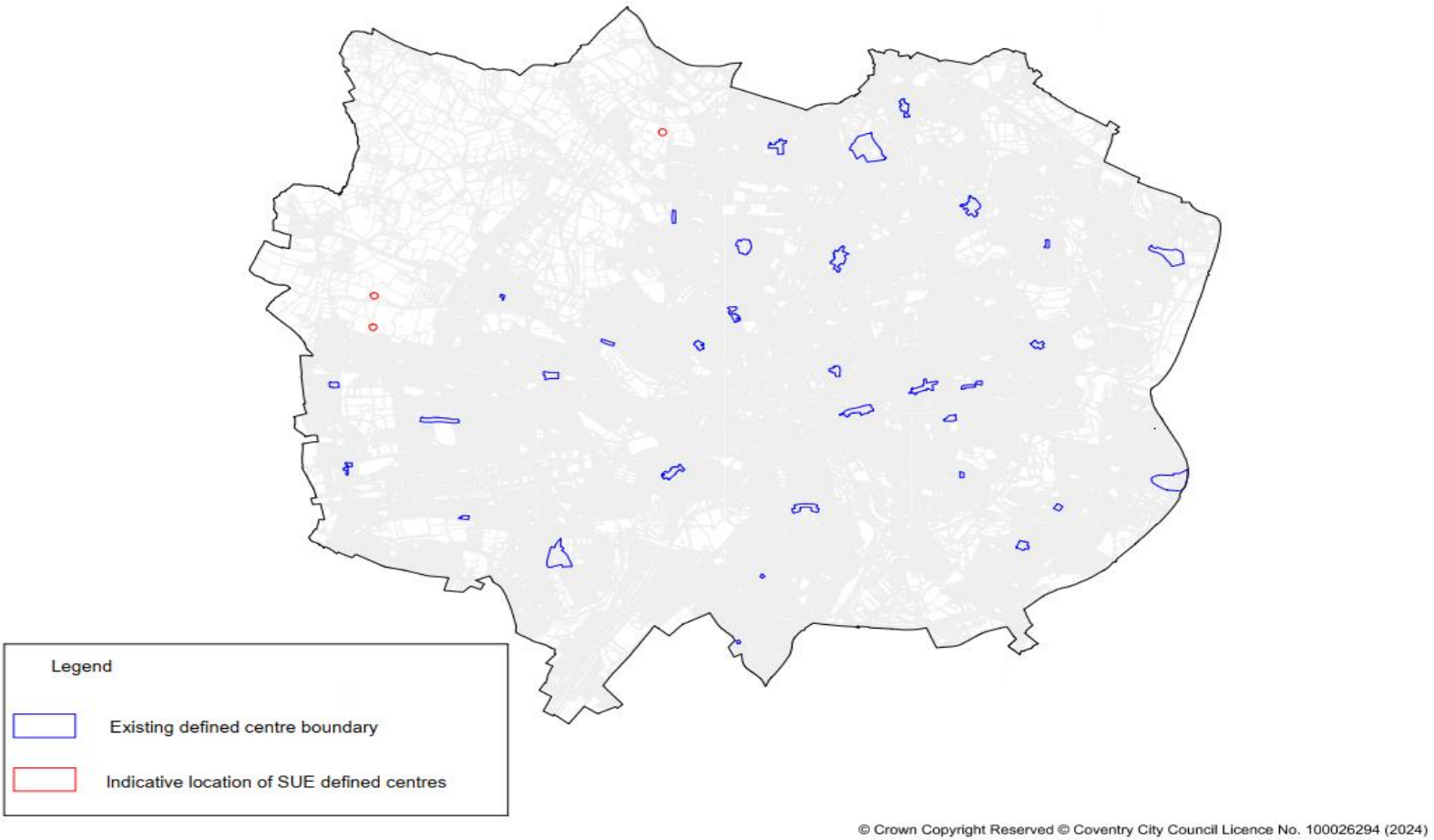


Appendix 9d: City Centre Boundary and Transition Zone



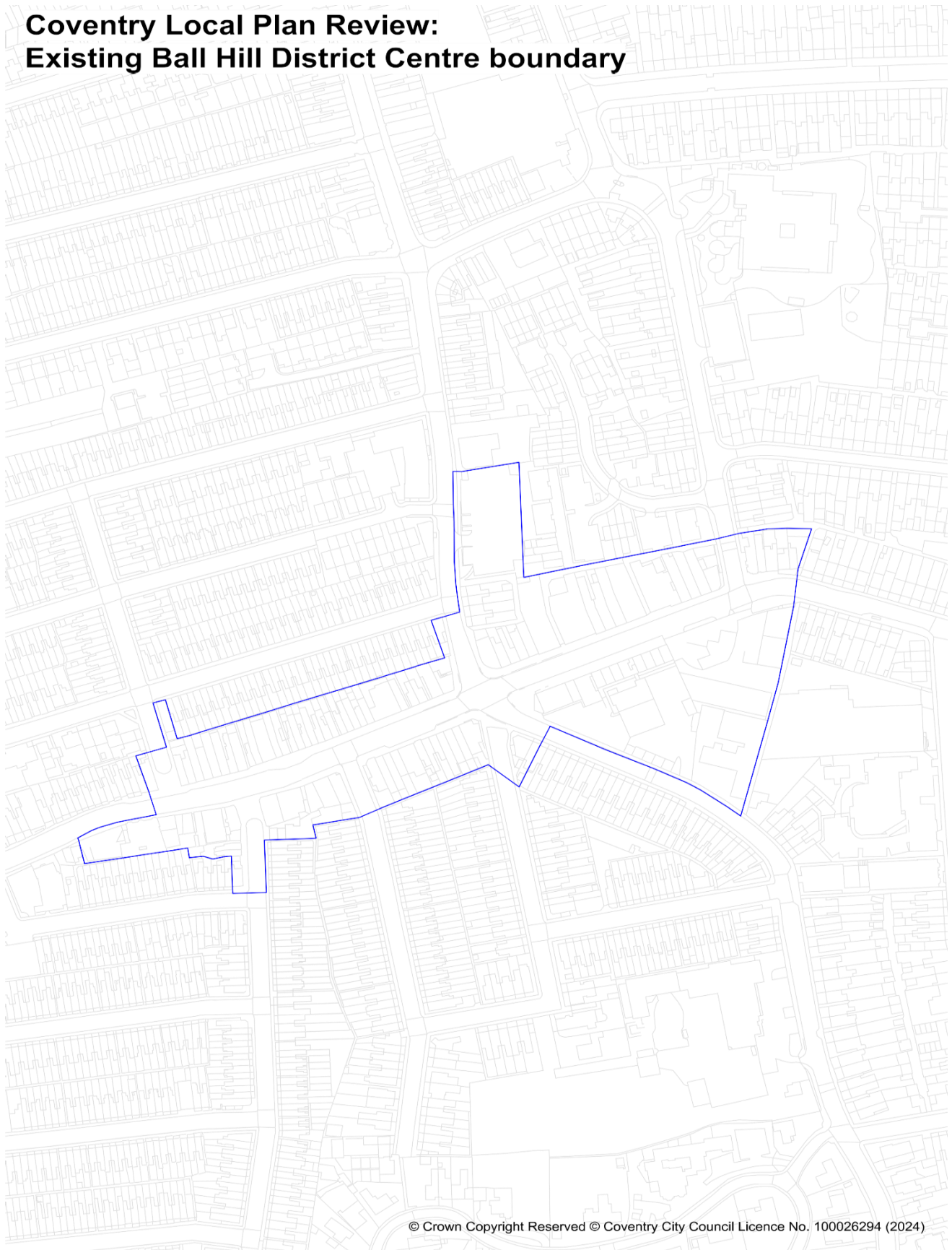
Appendix 9e: Centres and Primary Shopping Areas

City Wide Centres Maps



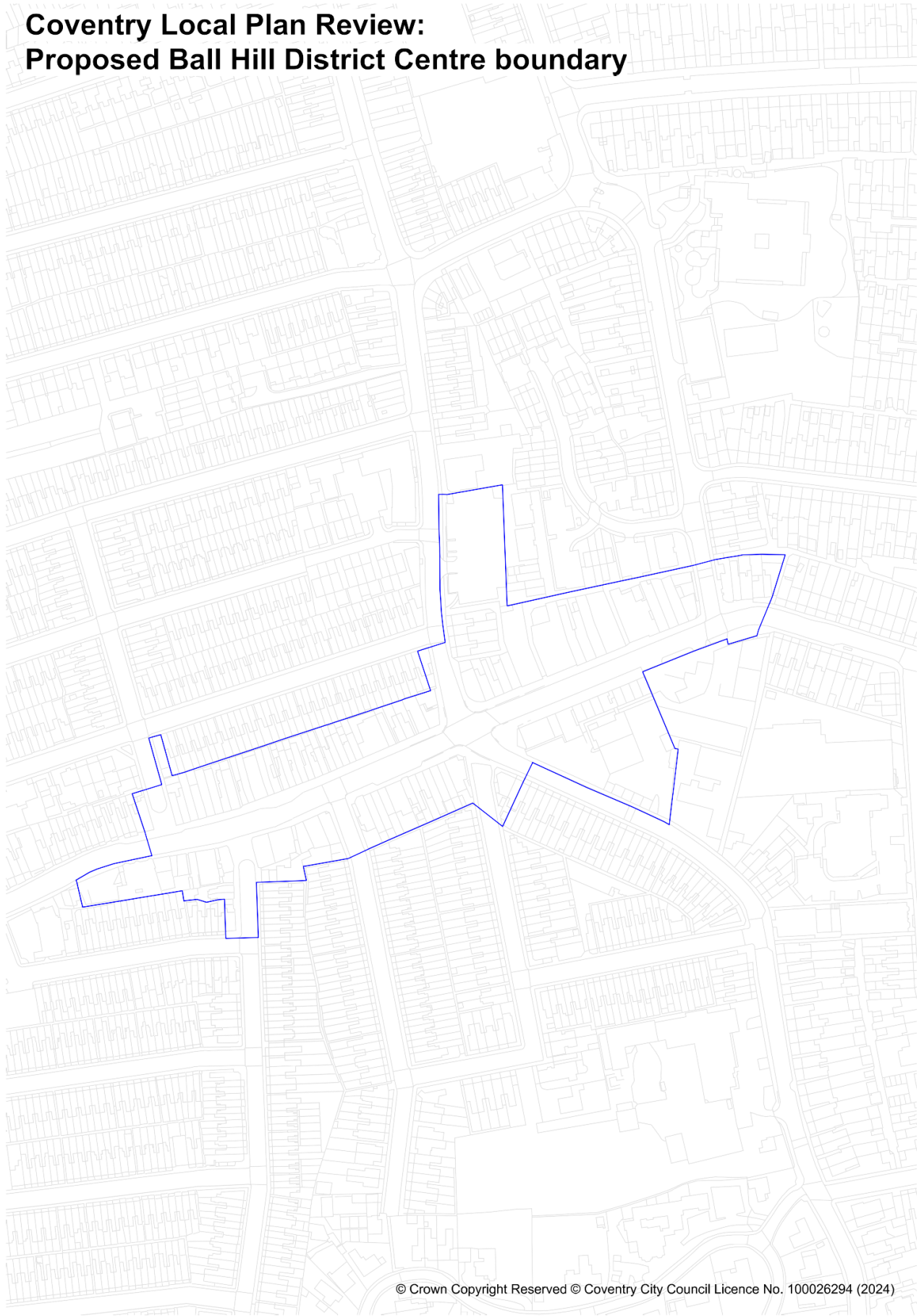
Proposed Centre Boundary Changes

Coventry Local Plan Review: Existing Ball Hill District Centre boundary



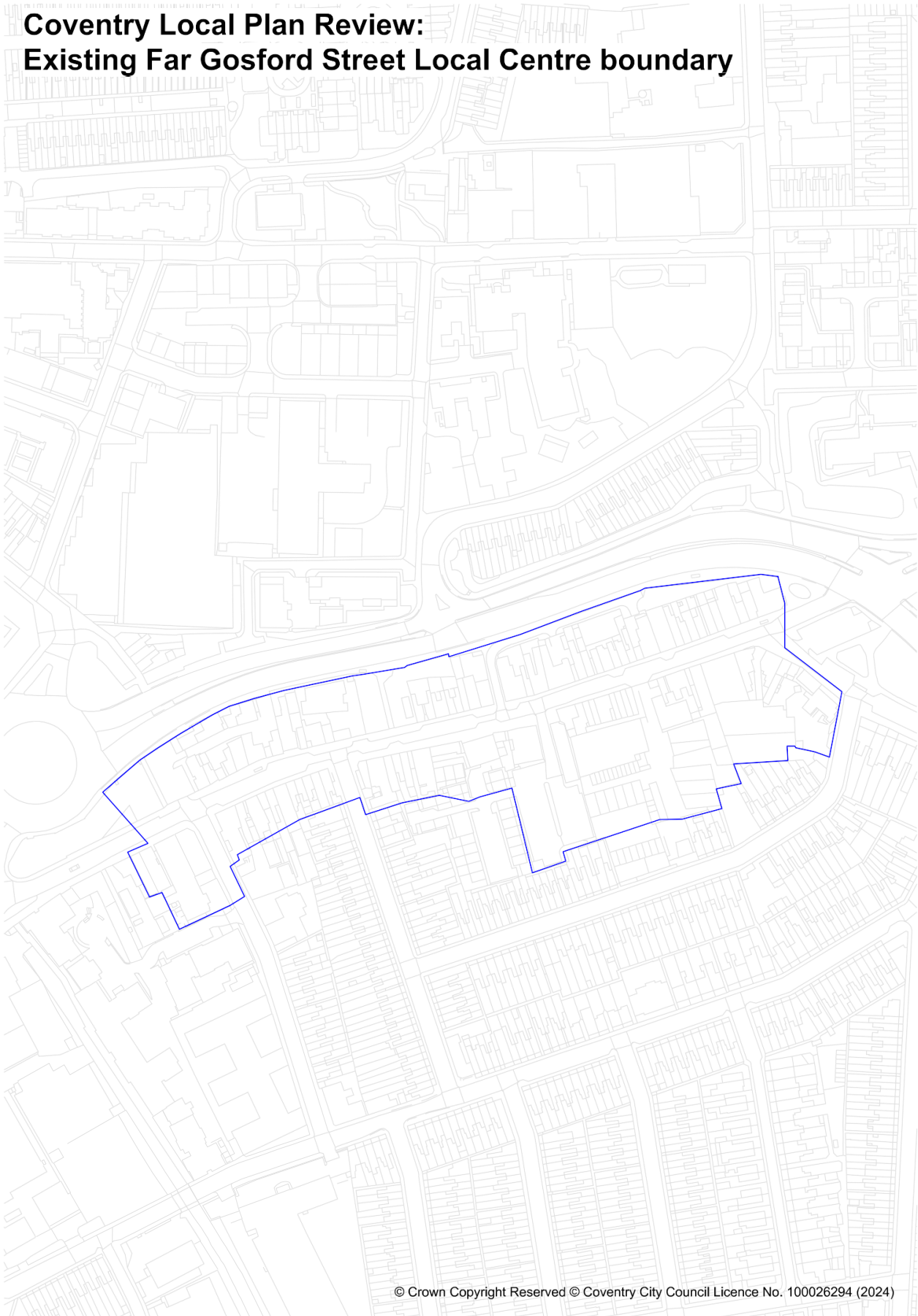
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Coventry Local Plan Review: Proposed Ball Hill District Centre boundary



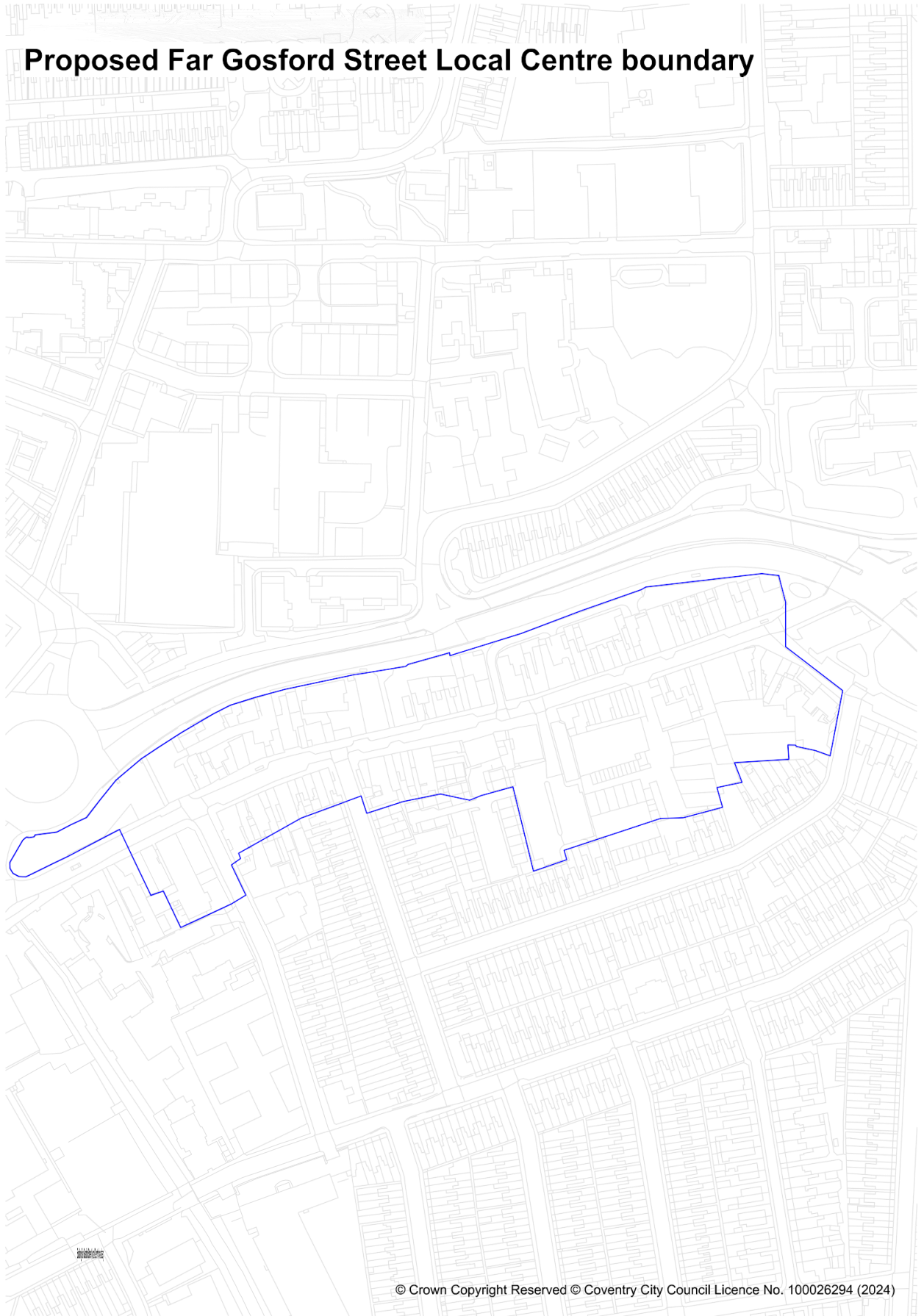
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Coventry Local Plan Review: Existing Far Gosford Street Local Centre boundary



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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



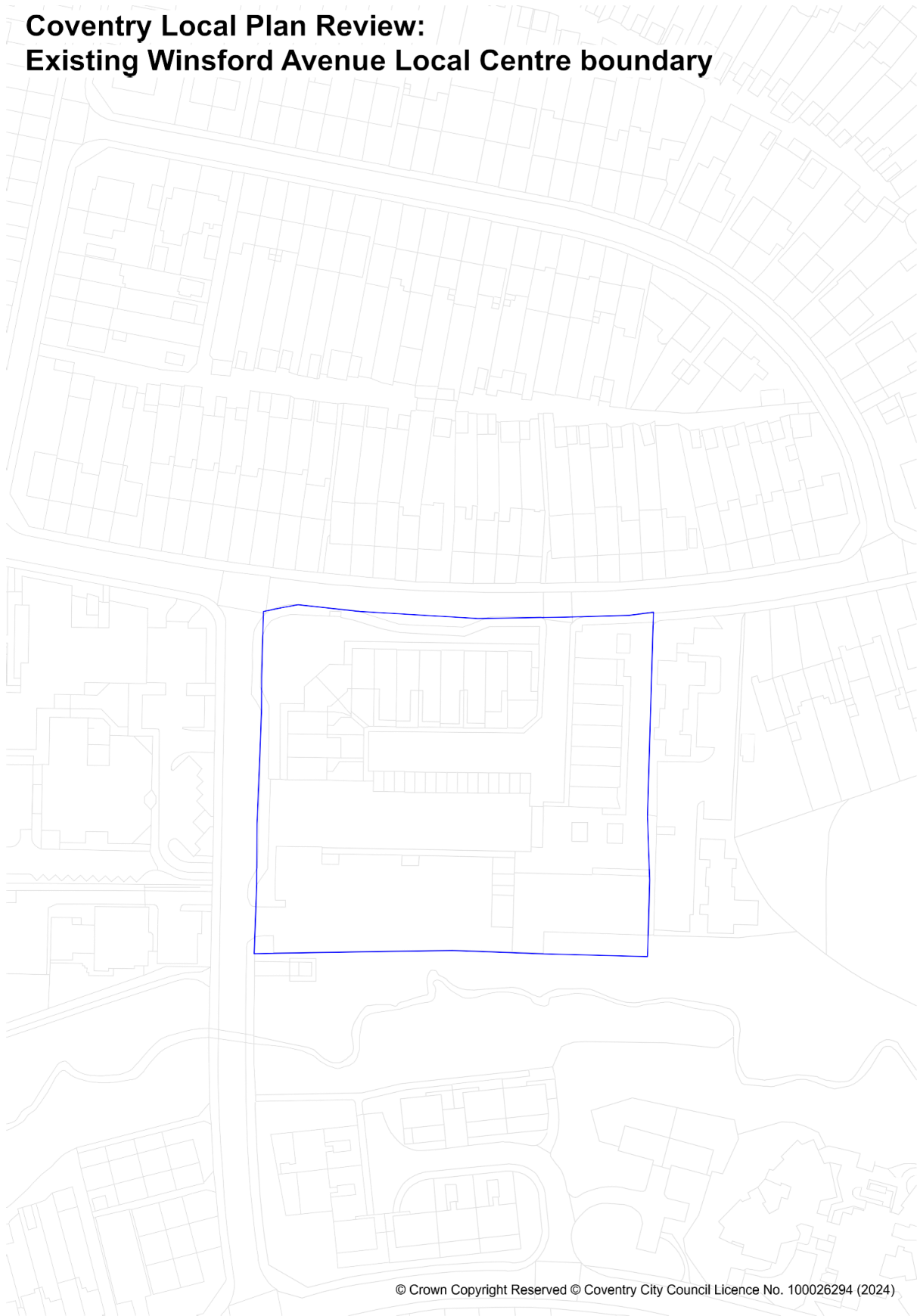
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Proposed Jardine Crescent District Centre boundary



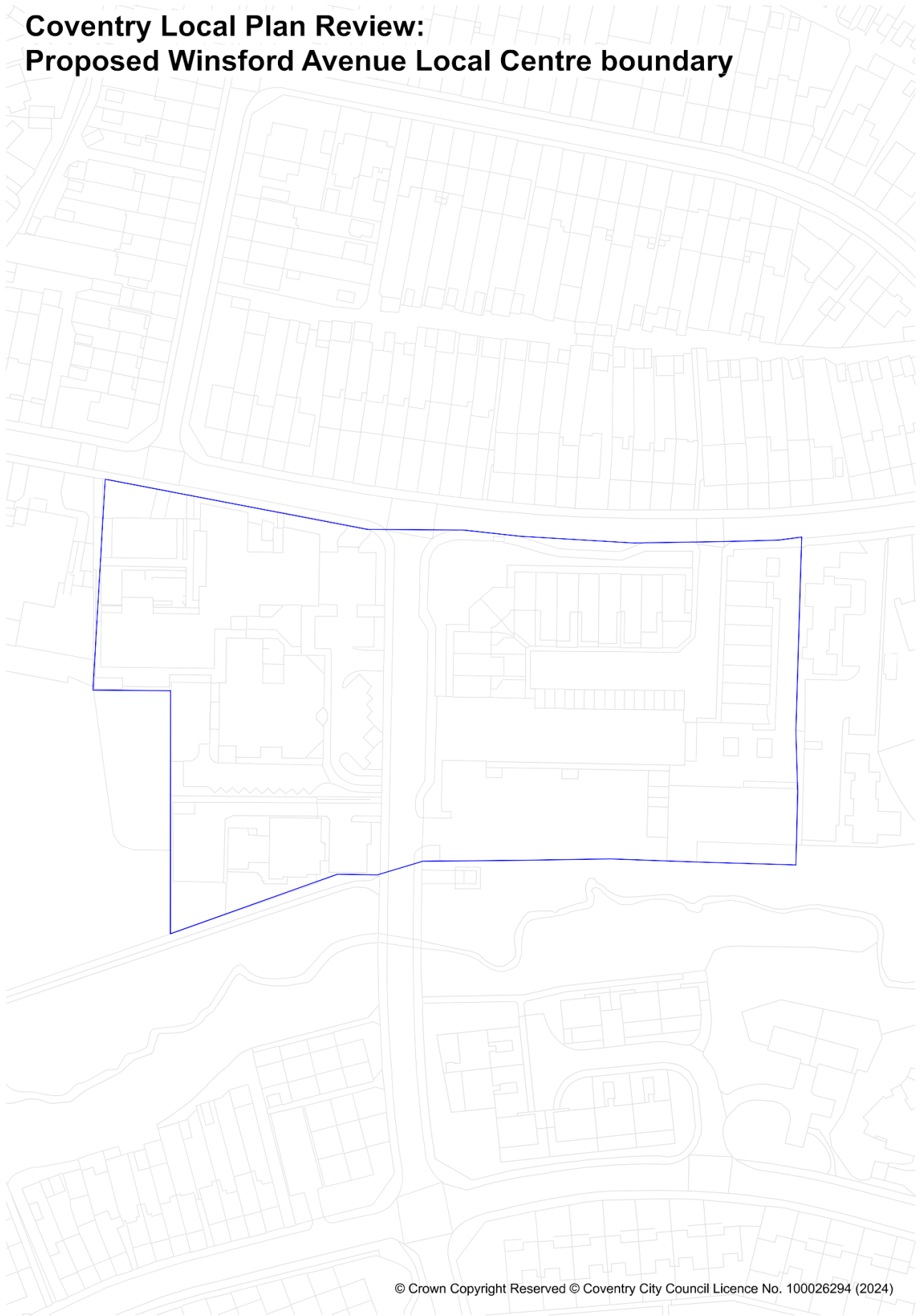
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**Coventry Local Plan Review:
Existing Winsford Avenue Local Centre boundary**



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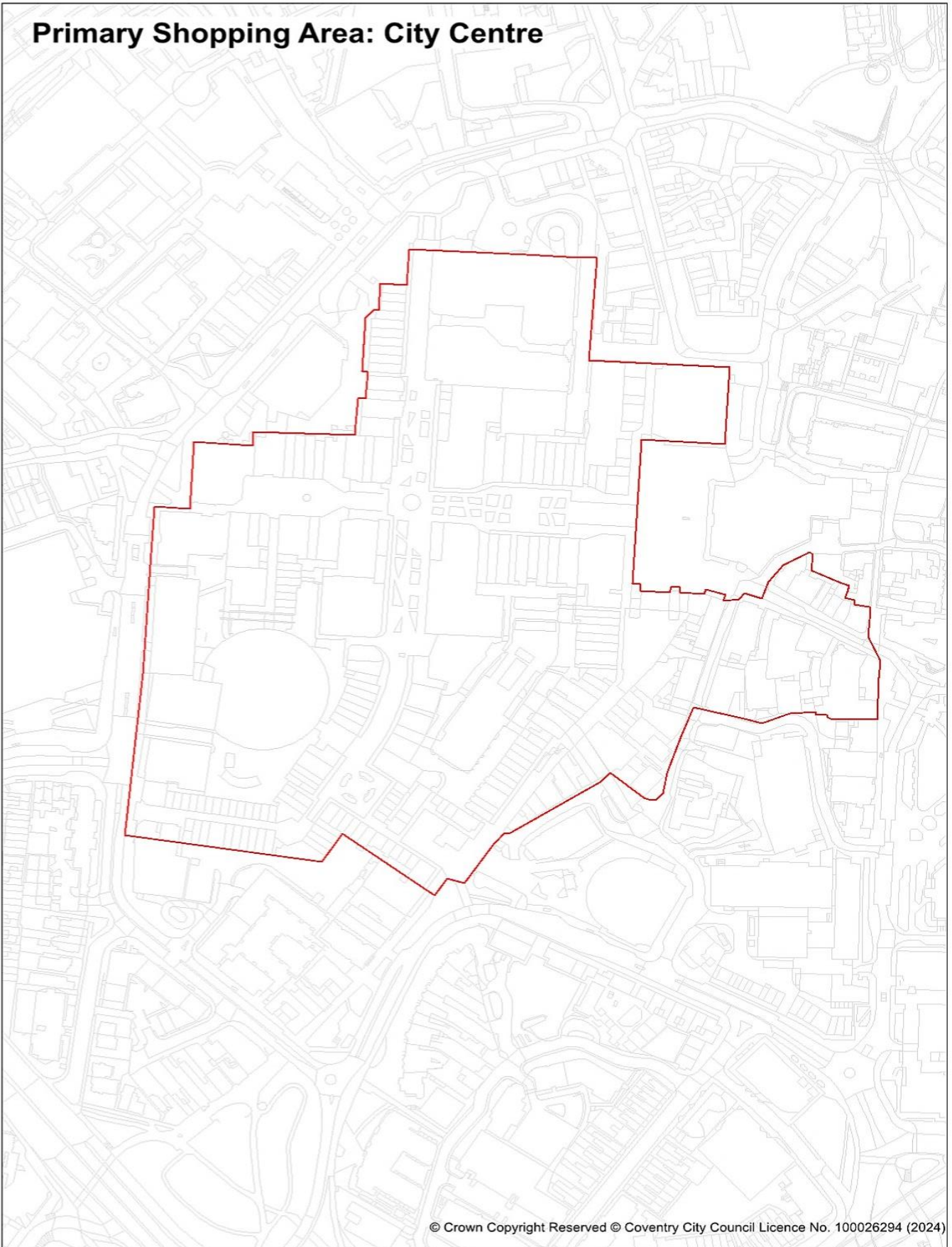
Coventry Local Plan Review: Proposed Winsford Avenue Local Centre boundary



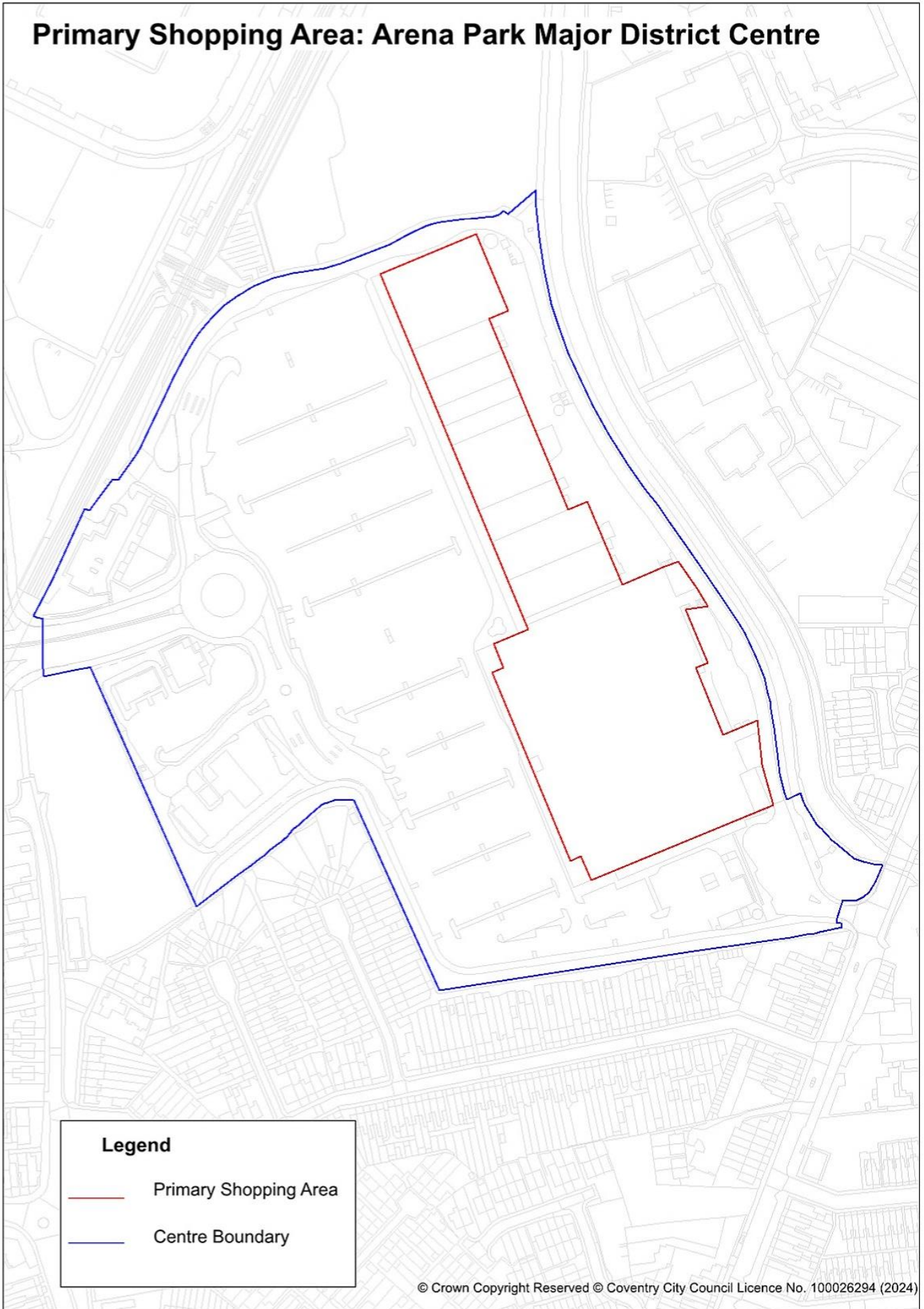
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Proposed Primary Shopping Areas

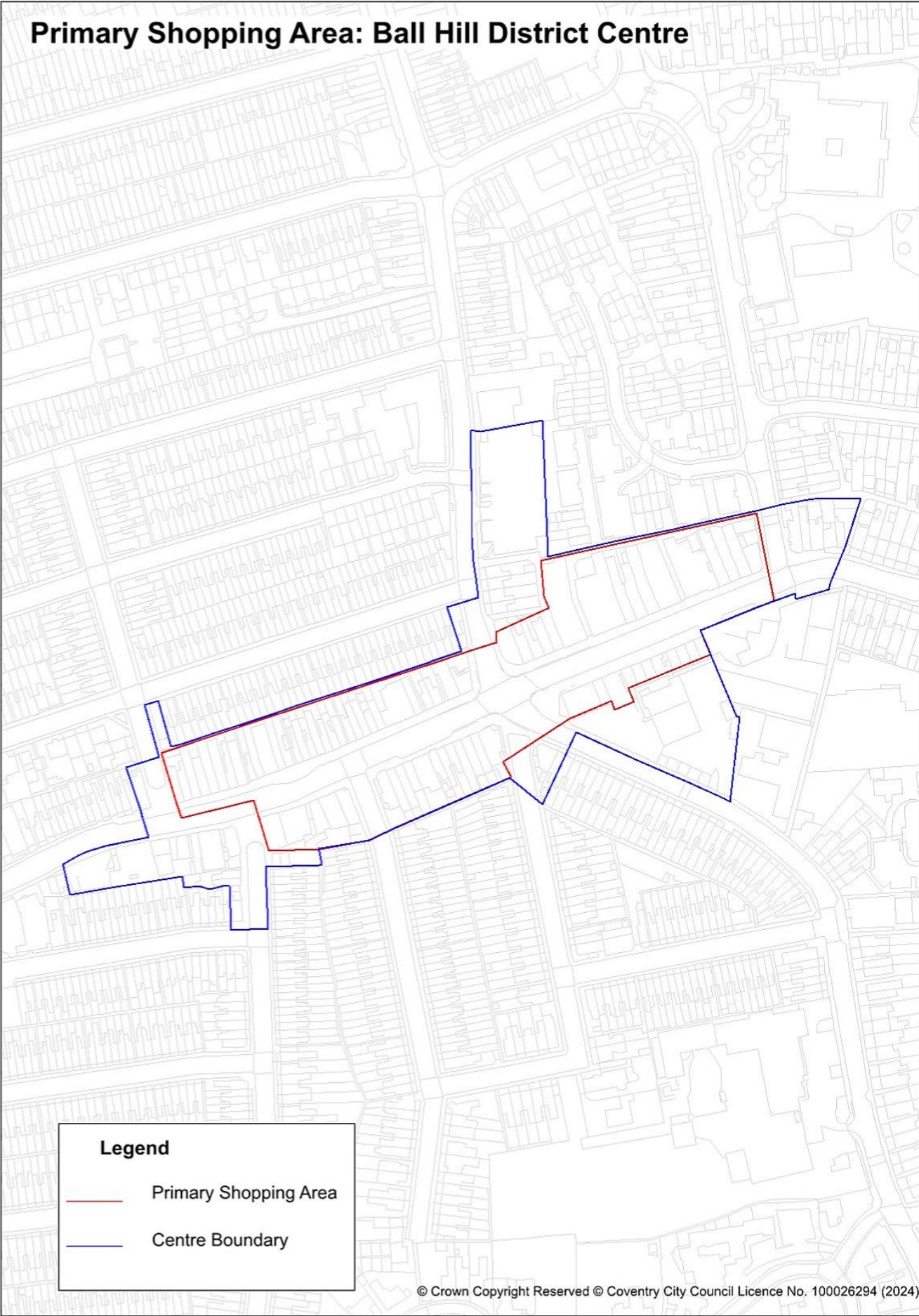
Primary Shopping Area: City Centre



Primary Shopping Area: Arena Park Major District Centre

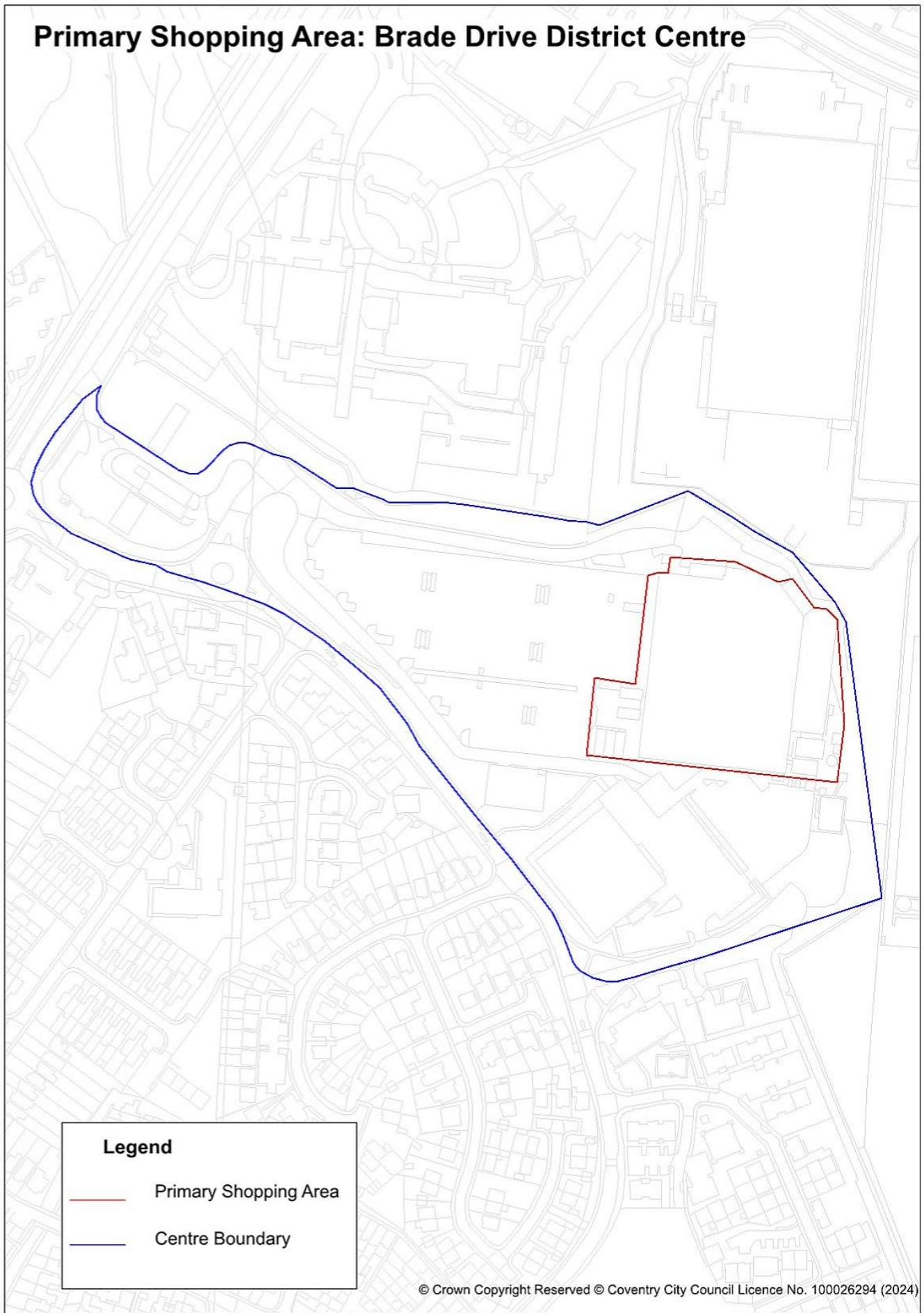


Primary Shopping Area: Ball Hill District Centre



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Primary Shopping Area: Brade Drive District Centre

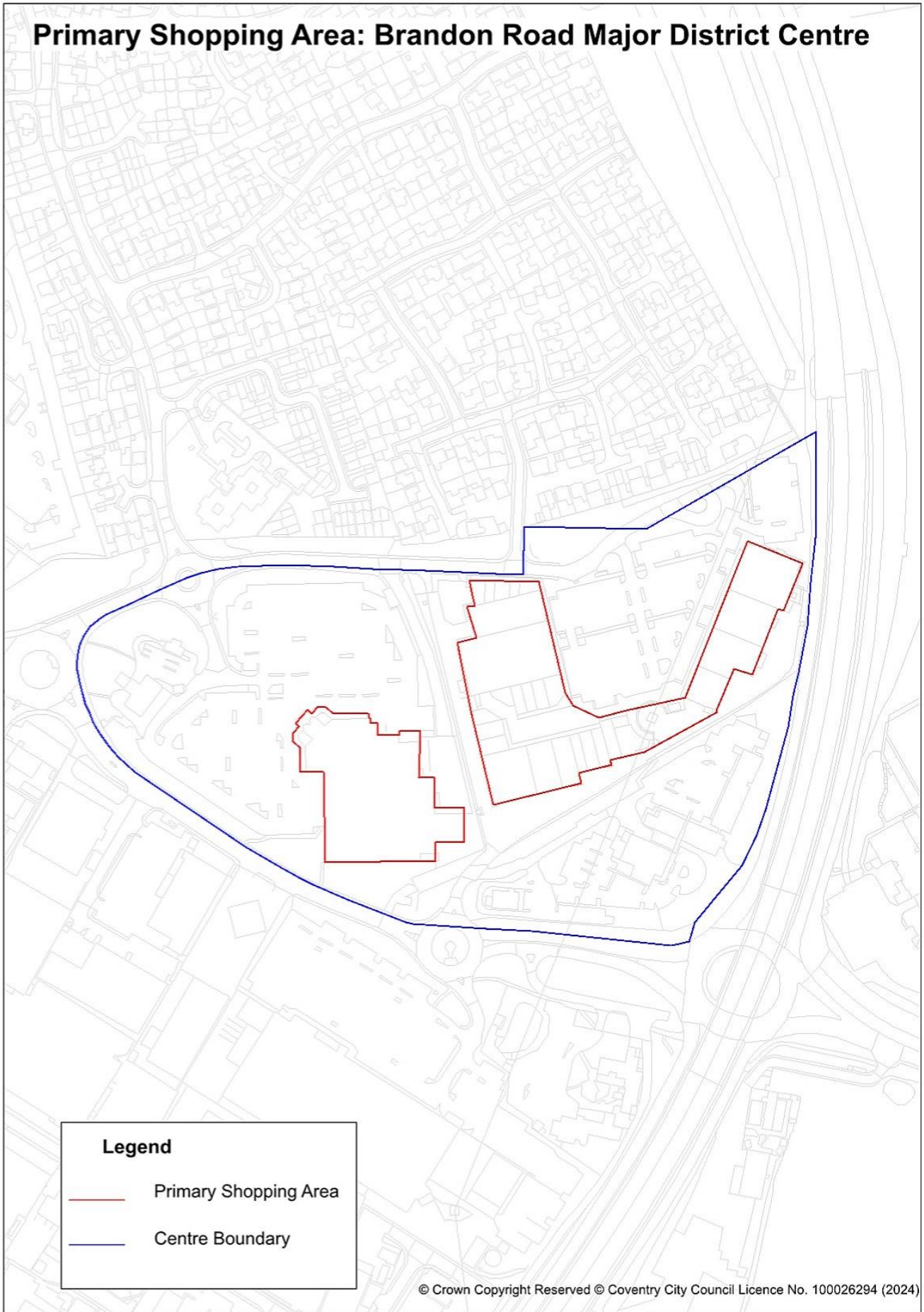


Legend

- Primary Shopping Area
- Centre Boundary

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Primary Shopping Area: Brandon Road Major District Centre

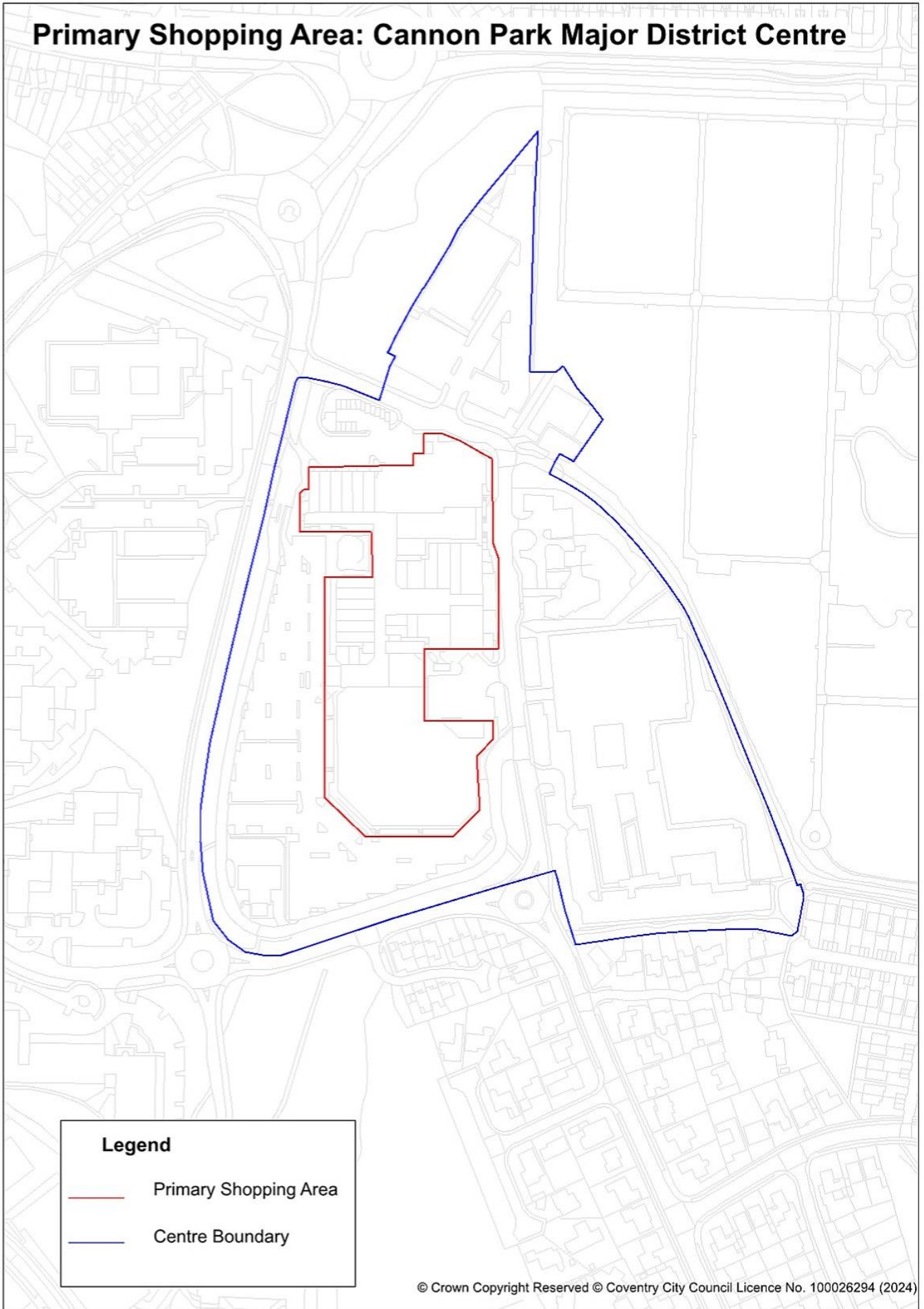


Legend

- Primary Shopping Area
- Centre Boundary

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Primary Shopping Area: Cannon Park Major District Centre

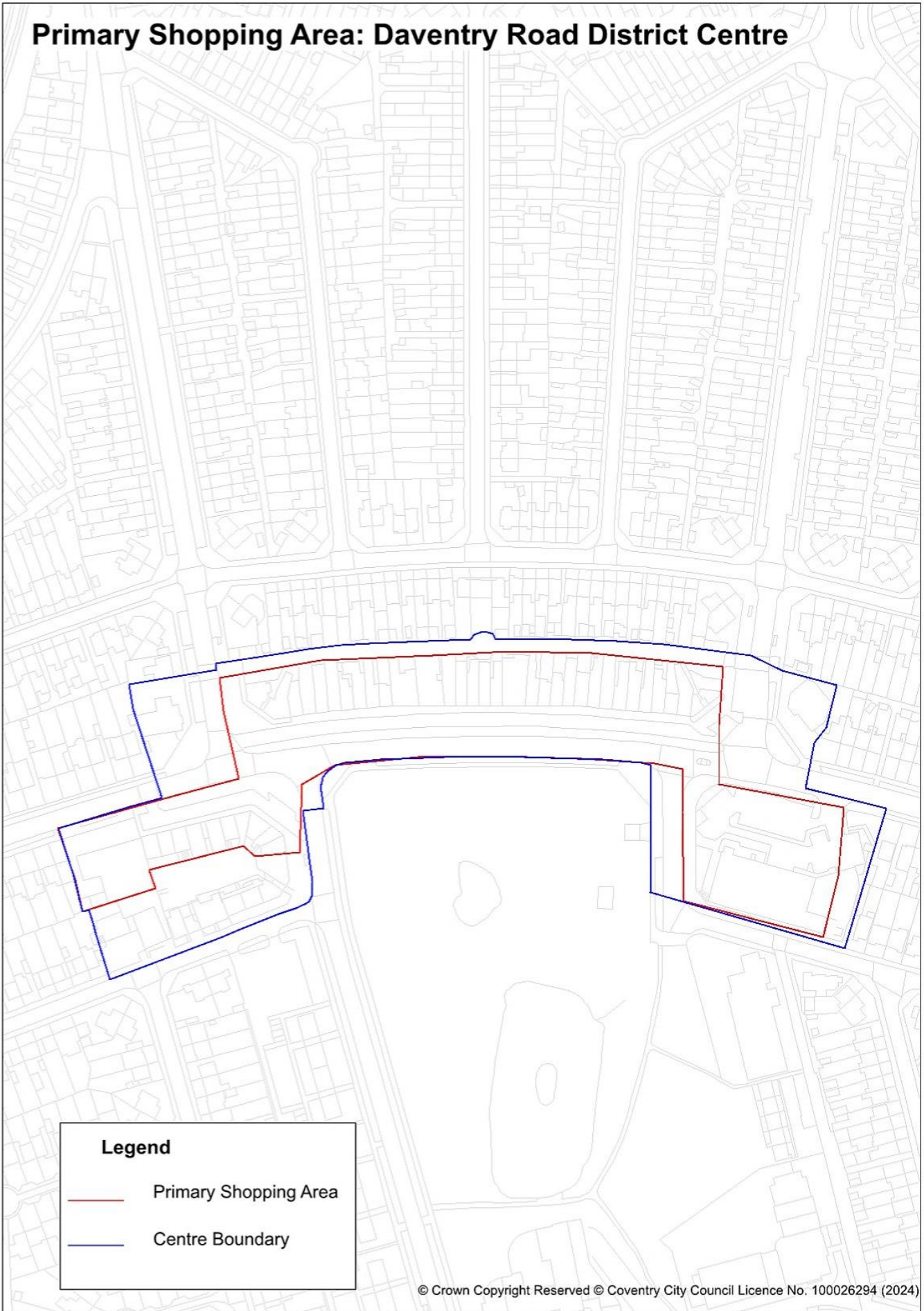


Legend

- Primary Shopping Area
- Centre Boundary

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Primary Shopping Area: Daventry Road District Centre

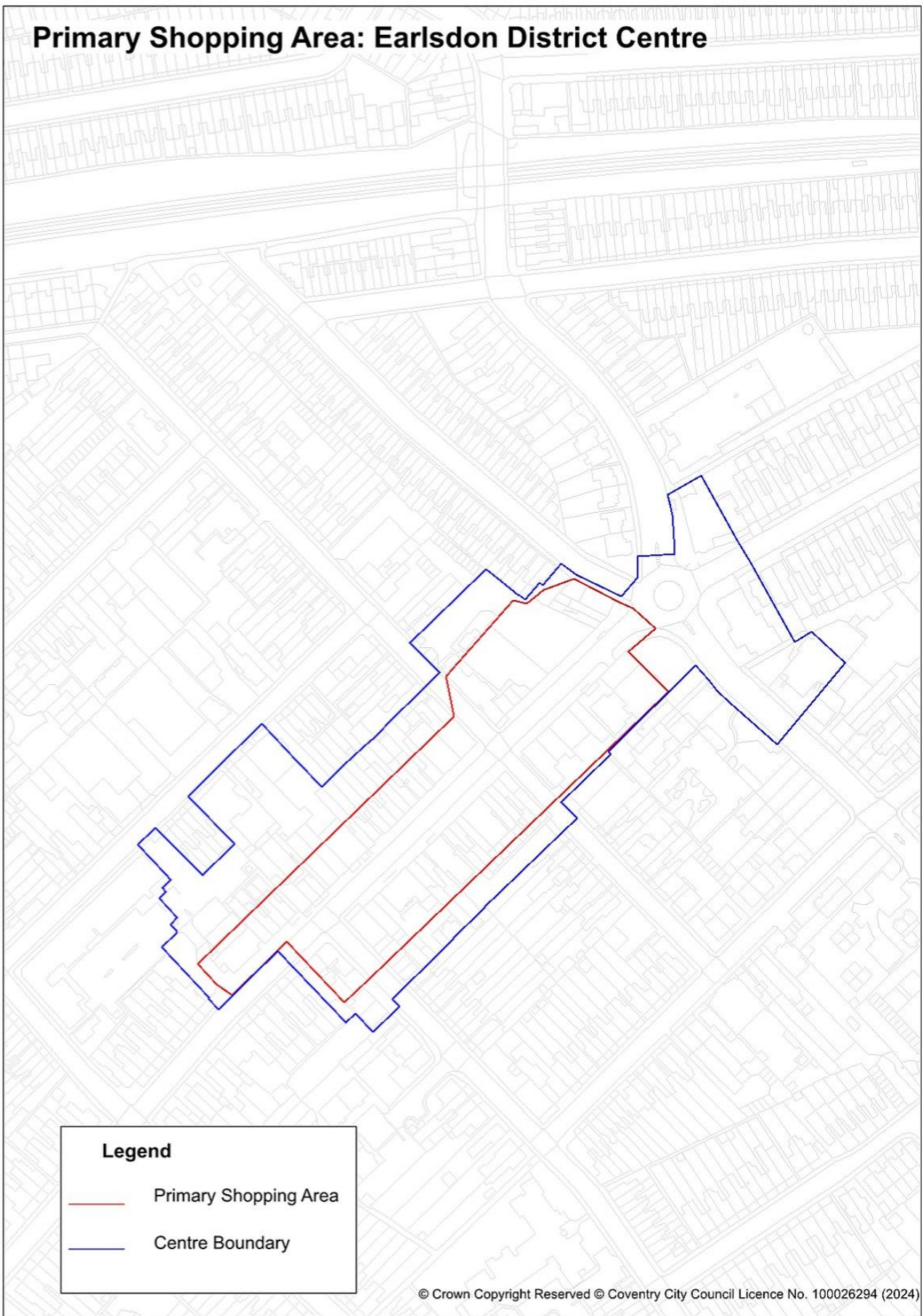


Legend

- Primary Shopping Area
- Centre Boundary

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Primary Shopping Area: Earlsdon District Centre

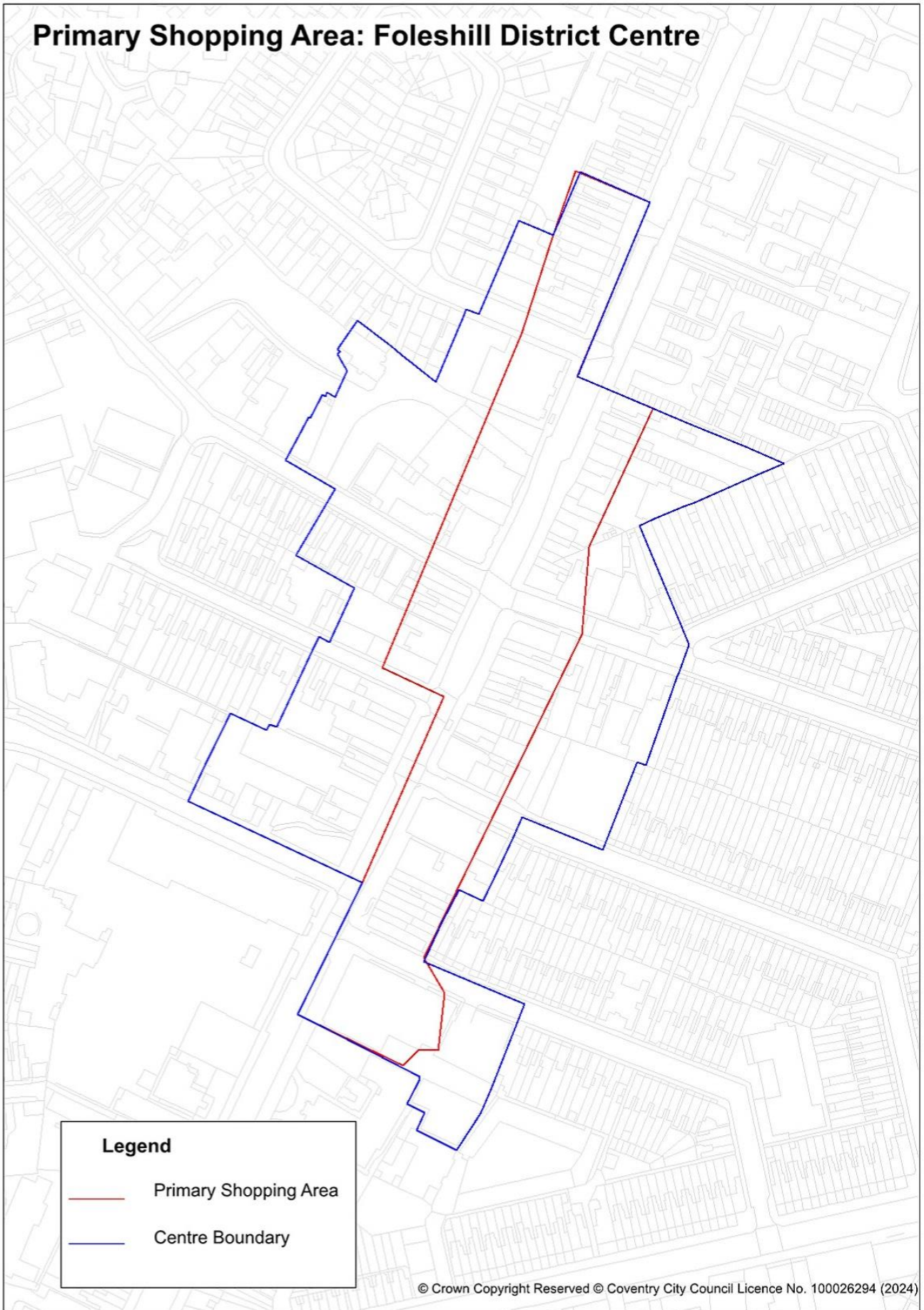


Legend

- Primary Shopping Area
- Centre Boundary

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Primary Shopping Area: Foleshill District Centre

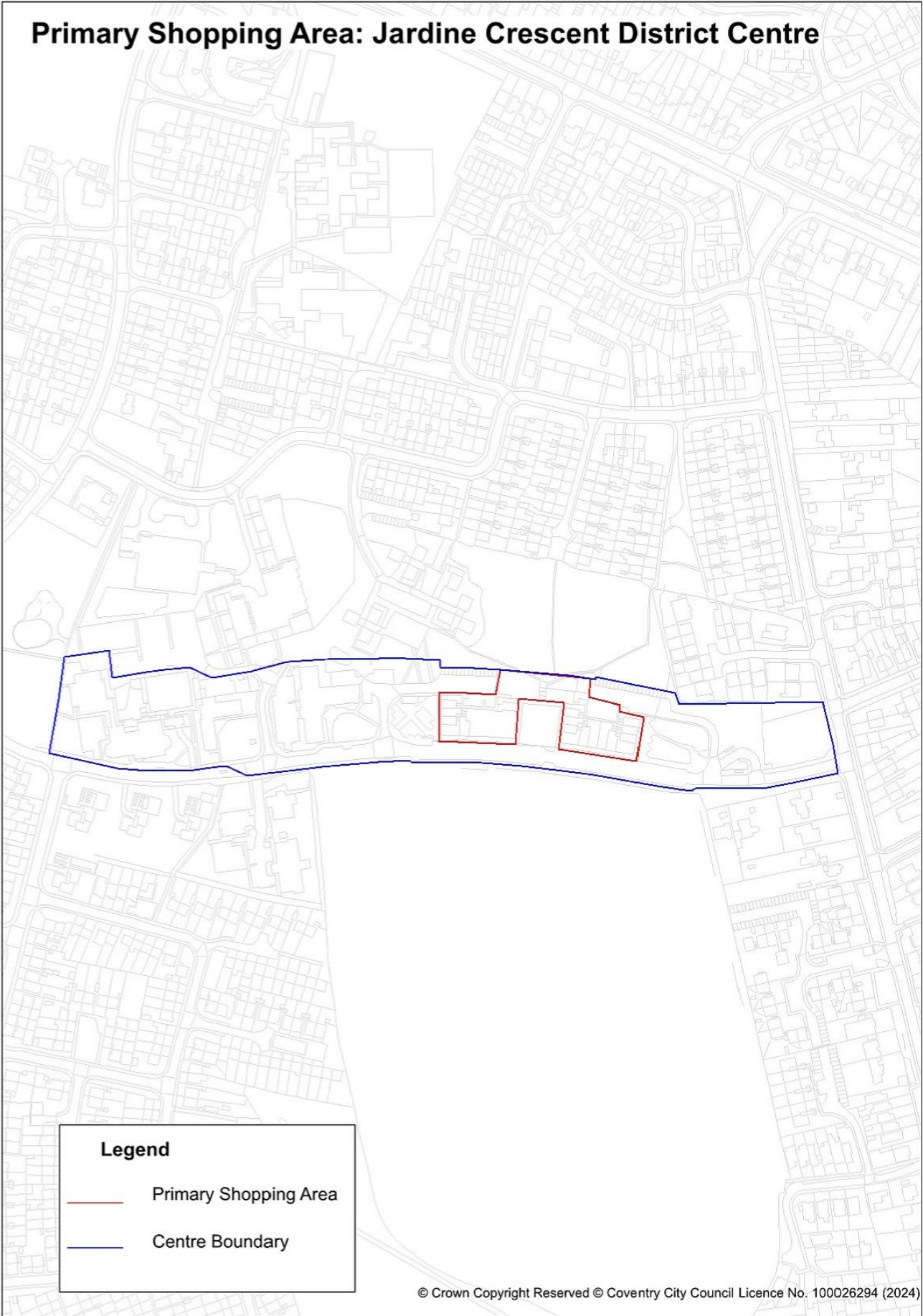


Legend

- Primary Shopping Area
- Centre Boundary

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Primary Shopping Area: Jardine Crescent District Centre

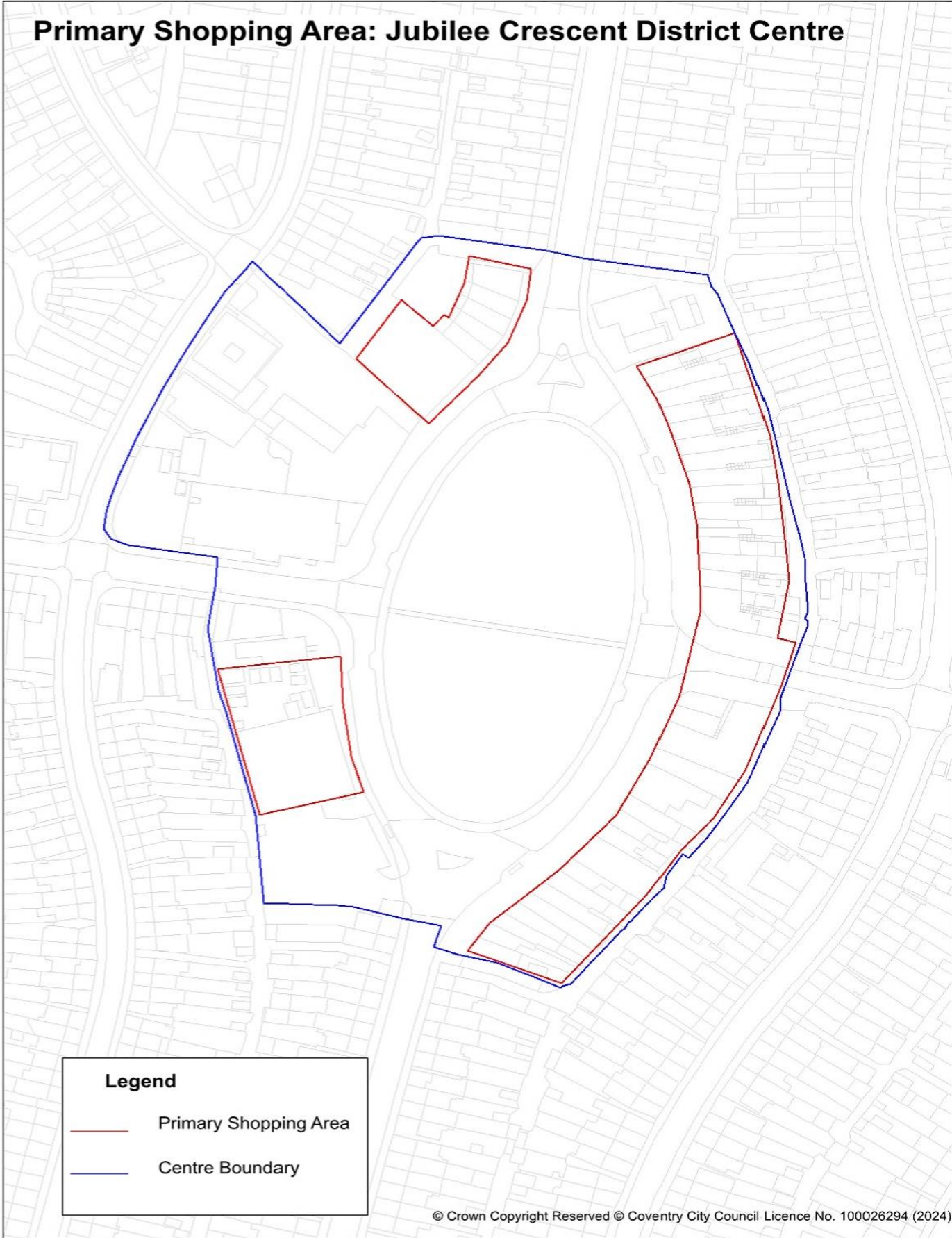


Legend

- Primary Shopping Area
- Centre Boundary

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Primary Shopping Area: Jubilee Crescent District Centre

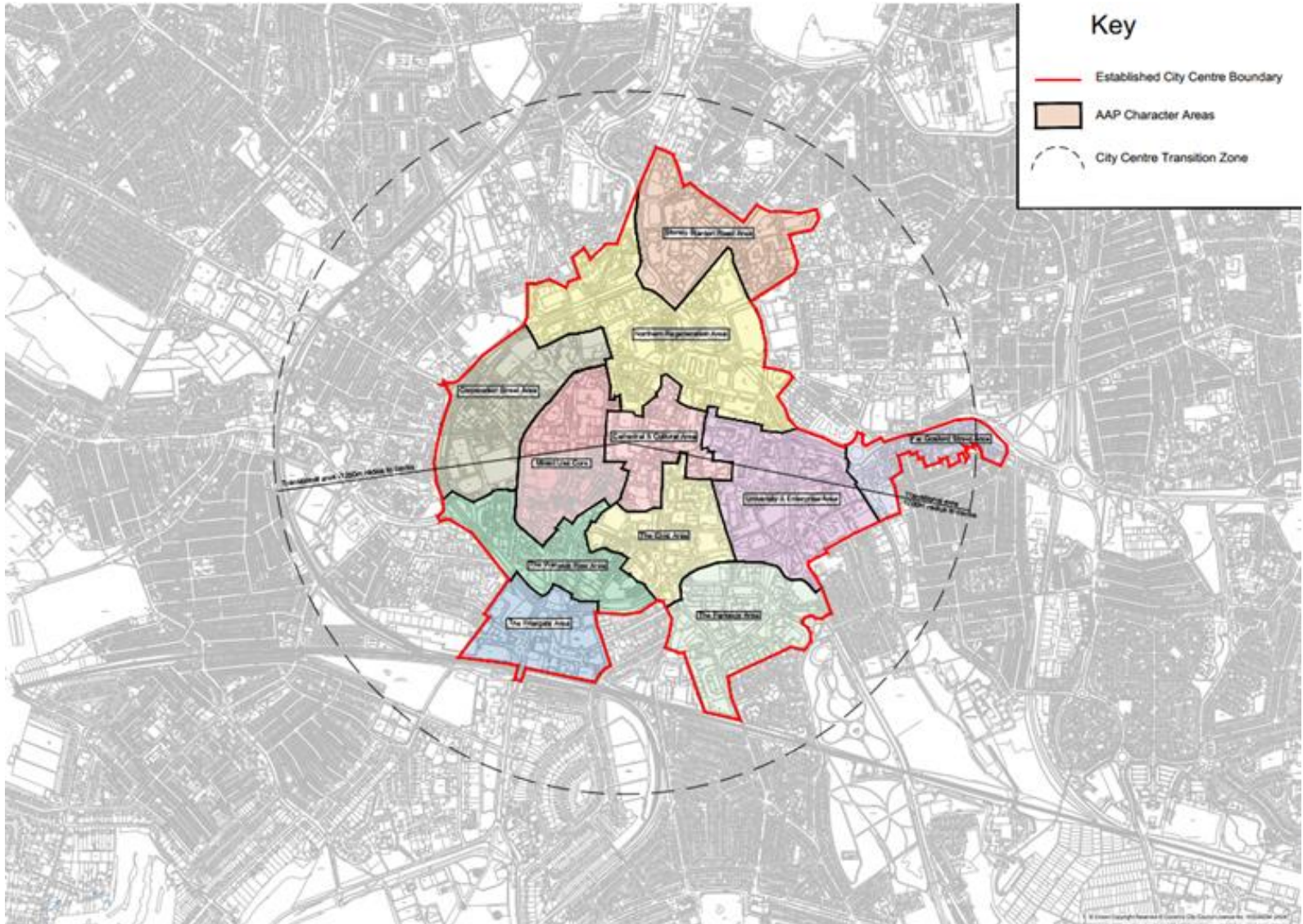


Legend

- Primary Shopping Area
- Centre Boundary

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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)

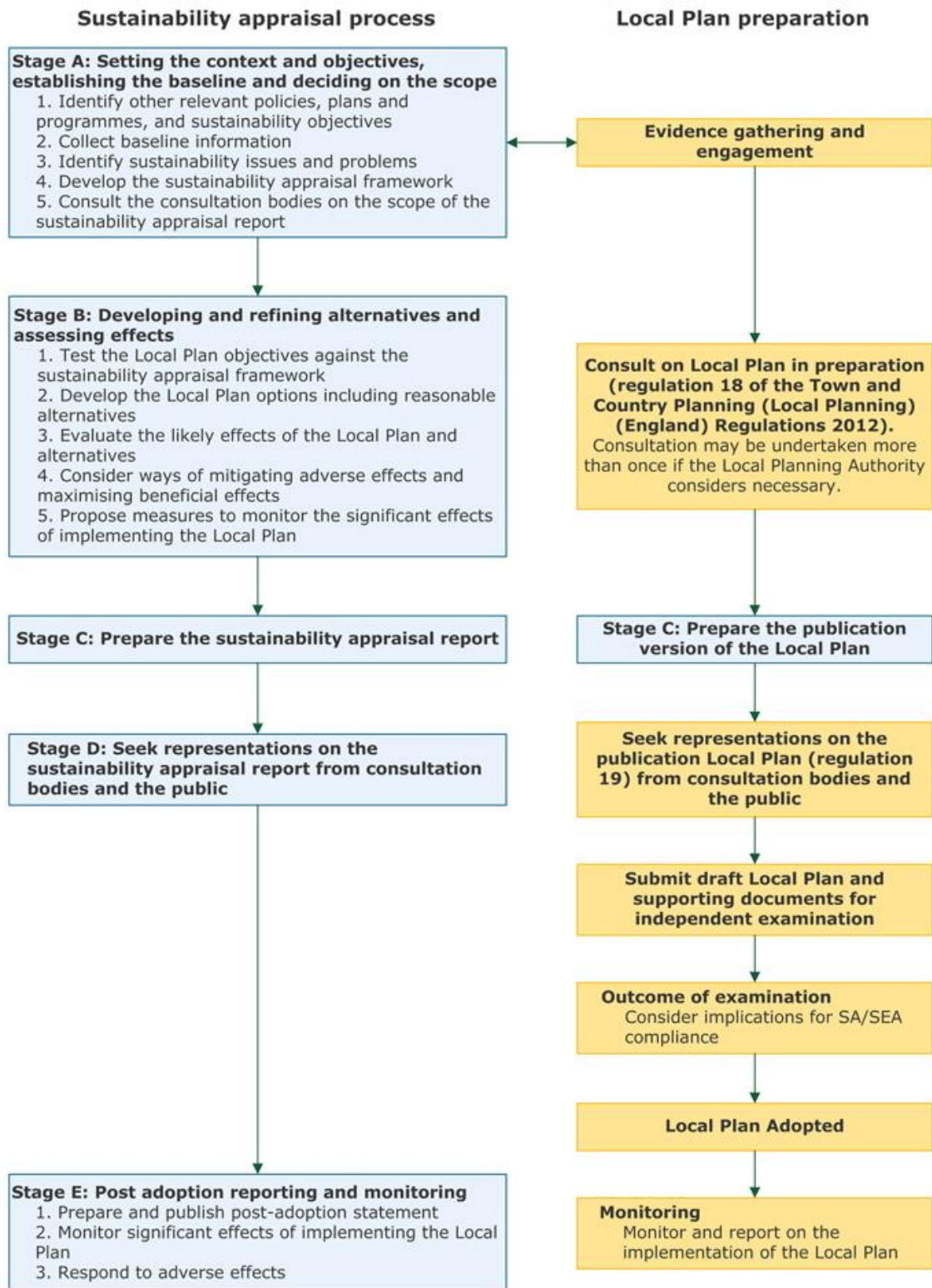
- 1.1 Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. The purpose of a Sustainability Appraisal is to promote sustainable development through assessing the extent to which an emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic, and social objectives¹.
- 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)². SA incorporates the requirements for Strategic Environmental Assessment (SEA,) as set out in the Environmental Assessment of Plans and Programmes Regulations 2004³. 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.

¹ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#strategic-environmental-assessment-and-sustainability-appraisal>

² <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

³ <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)⁴ of the Local Plan Review.⁵ The Conservation of Habitats & Species Regulations (2017, amended 2018)⁶ 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 Ramsar⁷ 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)⁸ enacted the changes and introduced national development management policies (NDMPs). The new Government has proposed different changes to the NPPF (July 2024)⁹ 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 99km² located in central England, approximately 15km south east of Birmingham and approximately 10km north of Leamington Spa – and as shown in the following figures:

⁴ <https://www.gov.uk/guidance/appropriate-assessment>

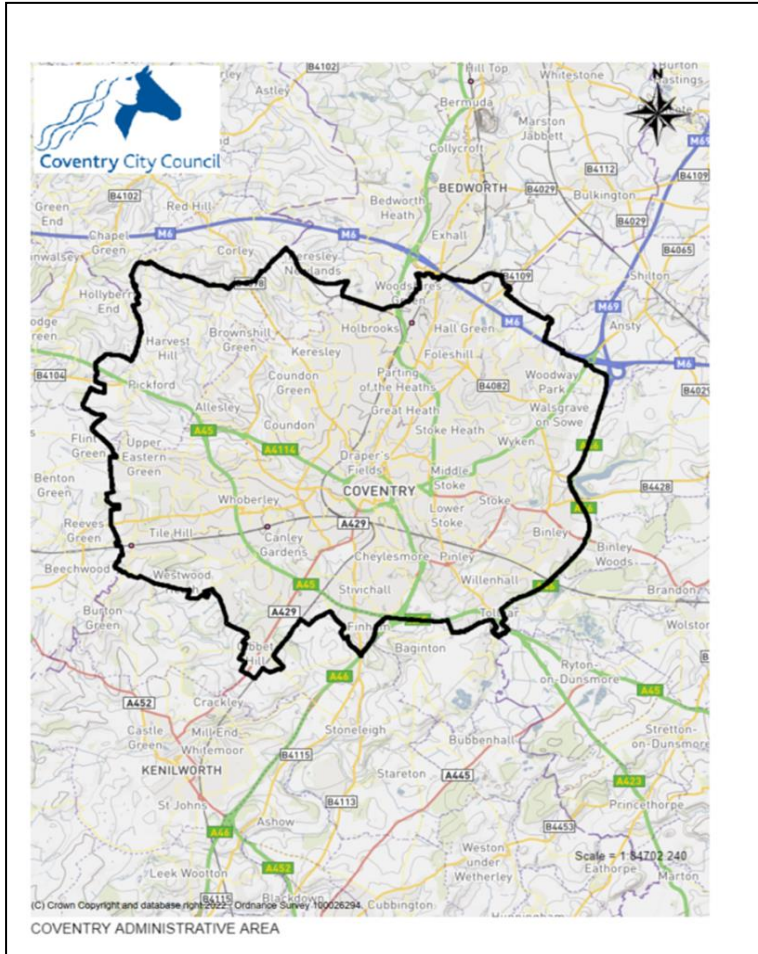
⁵ <https://www.gov.uk/guidance/appropriate-assessment>

⁶ <https://www.legislation.gov.uk/uksi/2017/1012/contents/made>

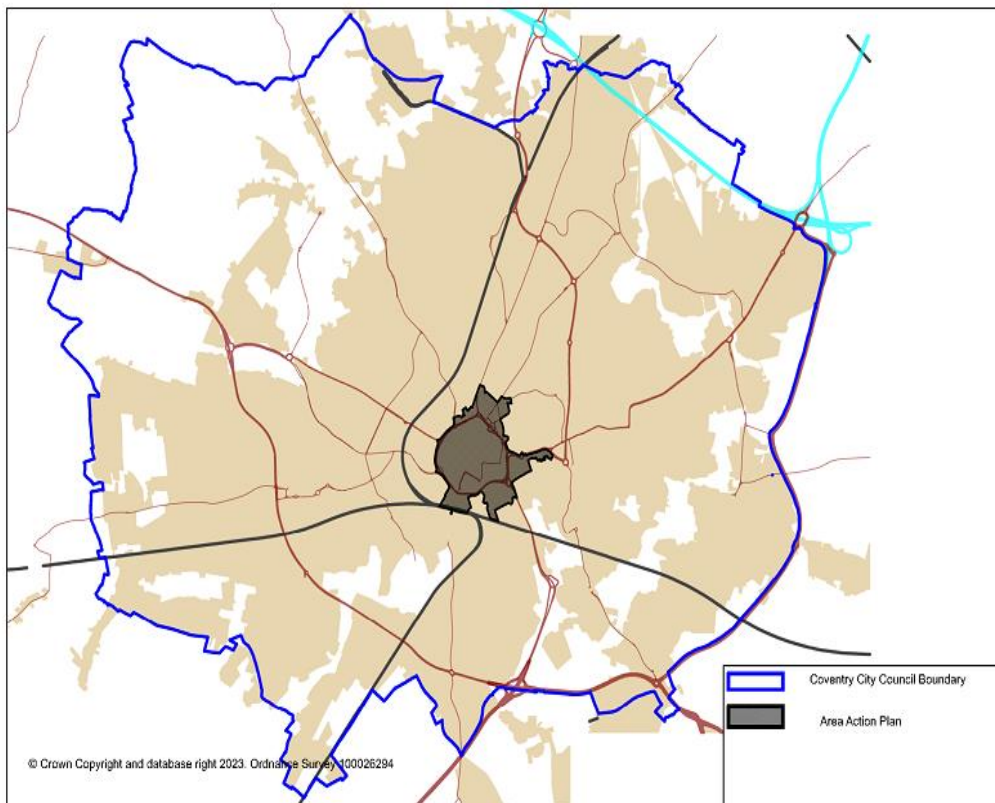
⁷ Support internationally important wetland habitats and are listed under the Ramsar Convention on Wetlands of International Importance

⁸ <https://www.legislation.gov.uk/ukpga/2023/55>

⁹ <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)¹⁰. 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

¹⁰ <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

CLPR Policy	Summary of Changes
DS1: Overall Development Needs	Strategic Policy - 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	Strategic Policy - Updated
DS3: Sustainable Development	Strategic Policy - Updated
DS4 Parts A, B, C & D Masterplan Principles	Strategic Policy - Minor updating
HW1: Health & Health Impact Assessments	Updated to broaden scope & align with updated SPD
JE1: Economy & Employment Strategy	Strategic Policy - Updated to reflect national changes & local evidence
JE2: Provision of Employment Land & Premises	Strategic Policy - 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	Strategic Policy - Updated needs for 2021-2041 for a minimum of 29,100 additional dwellings
H2: Housing Allocations	Strategic Policy - 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	Strategic Policy - Updating & new policy to differentiate between Green Belt & Local Green Space
GB2: Safeguarded Land in the Green Belt	Strategic Policy – 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)¹¹, and the five development pathways to sustainability set out in the draft Coventry Climate Change Strategy (2022-2030)¹². 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

¹¹ <https://www.coventry.gov.uk/onecoventryplan>

¹² <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 advises¹³ 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:

¹³ <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...)
SA No 1: To enable vibrant and inclusive communities	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
SA No 2: To provide accessible essential services and facilities for all residents	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
SA No 3: To improve health and promote active living	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
SA No 4: To provide decent and affordable housing for all	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
SA No 5: To support sustainable inclusive economic growth	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
SA No 6: To help achieve the Council's ambition to reach net zero carbon emissions	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>SA No 7: To build resilience to climate change</p>	<p>Take the long term risk of flooding into account Reduce risks from overheating & extreme weather events Provide adaptive techniques in building design such as passive heating/cooling Incorporation of GI measures such as green space & tree planting to support urban cooling see also SA Nos 11 & 13</p>
<p>SA No 8: To reduce traffic & improve sustainable transport choices</p>	<p>Reduce the need to travel by private vehicle Discourage car travel Support & improve a strong, inclusive sustainable transport network, including cycling & walking opportunities & buses/taxis with increased uptake for low/zero emission vehicles</p>
<p>SA No 9: To reduce air, noise & light pollution</p>	<p>Help to improve air quality – outdoors and indoors Help to reduce noise pollution & avoid noise disturbance Help to reduce light pollution & avoid light disturbance</p>
<p>SA No 10: To protect & conserve natural resources - soil, water, minerals & waste</p>	<p>Make use of previously developed, degraded or under-used land Minimise the loss of best & most versatile (BMV) agricultural land Encourage local food through allotments & urban farming Promote efficient use of water resources Avoid loss or sterilisation of mineral resources Maximise the reuse, recycling & composting of waste</p>
<p>SA No 11: To protect and enhance nature & biodiversity</p>	<p>Protect, maintain or enhance features of biological importance Contribute to the positive management of local biodiversity & 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 & Air Quality for nitrogen deposition & designated sites & sites of local importance (see also SA No 8)</p>
<p>SA No 12: To protect and enhance the historic environment, and its setting</p>	<p>Conserve and/or enhance heritage assets & their setting Respect & strengthen local character, distinctiveness & sense of place Sustain & 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>SA No 13: To protect and enhance the quality and character of townscapes and landscapes</p>	<p>Protect & enhance local character, distinctiveness & sense of place Protect & enhance visual amenity Restore degraded townscapes & 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
SA No 1: To enable vibrant and inclusive communities	Indices of Multiple Deprivation (IMD) Provision for potentially disadvantaged people Community participation
SA No 2: To provide accessible essential services & facilities for all residents	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
SA No 3: To improve health and promote active living	Health Index for England Reduction in health inequality Increase in active living Independent living & resilience for the ageing Reduction in crime
SA No 4: To provide decent and affordable housing for all	Provision of housing mix Provision of affordable housing Provision of HMOs, Coliving Provision of student accommodation; PBSAs Meeting Gypsies & Travellers' needs
SA No 5: To support sustainable inclusive economic growth	Delivery of employment space Support for centres & revitalisation/regeneration Number of vacant units Number of unemployed
SA No 6: To help achieve the Council's ambition to reach net zero carbon emissions	GHG emissions Embodied carbon Energy generation/use from renewable or low carbon sources Incorporation of GI
SA No 7: To build resilience to climate change	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
SA No 8: To reduce traffic & improve sustainable transport choices	Connectivity & proximity to sustainable transport options – bus, rail, cycle, walking Uptake of parking restrictions to discourage car use
SA No 9: To reduce air, noise & light pollution	NO ₂ & PM monitoring data Number of complaints – noise; light
SA No 10: Protect & conserve natural resources - soil, water, minerals & waste	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
SA No 11:	% biodiversity net gain (NE draft metric) Provision of, & connectivity to, GI/BI networks Enhancement & provision of long term management

To protect and enhance nature & biodiversity	
SA No 12: To protect and enhance the historic environment, and its setting	Potential impacts on heritage assets & their setting Historic assets on HE's Heritage at Risk Register
SA No 13: To protect and enhance the quality and character of townscapes and landscapes	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, secondary¹⁴, cumulative¹⁵ and synergistic¹⁶) 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:

¹⁴ Any aspect of a plan that may have an impact (positive or negative), but that is not a direct result of the proposed plan.

¹⁵ 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.

¹⁶ 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 Guidance¹⁷ 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:

¹⁷ <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 Report¹⁸ (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)

¹⁸ 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 CO₂ 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 NO₂. The main transport corridors to the north and north-east (linked to the M6) are most likely to exceed the NO₂ 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
Communities, Health & Wellbeing	<ul style="list-style-type: none"> ▪ Increasing population, especially in older age groups ▪ Need to plan for a growing, changing and increasingly diverse population

	<ul style="list-style-type: none"> ■ 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 ■ Need to focus on prevention to improve health & reduce inequalities - will need a community-informed and culturally competent approach ■ Further work needed at the local level through the place-based profiles, particularly around issues such as alcohol use and obesity/physical activity
Housing	<ul style="list-style-type: none"> ■ The need to maintain a mix of new homes continues into to the 2040s ■ 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 & support ■ Self-build and custom housebuilding, as well as Coliving, are growing elements of the housing market ■ High number of young people – need affordable homes ■ Significant student population predicted to increase; as more PBSA schemes become built, other housing will be released into wider housing market ■ 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
Economy	<ul style="list-style-type: none"> ■ 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 ■ Employment and education/training uses may be able to fill gaps, including with coworking spaces and/or encouraging start-ups ■ 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
Climate Change	<ul style="list-style-type: none"> ■ Planning for climate change adaption should be a part of every new development ■ 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 ■ Retrofitting existing buildings will be a very significant challenge ■ Consideration of embodied carbon is an ongoing challenge for the construction industry ■ Planning for climate change mitigation means building resilience, including reducing risks from overheating,

	<p>flooding and the resultant detriment to wellbeing, the economy and the environment</p> <ul style="list-style-type: none"> ■ Increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK
<p>Transport & Air Quality</p>	<ul style="list-style-type: none"> ■ Improve the sustainability of the transport system, improve integration with walking and cycling routes and green infrastructure networks, and promote more active travel ■ Reducing vehicle emissions will continue to improve air quality; Indoor air pollution is becoming an increasing proportion of the problem ■ 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 ■ Improvements in renewable transport provision and restrictions on car use in the city centre will help the city achieve zero carbon objectives ■ 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 ■ Improving sustainable transport networks and associated green infrastructure (GI) will also benefit nature and wellbeing for people ■ 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
<p>Natural Resources</p>	<ul style="list-style-type: none"> ■ 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 ■ The effective use of land could consider whether an uplift in minimum housing density requirements might be possible where sufficient infrastructure is in place ■ This would require careful consideration of reduced car ownership/parking but would further promote the Council's objectives towards zero carbon ■ The best agricultural land must be conserved and effects of climate change may affect food security
<p>Nature & Biodiversity</p>	<ul style="list-style-type: none"> ■ Need to consider the new requirements from the Environment Act including emerging metrics for calculating biodiversity net gain ■ 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 ■ Climate change is likely to affect changes to habitats and species distribution

	<ul style="list-style-type: none"> ▪ There may be opportunities to enhance blue infrastructure and update requirements taking into account recent legislation on nature and biodiversity
Historic Environment	<ul style="list-style-type: none"> ▪ Development pressures may continue to have potential negative effects on historic assets and their setting, especially through cumulative effects ▪ It is important to understand heritage value and local design guidance can be informed by local communities ▪ Mitigation of, and adaptation to, the effects of climate change are a particular challenge for heritage assets and their setting
Townscape & Landscape	<ul style="list-style-type: none"> ▪ Townscape is closely interwoven with the historic environment ▪ 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 ▪ Green, blue and open spaces should be woven into the urban design ▪ Green Belt remains an important mechanism to prevent towns merging and safeguard countryside from encroachment

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 Coventry¹⁹ 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

¹⁹ <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 Paper²⁰ 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	
1	63,760 dwellings (3,188 per annum) – Government standard method ²¹ (with ONS population projections from 2014) ²²
2	39,280 dwellings (1,964 per annum) – HEDNA method ²³ (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 ²⁴

²⁰ Coventry City Council (May 2023) Housing Topic Paper

²¹ <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

²² 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>

²³ 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>

²⁴ 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:

Table 4.1b: Options for Residential Density	
1	Greenfield 30 dph ²⁵ ; outside ring road minimum 35 dph; inside ring road minimum 200 dph. Current CLP Policy H9
2	As Option 1 but with >35 dph outside ring road – in certain locations

4.4 **Strategic Options for Progressing the Coventry Climate Change Strategy²⁶:** 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:

²⁵ Dwellings per hectare

²⁶ Coventry Climate Change Strategy 2022-2030 <https://www.coventry.gov.uk/draftclimatechangestrategy>

Table 4.1c: Options for progressing Coventry's Climate Change²⁷ 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"	
1	Planning policy requirements in line with national Future Homes Standard ²⁸ & Future Buildings Standard ²⁹ covering energy efficiency, ventilation and overheating through Building Regulations
2	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 Paper³⁰, and the initial SA investigated through high level assessment two scenarios, as follows:

Table 4.1d: Options for Nature & Biodiversity	
1	Planning policy requirements in line with national requirements & standards, including 10% Biodiversity Net Gain (BNG) ³¹ , and Green Infrastructure (GI) standards ³²
2	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.

²⁷ Coventry's draft Climate Change Strategy 2023-2030
<https://www.coventry.gov.uk/downloads/download/7434/coventry-s-draft-climate-change-strategy>

²⁸ For example, please see: <https://www.futurehomes.org.uk/delivery-at-scale>
²⁹ <https://www.gov.uk/government/consultations/the-future-buildings-standard>

³⁰ Coventry City Council (May 2023) Green Infrastructure & Biodiversity Topic Paper

³¹ Environment Act 2021, and for example, please see <https://consult.defra.gov.uk/defra-net-gain-consultation-team/consultation-on-biodiversity-net-gain-regulations/>

³² <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 & Options³³ 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)³⁴ 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)³⁵ 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

³³ <https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

³⁴ 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>

³⁵ 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 NPPF³⁶, 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)³⁷. 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:

Table 4.1e: 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) – HEDNA method as per Option 2 with housing numbers that 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)

- 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

³⁶ <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system>

³⁷ 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.

Table 4.1f: Options for Residential Density	
1	Greenfield 30 dph ³⁸ ; outside ring road minimum 35 dph; inside ring road minimum 200 dph. Current CLP Policy H9
2	As Option 1 but with >35 dph outside ring road – in certain locations
3	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 update³⁹ 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:

Table 4.1g: Options for Development in the Green Belt	
1	Potential for development within the Green Belt
2	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.

³⁸ Dwellings per hectare

³⁹ 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:

Table 4.1h: Options for General Industrial Employment Land	
1	156.1 hectares – HEDNA (2022) – 8.5 ha office; 147.6 ha general industrial (excluding strategic B8)
2	As per HEDNA 147.6 ha general industrial but with office land reduced by 30% to 5.95 ha (hybrid working reduces floorspace needs)
3	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)⁴⁰ 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:

Table 4.1i: 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) 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-

⁴⁰ 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:

Table 4.1j: Options for Distribution of Office Development	
1	City Centre focus including Friargate
2	A more dispersed approach
3	City Centre focus to include 39,549 sqm floorspace at Friargate ⁴¹ 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:

Table 4.1k: 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

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:

⁴¹ An office block was constructed in 2022 (12,449 sq m) leaving 27,100 sq m at Friargate & 1,451 sq m elsewhere

Table 4.2a: Strategic Options for Quantum of Housing Development	1. Standard Method (2014) – 63,760 dwellings	2. Standard Method (2022) – 39,280 dwellings	3. Standard Method less 35% 29,100 dwellings	4. Can be Accommodated approx. 31,500 dwellings	5. Proposed Standard Method (2024) 30,540 dwellings
Sustainability Objective					
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 ⁴²	-	-?	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	--?	-?	+	+	+

⁴² 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)⁴³ - with less negative effects and therefore, overall more likely positive effects.
- 4.32 **Health & Active Living:** Coventry became a Marmot City⁴⁴ 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.

⁴³ Coventry Housing and Economic Land Availability Assessment (HELAA, 2024)

<https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

⁴⁴ <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)⁴⁵ 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

⁴⁵ <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)⁴⁶ 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

⁴⁶ 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"> ▪ Homes would need to be small, more densely located & thus unable to meet variety & adaptability of needs ▪ Quantum could limit land for open/green space with negative effects for health & wellbeing

		<ul style="list-style-type: none"> Quantum would compromise ability to meet with other objectives, especially for climate change & nature Pressure on infrastructure & other services
2	39,280 dwellings (1,964 per annum)	<ul style="list-style-type: none"> Homes would need to be small, more densely located & thus unable to meet variety & adaptability of needs Quantum could limit land for open/green space with negative effects for health & wellbeing Quantum would compromise ability to meet with other objectives, especially for climate change & nature Pressure on infrastructure & other services
3	29,100 dwellings (1,455 per annum)	<ul style="list-style-type: none"> Quantum could be accommodated & aligns with the Local Need figure set out in the HEDNA (minus the 35% cities uplift), enables flexibility & provides a buffer <p>Preferred Option</p>
4	Approx. 31,500 dwellings (1,575 per annum)	<ul style="list-style-type: none"> Quantum calculated as being able to be accommodated & aligns with the identified need (Option 3) but provides no or very limiting buffer
5	30,540 dwellings (1,527 per annum)	<ul style="list-style-type: none"> Quantum could be accommodated but provides only a limited buffer

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:

Table 4.3a: Options for Residential Density		1_Greenfield 30 dph; Outside ring road min 35 dph; Inside min 200 dph	2_As Option 1 but Outside ring road >35 dph in certain locations	3_Greenfield 35 dph; Brownfield 45 dph; 125 dph in Transition zone 125 dph; City Centre 250 dph
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	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 ⁴⁷	- 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?	+	+

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

⁴⁷ First cell refers to land/soil & water resources; second cell refers to minerals & waste

Density study⁴⁸ 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 SPD⁴⁹, 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

⁴⁸ Coventry City Council (August 2024) Housing Density Paper

⁴⁹

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"> Identified quantum need could not be accommodated
2	As Option 1 but with >35 dph outside ring road – in certain locations	<ul style="list-style-type: none"> Identified quantum need could not be accommodated
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"> Identified quantum need could be accommodated <p>Preferred Option</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:

Table 4.4a: Options for Coventry's Climate Change Strategy – Building Regulations Standards	1_In line with FHS & FBS		2_Over & above Building Regulations	
Sustainability Objective				
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 ⁵⁰	-	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.

⁵⁰ 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 21st 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"> Viability and land values can support national standards Can help support investment and development in the city that would otherwise be located in areas outside the city Option will be progressed through mandatory requirements to meet national net zero ambitions
2	Over and above proposed Building Regulations	<ul style="list-style-type: none"> Can help Coventry meet its local and national net zero ambitions <p>Preferred Option 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 ⁵¹	+	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

⁵¹ 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"> 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 <p>Preferred Option</p>
2	Over and above national BNG & GI standards	<ul style="list-style-type: none"> 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

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:

Table 4.6a: Options for Development in the Green Belt Sustainability Objective	1_ Development within the Green Belt	2_ No development in the Green Belt
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 ⁵²	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	--	++

⁵² 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 Review⁵³, 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)⁵⁴ 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.

⁵³ Coventry & Warwickshire Joint Green Belt Review (2015)

⁵⁴ 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)⁵⁵ 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.

⁵⁵ 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)⁵⁶:
- (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 update⁵⁷ 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

⁵⁶ 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.

⁵⁷ 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"> ▪ Adverse effects on GB purposes ▪ Adverse effects on landscape ▪ Risk of isolated communities
2	No development in Green Belt	<ul style="list-style-type: none"> ▪ Identified quantum need could be accommodated without GB land ▪ Retains openness & protects townscapes/landscapes <p>Preferred Option</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>Table 4.7a: Options for Quantum of General Industrial Employment Land</p> <p>Sustainability Objective</p>	<p>1. 147.6 hectares</p>	<p>2. 60 hectares calculated that can be accommodated</p>	<p>3. 60 ha + 11.81 ha located in Green Belt</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 ⁵⁸	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)⁵⁹ would suggest that the role of employment contributing to vibrant communities would be satisfied with positive effects. However, capacity studies (HELAA 2024)⁶⁰ and review studies (ELR 2024)⁶¹ 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.

⁵⁸ First cell refers to land/soil & water resources; second cell refers to minerals & waste

⁵⁹ Housing & Economic Development Needs Assessment (HEDNA, November 2022) Iceni Projects Ltd on behalf of Coventry & Warwickshire Local Authorities

⁶⁰ Coventry Housing and Economic Land Availability Assessment (HELAA, 2023)
<https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

⁶¹ 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)⁶². 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

⁶² 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"> Rejected as this level of growth cannot be accommodated within Coventry's constrained boundaries
2	60 ha – can be accommodated	<ul style="list-style-type: none"> 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 Potential to address shortfall with partner authorities without resorting to Green Belt release <p>Preferred Option</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:

Table 4.8a: Options for Quantum of Office Development						
Sustainability Objective	1. 8.5 ha		2. 5.8 ha		3. 4.12 ha	
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 ⁶³	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?	

⁶³ 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"> Initial quantum proposed by the HEDNA has been superseded by the ELR Office Market addendum which demonstrates an oversupply
2	5.8 ha	<ul style="list-style-type: none"> 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
3	4.12 ha	<ul style="list-style-type: none"> Most effective use of land, taking into account oversupply and reduced floorspace requirements of changed patterns of working <p>Preferred Option</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
Sustainability Objective			
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 ⁶⁴	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.

⁶⁴ 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"> 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
2	More Dispersed Approach	<ul style="list-style-type: none"> Does not optimise updated opportunities for City Centre & Friargate Potential for accessing through less sustainable travel choice

3	City Centre including 27,000 sqm Friargate & rest to local centres	<ul style="list-style-type: none"> Most effective use of land which supports a range of needs including smaller businesses <p>Preferred Option</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 ⁶⁵	0	0

⁶⁵ 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 DPD⁶⁶ 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)⁶⁷ 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.

⁶⁶ <https://www.coventry.gov.uk/planning-policy/homes-multiple-occupation-development-plan-document>

⁶⁷ 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"> ▪ Risks continuing with poorer quality accommodation ▪ Potential underoccupation of PBSA & limits future change of use for alternative occupation
2	PBSA located at campus, city university area	<ul style="list-style-type: none"> ▪ Student population more focused in more sustainable locations ▪ More effective use of land for other essential housing needs <p>Preferred Option</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 Coventry⁶⁸ 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.

⁶⁸ <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 ⁶⁹	11. Nature & Biodiversity	12. Historic Environment	13. Townscapes & Landscapes	
New Housing Allocations (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?	++

⁶⁹ First cell refers to land/soil & water resources; second cell refers to minerals & waste

New Housing Allocations (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	+
New Housing Allocations (proposed density at 125 dph)															
Land at Spon End	750	+++?	+	+	++	0	0	0	+	0	+	0	??	0?	++
Existing Allocations with Changes															
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?	++
New Employment Site Option															
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)⁷⁰ 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

⁷⁰ <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)⁷¹ 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 research⁷² 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

⁷¹ <https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

⁷² 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.⁷³ 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**

⁷³ <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)⁷⁴ 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 requirements⁷⁵ for Biodiversity Net Gain (BNG) – and Coventry has established practice through such an approach with its BNG SPD (2022)⁷⁶. 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)⁷⁷, 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.

⁷⁴ JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

⁷⁵ <https://www.gov.uk/guidance/biodiversity-net-gain>

⁷⁶ <https://www.coventry.gov.uk/downloads/file/39624/biodiversity-net-gain-spd>

⁷⁷ <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 NPPF⁷⁸.
- 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.

⁷⁸ <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)⁷⁹ 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

⁷⁹ <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 Study⁸⁰ 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)⁸¹, 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.

⁸⁰ Coventry City Council (2024) Residential Density Study

⁸¹ 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 2024⁸² (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)⁸³. 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

⁸² <https://www.gov.uk/guidance/biodiversity-net-gain-what-local-planning-authorities-should-do>

⁸³ <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 guidance⁸⁴. 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 sites⁸⁵ 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)⁸⁶ 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

⁸⁴ <https://www.gov.uk/guidance/appropriate-assessment>

⁸⁵ Distances measured (direct nearest boundary to nearest boundary) using Magic Map (Defra) application <https://magic.defra.gov.uk/magicmap.aspx>

⁸⁶ JBA Consulting (June 2024) for Coventry CC, north Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford-on-Avon DC, and Warwick DC

(October 2020)⁸⁷. 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

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)⁸⁸ 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

⁸⁸ <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 ⁸⁹	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	++

⁸⁹ 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 Strategy⁹⁰. 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

⁹⁰ <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 guidance⁹¹ 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)⁹² (produced annually) is considered sufficient to ensure appropriate monitoring takes place.

⁹¹ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

⁹² 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

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Appendix I: Statement on Compliance with SEA Directive & Regulations

The EU SEA Directive¹ (Annex 1) requires certain information to be provided in the Environmental Report. This requirement is implemented into UK legislation through the SEA Regulations (2004)². 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)³.

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

¹ <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

² <http://www.parliament.uk/documents/post/postpn223.pdf>

³ <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

IIIa: Options for Quantum of Housing Needs 2022-2041	
1	63,760 dwellings (3,188 per annum) – Government standard method ⁴ (with ONS population projections from 2014) ⁵
2	39,280 dwellings (1,964 per annum) – HEDNA method ⁶ (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 ⁷
4	Approx. 31,500 dwellings (1, 575 per annum) – calculated as quantum that 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) ⁸

IIIb: Options for Residential Density	
1	Greenfield 30 dph ⁹ ; outside ring road minimum 35 dph; inside ring road minimum 200 dph. Current CLP Policy H9
2	As Option 1 but with >35 dph outside ring road – in certain locations
3	Greenfield 35 dph; Brownfield 45 dph; 125 dph in defined transition zone; 250 dph within City Centre boundary

IIIc: Options for progressing Coventry's Climate Change Strategy¹⁰	
1	Planning policy requirements in line with national Future Homes Standard ¹¹ & Future Buildings Standard ¹² covering energy efficiency, ventilation and overheating through Building Regulations
2	Planning policy requirements that are over and above proposed Building Regulations to better progress Coventry's aspirational ambitions for addressing climate change effects

⁴ <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

⁵ 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>

⁶ 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>

⁷ 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>

⁸ <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>

⁹ Dwellings per hectare

¹⁰ 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”>

¹¹ For example, please see: <https://www.futurehomes.org.uk/delivery-at-scale>

¹² <https://www.gov.uk/government/consultations/the-future-buildings-standard>

III d: Options for Nature & Biodiversity	
1	Planning policy requirements in line with national requirements & standards, including 10% Biodiversity Net Gain (BNG) ¹³ , and Green Infrastructure (GI) standards ¹⁴
2	Planning policy requirements that are over and above national requirements for BNG & GI standards

III e: Options for Development in the Green Belt	
1	Potential for development within the Green Belt
2	No potential development within the Green Belt

III f: Options for Quantum of Employment Land	
1	147.6 ha general industrial (excluding strategic B8) – HEDNA (2024)
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)

III g: 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)

III h: Options for Distribution of Office Development	
1	City Centre focus including Friargate
2	A more dispersed approach
3	City centre focus to include 39,549 sqm floorspace at Friargate ¹⁵ and the rest distributed to other defined centres (overall, 41,200 sq m)

¹³ Environment Act 2021, and for example, please see <https://consult.defra.gov.uk/defra-net-gain-consultation-team/consultation-on-biodiversity-net-gain-regulations/>

¹⁴ <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx>

¹⁵ An office block was constructed in 2022 (12,449 sq m) leaving 27,100 sq m at Friargate & 1,451 sq m elsewhere

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

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/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) ¹⁶

		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
1: To enable vibrant and inclusive 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 total population of Coventry City Council ¹⁷ 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	+	+	+	+	+

¹⁶ <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>

¹⁷ <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 & 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 & 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 & 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 averages¹⁸. 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>SA Suggestion at Regulation 18: 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>2: To provide accessible essential services and facilities for all residents</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 & 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 & facilities for residents. However, larger scale developments may be better able to support provision of new services & facilities. It is likely that the lower quantum of new housing in Options 3, 4 & 5 are less likely to overload the capacity of services & 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 & green infrastructure – including sufficient mitigation measures to ensure that services & facilities are sufficient, for example, Policy IM1 Developer Contributions. Policy H2 lists housing allocations that have been</p>	+	+	++	++	++

¹⁸ (ONS, 2021) <https://www.coventry.gov.uk/facts-coventry/population-demographics>

	<p>assessed & identified to be in suitable locations, including for provision of, and accessible, services & facilities, including sustainable/active transport, social & community facilities, education & training, and green infrastructure. The review will update these policies. Policies C1-3 specifically address communities.</p> <p>SA Suggestion at Regulation 18: Policy review could consider encouraging facilities that are adaptable to future changes in population demographics and technology. It could encourage & support people to lead healthy & active lives, and ensure that facilities are accessible to all groups, including those with physical or mental disabilities.</p>					
<p>3: To improve health & promote active living</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 JSNA¹⁹ 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)²⁰ 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 City²¹ 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>

¹⁹ <https://www.coventry.gov.uk/facts-coventry/joint-strategic-needs-assessment-jsna>

²⁰ <https://coventry-city-council.github.io/imd/2019/>

²¹ <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 & access to employment is well established as contributing to better health and wellbeing – physical & mental²². These factors are covered by the following SA Nos 4 & 5.</p> <p>Overcrowding is more likely to be experienced by minority ethnic groups²³ – 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 & 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 & 2; positive effects more certain for development that can be accommodated – Options 3, 4 & 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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²² For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

²³ 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 SPD²⁴ 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>SA Suggestions at Regulation 18: 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 & improving resilience (both physical & cognitive) for housing the elderly. Can design principles or requirements create safer neighbourhoods & help reduce crime, including violence – especially against women and girls? Are there particular issues for health & overcrowding, perhaps associated with ethnic minority groups?</p>					
<p>4: To provide decent and affordable housing for all</p>	<p>New demographic projections have been modelled (HEDNA 2022)²⁵ 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 housebuilding²⁶ 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-living²⁷ 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>

²⁴ Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

²⁵ <https://www.coventry.gov.uk/downloads/download/7374/coventry-and-warwickshire-housing-and-economic-development-needs-assessment-hedna>

²⁶ <https://www.gov.uk/guidance/self-build-and-custom-housebuilding>

²⁷ 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 & 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 & 2.</p> <p>However, capacity (HELAA 2024²⁸) and viability studies have indicated that Options 3, 4 & 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 Council²⁹, there must be some uncertainty about availability of suitable land in sustainable locations to accommodate the higher quanta of housing in Options 1 & 2, and to meet with other objectives, particularly for climate change & 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 & 2.</p> <p>In 2020/21³⁰ 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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²⁸ Coventry City Council (2024) Housing & Economic Land Availability <https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

²⁹ See AMR 2021/22 <https://www.coventry.gov.uk/downloads/file/39439/authority-monitoring-report-2021-22>

³⁰ <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 & 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)³¹ 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 & SA No 7 Resilience to Climate change).</p> <p>SA Suggestion at Regulation 18:</p> <ul style="list-style-type: none"> ■ Is there any scope for considering any particular housing needs from cultural, ethnic or migrants/refugees groups? 					
<p>5: To support sustainable</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>

³¹ <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

<p>inclusive economic growth</p>	<p>initial evidence indicated that employment need could be met from renewal of existing sites and redevelopment³².</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 & 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 & 2 could be accommodated due to the constraints within the Coventry boundary. The higher quanta in Options 1 & 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 & hybrid working, will affect requirements for employment land during the plan period.</p>					
<p>6: To help achieve the Council's ambition to reach net zero carbon emissions</p>	<p>The Council recognises the climate crisis and is currently reviewing its Strategy³³. 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 & Buildings Standards (FHBS) in 2024³⁴ 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>

³² <https://www.coventry.gov.uk/downloads/download/7374/coventry-and-warwickshire-housing-and-economic-development-needs-assessment-hedna>

³³A Green Future for a Changing City(2022 – 2030) <https://www.coventry.gov.uk/draftclimatechangepolicy>

³⁴ <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^{35,36}. The UK has committed to decarbonise the electricity system by 2035³⁷ 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 & 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 & 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 SPD³⁸ 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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³⁵ <https://www.futurehomes.org.uk/delivery-at-scale>

³⁶ <https://www.benuk.net/Decarbonising-the-Grid.html>

³⁷ <https://www.gov.uk/government/news/plans-unveiled-to-decarbonise-uk-power-system-by-2035>

³⁸Coventry 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 & 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>SA Suggestion at Regulation 18: Circular economy principles³⁹ 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>7: To build resilience to climate change</p>	<p>There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK.⁴⁰ 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 & updated.</p> <p>There is some uncertainty that the higher quanta of housing in Options 1 & 2 would be able to meet with the enhanced</p>	<p>-?</p>	<p>-?</p>	<p>+</p>	<p>+</p>	<p>+</p>

³⁹ For example, please see RIBA, 2021 <https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy> 9781859469545

⁴⁰ 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 & viability (and particularly in the shorter term until technology catches up with requirements & 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 & 2 that will be cumulative in the longer term, but uncertainties of significance at this stage of assessment.</p>					
<p>8: To reduce traffic & improve sustainable transport choices</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 Plan⁴¹ for England includes an aim for half of all journeys in cities to be cycled or walked by 2030 and Coventry's Transport Strategy⁴² 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>

⁴¹ <https://www.gov.uk/government/publications/environmental-improvement-plan>

⁴² <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 & 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 & sustainable transport, it is generally considered that larger developments, particularly in rural areas, are able to provide & encourage sustainable transport choices as part of an overall package of masterplanning & 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 & 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 & 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 & noise (SA No 9), health & 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>SA Suggestions at Regulation 18: Consider revision of policy to include restricted parking & zero emission zones Consider whether more areas of road space would be safe & appropriate for reallocation to cycling & 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>9: To reduce air, noise & light pollution</p>	<p>In the UK, air pollution has been recently reported (2022) as being the largest environmental risk to public health⁴³. Reducing vehicle emissions will continue to improve air quality. Indoor air pollution is becoming an increasing proportion of the problem⁴⁴.</p> <p>Noise pollution is an acknowledged issue for human health & wellbeing – physical & 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 Europe⁴⁵ & the UK⁴⁶. Significant health impacts are likely to be underestimated, and exposure to environmental noise does not affect everyone equally. Socially deprived groups & 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>

⁴³ 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>

⁴⁴ Chief Medical Officers' annual report 2022: air pollution <https://www.sciencemediacentre.org/chief-medical-officers-annual-report-2022-air-pollution/>

⁴⁵ EEA, 2020 <https://www.eea.europa.eu/publications/environmental-noise-in-europe>

⁴⁶ 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 & wellbeing, including fatigue, insomnia, stress & anxiety⁴⁷ (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>SA Suggestions at Regulation 18: 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 & including the indoor environment Consider cumulative effects Consider the implications of air, noise & light pollution for nature & biodiversity</p>										
<p>10: To protect & conserve natural resources – soil, water, minerals & waste⁴⁸</p>	<p>The vast majority of development completions (90%) in 2021/22⁴⁹ 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 & sustainable movement, there may be insufficient suitable PDL to meet with the higher quanta in Options 1 & 2 – indicating</p>	-	0?	-?	0	0	0	0	0	0	0

⁴⁷ For example, please see <https://www.darksky.org/light-pollution/human-health/>

⁴⁸ First cell refers to land/soil & water resources; second cell refers to minerals & waste

⁴⁹ <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)⁵⁰ indicates that there is water capacity for the quanta in Options 3, 4 & 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>SA Suggestions at Regulation 18: 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>11: To protect and enhance</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>

⁵⁰ JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

<p>nature & biodiversity</p>	<p>biodiversity net gain (BNG)⁵¹. 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 & 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. However, the higher quanta of housing in Options 1 & 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 & 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>SA Suggestions at Regulation 18: Need to consider any issues from transport & 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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⁵¹ 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>12: To protect and enhance the historic environment, and its setting</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 & 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 & 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 & 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 & location.</p> <p>The historic environment is closely interwoven with townscape & 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 & 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 emissions⁵².</p> <p>SA Suggestions at Regulation 18: Increasing density of housing in suitable locations could take the loading off land availability & 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 & 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 & enhancing access/context/setting? Consider proactive support for reuse of buildings pre 1919 with suitable energy improvements</p>					
<p>13: To protect and enhance the quality and character of townscapes & landscapes</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 Belt⁵³ 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 & Coventry's exceptional</p>	<p>--?</p>	<p>-?</p>	<p>+</p>	<p>+</p>	<p>+</p>

⁵² Historic England (March 2022) <https://historicengland.org.uk/whats-new/features/climate-change/our-strategy/>

⁵³ <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

	<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)⁵⁴ 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 infrastructure⁵⁵. Therefore, it is vital that space for green & blue infrastructure is retained & enhanced, including improvements to linkages & networks that will further benefit people & nature.</p> <p>Significant negative effects are likely for Options 1 & 2, and particularly for cumulative effects, as such high quanta of development are likely to compromise the possibilities for embedded & 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 & 5. New development that is high quality, creative & proportional to the receiving townscape & 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 & 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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⁵⁴ Coventry city Council (July 2024) Green Belt Technical Update Study

⁵⁵ 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 & extent of design mitigation possibilities.</p> <p>SA Suggestions at Regulation 18: Consider highest design & for reuse/refurbishment to avoid landtake & new build Consider higher densities in suitable, sustainable locations Require highest quality design principles & approach consistent with Coventry aspirations</p>					
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Appendix IIIb: Options for Residential Density	
1	Greenfield 30 dph ⁵⁶ ; outside ring road minimum 35 dph; inside ring road minimum 200 dph. Current adopted CLP Policy H9
2	As Option 1 but with >35 dph outside ring road – in certain locations
3	Greenfield 35 dph; Brownfield 45 dph; 125 dph in defined transition zone; 250 dph within City Centre boundary

		Options for Density		
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. Greenfield 30 dph; Outside ring road min 35 dph; inside min 200dph	2. As Option 1 but Outside ring road >35 dph in certain locations	3. Greenfield 35 dph; Brownfield 45 dph; Transition Zone 125 dph; City Centre 250 dph
1: To enable vibrant and inclusive communities	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.	0?	+	++

⁵⁶ 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 suburbs⁵⁷. However, a series of poetry films⁵⁸ 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 research⁵⁹ 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), & promoting higher densities will better protect & 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 study⁶⁰ 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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⁵⁷ 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>

⁵⁸ *Disappear Here* project funded with grants from Coventry City Council & Arts Council England

⁵⁹ 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>

⁶⁰ 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 & environmental characters and capacities – with major positive effects.</p> <p>SA suggestions at Regulation 18: Identify locations outside ring road where connectivity to the city centre could be optimised Consider recent experiences & research in England on the social implications of higher density development to inform potentially suitable dph & 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 & where sustainable deliverables have been reported⁶¹?</p>			
<p>2: To provide accessible essential services and facilities for all residents</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 & 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 & facilities are available & 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 & ability to accommodate different types of development as set out in Option 3 makes best use of accessibility to services & facilities with positive effects.</p>	<p>0?</p>	<p>0?</p>	<p>+</p>

⁶¹ 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 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>3: To improve health & promote active living</p>	<p>Overcrowding, poor housing conditions, and affordability problems have increased in recent years, as well as health inequalities⁶².</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 & 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 & environment.</p> <p>SA Suggestions: Identify the relevant & 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 & help reduce crime; promote active living Higher densities may be suitable for the ageing population & design requirements will need to consider physical health & mental wellbeing to improve resilience Higher densities may be suitable for coliving</p>	<p>0?</p>	<p>+</p>	<p>+</p>
<p>4: To provide decent and affordable housing for all</p>	<p>Overcrowding, poor housing conditions, and affordability problems have increased in recent years⁶³. 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>

⁶² 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>

⁶³ 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 & 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 & environment.</p>			
5: To support sustainable inclusive economic growth	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
6: To help achieve the Council's ambition to reach net zero carbon emissions	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
7: To build resilience to climate change	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
8: To reduce traffic & improve sustainable transport choices	<p>The Coventry urban area is well connected with sustainable transport modes. Increasing housing densities in certain locations outside the ring road & where there is good accessibility & 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 & the transition zone could better discourage car travel & improve sustainable transport choices with positive effects, although some uncertainty as might depend on specific developments.</p>	0	0	+
9: To reduce air, noise & light pollution		0	0	0

	<p>In the UK, air pollution has been recently reported as being the largest environmental risk to public health⁶⁴. Reducing vehicle emissions will continue to improve air quality. Indoor air pollution is becoming an increasing proportion of the problem⁶⁵. The Coventry Air Quality Action Plan⁶⁶ 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 & wellbeing – physical & mental - (and also certain biodiversity see SA No 11), and particularly road traffic noise remains a major problem in Europe⁶⁷. 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 requirements⁶⁸ with acoustic separation & sound insulation can ensure that mitigation measures are implemented to acceptable levels/effects.</p> <p>Similarly, good quality design of buildings & their location can reduce the implications for light pollution on health & wellbeing. Light pollution disturbance can adversely affect health & wellbeing, including fatigue, insomnia stress & anxiety⁶⁹ (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 & materials</p>			
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⁶⁴ 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>

⁶⁵ Chief Medical Officers' annual report 2022: air pollution <https://www.sciencemediacentre.org/chief-medical-officers-annual-report-2022-air-pollution/>

⁶⁶ <https://letstalk.coventry.gov.uk/improvingaq> Ring Road Junction 7

⁶⁷ EEA, 2020 <https://www.eea.europa.eu/publications/environmental-noise-in-europe>

⁶⁸ 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>

⁶⁹ 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>SA Suggestions at Regulation 18: Ensure that updating of environmental management policies considers highest design requirements to reduce potential air, noise & light pollution Continue to reduce the need to travel by vehicles & discourage car use</p>						
<p>10: To protect & conserve natural resources – soil, water, minerals & waste⁷⁰</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 & 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 & environment.</p>	-	0	++?	0	++	0
<p>11: To protect and enhance nature & biodiversity</p>	<p>The scale of new development needed is likely to have strong pressures on green infrastructure (GI) & 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 & with such importance for protecting spaces for GI & biodiversity. Possibilities for major significance but uncertain at this stage of assessment as depends on extent of quantum of housing, extent of densification & location.</p>	-?		++?		++	

⁷⁰ 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.			
12: To protect and enhance the historic environment, and its setting	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
13: To protect and enhance the quality and character of townscapes & landscapes	<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 & different possibilities for accommodating changes through increased development.</p> <p>High quality & proportionate new development can enhance the townscape & 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 & environment.</p> <p>SA Suggestions at Regulation 18: Consider highest design possibilities & including for reuse/refurbishment to resolve existing sustainability/townscape issues</p>	0?	+?	+

IIIc: Options for progressing Coventry's Climate Change Strategy⁷¹	
1	Planning policy requirements in line with national Future Homes Standard ⁷² & Future Buildings Standard ⁷³ covering energy efficiency, ventilation and overheating through Building Regulations
2	Planning policy requirements that are over and above proposed Building Regulations to better progress Coventry's aspirational ambitions for addressing climate change effects

		Options for Climate Change	
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 FHS & FBS	2. Over & above Building Regulations
1: To enable vibrant and inclusive communities	Other factors are more likely to have potential effects on objectives for inclusive communities than requirements in line or above Building Regulations.	0	0

⁷¹ Coventry's draft Climate Change Strategy 2023-2030 <https://www.coventry.gov.uk/downloads/download/7434/coventry-s-draft-climate-change-strategy>

⁷² For example, please see: <https://www.futurehomes.org.uk/delivery-at-scale>

⁷³ <https://www.gov.uk/government/consultations/the-future-buildings-standard>

2: To provide accessible essential services and facilities for all residents	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
3: To improve health & promote active living	<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 & wellbeing by better reducing the risks to health.</p> <p>Climate change affects the social & environmental determinants of health - clean air, safe drinking water, sufficient food & secure shelter⁷⁴. 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>⁷⁵. Any consequence of climate change that can bring physical ill health can also have mental health implications & 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 health⁷⁶.</p> <p>Aligning with Government requirements may be considered to have negligible but uncertain effects for health & wellbeing. However, by requiring standards over & above Building Regulations, aspirations for reducing carbon emissions will be achieved sooner & 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 & mental health with potential major positive effects. As climate change effects are global, considerable uncertainties indicated.</p>	0?	++?
SA No 4: To provide decent	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 ⁷⁷ .	0?	?

⁷⁴ WHO (October 2021) <https://www.who.int/news-room/fact-sheets/detail/climate-change-and-health>

⁷⁵ 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>

⁷⁶ UCL (July 2021) <https://www.ucl.ac.uk/bartlett/news/2021/jul/climate-change-and-mental-health>

⁷⁷ For example, please see <https://www.environmentalleader.com/2022/02/uk-construction-industry-cites-these-barriers-to-net-zero-emissions/>

<p>and affordable housing for all</p>	<p>Therefore, there is a risk that requiring higher standards than national Building Regulations will pose greater challenges for new development design & building – and particularly construction – such that costs & 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 & implementation of the circular economy with design for durability, reuse, remanufacturing, and recycling.⁷⁸ With commitment & creativity in design, higher standards may be more readily achievable; however, the effects on the delivery of the required housing is uncertain & unknown at this stage.</p>		
<p>5: To support sustainable inclusive economic growth</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 & thus limit growth. However, Government has advised that the transition to net zero carbon is the growth opportunity of the 21st century⁷⁹, and the recently published Net Zero Growth Plan (March, 2023)⁸⁰ continues to claim new opportunities to grow green jobs. Coventry has strong commitments for innovation, research & 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 impacts⁸¹ - and thus, this would support progressing higher standards sooner with some positive effects indicated for the economy.</p>	<p>0?</p>	<p>++?</p>
<p>6: To help achieve the</p>		<p>0?</p>	<p>+++?</p>

⁷⁸ For example, please see RIBA https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy_9781859469545 and BRE <https://bregroup.com/products/breeam/breeam-solutions/breeam-circularity-and-resilience/>
⁷⁹ <https://www.gov.uk/government/news/net-zero-review-uk-could-do-more-to-reap-economic-benefits-of-green-growth>
⁸⁰ DESNZ (March, 2023) <https://www.gov.uk/government/publications/powering-up-britain>
⁸¹ <https://www.ucl.ac.uk/news/2021/sep/economic-cost-climate-change-could-be-six-times-higher-previously-thought>

<p>Council's ambition to reach net zero carbon emissions</p>	<p>The Council recognises the climate crisis and is currently reviewing its Strategy⁸². 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 2019⁸³. It has been reported that the construction industry needs to decarbonise more urgently⁸⁴ 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>”⁸⁵.</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>7: To build resilience to climate change</p>	<p>There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK.⁸⁶ 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.</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>8: To reduce traffic & improve</p>	<p>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 vehicles⁸⁷.</p>	<p>0</p>	<p>0</p>

⁸²A Green Future for a Changing City(2022 – 2030) <https://www.coventry.gov.uk/draftclimatechangestrategy>

⁸³ UK Climate Change Committee <https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Buildings.pdf>

⁸⁴ For example, please see RAEng 2021 <https://raeng.org.uk/news/construction-sector-must-move-further-and-faster-to-curb-carbon-emissions-say-engineers>

⁸⁵ 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>

⁸⁶ For example, see <https://earth.org/climate-change-in-the-uk/>

⁸⁷ <https://www.gov.uk/government/statistics/transport-and-environment-statistics-2022/transport-and-environment-statistics-2022>

sustainable transport choices	Changes to Building Regulations will not affect this SA objective and therefore, neutral/not applicable effects.				
9: To reduce air, noise & light pollution	No direct effects likely – neutral/not applicable	0		0	
10: To protect & conserve natural resources – soil, water, minerals & waste⁸⁸	<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 & government has indicated that managing soil carbon could form a part of net zero plans⁸⁹. The review of the CLP will continue to build on previously developed land (PDL) where effectively located & 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 & water resources is uncertain, particularly in the shorter-medium term before the effects of net zero carbon actions are implemented & become effective. Therefore, uncertain negative effects for Option 1. Planning policy requirements that are over & above national building regulations requirements are likely to reduce carbon emissions earlier, thus mitigating negative effects on soils & 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 & encouraged through higher standards as in Option 2, will conserve minerals & reduce/minimise/reuse waste with some potential further positive effects in the longer term but with uncertainty of significance.</p>	-?	0	0?	+?

⁸⁸ First cell refers to land/soil & water resources; second cell refers to minerals & waste

⁸⁹ UK Horizon scanning (April 2021) <https://post.parliament.uk/soil-as-an-essential-national-asset/>

<p>11: To protect and enhance nature & biodiversity</p>	<p>The need for addressing biodiversity loss & climate change issues together is being increasingly recognised⁹⁰. Climate change can contribute to biodiversity loss & biodiversity loss can make climate change and its effects worse. Government has recently reiterated that we cannot mitigate & adapt to climate change without Nature-Based Solutions⁹¹. It could be considered that meeting the proposed national standards for building regulations & 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 & therefore, positive effects indicated for all options. It could be assumed that progressing more rigorous standards would reduce GHG emissions & sooner such that mitigation measures are earlier & more effective such that there could be some positive effects for nature & biodiversity – but uncertainty as depends upon quantum of new development & extent of associated biodiversity gain.</p>	<p>+</p>	<p>++</p>
<p>12: To protect and enhance the historic environment, and its setting</p>	<p>Historic England recognises the need for urgent action & 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 emissions⁹². 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. It could be assumed that progressing more rigorous standards would reduce GHG emissions & sooner such that mitigation measures are earlier & more effective such that there could be less risk of negative effects on the historic environment – but uncertainty as depends upon extent of development & location.</p>	<p>0</p>	<p>+</p>
<p>13: To protect and enhance the</p>	<p>The national design guide (2019)⁹³ sets out the characteristics of well-designed places & includes consideration of minimising carbon emissions. Circular economy principles in building design⁹⁴ will</p>	<p>0</p>	<p>0?</p>

⁹⁰ 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>

⁹¹ Defra (January 2023) Environmental Improvement Plan 2023 <https://www.gov.uk/government/publications/environmental-improvement-plan>

⁹² Historic England (March 2022) <https://historicengland.org.uk/whats-new/features/climate-change/our-strategy/>

⁹³ <https://www.gov.uk/government/publications/national-design-guide>

⁹⁴ For example, please see RIBA 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>quality and character of townscapes & landscapes</p>	<p>contribute towards mitigating effects of climate change. It is also acknowledged that new proportional & 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 & construction, particularly in the shorter term, if requirements over & above such standards are proposed and thus with some uncertainty of significance.</p>		
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IIIId: Options for Nature & Biodiversity	
1	Planning policy requirements in line with national requirements & standards, including 10% Biodiversity Net Gain (BNG) ⁹⁵ , and Green Infrastructure (GI) ⁹⁶ standards ⁹⁷
2	Planning policy requirements that are over and above national requirements for BNG & GI standards
<p>The recent Environmental Improvement Plan (January, 2023)⁹⁸ 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)⁹⁹ 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"> ▪ Urban Nature Recovery Standard – including trees & wildflowers to increase carbon capture, prevent flooding, & reduce temperatures during heatwaves ▪ Urban Greening Factor (UGF) – approximately 40% of residential developments to have green & blue spaces, green roofs or green walls ▪ Urban Tree Canopy Cover Standard – increase tree canopy cover in urban environments ▪ Accessible Greenspace Standards - promote access to good quality green and blue space within 15 minutes' walk from home ▪ Green Infrastructure Strategy - delivery plans to support creation and enhancement of new and existing greenspace 	

⁹⁵ Environment Act 2021, and for example, please see <https://consult.defra.gov.uk/defra-net-gain-consultation-team/consultation-on-biodiversity-net-gain-regulations/>

⁹⁶ Includes both green and blue (water-related) infrastructure

⁹⁷ <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx>

⁹⁸ Defra (January 2023) Environmental Improvement Plan 2023 <https://www.gov.uk/government/publications/environmental-improvement-plan>

⁹⁹ 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
		1: To enable vibrant and inclusive communities	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.
2: To provide accessible essential services and facilities for all residents	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.	+	++
3: To improve health & promote 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 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 City¹⁰⁰ since 2013 & there has been progress in outcomes across health & society. The Marmot Review¹⁰¹ in 2020 on health equity in England highlighted that the health gap has grown between wealthy & 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 & wellbeing. However, a requirement to meet standards for GI over & above national proposals would demonstrate further strong commitment to Marmot principles & support for the multisectoral & partnership approach in the city. The visible greening of the urban areas could further encourage people in active living with positive effects for health & wellbeing.</p> <p>SA Suggestions: Align opportunities for enhancing GI network in most deprived areas & where health inequity could be most reduced</p>		
<p>4: To provide decent and affordable housing for all</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 & tenure of housing, suitable for different housing needs of different people & at different times of their lives, is planned according to identified needs. Nonetheless, it is important to retain sufficient space to accommodate GI & in locations where it may better support nature & people. It is unclear at this stage what quantum of housing could be accommodated together with aspirational GI for nature, people & climate change. This is a particular challenge for Coventry with its boundary & 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 & location of development with uncertainties at this stage of assessment.</p>	<p>+?</p>	<p>+?</p>
<p>5: To support sustainable inclusive economic growth</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>

¹⁰⁰ <https://www.coventry.gov.uk/policy-1/coventry-marmot-city>

¹⁰¹ <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

	infrastructure ¹⁰² . 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.		
6: To help achieve the Council's ambition to reach net zero carbon emissions	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.		
7: To build resilience to climate change	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.		
8: To reduce traffic & improve sustainable transport choices	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
9: To reduce air, noise & light 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	+	++?

¹⁰² 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) & vegetation, including green roofs & 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 & accessibility of GI with further positive effects for reducing air & noise pollution – that are likely to be synergistic & cumulative, particularly in the longer term. Uncertainties for significance at this stage of assessment.</p>				
10: To protect & conserve natural resources – soil, water, minerals & waste¹⁰³	<p>Provision of GI – both green & blue – will contribute to protecting & conserving the natural resources of soils & 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 & minerals – likely negligible effects for both options.</p>	+	0	++	0
11: To protect and enhance nature & biodiversity	<p>Provision of GI – both green & blue – will contribute to protecting & enhancing nature & biodiversity with positive effects. It seems reasonable to assume that higher GI standards will achieve better protection & enhancement of nature & biodiversity but there is uncertainty for the significance of the further positive effects.</p>	+		++?	
12: To protect and enhance the historic environment, and its setting	<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	
13: To protect and enhance the quality and character of townscapes & landscapes	<p>Provision of GI – both green & blue – will contribute to protecting & enhancing the quality & character of townscapes & landscapes with positive effects. It seems reasonable to assume that higher GI standards will achieve better protection & enhancement of townscapes & landscapes but there is uncertainty for the significance of the further positive effects.</p>	+		++?	

¹⁰³ 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
		1: To enable vibrant and inclusive communities	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 ¹⁰⁴ .
2: To provide accessible essential services and facilities for all residents	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

¹⁰⁴ <https://www.theguardian.com/society/article/2024/aug/02/labours-grey-belt-plans-could-result-in-isolated-communities-warns-leading-architect>

<p>3: To improve health & promote active living</p>	<p>Provision of good quality housing will have positive effects on health & wellbeing regardless of whether it is in or out of the Green Belt. Protecting the openness of GB land, including for nature & recreation, is likely to have major positive effects for health & wellbeing with Option 2, although some uncertainty of the precise significance at this stage of assessment. Urban sprawl & encroachment of the countryside can affect residents' wellbeing & 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>SA No 4: To provide decent and affordable housing for all</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, & pressures on services/facilities; and preserves the countryside for nature, farming, recreation & related open uses, including protection of historic settlements & 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 prices¹⁰⁵, and it can also lead to leapfrog development on the outer edge of the GB; consideration of the GB can be controversial¹⁰⁶.</p> <p>In some areas, the actual land designated by such planning policy may not have any ecological value & has not been based on its natural beauty. These poor quality GB areas have been identified as grey belt areas by the Labour Government & likely definitions are set out in the proposed revisions to the NPPF (July 2024)¹⁰⁷. 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 & Local Green Space provides detailed</p>	<p>0</p>	<p>0</p>

¹⁰⁵ <https://www.ons.gov.uk/economy/environmentalaccounts/articles/urbangreenspacesraisenearbyhousepricesbyanaverageof2500/2019-10-14>

¹⁰⁶ 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/>

¹⁰⁷ <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 Review¹⁰⁸, 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.</p> <p>Coventry City Council has updated its technical review¹⁰⁹ 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)¹¹⁰ & 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>		
5: To support sustainable inclusive economic growth	<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 & 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 & mitigation possibilities depend upon locational & 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 & jobs details.</p>	+?	-?
6: To help achieve the Council's ambition to reach net zero carbon emissions	<p>The Council recognises the climate crisis and is currently reviewing its Strategy¹¹¹. 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

¹⁰⁸ Coventry & Warwickshire Joint Green Belt Review (2015)

¹⁰⁹ Coventry City Council (July 2024) Green Belt Technical Update Study

¹¹⁰ Coventry City Council (2023) Housing & Economic Land Availability Assessment <https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

¹¹¹A Green Future for a Changing City(2022 – 2030) <https://www.coventry.gov.uk/draftclimatechangepolicy>

	Direct greenhouse gas (GHG) emissions from buildings accounted for 17% of UK GHG emissions in 2019 ¹¹² . It has been reported that the construction industry needs to decarbonise more urgently ¹¹³ 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.				
7: To build resilience to climate change	There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK. ¹¹⁴ 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		
8: To reduce traffic & improve sustainable transport choices	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 ¹¹⁵ . 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?	+		
9: To reduce air, noise & light pollution	Development in or out of the Green Belt will not affect this SA objective and no direct effects likely – neutral/not applicable	0	0		
10: To protect & conserve natural resources – soil, water, minerals & waste¹¹⁶	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) ¹¹⁷ 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

¹¹² UK Climate Change Committee <https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Buildings.pdf>

¹¹³ For example, please see RAEng 2021 <https://raeng.org.uk/news/construction-sector-must-move-further-and-faster-to-curb-carbon-emissions-say-engineers>

¹¹⁴ For example, see <https://earth.org/climate-change-in-the-uk/>

¹¹⁵ <https://www.gov.uk/government/statistics/transport-and-environment-statistics-2022/transport-and-environment-statistics-2022>

¹¹⁶ First cell refers to land/soil & water resources; second cell refers to minerals & waste

¹¹⁷ 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.		
11: To protect and enhance nature & biodiversity	Grey belt land ¹¹⁸ 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.	+	+
12: To protect and enhance the historic environment, and its setting	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	+
13: To protect and enhance the quality and character of townscapes & landscapes	The NPPF ¹¹⁹ 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.	--	++

¹¹⁸ Proposed definition in NPPF consultation (July 2024) "ugly, disused land" including scrubland"

¹¹⁹ <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 Belt¹²⁰ and confirmed through recent proposals for reform of the NPPF (July 2024)¹²¹. 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 & 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 update¹²² to the original GB Review & 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 & the SA objectives.</p>		
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¹²⁰ <https://labour.org.uk/updates/stories/labours-housing-plan-how-well-protect-our-natural-spaces-and-free-up-grey-belt-land-for-building/>

¹²¹ <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/>

¹²² 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
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 employment land. However, provision of sufficient employment land to support the economy and a diversity of jobs will overall contribute to vibrant & inclusive communities.</p> <p>The HEDNA (Nov 2022)¹²³ 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>	-?	+	+

¹²³ 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)¹²⁴ have considered the changes & 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)¹²⁵ & review studies (ELR 2024) indicate that this quantum of land may not be possible within the constrained nature of the Coventry area & 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>2: To provide accessible essential services and facilities for all residents</p>	<p>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.</p>	0	0	0
<p>3: To improve health & promote active living</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)¹²⁶. 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>	-?	+?	+

¹²⁴ DLP Planning Ltd for Coventry City Council (May 2024) Coventry Employment Land Review

¹²⁵ Coventry Housing and Economic Land Availability Assessment (HELAA, 2024) <https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

¹²⁶ 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 & review studies indicate that this quantum of land may not be possible within the constrained nature of the Coventry area & 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>SA No 4: To provide decent and affordable housing for all</p>	<p>The provision of good quality new homes will support the ambitions for sustainable economic growth & 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 & other uses, and limit the opportunities for ensuring that general industrial land is located in the most sustainable locations.</p>	-?	0	0
<p>5: To support sustainable inclusive economic growth</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 & 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 figures¹²⁷.</p>	+?	++?	++

¹²⁷ 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 & the Council has an important priority to support SMEs¹²⁸. Further priorities for creating the infrastructure to enable sustainable economic growth include innovating with multi-user developments (such as Friargate & City Centre South), and enabling the city to be cleaner & greener with GI & renewable energy.</p> <p>With regard to employment land needs, the HEDNA (Nov 2022)¹²⁹ concluded that whilst the demand for B8 land use (storage/warehousing)¹³⁰ 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 & 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) & land review studies (ELR 2024)¹³¹ indicate that this quantum of land may not be possible within the constrained nature of the Coventry area & 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 & revised, including a new policy that addresses R&D employment, differentiating this from industrial & storage/distribution development. The Council is also reassessing whether the existing employment allocations are still suitable & deliverable & align with the overall strategy.</p>			
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¹²⁸ Coventry City Council Economic Development Strategy 2022-2027 <https://www.coventry.gov.uk/council-democracy/economic-development-strategy-2022-2027/3>

¹²⁹ Housing & Economic Development Needs Assessment (HEDNA, November 2022) Icen Projects Ltd on behalf of Coventry & Warwickshire Local Authorities

¹³⁰ 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

¹³¹

	<p>There may be other opportunities with employment sites to enhance objectives for GI, clean energy & net zero carbon that would extend positive effects beyond SA No 5 - depends on locational & industrial specificities.</p> <p>SA Suggestions:</p> <ul style="list-style-type: none"> ■ Is there scope to increase density of job numbers through creative building design that optimises footprinting? ■ Maximising use of green roofs & other GI to encourage greening of sustainable economic development ■ Maximising use of renewable energy modes – to include neighbourhood provision? 			
<p>6: To help achieve the Council's ambition to reach net zero carbon emissions</p>	<p>The Council recognises the climate crisis and is currently reviewing its Strategy¹³². 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 2019¹³³. It has been reported that the construction industry needs to decarbonise more urgently¹³⁴ 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 & 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.¹³⁵ Therefore, it is vital to</p>	0	0	0

¹³²A Green Future for a Changing City(2022 – 2030) <https://www.coventry.gov.uk/draftclimatechangestrategy>

¹³³ UK Climate Change Committee <https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Buildings.pdf>

¹³⁴ For example, please see RAEng 2021 <https://raeng.org.uk/news/construction-sector-must-move-further-and-faster-to-curb-carbon-emissions-say-engineers>

¹³⁵ For example, see <https://earth.org/climate-change-in-the-uk/>

<p>7: To build resilience to climate change</p>	<p>build resilience, including reducing risks from overheating, flooding and the resultant detriment to health & 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>8: To reduce traffic & improve sustainable transport choices</p>	<p>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 vehicles¹³⁶.</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 & 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 & active travel. Therefore, neutral effects for all three options.</p>	0	0	0
<p>9: To reduce air, noise & light pollution</p>	<p>No direct effects likely – neutral/not applicable. All development will be required to meet with EM Policies.</p>	0	0	0
<p>10: To protect & conserve natural resources – soil, water, minerals & waste¹³⁷</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 & government has indicated that managing soil carbon could form a part of net zero plans¹³⁸. The review of the CLP will continue to build on previously developed land (PDL) where effectively located & 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 & 3 such that the positive/negative effects indicate overall neutral. Some uncertainty of effects for Options 1 & 2 whilst for Option 3 that has most effectively used land, positive effects are more certain.</p>	0?	0	+?
		0	0	+

¹³⁶ <https://www.gov.uk/government/statistics/transport-and-environment-statistics-2022/transport-and-environment-statistics-2022>

¹³⁷ First cell refers to land/soil & water resources; second cell refers to minerals & waste

¹³⁸ UK Horizon scanning (April 2021) <https://post.parliament.uk/soil-as-an-essential-national-asset/>

	<p>CLP Policies EM1-EM6 will be updated & 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 & 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.</p>			
<p>11: To protect and enhance nature & biodiversity</p>	<p>It will be necessary to consider the new requirements from the Environment Act and including emerging metrics for calculating biodiversity net gain¹³⁹. 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 & 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. 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.</p> <p>The Council will continue to allocate employment development 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.</p>	<p>+</p>	<p>+</p>	<p>+</p>

¹³⁹ Biodiversity Metric 4.0 (JP039) 2021 <https://publications.naturalengland.org.uk/publication/6049804846366720>

12: To protect and enhance the historic environment, and its setting	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?
13: To protect and enhance the quality and character of townscapes & landscapes	<p>The national design guide (2019)¹⁴⁰ sets out the characteristics of well-designed places & circular economy principles in building design¹⁴¹ will contribute towards mitigating effects of climate change. It is also acknowledged that new proportional & 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 & 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

¹⁴⁰ <https://www.gov.uk/government/publications/national-design-guide>

¹⁴¹ For example, please see RIBA 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 & inclusive communities.</p> <p>The HEDNA (Nov 2022)¹⁴² 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)¹⁴³ further studied existing employment land & needs. A recent Office Market Study (June 2024)¹⁴⁴ focuses on the changes & trends in the office market since the HEDNA & ELR and to identify if the conclusions & recommendations are still valid. The Study raises issues for suitability & deliverability of existing allocations, potential over-supply, growing demands for flexible leases &</p>	-?

¹⁴² 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>

¹⁴³ DLP Planning Ltd for Coventry City Council (May 2024) Coventry Employment Land Review

¹⁴⁴ 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 & hybrid working patterns.</p> <p>Option 1 reflects an earlier office development need. Updated evidence indicates that this quantum would be an over-supply & 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 & takes into account increased flexibility & hybrid working patterns – thus providing more certainty of significance of positive effects overall for communities.</p>			
<p>2: To provide accessible essential services and facilities for all residents</p>	<p>Other factors are more likely to have potential effects on objectives for accessibility to essential services & facilities than the quantum of office land – neutral/not applicable effects for all three options.</p>	0	0	0
<p>SA No 4: To provide decent and affordable housing for all</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 & 2 is not the most efficient use of land & could compromise the availability of certain land for residential/mixed-use development & 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 & sustainable locations.</p>	-?	-?	+

<p>5: To support sustainable inclusive economic growth</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 & 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 figures¹⁴⁵.</p> <p>It is notable that many of Coventry's private sector businesses are small or micro-businesses & the Council has an important priority to support SMEs¹⁴⁶. Further priorities for creating the infrastructure to enable sustainable economic growth include innovating with multi-user developments (such as Friargate & City Centre South), and enabling the city to be cleaner & greener with GI & renewable energy.</p> <p>Option 1 reflects an earlier office development need. Updated evidence indicates that this quantum would be an over-supply & 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 & 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 & 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 & deliverability of existing</p>	<p>+</p>	<p>++</p>	<p>++</p>
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¹⁴⁵ One Coventry Plan 2022-2030 <https://www.coventry.gov.uk/downloads/download/7162/one-coventry-plan-2022-2030>

¹⁴⁶ 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.			
6: To help achieve the Council's ambition to reach net zero carbon emissions	The Council recognises the climate crisis and is currently reviewing its Strategy ¹⁴⁷ . 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 ¹⁴⁸ . It has been reported that the construction industry needs to decarbonise more urgently ¹⁴⁹ 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.			
7: To build resilience to climate change	There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK. ¹⁵⁰ 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.			
8: To reduce traffic & improve	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 ¹⁵¹ .	0	0	0

¹⁴⁷A Green Future for a Changing City(2022 – 2030) <https://www.coventry.gov.uk/draftclimatechangestrategy>

¹⁴⁸ UK Climate Change Committee <https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Buildings.pdf>

¹⁴⁹ For example, please see RAEng 2021 <https://raeng.org.uk/news/construction-sector-must-move-further-and-faster-to-curb-carbon-emissions-say-engineers>

¹⁵⁰ For example, see <https://earth.org/climate-change-in-the-uk/>

¹⁵¹ <https://www.gov.uk/government/statistics/transport-and-environment-statistics-2022/transport-and-environment-statistics-2022>

sustainable transport choices	The Council will seek to select development that best support objectives for sustainable transport – therefore, neutral effects overall for all three options.						
9: To reduce air, noise & light pollution	No direct effects likely – neutral/not applicable. All development will be required to meet with EM Policies.	0		0		0	
10: To protect & conserve natural resources – soil, water, minerals & waste¹⁵²	<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 & government has indicated that managing soil carbon could form a part of net zero plans¹⁵³. The review of the CLP will continue to build on previously developed land (PDL) where effectively located & 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 & 3 such that the positive/negative effects indicate overall neutral. Some uncertainty of effects for Options 1 & 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 & water resources is uncertain, particularly in the shorter-medium term before the effects of net zero carbon actions are implemented & become effective.</p> <p>CLP Policies EM1-EM6 will be updated & 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

¹⁵² First cell refers to land/soil & water resources; second cell refers to minerals & waste

¹⁵³ 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.			
11: To protect and enhance nature & biodiversity	<p>It will be necessary to consider the new requirements from the Environment Act and including emerging metrics for calculating biodiversity net gain¹⁵⁴. 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 & 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. 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.</p> <p>The Council will continue to aim to allocate employment 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.</p>	+	+	+
12: To protect and enhance the historic environment, and its setting	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?

¹⁵⁴ Biodiversity Metric 4.0 (JP039) 2021 <https://publications.naturalengland.org.uk/publication/6049804846366720>

<p>13: To protect and enhance the quality and character of townscapes & landscapes</p>	<p>The national design guide (2019)¹⁵⁵ sets out the characteristics of well-designed places & circular economy principles in building design¹⁵⁶ will contribute towards mitigating effects of climate change. It is also acknowledged that new proportional & 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 & 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>

¹⁵⁵ <https://www.gov.uk/government/publications/national-design-guide>

¹⁵⁶ For example, please see RIBA https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy_9781859469545 and BRE <https://bregroup.com/products/breem/breem-solutions/breem-circularity-and-resilience/>

IIIh: Options for Distribution of Office Development	
1	City Centre focus including Friargate
2	A more dispersed approach
3	City Centre focus to include 39,549 sqm floorspace at Friargate and the rest distributed to other defined centres (overall, 41,200 sq m)

		Options for Distribution 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. City Centre focus	2. More Dispersed Approach	3. City Centre focus (Friargate) & rest to other defined centres
1: To enable vibrant and inclusive communities	<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 & inclusive communities.</p> <p>Many of Coventry's businesses are small or micro-businesses & the Council has an important priority to support such SMEs¹⁵⁷. The Coventry Office Market Study (June 2024)¹⁵⁸ confirmed the need for flexibility & adaptability for office spaces.</p>	+ ?	+ ?	+

¹⁵⁷ Coventry City Council Economic Development Strategy 2022-2027 <https://www.coventry.gov.uk/council-democracy/economic-development-strategy-2022-2027/3>

¹⁵⁸ 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.			
2: To provide accessible essential services and facilities for all residents	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
3: To improve health & promote 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) ¹⁵⁹ . 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.	+	+	+
SA No 4: To provide decent and affordable housing for all	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
5: To support sustainable inclusive economic growth	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 ¹⁶⁰ . 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	+	+	++

¹⁵⁹ 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>

¹⁶⁰ 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.			
6: To help achieve the Council's ambition to reach net zero carbon emissions	The Council recognises the climate crisis and is currently reviewing its Strategy ¹⁶¹ . 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.			
7: To build resilience to climate change	There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK. ¹⁶² 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.			
8: To reduce traffic & improve sustainable transport choices	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 ¹⁶³ .	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.			

¹⁶¹A Green Future for a Changing City(2022 – 2030) <https://www.coventry.gov.uk/draftclimatechangestrategy>

¹⁶² For example, see <https://earth.org/climate-change-in-the-uk/>

¹⁶³ <https://www.gov.uk/government/statistics/transport-and-environment-statistics-2022/transport-and-environment-statistics-2022>

9: To reduce air, noise & light pollution	No direct effects likely – neutral/not applicable. All development will be required to meet with EM Policies.	0		0		0	
10: To protect & conserve natural resources – soil, water, minerals & waste¹⁶⁴	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.						
11: To protect and enhance 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 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.						
12: To protect and enhance the historic environment, and its setting	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?	
13: To protect and enhance the	The national design guide (2019) ¹⁶⁵ sets out the characteristics of well-designed places & circular economy principles in building design ¹⁶⁶ will contribute towards mitigating	0		0		0	

¹⁶⁴ First cell refers to land/soil & water resources; second cell refers to minerals & waste

¹⁶⁵ <https://www.gov.uk/government/publications/national-design-guide>

¹⁶⁶ For example, please see RIBA 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>quality and character of townscapes & landscapes</p>	<p>effects of climate change. It is also acknowledged that new proportional & 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
1: To enable vibrant and inclusive communities	<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 DPD¹⁶⁷ and this addresses issues such as effects on communities and the housing stock (please see SA No 4 later).</p>	-?	0

¹⁶⁷ <https://www.coventry.gov.uk/planning-policy/homes-multiple-occupation-development-plan-document>

<p>2: To provide accessible essential services and facilities for all residents</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>3: To improve health & promote active living</p>	<p>Provision of good quality housing will have positive effects on health & 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)¹⁶⁸ 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>SA Suggestion:</p> <ul style="list-style-type: none"> Require sufficient standards of building quality and design in PBSA to ensure decent homes & associated health & wellbeing 	<p>+?</p>	<p>+</p>
<p>SA No 4: To provide decent and affordable housing for all</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 & has more than 30,000 students across its UK campuses¹⁶⁹. 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)¹⁷⁰ 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>

¹⁶⁸ Cushman & Wakefield (July 2024) for Coventry CC Purpose Built Student Accommodation Market Study

¹⁶⁹ <https://www.coventry.ac.uk/>

¹⁷⁰ 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)¹⁷¹ 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 & city university area, the student population is more focused and very easily accessible to learning & 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>SA Suggestion:</p> <ul style="list-style-type: none"> ■ Require sufficient standards of building quality and design in PBSA to ensure decent homes 		
<p>5: To support sustainable inclusive economic growth</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>6: To help achieve the Council's ambition to reach net zero carbon emissions</p>	<p>The Council recognises the climate crisis and is currently reviewing its Strategy¹⁷². 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

¹⁷¹ Cushman & Wakefield (July 2024) for Coventry CC Purpose Built Student Accommodation Market Study

¹⁷²A 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 ¹⁷³ . It has been reported that the construction industry needs to decarbonise more urgently ¹⁷⁴ 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.		
7: To build resilience to climate change	There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK. ¹⁷⁵ 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
8: To reduce traffic & improve sustainable transport choices	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 ¹⁷⁶ . 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	+
9: To reduce air, noise & light pollution	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
10: To protect & conserve natural resources – soil, water, minerals & waste¹⁷⁷	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) ¹⁷⁸ 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

¹⁷³ UK Climate Change Committee <https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Buildings.pdf>

¹⁷⁴ For example, please see RAEng 2021 <https://raeng.org.uk/news/construction-sector-must-move-further-and-faster-to-curb-carbon-emissions-say-engineers>

¹⁷⁵ For example, see <https://earth.org/climate-change-in-the-uk/>

¹⁷⁶ <https://www.gov.uk/government/statistics/transport-and-environment-statistics-2022/transport-and-environment-statistics-2022>

¹⁷⁷ First cell refers to land/soil & water resources; second cell refers to minerals & waste

¹⁷⁸ JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

<p>11: To protect and enhance nature & biodiversity</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 & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These will be updated & should provide sufficient mitigation measures - 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.</p>	<p>+</p>	<p>+</p>
<p>12: To protect and enhance the historic environment, and its setting</p>	<p>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 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>13: To protect and enhance the quality and character of townscapes & landscapes</p>	<p>The current Policy H10 requires that any PBSA will not materially harm the amenities of occupiers of nearby properties & 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
Environment Agency		
	No specific comments on the SA at this stage	Noted
Historic England		
	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
Natural England		
	<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"> • Landscape and Visual Impact Assessments, Landscape Sensitivity Assessments and Landscape Character Assessments. • Soil surveys and mapping (Agricultural Land Classification available on Magic maps) ecological surveys, green infrastructure and biodiversity opportunity mapping <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"> • Sustainability Appraisal incorporating Strategic Environmental Assessment with recommendations used to inform mitigation measures and design principles for the allocated sites. • 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. 	
William Davis Homes		
	<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 & refinement of strategic options is an iterative process between the plan-making & 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"> ▪ Potential for development in the Green Belt ▪ No potential development in the Green Belt

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
	New Allocations				
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
	Existing Allocations with Changes				
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
	Employment				
BAB016-24	Land North of A45 at Pickford Green	11.81			11.81 ha

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/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>Coventry Central Police Station, Little Park Street Area: 1.19 hectares Capacity: 600 dwellings</p>	
Sustainability Objective	<p style="text-align: center;">Assessment of Effects</p> <p style="text-align: center;">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</p>	
<p>1: To enable vibrant and inclusive communities</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 & 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>2: To provide accessible essential services and facilities for all residents</p>	<p>Major positive effects indicated for this city centre location close to 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 nearby¹⁷⁹ such as Greyfriars Green & St Michael's Fields, and within a mile, wider spaces such as Spencer Park & Charterhouse Field.</p>	<p style="text-align: center; background-color: #4f7942;">++</p>
<p>3: To improve health & promote active living</p>	<p>Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental¹⁸⁰. These factors are covered by the following SA Nos 4 & 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>

¹⁷⁹ Approximate measurements made using Google Maps
<https://www.google.co.uk/maps/place/Coventry>

¹⁸⁰ 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 ¹⁸¹ provides information and guidance on completing the relevant health toolkit and HIA.	
4: To provide decent and affordable housing for all	<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 & 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 & city centre location are suitable for a flatted/high rise format & 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)¹⁸² provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	++
5: To support sustainable inclusive economic growth	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
6: To help achieve the Council's ambition to reach net zero carbon emissions	<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 & 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 SPD¹⁸³ 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
7: To build resilience to	All new housing development will need to meet updated policy requirements that seek to help the Council build	0

¹⁸¹ Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

¹⁸² <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

¹⁸³ Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) <https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

climate change	resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	
8: To reduce traffic & improve sustainable transport choices	<p>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 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 & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).</p> <p>SA Suggestion: Limit parking & provide secure cycle storage/sharing</p>	++
9: To reduce air, noise & light pollution	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
10: To protect & conserve natural resources – soil, water, minerals & waste¹⁸⁴	<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)¹⁸⁵ 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
11: To protect and enhance 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 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.	+?
12: To protect and enhance the historic environment, and its setting	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?

¹⁸⁴ First cell refers to land/soil & water resources; second cell refers to minerals & waste

¹⁸⁵ 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 & within the Three Spires View Cone - The Tall Buildings Design Guide & Three Spires View Framework SPD (2022)¹⁸⁶ 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>	
13: To protect and enhance the quality and character of townscapes & landscapes	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.	0?

STM011-24	New Union Street Area: 0.35 hectares dwelling	Capacity: 170
	Assessment of Effects	
Sustainability Objective	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: To enable vibrant and inclusive communities	<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 & 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>	+
2: To provide accessible essential	Major positive effects indicated for this city centre location close to a wide range of services & facilities, including schools, nurseries, shops, community & faith	++

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<https://edemocracy.coventry.gov.uk/documents/s54726/Appendix%201%20Draft%20Tall%20Building%20View%20Management%20Framework%20Guide%20SPD.pdf>

services and facilities for all residents	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.	
3: To improve health & promote active living	<p>Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental¹⁸⁷. These factors are covered by the following SA Nos 4 & 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 SPD¹⁸⁸ provides information and guidance on completing the relevant health toolkit and HIA.</p>	+
4: To provide decent and affordable housing for all	<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 & 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 & 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)¹⁸⁹ provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	++
5: To support sustainable inclusive	Whilst provision of new homes is not directly attributable to economic growth, good quality homes in a city centre	0

¹⁸⁷ For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

¹⁸⁸ Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

¹⁸⁹ <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

economic growth	location will support working people. Overall – neutral/not applicable effects.	
6: To help achieve the Council's ambition to reach net zero carbon emissions	<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 & 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 SPD¹⁹⁰ 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
7: To build resilience to climate change	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
8: To reduce traffic & improve sustainable transport choices	<p>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 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 & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).</p>	++
9: To reduce air, noise & light pollution	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
10: To protect & conserve natural resources – soil, water, minerals & waste¹⁹¹	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) ¹⁹² indicates that there is water capacity for the identified development need – indicating neutral effects.	+ 0

¹⁹⁰Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

¹⁹¹ First cell refers to land/soil & water resources; second cell refers to minerals & waste

¹⁹² JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratfor 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.	
11: To protect and enhance 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 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.	+
12: To protect and enhance the historic environment, and its setting	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) ¹⁹³ 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?
13: To protect and enhance the quality and character of townscapes & landscapes	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>

R003-23	Former Vintage House, St Nicholas Street/Leicester Row Area: 0.23 hectares Capacity: 100 dwellings	
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: To enable vibrant and inclusive communities	<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 & 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>	+
2: To provide accessible essential services and facilities for all residents	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.	++
3: To improve health & promote active living	<p>Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental¹⁹⁴. These factors are covered by the following SA Nos 4 & 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>	+

¹⁹⁴ 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 ¹⁹⁵ provides information and guidance on completing the relevant health toolkit and HIA.	
4: To provide decent and affordable housing for all	<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 & 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.</p> <p>The Affordable Housing SPD (March 2022)¹⁹⁶ provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	++
5: To support sustainable inclusive economic growth	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
6: To help achieve the Council's ambition to reach net zero carbon emissions	<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 & 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 SPD¹⁹⁷ 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
7: To build resilience to climate change	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

¹⁹⁵ Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

¹⁹⁶ <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

¹⁹⁷ Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) <https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

<p>8: To reduce traffic & improve sustainable transport choices</p>	<p>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 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 & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).</p>	<p>++</p>
<p>9: To reduce air, noise & light pollution</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>10: To protect & conserve natural resources – soil, water, minerals & waste¹⁹⁸</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)¹⁹⁹ 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>11: To protect and enhance nature & biodiversity</p>	<p>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.</p>	<p>+?</p>
<p>12: To protect and enhance the historic environment, and its setting</p>	<p>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.</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 & will need sensitive design - other plan policies should provide mitigation measures.</p>	<p>0?</p>

¹⁹⁸ First cell refers to land/soil & water resources; second cell refers to minerals & waste

¹⁹⁹ 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.	
13: To protect and enhance the quality and character of townscapes & landscapes	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.	

STM012-24	Whitefriars Street Car Park Area: 0.6 hectares Capacity: 185 dwelling	
	Assessment of Effects	
Sustainability Objective	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: To enable vibrant and inclusive communities	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.	+
2: To provide accessible essential services and facilities for all residents	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.	++
3: To improve health & promote active living	Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental ²⁰⁰ . These factors are covered by the following SA Nos 4 & 5. There are some 9 health centres/general practices and 9	+

²⁰⁰ 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 SPD²⁰¹ provides information and guidance on completing the relevant health toolkit and HIA.</p>	
<p>4: To provide decent and affordable housing for all</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 & 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.</p> <p>The Affordable Housing SPD (March 2022)²⁰² 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>5: To support sustainable inclusive economic growth</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>6: To help achieve the Council's ambition to reach net zero carbon emissions</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 & 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>

²⁰¹ Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

²⁰² <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 ²⁰³ 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.	
7: To build resilience to climate change	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
8: To reduce traffic & improve sustainable transport choices	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).	++
9: To reduce air, noise & light pollution	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
10: To protect & conserve natural resources – soil, water, minerals & waste²⁰⁴	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) ²⁰⁵ 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
11: To protect and enhance 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 mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects	+?

²⁰³Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

²⁰⁴ First cell refers to land/soil & water resources; second cell refers to minerals & waste

²⁰⁵ 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.	
12: To protect and enhance the historic environment, and its setting	<p>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.</p> <p>The site is within the city centre & within the Three Spires View Cone and an archaeological constraint area - The Tall Buildings Design Guide & Three Spires View Framework SPD (2022)²⁰⁶ 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.</p>	0?
13: To protect and enhance the quality and character of townscapes & landscapes	<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>	+

²⁰⁶

<https://edemocracy.coventry.gov.uk/documents/s54726/Appendix%201%20Draft%20Tall%20Building%20View%20Management%20Framework%20Guide%20SPD.pdf>

F008-24	Paybody Building, Stoney Stanton Road Area: 0.73 hectares Capacity: 280 dwellings	
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: To enable vibrant and inclusive communities	<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 & 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>	+
2: To provide accessible essential services and facilities for all residents	<p>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, Radford Recreation Ground, and Naul's Mill Park – and the Coventry Canal towpath for wider walking is nearby within 5 mins walk.</p>	++
3: To improve health & promote active living	<p>Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental²⁰⁷. These factors are covered by the following SA Nos 4 & 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>	+

²⁰⁷ 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 ²⁰⁸ provides information and guidance on completing the relevant health toolkit and HIA.	
4: To provide decent and affordable housing for all	<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 & 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.</p> <p>The Affordable Housing SPD (March 2022)²⁰⁹ provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	++
5: To support sustainable inclusive economic growth	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
6: To help achieve the Council's ambition to reach net zero carbon emissions	<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 & 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 SPD²¹⁰ 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
7: To build resilience to climate change	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

²⁰⁸ Health Impact Assessment (HIA) Supplementary Planning Document

(SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

²⁰⁹ <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

²¹⁰ Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) <https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

<p>8: To reduce traffic & improve sustainable transport choices</p>	<p>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 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 & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).</p>	<p>++</p>
<p>9: To reduce air, noise & light pollution</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>10: To protect & conserve natural resources – soil, water, minerals & waste²¹¹</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)²¹² 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>11: To protect and enhance nature & biodiversity</p>	<p>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.</p>	<p>+?</p>
<p>12: To protect and enhance the historic environment, and its setting</p>	<p>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.</p> <p>The site is within the city centre & 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>

²¹¹ First cell refers to land/soil & water resources; second cell refers to minerals & waste

²¹² 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.	
13: To protect and enhance the quality and character of townscapes & landscapes	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.	

STM013-24	Dale Buildings, Tower Street Area: 0.37 hectares dwelling	Capacity: 200
	Assessment of Effects	
Sustainability Objective	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: To enable vibrant and inclusive communities	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.	+
2: To provide accessible essential services and facilities for all residents	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.	++
3: To improve health &	Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental ²¹³ . There are	+

²¹³ For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

<p>promote active living</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 & 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 SPD²¹⁴ provides information and guidance on completing the relevant health toolkit and HIA.</p>	
<p>4: To provide decent and affordable housing for all</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 & 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.</p> <p>The Affordable Housing SPD (March 2022)²¹⁵ 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>5: To support sustainable inclusive economic growth</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>6: To help achieve the Council's ambition to reach net zero carbon emissions</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 & avoid any significant negative effects – neutral effects overall.</p>	<p>0</p>

²¹⁴ Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

²¹⁵ <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 ²¹⁶ 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.	
7: To build resilience to climate change	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
8: To reduce traffic & improve sustainable transport choices	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).	++
9: To reduce air, noise & light pollution	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
10: To protect & conserve natural resources – soil, water, minerals & waste²¹⁷	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) ²¹⁸ 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
11: To protect and enhance	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.	+?

²¹⁶Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

²¹⁷ First cell refers to land/soil & water resources; second cell refers to minerals & waste

²¹⁸ JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

nature & 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.	
12: To protect and enhance the historic environment, and its setting	<p>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.</p> <p>The site is within the Three Spires View Cone & an archaeological constraint area; it is near to the Lady Herbert's Garden & Burgess Conservation Area & 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 & creative detailed design.</p>	0?
13: To protect and enhance the quality and character of townscapes & landscapes	<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 & industrial/warehouse type units in poor condition will improve the quality and character of the townscape.</p>	+

STM18-24	City Centre South Area: 6.91 hectares Capacity: 1,575 dwellings
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: To enable vibrant and inclusive communities	<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 & opportunities for inclusive communities for this site in the city centre. A range of public realm works are proposed & these will contribute to social interactions.</p> <p>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.</p> <p>SA Suggestion:</p> <ul style="list-style-type: none"> ■ Creative design for inclusivity & to encourage support social interaction 	
<p>2: To provide accessible essential services and facilities for all residents</p>	<p>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.</p>	<p style="text-align: center;">++</p>
<p>3: To improve health & promote active living</p>	<p>Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental²¹⁹. These factors are covered by the following SA Nos 4 & 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 & these will contribute to health & 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 SPD²²⁰ provides information</p>	<p style="text-align: center;">+</p>

²¹⁹ For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>
²²⁰ 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.	
4: To provide decent and affordable housing for all	<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 & 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 & with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)²²¹ 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>SA Suggestion:</p> <ul style="list-style-type: none"> ■ Creative design to encourage flexible & adaptable housing to support mix & tenure with changing needs 	++
5: To support sustainable inclusive economic growth	<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 & 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>	++
6: To help achieve the Council's ambition to reach net zero carbon emissions	<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 & 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 SPD²²² 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
7: To build resilience to	All new housing development will need to meet updated policy requirements that seek to help the Council build	0

²²¹ <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

²²² Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

climate change	resilience to climate change. The site is within Flood Zone 1 & partly within FZ2 indicating low risk of flooding.	
8: To reduce traffic & improve sustainable transport choices	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).	++
9: To reduce air, noise & light pollution	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
10: To protect & conserve natural resources – soil, water, minerals & waste²²³	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) ²²⁴ 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
11: To protect and enhance 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 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.	+?
12: To protect and enhance the historic environment, and its setting	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?

²²³ First cell refers to land/soil & water resources; second cell refers to minerals & waste

²²⁴ 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) ²²⁵ 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.	
13: To protect and enhance the quality and character of townscapes & landscapes	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 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.	

STM001-23	New Gate Court Business Park, Paradise Street Area: 0.57 hectares Capacity: 303 dwelling	
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: To enable vibrant and inclusive communities	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. The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental	+

²²⁵

<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.	
2: To provide accessible essential services and facilities for all residents	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.	++
3: To improve health & promote active living	<p>Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental²²⁶. 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 & 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 SPD²²⁷ provides information and guidance on completing the relevant health toolkit and HIA.</p>	+
4: To provide decent and affordable housing for all	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.	++

²²⁶ For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

²²⁷ 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) ²²⁸ provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.	
5: To support sustainable inclusive economic growth	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
6: To help achieve the Council's ambition to reach net zero carbon emissions	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 ²²⁹ 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
7: To build resilience to climate change	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
8: To reduce traffic & improve sustainable transport choices	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).	++
9: To reduce air, noise & light pollution	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
10: To protect & conserve	Development on previously developed land is positive effects. Water resources and quality are protected	+ 0

²²⁸ <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

²²⁹ Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

<p>natural resources – soil, water, minerals & waste²³⁰</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)²³¹ 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>11: To protect and enhance nature & biodiversity</p>	<p>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.</p>	<p style="text-align: center; background-color: #92d050;">+?</p>
<p>12: To protect and enhance the historic environment, and its setting</p>	<p>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.</p> <p>The site is partly within an archaeological constraint area & the Old City Wall Scheduled Monument²³² 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 & creative detailed design.</p>	<p style="text-align: center; background-color: #2e5496; color: white;">0?</p>
<p>13: To protect and enhance the quality and character of townscapes & landscapes</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; background-color: #92d050;">+</p>

²³⁰ First cell refers to land/soil & water resources; second cell refers to minerals & waste

²³¹ JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

²³² <https://historicengland.org.uk/listing/the-list/list-entry/1002979> and <https://magic.defra.gov.uk/MagicMap.aspx>

BAB01-23	The Allesley Hotel, Birmingham Road Area: 2.0 hectares Capacity: 48 dwellings	
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: To enable vibrant and inclusive communities	<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 & 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>	+
2: To provide accessible essential services and facilities for all residents	<p>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</p>	+
3: To improve health & promote active living	<p>Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental²³³. 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 & 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 SPD²³⁴ provides information</p>	+

²³³ For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

²³⁴ 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.	
4: To provide decent and affordable housing for all	<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 & 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 & with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)²³⁵ provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	++
5: To support sustainable inclusive economic growth	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
6: To help achieve the Council's ambition to reach net zero carbon emissions	<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 & 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 SPD²³⁶ 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
7: To build resilience to climate change	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
8: To reduce traffic & improve sustainable transport choices	<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 & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).</p>	+

²³⁵ <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

²³⁶ Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

<p>9: To reduce air, noise & light pollution</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>10: To protect & conserve natural resources – soil, water, minerals & waste²³⁷</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)²³⁸ 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>11: To protect and enhance nature & biodiversity</p>	<p>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.</p>	<p>+</p>	
<p>12: To protect and enhance the historic environment, and its setting</p>	<p>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.</p> <p>The site is within the Allesley Village conservation Area & 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 & creative detailed design.</p>	<p>0?</p>	
<p>13: To protect and enhance the quality</p>	<p>A location accessible to the city centre & designed according to other policy requirements as described</p>	<p>+</p>	

²³⁷ First cell refers to land/soil & water resources; second cell refers to minerals & waste

²³⁸ JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

and character of townscapes & landscapes	<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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BW001-23	<p>Former Chace School, Chace Avenue, Willenhall Area: 1.4 hectares Capacity: 60 dwellings</p>	
Sustainability Objective	<p>Assessment of Effects</p> <p>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</p>	
1: To enable vibrant and inclusive communities	<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 & 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>	+
2: To provide accessible essential services and facilities for all residents	<p>Positive effects indicated for this location in Willenhall and a range of essential services & 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>	+
3: To improve health & promote active living	<p>Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental²³⁹. 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>	+

²³⁹ 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 & 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 SPD²⁴⁰ provides information and guidance on completing the relevant health toolkit and HIA.</p>	
4: To provide decent and affordable housing for all	<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 & 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 & with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)²⁴¹ provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	++
5: To support sustainable inclusive economic growth	<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
6: To help achieve the Council's ambition to reach net zero carbon emissions	<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 & 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 SPD²⁴² 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

²⁴⁰ Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

²⁴¹ <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

²⁴² Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) <https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

7: To build resilience to climate change	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
8: To reduce traffic & improve sustainable transport choices	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).	+
9: To reduce air, noise & light pollution	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
10: To protect & conserve natural resources – soil, water, minerals & waste²⁴³	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) ²⁴⁴ 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
11: To protect and enhance 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 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.	+?
12: To protect and enhance the historic environment, and its setting	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

²⁴³ First cell refers to land/soil & water resources; second cell refers to minerals & waste

²⁴⁴ 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.	
13: To protect and enhance the quality and character of townscapes & landscapes	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.	
LS001-23	Former School Site, New Century Park, Land to the south of Isadora Lea Area: 2.58 hectares Capacity: 93 dwellingings	
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: To enable vibrant and inclusive communities	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.	+
2: To provide accessible essential services and facilities for all residents	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>3: To improve health & promote active living</p>	<p>Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental²⁴⁵. 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 & 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 SPD²⁴⁶ provides information and guidance on completing the relevant health toolkit and HIA.</p>	<p style="text-align: center;">+</p>
<p>4: To provide decent and affordable housing for all</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 & 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 & with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)²⁴⁷ 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>5: To support sustainable inclusive economic growth</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>6: To help achieve the Council's ambition to reach net zero carbon emissions</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 & 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>

²⁴⁵ For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

²⁴⁶ Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

²⁴⁷ <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 ²⁴⁸ 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.	
7: To build resilience to climate change	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
8: To reduce traffic & improve sustainable transport choices	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).	+
9: To reduce air, noise & light pollution	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
10: To protect & conserve natural resources – soil, water, minerals & waste²⁴⁹	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) ²⁵⁰ 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
11: To protect and enhance 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 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.	+?

²⁴⁸Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

²⁴⁹ First cell refers to land/soil & water resources; second cell refers to minerals & waste

²⁵⁰ JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

12: To protect and enhance the historic environment, and its setting	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.	0
13: To protect and enhance the quality and character of townscapes & landscapes	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.	+

SH004-24	Land at Spon End Area: 7.2 hectares Capacity: 750 dwellings	
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: To enable vibrant and inclusive communities	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. 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. The site is part of the Citizen Housing ²⁵¹ portfolio, a social housing provider, & 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.	++?

²⁵¹ <https://www.citizenhousing.org.uk/about-us/what-we-do/#row1>

<p>2: To provide accessible essential services and facilities for all residents</p>	<p>Positive effects indicated for this location in the urban area with a range of essential local services & 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>3: To improve health & promote active living</p>	<p>Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental²⁵². 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 & 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 SPD²⁵³ provides information and guidance on completing the relevant health toolkit and HIA.</p>	<p style="text-align: center;">+</p>
<p>4: To provide decent and affordable housing for all</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 & 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 & with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)²⁵⁴ 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>5: To support sustainable inclusive economic growth</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>

²⁵² For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

²⁵³ Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

²⁵⁴ <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

<p>6: To help achieve the Council's ambition to reach net zero carbon emissions</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 & 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 SPD²⁵⁵ 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>7: To build resilience to climate change</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 & partly in FZ3 indicating risk of flooding.</p>	<p>0</p>	
<p>8: To reduce traffic & improve sustainable transport choices</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 & 1 mile from the railway station.</p> <p>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).</p>	<p>+</p>	
<p>9: To reduce air, noise & light pollution</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>10: To protect & conserve natural resources – soil, water, minerals & waste²⁵⁶</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)²⁵⁷ 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>11: To protect and enhance</p>	<p>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.</p>	<p>+</p>	

²⁵⁵Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

²⁵⁶ First cell refers to land/soil & water resources; second cell refers to minerals & waste

²⁵⁷ JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

nature & 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.	
12: To protect and enhance the historic environment, and its setting	<p>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.</p> <p>The site is partly within the Spon End Conservation Area & 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 & creative detailed design.</p>	0?
13: To protect and enhance the quality and character of townscapes & landscapes	<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>	++
H2:3	<p>Walsgrave Hill Farm Area: 59 hectares Capacity: 900 dwellings A long standing Local Plan Allocation – retained for the Local Plan Review; challenges to delivery relate to access & the A46 but this may be improved in due course.</p>	
Sustainability Objective	<p>Assessment of Effects</p> <p>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</p>	
1: To enable vibrant and	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement	++?

<p>inclusive communities</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 & 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>SA Suggestion:</p> <ul style="list-style-type: none"> ■ Creative design for inclusivity & to encourage support social interaction 	<p style="background-color: #4F7942; color: white; text-align: center;">+</p>
<p>2: To provide accessible essential services and facilities for all residents</p>	<p>Positive effects indicated for this location at the edge of the city urban area with a variety of accessible services & 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>3: To improve health & promote active living</p>	<p>Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental²⁵⁸. 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 & 5. There are various fitness centres within a mile of the site & access to wider green spaces, including the Sowe Valley footpath & 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 SPD²⁵⁹ 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>4: To provide decent and</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>

²⁵⁸ For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

²⁵⁹ Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

<p>affordable housing for all</p>	<p>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 accessible to the city centre & with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)²⁶⁰ 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>5: To support sustainable inclusive economic growth</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>6: To help achieve the Council's ambition to reach net zero carbon emissions</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 & 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 SPD²⁶¹ 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>7: To build resilience to climate change</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 & partly within FZ2 & 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>8: To reduce traffic & improve sustainable transport choices</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 & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).</p>	<p>+?</p>

²⁶⁰ <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

²⁶¹ Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

	<p>SA Suggestion:</p> <ul style="list-style-type: none"> ■ Incorporate a safe walking/cycling network through the new development & linking to urban area to west & country area to east to encourage more active transport/living locally 	
9: To reduce air, noise & light pollution	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
10: To protect & conserve natural resources – soil, water, minerals & waste²⁶²	<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)²⁶³ 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
11: To protect and enhance nature & biodiversity	<p>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.</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 & the wider countryside to the east providing creative opportunities for linking into green & blue infrastructure; uncertainty as depends on detailed design.</p>	++?
12: To protect and enhance the historic environment, and its setting	<p>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.</p> <p>The current site allocation recognises risk to heritage and includes a requirement for retention and enhanced</p>	0

²⁶² First cell refers to land/soil & water resources; second cell refers to minerals & waste

²⁶³ 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.	
13: To protect and enhance the quality and character of townscapes & landscapes	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.	

H2:15	Sandy Lane Area: 2.7 hectares Capacity: 250 dwellingings A current Local Plan Allocation – retained with increased density for the Local Plan Review	
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: To enable vibrant and inclusive communities	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.	+
2: To provide accessible essential services and facilities for all residents	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.	+
3: To improve health &	Provision of good quality housing & access to employment is well established as contributing to better	+

<p>promote active living</p>	<p>health and wellbeing – physical & mental²⁶⁴. There are several health centres & dentists within about 1 mile of the site.</p> <p>These factors are covered by the following SA Nos 4 & 5. There are several fitness centres within a mile of the site & 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 SPD²⁶⁵ provides information and guidance on completing the relevant health toolkit and HIA.</p>	<p></p>
<p>4: To provide decent and affordable housing for all</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 & 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 & with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)²⁶⁶ 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>5: To support sustainable inclusive economic growth</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>6: To help achieve the Council's ambition to reach net zero carbon emissions</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 & 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>

²⁶⁴ For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

²⁶⁵ Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

²⁶⁶ <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

	SPD ²⁶⁷ 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.	
7: To build resilience to climate change	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
8: To reduce traffic & improve sustainable transport choices	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).	+
9: To reduce air, noise & light pollution	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
10: To protect & conserve natural resources – soil, water, minerals & waste²⁶⁸	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) ²⁶⁹ 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
11: To protect and enhance 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 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.	+?

²⁶⁷Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

²⁶⁸ First cell refers to land/soil & water resources; second cell refers to minerals & waste

²⁶⁹ JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

<p>12: To protect and enhance the historic environment, and its setting</p>	<p>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.</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 style="text-align: center;">0</p>
<p>13: To protect and enhance the quality and character of townscapes & landscapes</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 style="text-align: center;">+</p>

<p>STM014-24</p>	<p>JE2:1 Friargate Mixed Use Scheme, City Centre Area: 10.0 hectares Capacity: 1,350 dwellings 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, & public realm improvements. Changes to development types & capacities proposed.</p>	
<p>Sustainability Objective</p>	<p style="text-align: center;">Assessment of Effects</p> <p style="text-align: center;">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</p>	
<p>1: To enable vibrant and inclusive communities</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 & 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 style="text-align: center;">++?</p>

	<p>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.</p> <p>SA Suggestion:</p> <ul style="list-style-type: none"> ■ Creative design for inclusivity & to encourage, support social interaction 	
2: To provide accessible essential services and facilities for all residents	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.	++
3: To improve health & promote active living	<p>Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental²⁷⁰. These factors are covered by the following SA Nos 4 & 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 SPD²⁷¹ provides information and guidance on completing the relevant health toolkit and HIA.</p>	+
4: To provide decent and affordable housing for all	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	++

²⁷⁰ For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

²⁷¹ 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 & with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)²⁷² 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>SA Suggestion:</p> <ul style="list-style-type: none"> ■ Creative design to encourage flexible & adaptable housing to support mix & tenure with changing needs 	
5: To support sustainable inclusive economic growth	<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 & 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>	++
6: To help achieve the Council's ambition to reach net zero carbon emissions	<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 & 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 SPD²⁷³ 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
7: To build resilience to climate change	<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
8: To reduce traffic & improve	<p>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</p>	++

²⁷² <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

²⁷³ Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

<p>sustainable transport choices</p>	<p>most services & 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 & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).</p>	
<p>9: To reduce air, noise & light pollution</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>10: To protect & conserve natural resources – soil, water, minerals & waste²⁷⁴</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)²⁷⁵ 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>11: To protect and enhance nature & biodiversity</p>	<p>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.</p>	<p>+?</p>
<p>12: To protect and enhance the historic environment, and its setting</p>	<p>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.</p> <p>The site is within the city centre & within the Three Spires View Cone and but not within an archaeological constraint area - The Tall Buildings Design Guide & Three</p>	<p>0?</p>

²⁷⁴ First cell refers to land/soil & water resources; second cell refers to minerals & waste

²⁷⁵ 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) ²⁷⁶ 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.	
13: To protect and enhance the quality and character of townscapes & landscapes	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 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.	

BAB016-24	Land North of A45 Developable Area: 11.81 hectares Employment	
	Assessment of Effects	
Sustainability Objective	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: To enable vibrant and inclusive communities	The provision of good quality accessible employment will support vibrant communities.	+?
2: To provide accessible essential services and facilities for all residents	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.	+?

²⁷⁶

<https://edemocracy.coventry.gov.uk/documents/s54726/Appendix%201%20Draft%20All%20Building%20View%20Management%20Framework%20Guide%20SPD.pdf>

<p>3: To improve health & promote active living</p>	<p>Provision of & access to employment is well established as contributing to better health and wellbeing – physical & mental²⁷⁷.</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 SPD²⁷⁸ provides information and guidance on completing the relevant health toolkit and HIA.</p>	<p style="text-align: center;">+</p>
<p>4: To provide decent and affordable housing for all</p>	<p>Employment site – neutral effects on housing.</p>	<p style="text-align: center;">0</p>
<p>5: To support sustainable inclusive economic growth</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 & 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>6: To help achieve the Council's ambition to reach net zero carbon emissions</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 & 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 SPD²⁷⁹ 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>7: To build resilience to climate change</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 & 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>

²⁷⁷ For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

²⁷⁸ Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

²⁷⁹ Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) <https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

<p>8: To reduce traffic & improve sustainable transport choices</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 & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).</p>	<p style="text-align: center;">+</p>
<p>9: To reduce air, noise & light pollution</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>10: To protect & conserve natural resources – soil, water, minerals & waste²⁸⁰</p>	<p>The land is classed as Grade 3 moderate to good agricultural land & therefore, negative effects for loss of best & most versatile agricultural land & 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)²⁸¹ 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>11: To protect and enhance nature & biodiversity</p>	<p>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.</p>	<p style="text-align: center;">+?</p>
<p>12: To protect and enhance the historic environment, and its setting</p>	<p>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.</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>

²⁸⁰ First cell refers to land/soil & water resources; second cell refers to minerals & waste

²⁸¹ JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

<p>13: To protect and enhance the quality and character of townscapes & landscapes</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 & 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 Birmingham²⁸².</p> <p>Therefore, likely major negative effects for landscape and Green Belt objectives.</p>	<p>--</p>
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²⁸² Coventry City Council Green Belt Technical Review Update (July 2024)

EQUALITY IMPACT ASSESSMENT (EIA)



Title of EIA		Coventry Local Plan Review Proposed submission (Regulation 19)
EIA Author	Name	Rob Haigh
	Position	Senior Planning Policy Officer
	Date of completion	01 October 2024
Head of Service	Name	Rob Back
	Position	Strategic Lead - Planning
Cabinet Member	Name	Councillor Naeem Akhtar
	Portfolio	Housing and Communities

EIA	<ul style="list-style-type: none"> • Having identified an EIA is required, ensure that the EIA form is completed as early as possible. • Any advice or guidance can be obtained by contacting Jaspal Mann (Equalities) or Hannah Watts (Health Inequalities)
Sign Off	<ul style="list-style-type: none"> • Brief the relevant Head of Service/Director/Elected Member for sign off • Have the EIA Form ready for consultation if it is required • Amend according to consultation feedback and brief decision makers of any changes
Action	<ul style="list-style-type: none"> • Implement project / changes or finalise policy/strategy/contract • Monitor equalities impact and mitigations as evidence of duty of care

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 Options¹. 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

¹ <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"> - A 18% increase in the population aged 65+ (potentially accounting for 54% of total population growth; - A 21% increase in the number of people aged 65+ with dementia and a 20% increase in those aged 65+ with mobility problems <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 prevalent². 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	P	<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	NI	<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	NI	<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>

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Pregnancy and maternity	NI	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)	NI	<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	NI	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	NI	<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>

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		isolated locations are all considerations in planning to meet the needs of women.
Sexual orientation	NI	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.

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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	+	+	+	+	+	+	+	+	+

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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

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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>2.11</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>Please answer the questions below to help identify if the area of work will have any impact on health inequalities, positive or negative.</p> <p>If you need assistance in completing this section please contact: Hannah Watts (hannah.watts@coventry.gov.uk) in Public Health for more information. More details and worked examples can be found at https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx</p>	
<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"> • Explore existing data sources on the distribution of health across different population groups (<i>examples of where to find data to be included in support materials</i>) • Consider protected characteristics and different dimensions of HI such as socio-economic status or geographical deprivation 	
	<p>Response: 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>Consider and answer below:</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"> ● Think about whether outcomes vary across groups and who benefits the most and least, for example, the outcome for a woman on a low income may be different to the outcome for a woman a high income ● Consider what the unintended consequences of your work might be
	<p>Response:</p> <p style="margin-left: 40px;">a. Potential outcomes including impact based on socio-economic status or geographical deprivation</p> <p>Coventry became a Marmot City³ 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>

³ 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 migration⁴, social unrest⁵, 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.

⁴ <https://www.gov.uk/government/statistics/irregular-migration-to-the-uk-year-ending-june-2023/irregular-migration-to-the-uk-year-ending-june-2023>

⁵ <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

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

Signed: Head of Service: Rob Back	Date:
Name of Director: Andrew Walster	Date sent to Director:
Name of Lead Elected Member: Cllr. Naeem Akhtar	Date sent to Councillor:

Email completed EIA to 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 Council's 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)¹.

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 12th September and was extended to 29th September 2023).

¹ 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 23rd 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 11th 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 6th September 2023, hosted by Marrons and similarly a Breakfast Event hosted by the Coventry and Warwickshire Chamber of Commerce on 8th September 2023. The Council also attended a local plan-focused workshop held by the Coventry Society on 5th 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
Chapter 2 review - Health and Wellbeing			
Review of Policy HW1 Health Impact Assessments (HIA)			
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>Context: 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>Responses (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>Context: 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>Responses (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>Context: options were proposed for reviewing the threshold for requiring a full Health Impact Assessment for development proposals.</p> <p>Responses (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>Context: 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>Responses (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.		
Chapter 3: Review of the Overall Levels of Growth and the Duty to Co-operate			
Review of Policy DS1: Overall Development Needs			
<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>Context: The three scenarios presented for the plan period 2021 were:</p> <ul style="list-style-type: none"> • the Government default standard method using 2014 population projections (63,760 dwellings / 3,188 pa) • The HEDNA method using 2021 census data (39,280 or 1,964 pa) • The HEDNA method with the 35% uplift removed (29,100, or 1,455 pa) <p>Responses (29): 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>Context: 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>Responses (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>	
Review of Policy DS2 (Duty to Co-operate)			
<p>Q8 [Duty to Co-operate policy] Do you have any comments on our proposed amendments to Policy DS2?</p>	<p>Context: 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>Responses (33). 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>
Review of Policy DS3 (Sustainable Development)			

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>Context: 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>Responses (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>Review of Policy DS4 Part A (general masterplan principles), part B (Whitley) Part C (Keresley SUE) Part D (Eastern Green SUE)</p>			
<p>Q10 [general masterplan principles] Do you have any comments on our proposed updates to Part A of policy DS4?</p>	<p>Context: The consultation suggested that Part A of DS4 (general masterplan principles) could strengthen references to design and cross reference to design policy.</p> <p>Responses (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>Context: 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>Responses (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.
Chapter 4: Jobs and Economy			
Q12 Do you have any comments on our proposals to introduce a new policy which defines our definition of 'employment' for planning policy purposes?	<p>Context: 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>Responses: (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>		
Review of Policy JE1: Overall Economy and Employment Strategy			
<p>Q13: Do you have any comments on our proposals that Policy JE1 could be strengthened in line with our proposals?</p>	<p>Context: 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>Responses (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
	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.		strategy including supporting Green Industry, sustainably located employment and more green infrastructure as part of new developments.
Q14: Do you have any comments, or local evidence which might be helpful in assisting us develop standards for new employment sites?	<p>Context: This was a follow on to question 13, above, to see if there was any feedback on developing specific standards.</p> <p>Responses (8). 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>	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.	No further change

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
Review of Policy JE2: Provision of Employment Land and Premises			
<p>Q15: Do you have any comments on the supply of employment land? [Policy JE2 – provision of employment land and premises]</p>	<p>Context: 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. Responses (16). 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>Context: 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>Responses (10). 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>Context: 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>Responses (5). 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>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
		https://www.gov.uk/government/organisations/land-registry	Employment Sites.
Review of Policy JE3 Non-employment uses on employment land			
<p>Q18: Do you have any comments on our proposed changes to JE3 Part 1a?</p>	<p>Context: 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>Responses (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>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
Q19: Do you have any other comments regarding policy JE3?	<p>Context: This question offered the opportunity for further issues to be raised on policy JE3.</p> <p>Responses (5). 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.
Review of Policy JE4 Location of Office Development			
Q20: Do you have any comments on our suggestions for proposed changes to Policy JE4? [location of office development]	<p>Context: 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>Responses (12). 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.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	<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>Review of Policy JE5 Location of R&D, Industrial and Storage / Distribution Development</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>Context: 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>Responses (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>Context: 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&D relating to universities).</p> <p>Responses (7). 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>Context: This question invited comment on other sectors.</p> <p>Responses (2). 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.
Review of Policy JE6 Tourism / Visitor Related Development			
Q24: Do you have any comments on our suggestion that policy JE6 should treat tourism as a main town centre use?	<p>Context: 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>Responses (7). 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>Context: This question supplemented Q24 above in case there were other comments people might have.</p> <p>Responses (0). No comments received on this question.</p>	No comments received.	N/A
Review of Policy JE7: Accessibility to Employment Opportunities			
Q26: Do you have any comments on our view that this policy [JE7] remains up to date?	<p>Context: 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>Responses (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 .’
Chapter 5: Housing			

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
Review of Policy H1 Housing Land Requirements			
<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>Context: 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>Responses (34). Through the consultation the following sites were submitted proposing development:</p> <ul style="list-style-type: none"> • 20 brownfield • 3 greenfield • 1 on Local Green Space • 26 Green Belt • 2 for the safeguarded sites <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.		
Review of Policy H2 Housing Allocations			
Q28: Do you have any comments on the review of Policy H2 (Housing Allocations)?	<p>Context: 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>Responses (150). 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.		
Review of Policy H3 Provision of New Housing			
<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>Context: This question related to whether or not new standards could be introduced</p> <p>Responses (33). 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>Context: 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>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
	<p>Responses (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>Context: This follows on from Q30, the question sought further elaboration. Responses (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>Context: This question sought to seek feedback on the Council's stated intentions to adopt the NDSS</p> <p>Responses (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>Context: 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>Responses (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>Context: Co-living is a newly emerging housing model, and some draft policy wording was consulted on.</p> <p>Responses (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>Context: this followed on from Q34 and was based upon a suggestion in the HEDNA that a limit could be explored</p> <p>Responses (9). 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>Context: currently Custom and Self Build Housing does not have a specific policy but is addressed in wider housing policy.</p> <p>Responses (19): 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.

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<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>Context: currently, Policy H3 supports limited infill for self and custom build housing.</p> <p>Responses (12). 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>Context: this question was to explore whether the council could be more proactive in supporting self and custom build housing.</p> <p>Responses (9). 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>Context: this question was asked to see if Community led housing should receive specific support.</p> <p>Responses (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.
Review of Policy H4: Securing a Mix of Housing			
Q40: Do you have any comments on our proposed minor revisions to Policy H4 (securing a mix of housing)?	<p>Context: 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>Responses (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.
Review of Policy H5: Managing Existing Housing Stock			
Q41: Do you have any comments on the review of Policy H5 Managing Existing Housing Stock?	<p>Context: The consultation sought views on strengthening the policy to include reference to energy efficiency.</p> <p>Responses (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.		
Review of Policy H6: Affordable Housing			
<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>Context: affordable housing and the nature of its delivery is defined in the NPPF however there is still some local flexibility which was explored here. Responses (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>Context: 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>Responses (18). 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.

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<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>Context: this question was asked in order to gauge whether there were other issues not already addressed, including viability. Responses (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>Review of Policy H7: Gypsy and Traveller Accommodation</p>			
<p>Q45: Do you have any comments on our review of Policy H7, Gypsy and Traveller Accommodation?</p>	<p>Context: 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. Responses (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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Review of Policy H8: Care Homes, Supported Housing, Nursing Homes and Older Persons Accommodation			
<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>Context: these are optional standards which go beyond standard building regulations, but which could be added to policy if appropriately evidenced.</p> <p>Responses (26). 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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Q47: Do you have any other comments on our review of Policy H8?	<p>Context: 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>Responses (8). 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>	Comments are noted. Policy to be expanded to take more account of the needs of the sector and to ensure flexibility.	Policy expanded.
Review of Policy H9: Residential Density			
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>Context: 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>Responses (21). 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>	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.	Update to reflect the evidence (Density Study).

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.		
Review of Policy H10: Student Accommodation			
Q49: Do you have any comments on our review of Policy H10?	<p>Context: 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>Responses (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.

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	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>Context: 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>Responses: (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>Context: 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>Responses (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>Context: This question was asked to invite wider comment on issues not already covered.</p> <p>Responses: (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.	
Review of Policy H11: Homes in Multiple Occupation (HMOs)			
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>Context: Views were sought on whether this policy should still be retained given that a separate HMO DPD is being produced.</p> <p>Responses: (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.

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
Chapter 6 Retail and Centres			
Overarching questions			
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>Context: 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>Responses (7). 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>Context: 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>Responses (5). 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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Review of Policy R1: Delivering Retail Growth			
Q56: Do you think the centres listed in this policy remain fit for purpose and should be retained as allocations within this policy?	<p>Context: This question related to the current hierarchy of centres querying whether this still remains applicable.</p> <p>Responses (2). 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.</p>	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?	<p>Context: This question was asked as it is considered that the area is a key tourist attraction, and this could be recognised in policy.</p> <p>Responses (2). 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'.</p>	The retail evidence base considered the issues raised, reference to tourism retained.	Retail evidence clarifies this position.
Review of Policy R2: Coventry City Centre – development strategy			
Q58: Do you have any comments on the insertion of a reference to limit the disproportionate concentration of sui	<p>Context: 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.</p> <p>Responses (8). Of these, 2 supported and 4 objected. It was commented that some sui</p>	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>Review of Policy R3: the Network of Centres</p>			
<p>Q59: Do you have any comments on the proposed changes to the above paragraph?</p>	<p>Context: 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. Responses (3). 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>Context: 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>

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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.’ Responses (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.
Review of Policy R4: Out of Centre Proposals			
Q61: Do you have any comments on whether part one of Policy R4 should include reference to hot food takeaways?	Context: 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> Responses (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	Context: This question was based on bringing local policy up to date with national policy. Responses (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>Context: this was asked to explore the evolving context of the sector.</p> <p>Responses (2). 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.
Review of Policy R5: Retail Frontages and Ground Floor Units in Defined Centres			
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>Context: 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>Responses (1). 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.
Review of Policy R6: Restaurants, Bars and Hot Food Takeaways			
Q65: Do you agree with our proposals for the deletion of 'normally' and	Context: 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

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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 normally 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>Responses (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>Context: This question was asked in order to gauge views on an exclusion zone around schools for hot food takeaways.</p> <p>Responses (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.
Potential new policy: Local services			
Q67: Do you have any comments on our proposal? Have you any examples of a policy	<p>Context: 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?	Responses (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.
Chapter 7: Communities			
Review of Policy CO1: New or improved social community and leisure premises			
Q68: Do you have any comments on our review of Policy CO1?	Context: 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. Responses (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.
Review of Policy CO2 Re-Use of or Redevelopment of Facilities			
Q69: Do you have any comments on our suggestions for amending Policy CO2?	Context: 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>Responses (9). 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>
Review of Policy CO3 Neighbourhood and Community Planning			
<p>Q70: Do you have any comments on our view that Policy CO3 needs a</p>	<p>Context: 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>

Question asked	Summary of key issues raised	Officer response	Proposed change to plan
minor update as described?	Responses (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.		
Chapter 8: Green Belt and Green Environment			
Review of Policy GB1 Green Belt and Local Green Space			
Q71: Do you have any comments regarding Policy GB1?	Context: Q71 and 72 should be read together. Q71 was focusing upon general comments relating to the policy overall. Responses (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	Context: 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>Responses (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.
Review of Policy GB2: Safeguarded land in the Green Belt			
Q73: Do you have any comments of the review of Policy GB2?	<p>Context: 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>Responses (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
Review of Policy GE1 Green Infrastructure			
<p>Q74: Do you have any comments on our review of Policy GE1: Green Infrastructure?</p>	<p>Context: 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>Responses (28). 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.		
Review of Policy GE2 Green Space			
Q75: Do you have any comments on our proposals to retain the above policy with no changes?	<p>Context: It was suggested through the consultation that the Green Space policy remained up to date.</p> <p>Responses (4). 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.
Review of Policy GE3 Biodiversity, Geological, landscape and Archaeological Conservation			
Q76: Do you have any comments on our suggested policy approach to strengthening and updating Policy GE3?	<p>Context: 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>Responses (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>		
Review of Policy GE4: Tree Protection			
<p>Q77: Do you have any comments on our review of Policy GE4 Tree protection?</p>	<p>Context: 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>Responses (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.
Chapter 9: Design			
Review of Policy DE1 (Encouraging High Quality Design)			
Q78: Do you have any comments on the review	Context: 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>Responses (27). 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>Chapter 10: Heritage</p>			
<p>Review of Policy HE1, Conservation Areas</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>Context: It was proposed through consultation to add in the new Conservation Areas and Brownhill Green and Earlsdon.</p> <p>Responses (10). 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.
Review of Policy HE2, Conservation and Heritage Assets			
Q80: Do you have any comments on our review of Policy HE2, Conservation and Heritage Assets?	<p>Context: The consultation suggested the policy was up to date but could benefit from a reference to Historic England guidance 'streets for all'.</p> <p>Response (10): 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.	
Review of Policy HE3 Heritage Park – Charterhouse			
Q81: Do you have any comments on the review of Policy HE3 (Heritage Park – Charterhouse)	Context: Minor changes to update the latest position were proposed by the consultation. Responses one person commented, to say they supported this.	Policy reviewed and considered to remain fit for purpose	No change
Review of Policy HE4 Archaeology			
Q82: Do you have any comments on whether a separate archaeological policy would be beneficial (Policy HE4)	Context: Comments were sought on whether there should be a separate archaeology policy. Responses (6) 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
Chapter 11: Accessibility			
Review of Policy AC1: Accessible Transport Network			
Q83: Do you have any comments on the review of Policy AC1 (Accessible Transport Network)	Context: The consultation proposed updates to bring policy in line with national policy and strategy. Responses (25): 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>	
Review of Policy AC2: Road Network			
Q84: Do you have any comments on a mechanism to support the provision of Electric Vehicle Charging Points (EVCP)?	<p>Context: It was proposed to include separate and specific requirements on how EVC can be better supported.</p> <p>Responses (17): 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
Review of Policy AC3: Demand Management			
Q85: Do you have any comments on whether parking standards should	Context: 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?	Responses (17): 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?	Context: The proposal is for a more nuanced approach to parking levels that accounts for the nature of the development and site context. Responses (10): 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?	Context: To introduce a mechanism to secure mobility credits as part of planning permissions. Responses (10): 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
Review of Policy AC4: Walking and Cycling			
<p>Q88: Do you agree that strengthening the wording to promote cycling and walking more is the right approach? Please provide comments</p>	<p>Context: 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>Responses (17): 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>
Review of Policy AC5: Bus and Rapid Transit			
<p>Q89: Do you have any comments on the review of Policy AC5 (Bus and Rapid Transit)?</p>	<p>Context: 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>Responses (11): 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
Review of Policy AC6: Rail			
Q90: Do you have any comments on the review of Policy AC6 (Rail)?	<p>Context: No changes were proposed via the consultation although a re-ordering of policies to reflect the importance of sustainable transport was suggested.</p> <p>Responses (10): 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.
Review of Policy AC7: Freight			
Q91: Do you have any comments on the review of Policy AC7 (Freight)?	<p>Context: Some updates in line with Government strategy were proposed via the consultation along with strategies to reduce certain HGV movements.</p> <p>Responses (9): 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.
Chapter 12: Environmental Management, Minerals and Waste			
Review of Policy EM1 Planning for Climate Change			

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>Context: 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>Responses (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 https://www.gov.uk/guidance/flood-risk-and-coastal-change</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>Context: 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>Responses (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.		
Review of Policy EM2 Building Standards			
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>Context: 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>Responses (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>Context: This question was aimed at establishing any local evidence and justification for going beyond Building Regulations.</p> <p>Responses (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.			
Review of Policy EM3 Renewable Energy Generation			
Q96: Do you have any comments on our suggestions for updating Policy EM3?	<p>Context: 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>Responses (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.	
Policy EM4 Flood Risk Management			
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>Context: 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>Responses (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
Review of Policy EM5 Sustainable Drainage Systems (SuDS)			
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>Context: 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>Responses (12): 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.
Review of Policy EM6 Redevelopment of Previously Developed Land			
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>Context: The consultation proposed that this policy needs a minor technical update in terms of specific reference Water Environment Regulations.</p> <p>Responses (7) 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.
Review of Policy EM7 Air Quality			
Q100: Do you agree with our suggestion that Policy EM7 needs updating as described above?	<p>Context: 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>Responses (8): 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>		
Review of Policy EM8 Waste Management			
Q101: Do you agree with our view that Policy EM8 remains up to date?	<p>Context: Policy EM8 deals with waste management</p> <p>Responses (6). 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.
Review of Policy EM9 Safeguarding Mineral Resources			
Q102: Do you agree with our view that Policy EM9 remains up to date?	<p>Context: this policy relates to mineral resources such as aggregates and recycled and secondary materials and the safeguarding of these.</p> <p>Responses (1). It was agreed the policy was up to date.</p>	Comments noted: no change proposed as wording remains fit for purpose.	No change
Review of Policy EM10 Non Mineral Development I Mineral Safeguarding Areas			

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>Context: 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>Responses: None received</p>	No comments received. No change proposed.	No change
Chapter 13 Connectivity			
Review of Policy C1: Broadband and Mobile Internet			
Q104: Do you have any comments on our assessment of Policy C1 Broadband and Mobile Internet?	<p>Context: 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>Responses: 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
Review of Policy C2: Telecommunications			
Q105: Do you have any comments on our assessment of Policy C2 Telecommunications?	<p>Context: 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>Responses: None</p>	No responses. Propose policy is deleted as this duplicates national policy.	Delete policy
Review of Policy IM1: Developer Contributions for Infrastructure			
Q106: Do you have any comments on our proposals for a minor amendment to policy IM1? Do you have any	<p>Context: 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?	Responses (8) 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)	
Infrastructure Delivery Plan (IDP)			
Q107: Do you have any comments on the updated Infrastructure Delivery Plan at Appendix 3?	Context: 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. Responses (9): 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
Chapter 14: Coventry City Area Action Plan Context			

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>Context: 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>Responses (8): 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>
Sustainability Appraisal			
<p>Feedback was sought on the Sustainability Appraisal which was consulted on at the same time</p>	<p>Responses (4) 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>		
Equalities and Health Impact Assessment			
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, or posted to **Planning Policy, PO Box 15, Council House, Earl Street, Coventry, CV1 5RR.** The deadline for submissions is **12th 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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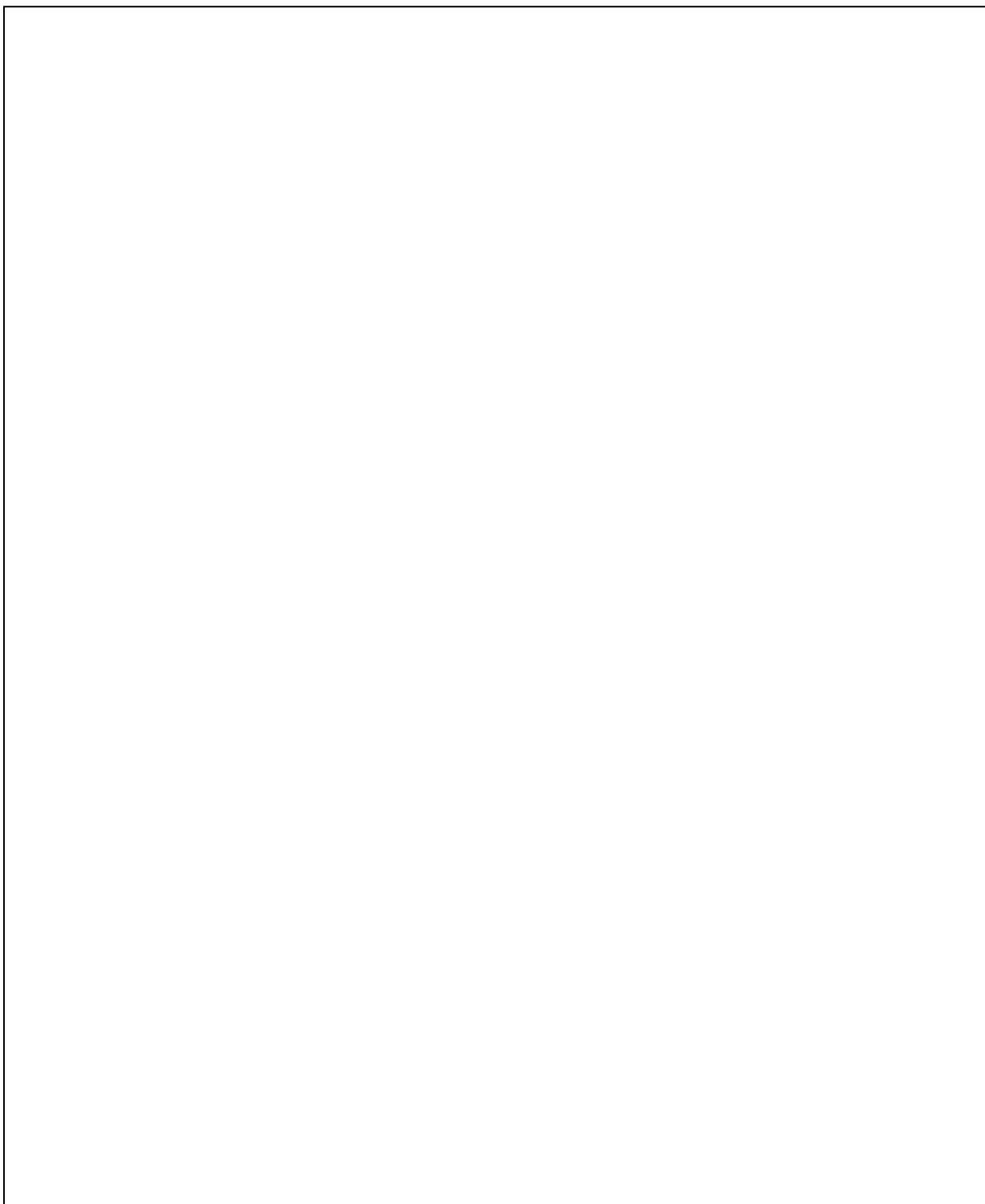
Would you like us to add your email to our consultation database, so you are aware of updates and other planning consultations. (Please tick yes if you consent to us adding your details). Yes

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

Ends



Appendix 3 – Social media analytic report

22/01/2024, 17:19

Orlo - App

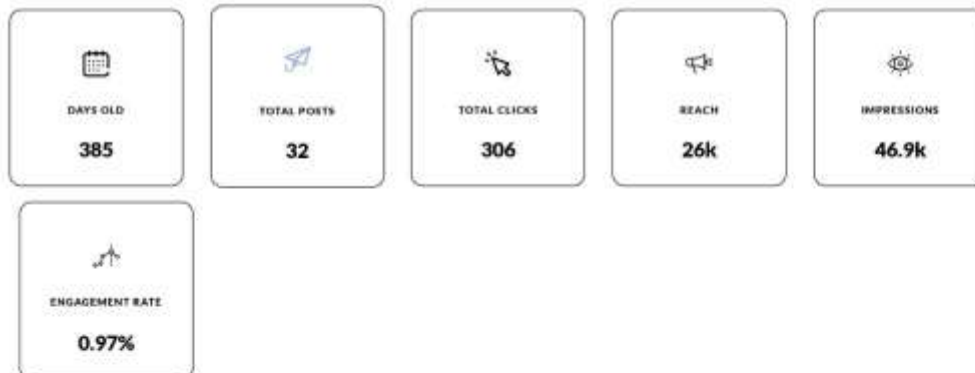
CAMPAIGN REPORT

2 Jan 23 - 22 Jan 24 **Local Plan 2023**

 X 1 Account	0	15
	MESSAGES	POSTS
 Facebook 1 Account	0	15
	MESSAGES	POSTS
 LinkedIn 1 Account	0	2
	MESSAGES	POSTS

Overview

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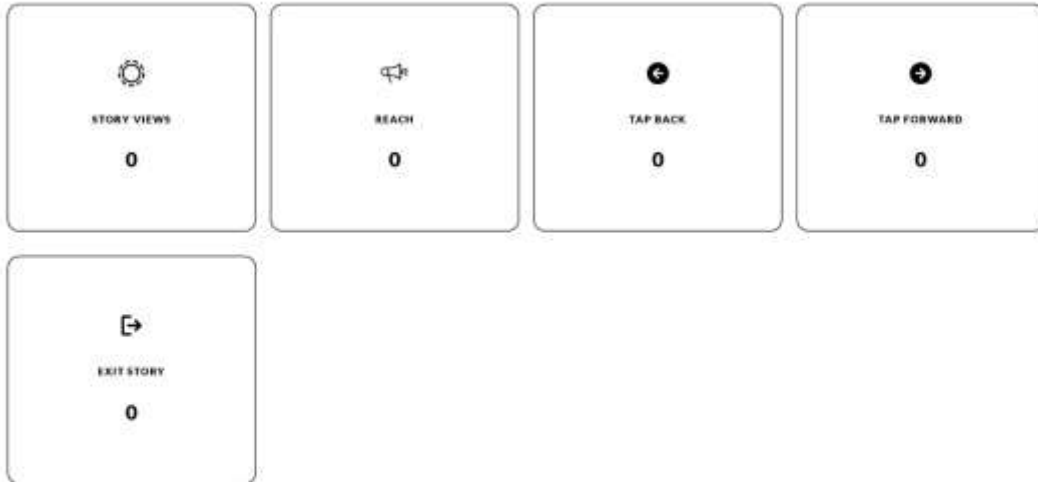


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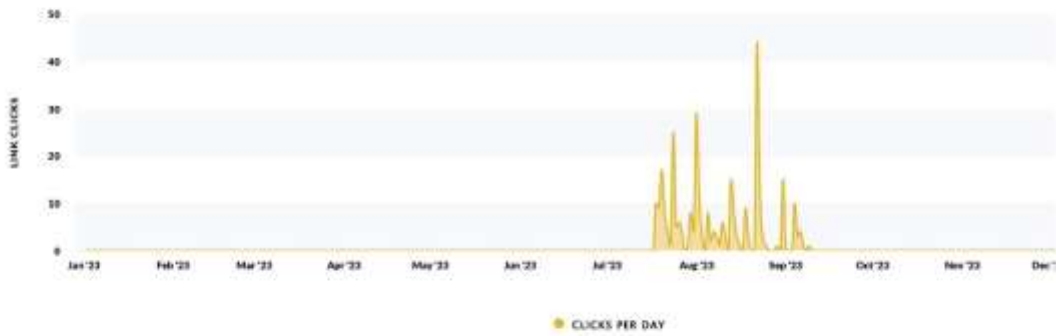
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Instagram Stories



Link clicks ²

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Make sure it all clicks into place!

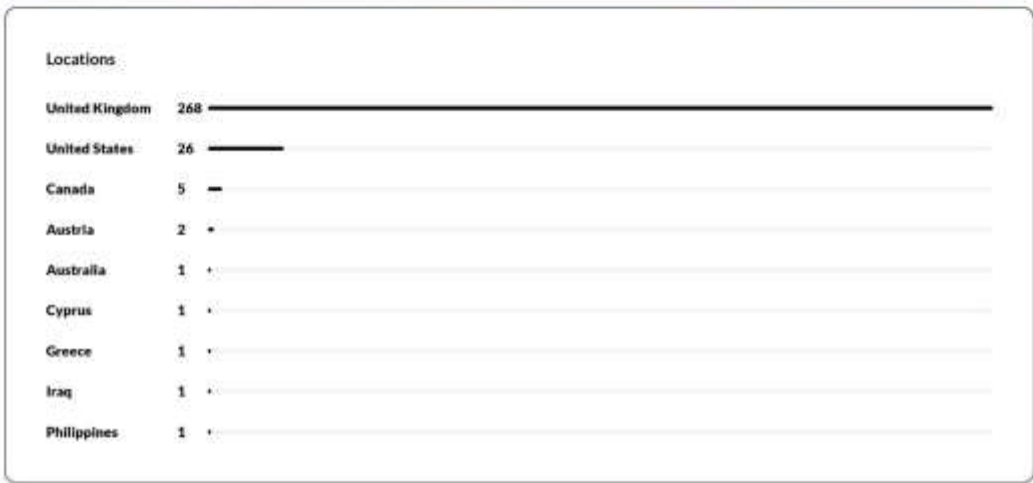
Shorten URLs and get the most accurate reporting by using orlo.uk (unsafe:~/http://orlo.uk/~) tracking links in your posts! Remember, for Instagram and Youtube, no data will be available as posts on these channels can't contain links

<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

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Global Link Clicks



Posts breakdown

Posts by Network



f Facebook
TOTAL REACH

23.2k

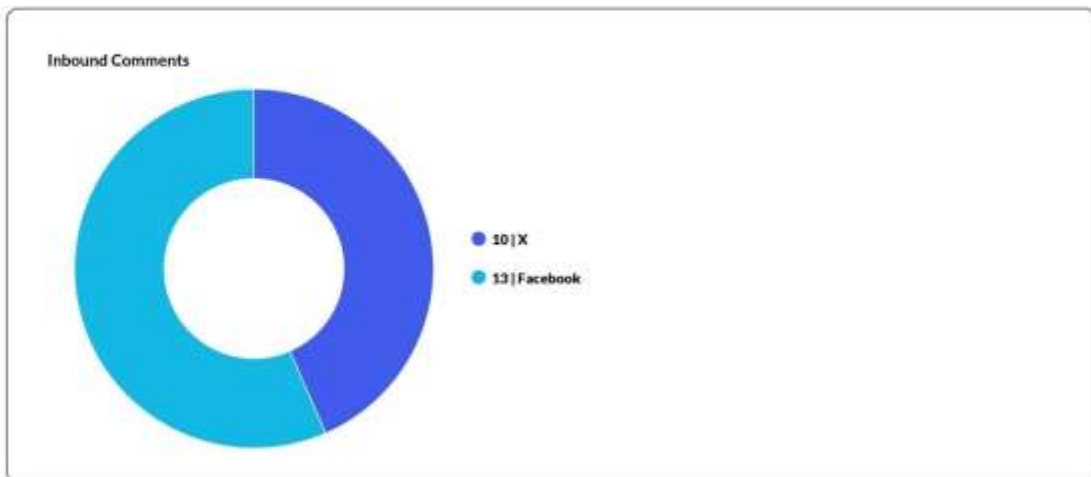
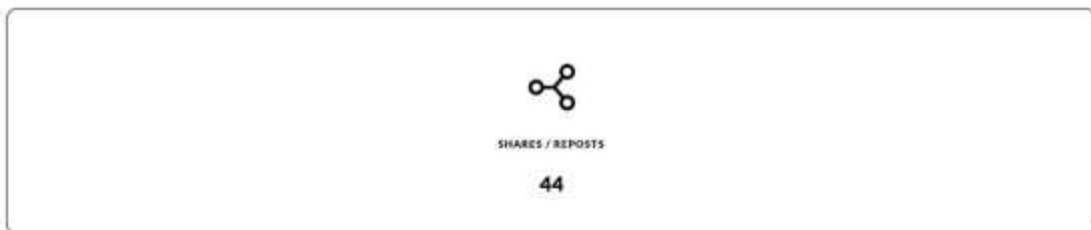
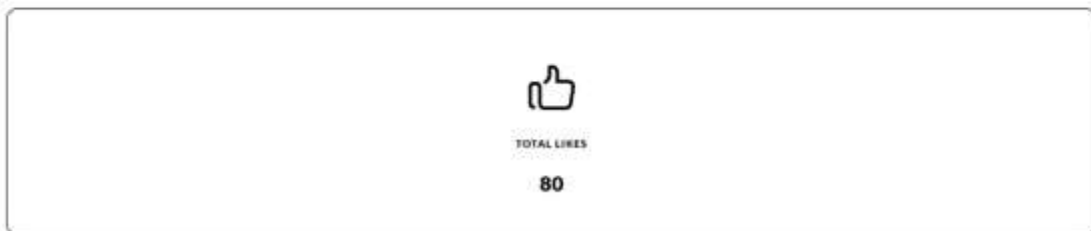
in LinkedIn (Video)
TOTAL REACH

2.8k

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Orlo - App



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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	More	Like	Comment	Share	Clicks
View post	coventrycc	22 Aug 2023	08:00		⋮	7	13	40	40
It's the right time to review Coventry's Local Plan, and we'd like to get residents' comments. Drop-in to Central Library...									
View post	coventrycc	01 Aug 2023	08:10		⋮	1	0	34	34
It's the right time to review Coventry's Local Plan, and we'd like to get residents' comments. Have your say at...									
View post	coventrycc	30 Jul 2023	06:55		⋮	1	1	26	26
We have started a consultation seeking views on Coventry's Local Plan policies, including the methodology employed to...									
View post	coventry-city-council	26 Jul 2023	11:00		⋮	25	0	21	25
Curious about the Local Plan review and its significance? We've got you covered! The Coventry Local Plan was adopted in 2017...									
View post	coventrycc	24 Jul 2023	08:00		⋮	1	0	19	19
With more up-to-date information available to us, we need to update the city's Local Plan policies. Visit https://orlo.uk/hrrGv...									
View post	coventrycc	18 Jul 2023	20:00		⋮	2	1	16	16
The Coventry Local Plan was adopted in 2017 and we now need to review it to make sure our planning policies are up to date. T...									
View post	coventrycc	03 Aug 2023	17:10		⋮	0	0		149

<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 comments, 16 shares	0 reactions
	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 heart, 1 comment, 0 shares, 15 shares	955 views, 1.78 shares, 1 reaction
	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 heart, 1 comment, 1 share, 14 shares	1.4K views, 1.24 shares, 1 reaction
	coventrycc	With more up-to-date information available to us, we need to update the city's Local Plan policies. Visit https://orlo.uk/4Asq7...		0 hearts, 0 comments, 4 shares, 13 shares	1.4K views, 1.19 shares, 0 reactions

<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

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>Policy DS1: Overall Development Needs</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"> a. A minimum of 24,600 additional homes. b. A minimum of 128ha of employment land within the city’s administrative boundary, including: <ul style="list-style-type: none"> i. at least 176,000sq.m of office floor space at Friargate and the wider city centre, 	<p>STRATEGIC POLICY</p> <p>Policy DS1: Overall Development Needs</p> <p>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:-</p> <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> 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. 	<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>3. 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"> a. 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; b. Updated evidence or changes to national policy 	<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"> 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. 	

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>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;</p> <p>d. Any other reasons that render the Plan, or part of it, significantly out of date.</p>		
DS2	<p>Policy DS2: The Duty to Co-operate</p> <p>1. 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>STRATEGIC POLICY</p> <p>Policy DS2: The Duty to Co-operate and partnership working</p> <p>1. 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>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.</p> <p>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.</p> <p>4. 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>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.</p> <p>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.</p> <p>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 and design guides to help deliver new sustainable development that may straddle or adjoin the city's administrative boundary.</p> <p>5. 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>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.</p> <p>6. 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"> a. Jaguar Land Rover at Whitley; b. The University of Warwick; c. The wider Coventry Gateway proposals; d. Ansty Park; 	<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>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:</p> <ul style="list-style-type: none"> 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. <p>7. 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>Policy DS3: Sustainable Development Policy</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>STRATEGIC POLICY</p> <p>Policy DS3: Sustainable Development Policy</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"> 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. <p>2. 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 One Coventry Plan and the Climate Change Strategy and including:</p> <ul style="list-style-type: none"> 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. <p>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.</p> <p>3. 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>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.</p> <p>4. This will take into account:</p> <p style="padding-left: 20px;">a. 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. 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>4. This will take into account:</p> <p style="padding-left: 20px;">a. 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. Specific policies in that Framework that indicate that development should be restricted</p>	
DS4 (Part A)	Policy DS4 (Part A) – General Masterplan principles	STRATEGIC POLICY	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"> 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 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 	<p>Policy DS4 (Part A) – General Masterplan principles</p> <p>The following General Principles should be adhered to when master planning any major development proposal:</p> <ul style="list-style-type: none"> 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 	<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>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:</p> <ul style="list-style-type: none"> i) Any development should support and complement the existing JLR global headquarters; 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; iii) Support and integrate the planned highway infrastructure (as listed 	<p>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:</p> <ul style="list-style-type: none"> 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; 	<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)	Policy DS4 (Part C) – Keresley SUE Specific Masterplan Principles	Policy DS4 (Part C) – Keresley SUE Specific Masterplan Principles	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 data-bbox="472 571 958 715">i) Incorporate the recommendations of the Council's SUE Design Guidance SPD; <li data-bbox="472 719 958 895">ii) Ensure that the planned Local Centres are located at separate ends (north and south) in accordance with Policy R1; <li data-bbox="472 900 958 1155">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 data-bbox="472 1160 958 1374">iv) Establish a comprehensive green and blue infrastructure corridor focused around the Ancient Woodlands, Hounds Hill and the Hall 	<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"> 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; b. The delivery of the Link Road should not be to the detriment of Pro-Logis Park; and 		

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>Policy DS4 (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>Policy DS4 (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 data-bbox="584 679 965 1270">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 data-bbox="584 1278 965 1374">iv) Furthermore, the residential element of the scheme 		

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
	<ul style="list-style-type: none"> <li data-bbox="589 276 958 895">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; <li data-bbox="589 903 958 1305">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; <li data-bbox="589 1313 958 1375">ix) In accordance with Policy AC2, manage 		

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>Policy HW1: 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>STRATEGIC POLICY</p> <p>Policy HW1: 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>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>2. All HIAs shall be undertaken in accordance with the Council's HIA Supplementary Planning Document.</p> <p>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 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>2. All HIAs shall be undertaken in accordance with the Council's HIA Supplementary Planning Document or any future equivalent.</p> <p>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</p> <p>4. 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.</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>Policy JE1: Overall Economy and Employment Strategy</p> <p>1. 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>a. 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. 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>c. Provide for a readily available range and choice of employment</p>	<p>STRATEGIC POLICY</p> <p>Policy JE1: Overall Economy and Employment Strategy</p> <p>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:</p> <p>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;</p> <p>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>c. 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>d. Safeguard existing employment sites and premises from being lost to non-employment uses unless certain exceptional circumstances are demonstrated;</p> <p>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.</p> <p>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's Friargate Business District;</p> <p>g. 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>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</p> <p>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.</p> <p>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</p> <p>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;</p> <p>h. 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>h. Support tourism/visitor related development in respect of Coventry city centre, the Ricoh Arena and the Coventry and Warwick University Campuses.</p> <p>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</p>	<p>and the Coventry and Warwick University Campuses.</p> <p>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</p> <p>j support the provision of new green infrastructure as part of new and improved developments</p>	
JE2	<p>Policy JE2: Provision of Employment Land and Premises</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>STRATEGIC POLICY</p> <p>Policy JE2: Provision of Employment Land and Premises</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="472 421 960 711"> <thead> <tr> <th>Site Ref</th> <th>Site</th> <th>Ward/LPA</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 & B8</td> </tr> <tr> <td>JE23</td> <td>Whitley Business Park</td> <td>Chykelesmore</td> <td>35</td> <td>B1a, B2 & 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 & 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 & 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 & 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 & 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 & B8</td> </tr> <tr> <td></td> <td>TOTAL</td> <td></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/LPA	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/LPA	Area Ha (hectares)	Employment Type																																																	
JE21	Friargate (part of mixed use site)	St. Michael's	3	Primary B1a																																																	
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	TOTAL		107																																																		

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	<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"> • Binley Business Park • Coventry Business Park • Cyan Park • Lyons Park • Swallowgate Business Park • University of Warwick Science Park • Whitley Business Park 	
JE3	<p>Policy JE3: Non-Employment Uses on Employment Land</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>Policy JE3: Non-Employment Uses on Employment Land</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. 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>c. 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>d. The non-employment development would generate significant employment gains which are of sufficient weight to justify the loss of employment land</p> <p>2. In addition to at least one of the above criteria being satisfied it will also need to be demonstrated that:</p> <p>a. 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. 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>c. 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>d. The non-employment development would generate significant employment gains which are of sufficient weight to justify the loss of employment land</p> <p>2. In addition to at least one of the above criteria being satisfied it will also need to be demonstrated that:</p> <p>a. 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. 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. 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>c. The proposal will not have an unacceptable adverse impact on the continuing operation of any nearby existing businesses.</p> <p>3. 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>4. 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>c. The proposal will not have an unacceptable adverse impact on the continuing operation of any nearby existing businesses.</p> <p>3. 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>4. 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>Policy JE4: Location of Office Development</p> <p>1. New office development (including change of use of buildings to provide office</p>	<p>Policy JE4: Location and type of Office Development</p> <p>1. 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>2. 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>3. Proposals for new office development in other locations will only be permitted if the following criteria are satisfied:</p> <p>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</p> <p>b. The proposal is for small scale rural offices;</p> <p>4. 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>2. The Friargate site within Coventry city centre is the Council's preferred location for new large scale office development.</p> <p>3. Proposals for new office development in other locations will only be permitted if the following criteria are satisfied:</p> <p>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</p> <p>b. The proposal is for small scale rural offices;</p> <p>4. In addition to at least one of the above criteria being satisfied it will also need to be demonstrated that:</p> <p>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</p> <p>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>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</p> <p>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>c. 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>d. The proposals are compatible with other Plan Policies.</p> <p>5. 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>c. 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>d. The proposals are compatible with other Plan Policies.</p> <p>5. Proposals for new office development outside of Defined Centres shall be accompanied by a Sequential Assessment</p> <p>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.</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>Policy JE5:Location of R&D, Industrial and Storage/Distribution Development</p> <p>1. The Council’s preferred location for new Research & Development (R&D), industrial and storage/distribution development are the sites allocated for such purposes under Policy JE2</p> <p>2. However, proposals for new R&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&D will become a new policy JE8.</p> <p>Policy JE5: Industrial and Storage / Distribution Development</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>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;</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. The proposal would not significantly compromise the viability or deliverability of land allocated in this Plan for employment development;</p> <p>d. The development is 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</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>Policy JE6: Tourism/Visitor Related Development</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>Policy JE6: Tourism/Visitor Related Development</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>Policy JE7: Accessibility to Employment Opportunities</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>Policy JE7: Accessibility to Employment Opportunities</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> <p>a. enhancement of the accessibility of the development to residents by a choice of means of transport;</p> <p>b. developments must be well designed to accommodate the needs of all transport modes and must be fully integrated with existing transport networks.</p> <p>c. the provision of support to residents in applying for jobs arising from the development;</p> <p>d. the provision of training opportunities to assist residents in accessing employment opportunities;</p> <p>e. childcare provision which enables residents to access employment opportunities; and/or</p> <p>f. measures to assist those with physical or mental health disabilities to access employment opportunities.</p> <p>2. In respect of planning applications for new employment development the Council may require applicants to make</p>	<p>a. enhancement of the accessibility of the development to residents by a choice of means of transport;</p> <p>b. developments must be well designed to accommodate the needs of all transport modes and must be fully integrated with existing transport networks.</p> <p>c. the provision of support to residents in applying for jobs arising from the development;</p> <p>d. the provision of training opportunities to assist residents in accessing employment opportunities;</p> <p>e. childcare provision which enables residents to access employment opportunities; and/or</p> <p>f. measures to assist those with physical or mental health disabilities to access employment opportunities.</p> <p>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.</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	Split from original JE5	<p>Policy JE8: Location of Research and Development (R&D)</p> <p>1. The Council's preferred location for new Research & Development (R&D), are the sites allocated under Policy JE2.</p> <p>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:</p> <p>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;</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. The proposal would not significantly compromise the viability or deliverability of land allocated in this Plan for employment development;</p> <p>d. 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>Policy H1: Housing Land Requirements</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>STRATEGIC POLICY</p> <p>Policy H1: Housing Land Requirements</p> <p>1. Provisions will be made for a minimum of 29,100 additional dwellings between 2021 and 2041.</p> <p>2. The housing requirement is to be delivered in line with the trajectory set out in Appendix 1</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>Policy H2: Housing Allocations</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>STRATEGIC POLICY</p> <p>Policy H2: Housing Allocations</p> <p>1. Table 6.2 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>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.</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>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.</p> <p>Table 6.2 - Site Allocations for Housing – Please see main Local Plan</p>	
H3	<p>Policy H3: Provision of New Housing</p> <p>1. New residential development, including opportunities for self-build homes and starter homes,</p>	<p>STRATEGIC POLICY</p> <p>Policy H3: Provision of New Housing</p> <p>1. 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>2. 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>3. 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>4. Wherever possible new developments should also be:</p> <p>a. within 2km radius of local medical services;</p>	<p>residential environment that ensures all new dwellings:</p> <p>a. comply with Nationally Described Space Standards (NDSS);</p> <p>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>c. meet M4(2) - Adaptable and Accessible Dwellings;</p> <p>d. 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>e. 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>f. 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. within 1.5km of a designated centre within the city hierarchy (policy R3);</p> <p>c. within 1km radius of a primary school;</p> <p>d. within 1km of indoor and outdoor sports facilities;</p> <p>e. within 400m of a bus stop; and</p> <p>f. within 400m of publicly accessible green space.</p> <p>5. Proposals should also be in conformity with all other relevant plan policies.</p> <p>6. 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>7. 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>2. New developments result in a satisfactory residential environment for neighbouring and future occupiers</p> <p>3 New developments must not result in existing businesses having unreasonable restrictions placed on them because of the new residential development.</p> <p>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:</p> <ul style="list-style-type: none"> 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. 	<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>5. Proposals should also be in conformity with all other relevant plan policies.</p> <p>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.</p> <p>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.</p>	
H4	<p>Policy H4: Securing a Mix of Housing</p> <p>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 Strategic Housing Market Assessment.</p> <p>2. In assessing the housing mix in residential schemes the Council</p>	<p>Policy H4: Securing a Mix of Housing</p> <p>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.</p> <p>2. 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>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;</p> <p>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>c) sites with severe development constraints where housing mix may impact on viability;</p> <p>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; and</p> <p>e) 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 Housing and Economic Development Needs Assessment or its future equivalent:</p> <ul style="list-style-type: none"> 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 	

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>Policy H5: Managing Existing Housing Stock</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>Policy H5: Managing Existing Housing Stock</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"> 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 in line with policy EM14, along with 	<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>Policy H6: 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>Policy H6: Affordable Housing</p> <p>Proportion of Affordable Housing</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>a. 12.5% Social/Affordable Rental provision</p> <p>b. 12.5% Intermediate Provision</p> <p>4. Proposals within areas of existing low concentration (shown on Figure 4.1) should make provisions as follows:</p> <p>a. 15% Social/Affordable Rental provision</p> <p>b. 10% Intermediate Provision</p> <p>5. 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>6. 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>7. 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"> 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. <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>Tenure</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"> 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. <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">Housing Size Mix</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">Where a policy compliant provision is not provided</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>Design Standards</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>Policy H7: Gypsy and Traveller Accommodation</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>Policy H7: Gypsy and Traveller Accommodation</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>	<p>Changes made to reflect local policy and in line with Gypsy and Traveller Accommodation Assessment, February 2023.</p>

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>2. 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>a. 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. Sites should be located within reasonable travelling distance of local services and community facilities, including a primary school;</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</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>Policy H8: Care Homes, Supported Housing, Nursing Homes and Older Persons accommodation</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>Policy H8: Specialist Housing including specialist housing with elements of care, Older Persons accommodation and hostels</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>Policy H9: Residential Density</p> <p>1. Residential development, including conversions, must make</p>	<p>Policy H9: Residential Density</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>2. 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>3. Developments inside the Ring Road (The A4053) should aim to achieve a minimum of 200 dwellings per hectare (net).</p> <p>4. Developments on Greenfield sites should achieve a minimum of 30 dwellings per hectare (net).</p>	<p>1. Residential development, including conversions, must make the most effective and efficient use of land.</p> <p>2. Proposed development density should be informed by a site’s local character and context, in alignment with other plan policies.</p> <p>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:</p> <ul style="list-style-type: none"> • Greenfield sites – 35Dph • Brownfield Sites – 45Dph • Sites within the City Centre Transition zone* – 125Dph • Development within the defined City Centre boundary** - 250Dph <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>Policy H10: Student Accommodation</p> <p>1. Purpose-built student accommodation and conversions of residential and non-residential properties to student accommodation will be encouraged where:</p> <p>a. It is directly accessible from the universities;</p> <p>b. Such development can play a part in the regeneration of the immediate neighbourhoods without disadvantage to local services.</p> <p>c. It will not materially harm the amenities of occupiers of nearby properties; and</p> <p>d. 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>Policy H10: Student Accommodation</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"> - the PBSA market in Coventry shows signs of being at saturation point. - The city centre is over catered for. - The city is dominated by studio accommodation. - The council should expect more applications to change the use of PBSA to other (residential) uses. <p>And recommends that:</p> <ul style="list-style-type: none"> - any new PBSA developments to only be allowed if evidence is provided to show it is needed. - restrict the location of PBSA developments. - Restrict studio only developments. - The city would benefit from living and amenity standards being introduced.

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>Policy H11: Homes in Multiple Occupation (HiMOs)</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>Policy H11: Homes in Multiple Occupation (HMOs)</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"> a. the amenities of occupiers of nearby properties (including the provision of suitable parking provisions); b. the appearance or character of an area; c. local services; and d. The amenity value and living standards of future occupants of the property, having specific regard to internal space and garden/amenity space. 	<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>New policy H12 – Build to Rent</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"> 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; 	<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"> 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. 	
H13		<p>New Policy H13 – Co-living</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"> a. it is of good quality and design and adhere to a minimum bedroom size of 	<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 & 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>Policy R1 Delivering Retail Growth</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>Policy R1 Delivering Retail Growth</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>	<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</p>

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	<p>other policies within this plan and the City Centre AAP as appropriate</p> <table border="1" data-bbox="472 384 974 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 B 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. Non A1 uses will be supported to encroachment of the centre, especially around A2-A5.</td> </tr> <tr> <td>New Keresley Local Centre south</td> <td>1,500</td> <td>Local centre to include a range of small a range of local community uses and to</td> </tr> <tr> <td>New Keresley Local Centre north</td> <td>1,000</td> <td>Local centre to include a range of small a range of community uses and top up</td> </tr> <tr> <td>Brade Drive District Centre</td> <td>1,000</td> <td>New retail floor space should be focus uses and other non-retail uses. This should small scale units to support local needs the centre's current offer.</td> </tr> <tr> <td>Jardine Crescent District Centre</td> <td>500</td> <td>New floor space to be provided as part schemes within amended centre bound A1-A5 uses to be provided, which reflect character of the centre.</td> </tr> </tbody> </table> <p>2. The comprehensive redevelopment of the Riley Square element of Ball Green District Centre 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 B Centre Supermarket and wider support active frontages within the wider city centre allowance for city centre vacant units.	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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>	<table border="1" data-bbox="1059 272 1641 384"> <tr> <td data-bbox="1059 272 1328 384"></td> <td data-bbox="1328 272 1641 384">community uses and top up provisions.</td> </tr> </table> <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>		community uses and top up provisions.	<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>
	community uses and top up provisions.				

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
R2	<p>Policy R2: Coventry City Centre – Development Strategy</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"> 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; 	<p>Policy R2: Coventry City Centre – Development Strategy</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"> 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 	<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>h. Accessible for all;</p> <p>i. Providing an attractive and safe environment for pedestrians, cyclists and motorists;</p> <p>j. Provide a high quality public transport system that benefits from seamless integration and is well connected to existing and new infrastructure;</p> <p>k. High quality sustainable built design;</p> <p>l. Continuing to develop a vibrant and attractive night time economy;</p> <p>m. Providing opportunities to improve health and wellbeing;</p> <p>n. 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>o. Recognising and preserving key views to the iconic three spires of St Michaels, Holy Trinity and Christchurch;</p> <p>p. 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>k. High quality sustainable built design;</p> <p>l. Continuing to develop a vibrant and attractive night time economy;</p> <p>m. Providing opportunities to improve health and wellbeing;</p> <p>n. Continuing to support greater integration of the university within the wider city centre in accordance with the City Centre policies of this plan.</p> <p>o. Recognising and preserving key views to the iconic three spires of St Michaels, Holy Trinity and Christchurch;</p> <p>p. 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>Policy R3: The Network of Centres 1. To support the city centre, the Council will designate, enhance, maintain and protect a network of</p>	<p>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</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>2. In all these Centres:</p> <p>a. 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. Proposals that reduce the concentration of A-class uses within a centre below 51% will not be approved;</p> <p>c. 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>d. 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>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;</p> <p>b. Improvement to the environment and accessibility will be promoted and encouraged.</p> <p>2. Centre boundaries and Primary Shopping Areas for the following Major District Centres are shown on the Policies Map at:</p> <p>a. Arena Park;</p> <p>b. Cannon Park;</p> <p>c. 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>3. Centre boundaries and Primary Shopping Areas for the following District Centres are shown on the Policies Map at:</p> <p>a. 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>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>3. Major District Centres are shown on the Policies Map at:</p> <ul style="list-style-type: none"> a. Arena Park; b. Cannon Park; c. Brandon Road; d. Eastern Green. <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"> e. a mix of bulk convenience and comparison shopping as well as service and catering uses; f. social, community and leisure uses including hotels; g. offices. <p>4. District Centres are shown on the Policies Map at:</p> <ul style="list-style-type: none"> a. Ball Hill; b. Bell Green; c. Brade Drive; d. Daventry Road; e. Earlsdon; f. Foleshill; g. Jardine Crescent; h. Jubilee Crescent. 	<ul style="list-style-type: none"> b. Bell Green; c. Brade Drive; d. Daventry Road; e. Earlsdon; f. Eastern Green* g. Foleshill; h. Jardine Crescent; i. Jubilee Crescent. <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>4. Centre boundaries for the following Local Centres are shown on the Policies Map at:</p> <ul style="list-style-type: none"> 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; 	<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>

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<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>5. Local Centres are shown on the Policies Map at:</p> <p>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. Far Gosford Street; k. Green Lane; l. Hillfields; m. Holbrook Lane; n. Holyhead Road; o. Keresley North;</p>	<p>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.</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>p. Keresley Road; q. Keresley South; r. Longford; s. Quorn Way; t. Radford Road; u. Station Avenue; v. Sutton Avenue; w. Walsgrave Road; x. Willenhall; y. 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>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</p>	<p>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</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>2. Sequential Assessment</p> <p>a. 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. 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>3. Impact Test</p> <p>a. 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>2. Sequential Assessment</p> <p>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.</p> <p>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"> • 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: <p>i. Arena Park;</p> <p>ii. Cannon Park;</p> <p>iii. Brandon Road.</p> <p>iv. Ball Hill;</p> <p>v. Bell Green;</p> <p>vi. Brade Drive;</p> <p>vii. Daventry Road;</p> <p>viii. Earlsdon;</p> <p>ix. Foleshill;</p> <p>x. 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. 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>xi. Jubilee Crescent.</p> <ul style="list-style-type: none"> • Other Main Town Centre use proposals within 300m of a defined centre boundary <p>C. Retail proposals close to centres which do not have a defined PSA.</p> <p>3. Impact Test 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"> • 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. <p>4. 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>Policy R5: Retail Frontages and Ground Floor Units in defined centres</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>a. the primary retail function of the centre would not be undermined in the context of Policy R3;</p> <p>b. the use would make a positive contribution to the overall role, vitality and viability of the centre;</p> <p>c. 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>Policy R5: Retail Frontages and Ground Floor Units in defined centres</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>a. the primary function of the centre would not be undermined in the context of Policy R3;</p> <p>b. the use would make a positive contribution to the overall role, vitality and viability of the centre;</p> <p>c. 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>a. the location and prominence of the unit within the relevant frontage;</p> <p>b. the width of the frontage of the unit when compared to other units in the centre;</p> <p>c. the number and proximity of other units occupied by 'A' class uses;</p> <p>d. compatibility of the proposal with nearby uses.</p>		
R6	<p>Policy R6 Restaurants, Bars and Hot Food Takeaways</p> <p>1. Outlets should be located within defined centres and will normally be discouraged outside those locations.</p> <p>2. Proposals within defined centres will be permitted provided they:</p> <p>a. would not result in significant harm to the amenity of nearby residents or highway safety;</p> <p>b. would not result in harmful cumulative impacts due to the existence of any existing or consented proposed outlet;</p> <p>c. are in accordance with the emerging Hot Food Takeaway Supplementary Planning</p>	<p>Policy R6 Restaurants, Bars and Hot Food Takeaways</p> <p>1. Outlets should be located within defined centres and will normally be discouraged outside those locations.</p> <p>2. Proposals within defined centres will be permitted provided they:</p> <p>a. would not result in significant harm to the amenity of nearby residents or highway safety;</p> <p>b. would not result in harmful cumulative impacts due to the existence of any existing or consented proposed outlet;</p> <p>c. are in accordance with the Adopted Hot Food Takeaway Supplementary Planning Document and any subsequent replacement</p> <p>d. 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 d. are compatible with other Plan Policies.		
CO1	<p>Policy CO1: New or improved social community and leisure premises</p> <p>1. Proposals for social, community and leisure facilities will be considered through the following sequential approach:</p> <p>a. Designated centres to support the centres hierarchy;</p> <p>b. Where no suitable sites are available in a designated centre, an edge-of-centre location;</p> <p>c. Where no edge of centre sites are available, a site adjacent to other associated facilities including existing schools and educational facilities;</p> <p>d. 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>2. Proposals will be considered on the basis of:</p> <p>a. The appropriateness of their proposed location in relation to their scale and intended catchment;</p> <p>b. Compatibility with nearby uses;</p> <p>c. Accessibility by a choice of means of transport;</p> <p>d. Compatibility with other Plan Policies.</p> <p>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.</p>		
CO2	<p>Policy CO2: Re-Use of or Redevelopment of Facilities</p> <p>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:</p>	<p>Policy CO2: Re-Use of or Redevelopment of Facilities</p> <p>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:</p> <p>a. 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>a. There is an outstanding local need which could reasonably be met at that location;</p> <p>b. The site remains viable for existing uses or could be made viable through appropriate diversification of use;</p> <p>c. the proposal is not compatible with nearby uses.</p> <p>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</p> <p>3. Where replacement facilities are intended, they should:</p> <p>a. continue to serve the community;</p> <p>b. be of appropriate scale and character;</p> <p>c. be of high quality design.</p>	<p>b. The site remains viable for existing uses or could be made viable through appropriate diversification of use; and</p> <p>c. the proposal is not compatible with nearby uses.</p> <p>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</p> <p>3. Where replacement facilities are intended, they should:</p> <p>a. continue to serve the community;</p> <p>b. be of appropriate scale and character;</p> <p>c. 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>Policy CO3: Neighbourhood and Community Planning</p> <p>1. Where appropriate the Council will support communities in the preparation of:</p> <p>a. Parish Plans;</p> <p>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>Policy GB1: Green Belt and Local Green Space</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>2A: 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>STRATEGIC POLICY</p> <p>Policy to be split: GB1 Green Belt, new policy GB3 Local Green Space</p> <p>Policy GB1: Green Belt</p> <ol style="list-style-type: none"> 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 	<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>2B: 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>3. 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>a. Land part of the Wood End redevelopment (residential)</p> <p>b. Land at Sutton Stop (residential and employment)</p> <p>c. Land south at Walsgrave Hill Farm (residential)</p> <p>d. Land at Keresley (residential)</p> <p>e. 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>f. Land at Cromwell Lane (residential)</p> <p>g. Land at Mitchell Avenue (residential)</p> <p>h. Land off Allard Way/London Road (residential)</p> <p>i. Land at Cheltenham Croft (residential)</p> <p>j. Land east of Browns Lane (residential)</p> <p>k. Land west of Browns Lane/Burton Close (residential)</p> <p>l. Land at Cryfield Heights (residential)</p> <p>m. Land at Woodfield School, Stoneleigh Road (Residential and infrastructure)</p> <p>n. Land south of Blue Coats School (Heritage and Education)</p> <p>o. Land at Baginton Fields and South East of Whitley Business Park (employment)</p> <p>p. Land to the east of the existing Energy from Waste plant at Bar Road (general industrial)</p> <p>4. 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"> a. Sowe Valley b. Sherbourne Valley c. War Memorial Park d. Tocil Wood Brook Stray e. Park Wood and Ten Shilling Wood f. Tile Hill Wood g. Allesley Park <p>5. 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"> a. Land at Park Hill Lane b. Land at Westwood School and Xcel Leisure Centre <p>6. 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"> a. Sowe Valley Northern Extension b. Sherbourne Valley and Lake View Park c. Walsgrave Triangle, Cross Point. 		

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>Policy GB2: 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>STRATEGIC POLICY</p> <p>Policy GB2: 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>STRATEGIC POLICY New Policy GB3: Local Green Space</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>Policy GE1 Green Infrastructure 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>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.</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 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.</p> <p>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.</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 and blue infrastructure already exists in the city, connecting natural heritage, green space, biodiversity, historic landscapes water bodies</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>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 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>a. Not permitting development that compromises its integrity and that of the overall green infrastructure framework (including the Coventry/Oxford Canal);</p> <p>b. Using developer contributions to facilitate improvements to its</p>	<p>and 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 and blue 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 and blue 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 and blue infrastructure is the maintenance and improvement and expansion of biodiversity;</p> <p>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;</p> <p>g. Flood risk management and improving surface water quality, with preference being</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>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 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 infrastructure is the maintenance and improvement and expansion of biodiversity;</p> <p>f. 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>g. Flood risk management and improving surface water quality.</p>	<p>given to nature-based solutions where possible.</p>	
GE2	<p>Policy GE2: Green Space</p> <p>1. 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>Policy GE2: Green Space</p> <p>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:</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>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</p> <p>b. A deficiency would not be created through its loss, measured against the most up-to-date Coventry Green Space standards; or</p> <p>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.</p> <p>2. 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>a. Land at Charter Avenue (former Alderman Harris School site).</p> <p>b. Land east of Coundon Wedge Road.</p>	<p>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</p> <p>b. A deficiency would not be created through its loss, measured against the most up-to-date Coventry Green Space standards; or</p> <p>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.</p> <p>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.</p> <p>3. 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>a. Land at Charter Avenue (former Alderman Harris School site).</p> <p>b. Land east of Coundon Wedge Road.</p> <p>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</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
GE3	<p>Policy GE3: Biodiversity, Geological, Landscape and Archaeological Conservation</p> <p>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:</p> <p>a. 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. protect or enhance biodiversity assets and secure their long term management and maintenance;</p> <p>c. avoid negative impacts on existing biodiversity;</p> <p>d. preserve species which are legally protected, in decline, are</p>	<p>Policy GE3: Biodiversity, Geological, and Landscape Conservation</p> <p>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:</p> <p>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;</p> <p>b. protect or enhance biodiversity assets and secure their long term management and maintenance;</p> <p>c. avoid negative impacts on existing biodiversity;</p> <p>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.</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>2. Where this is not possible, adequate mitigation measures must be identified. If mitigation measures are not possible on site, then compensatory measures involving biodiversity offsetting will be considered, but only in exceptional circumstances.</p> <p>3. Biodiversity will be encouraged particularly in areas of deficiency, in areas of development and sustainable urban extensions, and along wildlife corridors. Opportunities will be sought to restore or recreate habitats, or enhance the linkages between them, as part of the strategic framework for green infrastructure. Protected Species, and species and habitats identified in the Local Biodiversity Action Plan (LBAP), will be protected and conserved through a buffer or movement to alternative</p>	<p>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.</p> <p>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 (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>	

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	<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>	
GE4	<p>Policy GE4: Tree Protection</p> <p>1. Development proposals will be positively considered provided:</p> <p>a. 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;</p> <p>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>c. existing trees worthy of retention are sympathetically</p>	<p>Policy GE4: Tree Protection</p> <p>1. Development will be positively considered provided:</p> <p>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 should be supported by a tree survey;</p> <p>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>2. Development proposals that seek to remove trees that are subject to 'Protection', without justification, will not be permitted.</p>	<p>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.</p> <p>d. recommendations within the Coventry Trees and Development Guidelines SPD have been fully considered.</p> <p>e. proposals are in accordance with the requirements of planning national legislation</p> <p>2. Development proposals that seek to remove trees that are subject to 'Protection', without justification, will not be permitted.</p>	
DE1	<p>Policy DE1 Ensuring High Quality Design</p> <p>1. All development proposals must respect and enhance their surroundings and positively contribute towards the local identity and character of an area.</p> <p>2. The setting, integrity and character of heritage assets will be protected in accordance with Policy HE2.</p>	<p>STRATEGIC POLICY</p> <p>Policy DE1 Ensuring High Quality Design</p> <p>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</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>3. All development will be expected to meet the following key principles:</p> <p>a. respond to the physical context of the site;</p> <p>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>c. where appropriate, retain and incorporate into the layout the protection of important views, including key views of the three spires;</p> <p>d. preserve or enhance the character and setting of the historic built, landscape and where appropriate archaeological environment;</p> <p>e. preserve or enhance the character and setting of major road, rail and canal corridors;</p> <p>f. clearly define the boundaries between public and private spaces and enclosure of space;</p> <p>g. provide attractive, safe, uncluttered, active and easily</p>	<p>reference to the climate change strategy and the adaptation and resilience strategy.</p> <p>2. The setting, integrity and character of heritage assets will be protected in accordance with Policy HE2.</p> <p>3. Where buildings in excess of 20m in height are proposed, these must be informed by the guidance of the Tall Buildings SPD.</p> <p>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.</p> <p>5. All development will be expected to meet the following key principles:</p> <p>a. respond to the physical context of the site;</p> <p>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>c. where appropriate, retain and incorporate into the layout the protection of important views, including key views of the three spires;</p> <p>d. preserve or enhance the character and setting of the historic built, landscape and where appropriate archaeological environment;</p> <p>e. 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>h. make places that inter-connect and are easy to move through;</p> <p>i. ensure places are easily understood by users, with clear routes and distinct physical features;</p> <p>j. seek high quality design and attention to detail in the layout of developments, individual buildings and infrastructure in terms of function and impact, not just for the short term, but over the lifetime of the development;</p> <p>k. be adaptable to changing social, technological, economic and market conditions and ensure that developments maximise the use of the site;</p> <p>l. promote diversity through mixes of uses within a site or building, which work together to create vital and viable places;</p> <p>m. 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>f. clearly define the boundaries between public and private spaces and enclosure of space;</p> <p>g. provide attractive, safe, uncluttered, active and easily identifiable, high quality public spaces;</p> <p>h. consider the safety and security of new and existing users, showing how these considerations have informed the design process;</p> <p>i. make places that inter-connect and are easy to move through;</p> <p>j. ensure places are easily understood by users, with clear routes and distinct physical features;</p> <p>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;</p> <p>l. be adaptable to changing social, technological, economic and market conditions and ensure that developments maximise the use of the site;</p> <p>m. promote diverse, viable places;</p> <p>n. 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>n. consider green infrastructure at the earliest stage in the design process, to ensure that it is well planned, designed, managed and maintained. It should also be well integrated and serve multiple purposes (as appropriate);</p> <p>o. support the integration of through routes for public transport and incorporate suitable bus priority measures as appropriate;</p> <p>p. minimise adverse impact on important natural resources;</p> <p>q. conserve, restore or enhance biodiversity; and</p> <p>r. respect and enhance landscape quality including trees, hedges and other landscape features of value.</p>	<p>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> <p>p. support the integration of through routes for public transport and incorporate suitable bus priority measures as appropriate;</p> <p>q. minimise adverse impact on important natural resources;</p> <p>r. conserve and enhance biodiversity; and</p> <p>s. respect and enhance landscape quality including trees, hedges and other landscape features of value.</p> <p>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;</p> <p>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;</p> <p>6. 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>New Policy DE2: Delivering High Quality Places</p> <p>1. Public Realm</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>2. Public Art</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>3.Lighting</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>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</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<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>5.Meanwhile Uses</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>6. City Centre and Transition Zone 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>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.</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>Policy HE1 Conservation Areas</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"> 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 <p>2. The following areas are proposed for designation as Conservation Areas:</p> <ul style="list-style-type: none"> a. Earlsdon b. Brownhill Green 	<p>STRATEGIC POLICY</p> <p>Policy HE1 Conservation Areas</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"> 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 <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>3. 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>Policy HE2: Conservation and Heritage Assets</p> <p>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</p>	<p>STRATEGIC POLICY</p> <p>Policy HE2: Conservation and Heritage Assets</p> <p>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:</p> <p>a. Listed Buildings and Locally Listed buildings;</p> <p>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> <ul style="list-style-type: none"> 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. <p>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.</p> <p>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.</p>	<ul style="list-style-type: none"> 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. <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>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.</p> <p>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.</p> <p>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.</p> <p>7. 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>7. All proposals should aim to sustain and reinforce the special character and conserve the following distinctive historic elements of Coventry:</p> <p>a. The surviving buildings, defences and street plan of the medieval city centre and its suburbs;</p> <p>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>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;</p> <p>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;</p> <p>e. The Victorian and Edwardian suburbs such as Earlsdon and Stoke;</p> <p>f. Designed landscapes, including historic parks and gardens (both registered and locally listed), historic cemeteries, churchyards and public parks;</p> <p>g. 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>a. The surviving buildings, defences and street plan of the medieval city centre and its suburbs;</p> <p>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>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;</p> <p>d. Buildings associated with the city's industrial heritage; ribbon weaving, watch making, cycle making, motor car manufacturing, brick making, coal mining,</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</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>e. The Victorian and Edwardian suburbs such as Earlsdon and Stoke;</p> <p>f. Designed landscapes, including historic parks and gardens (both registered and locally listed), historic cemeteries, churchyards and public parks;</p> <p>g. 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>h. Archaeological remains of all periods from the earliest Prehistoric human habitation to the modern industrial period.</p> <p>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</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>Policy HE3 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>Policy HE3 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>3. 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>New Policy HE4: Archaeology</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	Policy AC1: Accessible Transport Network	STRATEGIC POLICY Policy AC1: Accessible Transport Network	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>d. 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>2. Further guidance will be contained in the Coventry Connected SPD.</p>	<p>more attractive neighbourhoods for people.</p> <p>3. Development proposals which are expected to generate additional trips on the transport network should:</p> <ul style="list-style-type: none"> 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. c. 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 	

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. 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.</p>	
AC2	<p>Policy AC2: Road Network</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>Policy AC2: Road Network</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. 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>c. 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>2. 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. 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>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.</p> <p>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</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>3. 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>4. Proposals should not negatively impact road safety and should be in line with the Council's Transport Strategy.</p> <p>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.</p> <p>6. Further guidance will be contained in the Coventry Connected SPD and the emerging Transport Design Guide.</p>	
AC3	<p>Policy AC3: Demand Management</p> <p>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.</p>	<p>Policy AC3: Demand Management</p> <p>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.</p> <p>2. 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>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.</p> <p>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 5.</p> <p>4. 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>5. 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>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.</p> <p>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:</p> <ul style="list-style-type: none"> • 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 	

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		<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"> • 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. <p>5. Proposals will be required to encourage and incentivise sustainable travel, such as through the provision of Mobility Credits.</p> <p>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.</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>Policy AC4: 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>Policy AC4: Active Transport Provision including Walking, Cycling and Micro Mobility</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"> 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 	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>3. Further details will be set out in the Coventry Connected SPD.</p> <p>4. 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"> • 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. <p>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</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"> • 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. 	

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. 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.</p>	
AC5	<p>Policy AC5: Bus 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. The level of need and expected provision will be determined through Transport Assessments and Travel Plans.</p>	<p>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</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>2. 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>3. 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>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.</p> <p>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.</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<p>5. Further details will be set out in the Coventry Connected SPD, the TfWM LTP and TfWM Bus Service Improvement Plan.</p>	
AC6	<p>Policy AC6: Rail</p> <p>1. 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>2. 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>Policy AC6: Rail</p> <p>1. 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>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.</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>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.</p> <p>4. Further details are set out in the Coventry Connected SPD, Coventry Rail Investment Strategy and the West Midlands Strategic Transport Plan</p>	<p>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.</p> <p>4. 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>Policy AC7: Freight</p> <p>1. 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>Policy AC7: Freight</p> <p>1. 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"> a. accommodate appropriate on-site lorry parking and turning facilities to minimise disruption and safety issues on the public highway. 	<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>Policy EM1: Planning for Climate Change Adaptation</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>a. using layout, building orientation, construction techniques and materials and natural ventilation methods to mitigate against rising temperatures;</p> <p>b. optimising the use of multi-functional green infrastructure, including tree planting for urban cooling, local flood risk management and shading,</p> <p>c. incorporating water efficiency measures, such as the use of grey water and rainwater recycling, low water use sanitary equipment</p> <p>d. minimising vulnerability to flood risk by locating development in</p>	<p>STRATEGIC POLICY</p> <p>Policy EM1: Planning for Climate Change Adaptation</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>a. using layout, building orientation, construction techniques and materials and natural ventilation methods to mitigate against rising temperatures and address overheating in new buildings;</p> <p>b. optimising the use of multi-functional green infrastructure, including tree planting for urban cooling, local flood risk management and shading;</p> <p>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;</p> <p>d. 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>e. Where applicable, maintain and enhance the canal network to reflect the canals' role in urban cooling.</p> <p>f. seek opportunities to make space for water and develop new blue infrastructure to accommodate climate change.</p> <p>2. 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>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.</p>	<p>SUDS in accordance with Policy EM4 and EM5;</p> <p>e. Where applicable, maintain and enhance the canal network to reflect the canals' role in urban cooling;</p> <p>f. seek opportunities to make space for water and develop new blue infrastructure to accommodate climate change challenges.</p> <p>g. major developments must consider making connections available to the Coventry Heat Network in areas identified as Heat Network Zones;</p> <p>h. development must meet net zero (regulated operational carbon) for residential and non-domestic development including the need to address embodied carbon and waste;</p> <p>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</p> <p>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.</p> <p>2. 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>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.</p>	
EM2	<p>Policy EM2: Building Standards</p> <p>1. 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"> a. Maximising energy efficiency and the use of low carbon energy; b. Conserving water and minimising flood risk including flood resilient construction; c. Considering the type and source of the materials used; d. Minimising waste and maximising recycling during construction and operation; e. Being flexible and adaptable to future occupier needs; and f. Incorporating measures to enhance biodiversity value. <p>2. In meeting the carbon reduction targets set out in Building Regulations, the Council will expect</p>	<p>Delete policy EM2</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"> a. Reduce energy demand through energy efficiency measures. b. Supply energy through efficient means (i.e. low carbon technologies). c. Utilise renewable energy generation. <p>3. 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>4. A comprehensive update of the Delivering a More Sustainable City SPD incorporating the approach to Building Sustainability Standards will be developed.</p>		
EM3	Policy EM3 Renewable Energy Generation	Delete policy EM3	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"> a. any significant adverse impacts can be mitigated; b. where biofuels are to be utilised, they should be obtained from sustainable sources and transportation distances are minimised; c. any energy centre is suitably located and designed to a high quality such that it is sympathetically integrated with its surroundings; d. all proposals are consistent with any relevant Policies in this Plan. 		integrated renewable energy requirements).
EM4	<p>Policy EM4 Flood Risk Management</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>Policy EM4 Flood Risk Management</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> <ul style="list-style-type: none"> a) the type of development is appropriate to 	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>a. 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. 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;</p> <p>e. in the case of essential infrastructure, access must be</p>	<p>the level of flood risk associated with its location in 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>2. 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>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 Zone 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</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>e. 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>3. 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>4. 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 measures 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>5. 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>6. 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 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.</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>7. 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>8. 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"> 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. <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>Policy EM5 Sustainable Drainage Systems (SuDS)</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>Policy EM5 Sustainable Drainage Systems (SuDS)</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"> 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. <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 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.</p> <p>Flood and Water Management Act (FWMA) 2010 or future equivalent.</p>	
EM6	<p>Policy EM6: Redevelopment of Previously Developed Land</p> <p>1. Development will be permitted where proposals do not have a</p>	<p>Policy EM6 Redevelopment of Previously Developed Land</p> <p>1. Development will be supported 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>2. 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>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>	<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 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.</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>Policy EM7 Air Quality</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>Policy EM7 Air Quality</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 should 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>2. 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>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);</p> <p>c. 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>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:</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>3. 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>3. A Supplementary Planning Document will be developed to support this Policy.</p>		
EM8	<p>Policy EM8 Waste Management</p> <p>1. The Council's Waste Management Strategy will be supported through:</p> <p>a. encouraging less consumption of raw materials through the reduction and re-use of waste products;</p> <p>b. a requirement for development proposals to incorporate adequate storage for waste and recycling services along with safe access for collection vehicles;</p> <p>c. encouragement of new methods of processing and recycling at waste management sites;</p> <p>d. supporting recycling proposals for aggregate materials subject to the criteria in part 2 of this policy;</p> <p>e. 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>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.</p> <p>2. Proposed new or expanded waste management facilities will be assessed against the following criteria:</p> <p>a. The effect of the proposed waste facility upon the environment and neighbouring land uses;</p> <p>b. The impact of traffic generated by the proposal and the availability of alternative transit modes, such as rail and waterways;</p> <p>c. The need for pollution control measures appropriate to the type of waste to be processed or handled;</p> <p>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</p>		

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
	<p>approved in close proximity to existing housing;</p> <p>e. The effect of proposals on aircraft safety; and</p> <p>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.</p> <p>3. Proposals will be supported where it is demonstrated that these criteria are satisfied.</p> <p>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</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>Policy EM9 Safeguarding Mineral Resources</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>Policy EM10 Non Mineral Development in Mineral Safeguarding Areas</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	New Policy	<p>Policy EM11: Energy Infrastructure</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>Evidence: 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/m²/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"> 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. 	

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 viable¹, it should be demonstrated that the amount of on-site renewable energy generation equates to >114.9 kWh/m² 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>	

¹ 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>Policy EM12 Reducing operational carbon in new build non-residential development</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"> - Offices: ≥25% - Schools: ≥35% - Industrial buildings: ≥45% - Hotels (C2, C5) and residential institutions (C2, C2a): ≥10% - Other non-residential buildings: ≥35% <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"> - Total Energy Use: 65 kWh/m2/year - Space heating demand: 15 kWh/m2/year. <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>Evidence: 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 viable², it should be demonstrated that the amount of on-site renewable energy</p>	

² 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 >114.9 kWh/m²projected 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 m² 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>Policy EM13 Overheating in new buildings</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"> - Building orientation; - Shading; 	<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"> - Albedo; - Fenestration; and - Insulation. <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>Evidence: Carbon policy support evidence base and policy recommendations study 2024</p>
EM14	New Policy: Embodied carbon and waste	<p>Policy EM14 Embodied carbon and waste</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>Evidence: Carbon policy support evidence base and policy recommendations study 2024</p>
EM15	New Policy: Noise	<p>Policy EM15 Noise</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"> - 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.

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
			<ul style="list-style-type: none"> - 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.
C1	<p>Policy C1: 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>3. Developers are required to work with a recognised network carrier to design a bespoke duct network, for the development.</p> <p>4. 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>Policy C2: Telecommunications</p> <p>1. When considering notifications, planning applications and prior approval applications, regard will be given to the following factors:</p> <p>a. 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. 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>c. the potential for sharing existing masts, buildings and other structures;</p> <p>d. the impact of the development on its surroundings with particular regard to the following criteria:</p> <ul style="list-style-type: none"> the visual amenity, character of area, apparatus and associated structures sited and designed in order to i. appearance of the host building ii. unacceptable effect on conservation areas, historic interest or areas of ecological interest or sites of archaeological importance and landscaping. <p>2. 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>Policy CC1 (Part A) Coventry City Centre – Development Strategy</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"> •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 	<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>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.</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"> •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 <p>Contributing to the key aims, vision and objectives of Coventry City Council.</p> <p>Policy CC1 (Part B) – Green and Blue Infrastructure</p> <ul style="list-style-type: none"> a.New development will be expected to maintain the quantity, quality and functionality 	

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>CC1 (Part C) Drainage & Flood Risk</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>Policy CC1 (Part D) – Environmental Management</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>Policy CC1 (Part E) – City Centre Character Area</p> <ul style="list-style-type: none"> • 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. <p>The Friargate Area</p> <ol style="list-style-type: none"> 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: 	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<ul style="list-style-type: none"> • Office Development • High quality City Centre Residential Dwellings • Leisure and recreation uses, including hotels; • Social and community uses; • Provisions for public transport infrastructure. <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>Cathedral and Cultural Area</p> <ul style="list-style-type: none"> 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. 	

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>Civic Area</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"> • High Quality Residential Dwellings • Social and community uses; • Leisure and recreation uses; • Educational uses, including new university and research provisions; • Office use; <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>Far Gosford Street Area</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>Stoney Stanton Road Area.</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"> • reflect and enhance the area's character through mixed-use developments; 	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<ul style="list-style-type: none"> •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; <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>Corporation Street Area</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>Mixed Use Core 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>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;</p>	

Policy reference	Adopted Local Plan Policy wording	Proposed new wording (if applicable)	Explanation
		<ul style="list-style-type: none"> •Research and Development activity; •Other Education facilities; •Residential provision; •Leisure and recreation uses; •Social and community uses; •Office use; •Car parking; <p>b. Improvements in pedestrian connections from the area around Junction 5 toward London Road Cemetery to the South will be encouraged</p> <p>University and Enterprise Area</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"> 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. 	

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>Northern Regeneration Area</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"> •Office; •Retail and commercial; •Social, community and leisure uses; 	

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>The Warwick Row Area</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>Policy IM1: Developer Contributions for Infrastructure</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>Policy IM1: Developer Contributions for Infrastructure</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>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.</p> <p>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.</p>	<p>on viability grounds must be accompanied by a detailed Viability Assessment.</p> <p>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.</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>Policy CC1: Coventry City Centre – Development Strategy</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"> •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 	<p>Policy CC1 (Part A) Coventry City Centre – Development Strategy</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"> •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 	<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 13th 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"> •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 in accordance with the policies in the Area Action Plan; •Recognising and preserving key views to the iconic three spires of St. Michaels, Holy Trinity and Christchurch; and 	<p>accessible through the creation of desirable and legible pedestrian routes;</p> <ul style="list-style-type: none"> •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 	

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"> •Supporting the reintroduction of green and blue infrastructure throughout the city centre, including opportunities for deculverting wherever possible. 	<p>Design Guide and View Management Framework SPD</p> <ul style="list-style-type: none"> •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 	
CC2	Policy CC2: Enhancement of Heritage Assets	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>Policy CC3: Building Design</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>Policy CC4: Public Art</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>Policy CC5: Lighting</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>Policy CC6: Public Realm</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 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>Policy CC7: Tall Buildings</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>Policy CC8 – Green and Blue Infrastructure</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>Policy CC1 (Part B) – Green and Blue Infrastructure</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. 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 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>Policy CC9: Drainage & Flood Risk</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>CC1 (Part C) Drainage & Flood Risk</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>Policy CC10 – Environmental Management</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 CC1 (Part D) – Environmental Management</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. (CLR11).</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>Policy CC11: Accessibility</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"> • 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. <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"> a.Infrastructure which supports the intelligent mobility agenda; b.The inclusion of public transport infrastructure; c.The development of Mobility Hubs; d.The delivery of the Coventry Station Masterplan; e.The provision of high quality cycle parking; and f.The development of Rapid Transit. 		

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"> • Salt Lane car park (See policy CC13); • Cheylesmore / New Union Street car parks (See policy CC14); • Bishop St car park (See policy CC25); • Whitefriars St car park (See policy CC14); • Leicester Row Car Park; • Cox St Car Park (See policy CC25); • Christchurch House Car Park (See policy CC14). <ul style="list-style-type: none"> • Far Gosford St car park; • *Gosford Street car park; • Grosvenor Road car park (See policy CC12); • *Grove Street car park; • Barracks Car Park (See policy CC19) • City Arcade car park <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"> •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. •The redevelopment and improvement of surface level car parks will be prioritised. •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. <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>Policy CC12 Friargate</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"> •Leisure and recreation uses, including hotels; •Social and community uses; •New multi-storey car parking; and •Provisions for public transport infrastructure delivered in accordance with the Station Masterplan and NUCKLE project <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>Policy CC13 Cathedrals and Cultural Area</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>Policy CC14 Civic Area</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"> •Social and community uses; •Leisure and recreation uses; •Educational uses, including new university and research provisions; •Office use; •Residential development; and •New multi-storey car parking. <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>Policy CC15 Far Gosford Street Area</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>		

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	wider green linkages beyond the city centre boundary, especially towards the Heritage Park at Charterhouse.		
CC16	<p>Policy CC16 Health and Education Area</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"> •Education provisions; •Public Health provisions; •Residential development; •Social and community uses; and •Green and blue infrastructure <p>b.All prospective developments should:</p> <ul style="list-style-type: none"> •reflect and enhance the area's character through mixed-use developments; •ensure a mix of residential densities where appropriate; 	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"> •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 impacts of the Ring Road; <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>Policy CC17 Leisure and Entertainment Area</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"> 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. c. Development for at least 325 homes on vacant land between Bond Street, Hill Street and Ryley Street (1) will be supported subject to: 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 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 		

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	<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> <p>o.</p> <p>p. Opportunities to improve the linkages between:</p> <p>q. Spon Street and the Primary Shopping Area;</p> <p>r. Belgrade Plaza and the Primary Shopping Area; and</p> <p>s. Belgrade Plaza with the Northern Regeneration Area</p> <p>t. Improvements to the Ring Road underpass and Spon End.</p> <p>u. will be promoted and encouraged. Where appropriate these improved linkages should be incorporated into, or supported by, new development proposals.</p>		
CC18	<p>Policy CC18: The Primary Shopping Area</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</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>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>		

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CC19	<p>Policy CC19: Primary Shopping Area regeneration – South</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"> •An increase of at least 10,000sq,m gross retail floor space •A range of shop sizes that reflect market requirements; •High quality entrances from the Precinct, Queen Victoria Road and Bull Yard; •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; •The relocation of the listed mural situated in Bull Yard to a new and prominent site situated within the new development; and 	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"> •The retention of the listed market building, with improvements made to its setting and connectivity to Queen Victoria Road and Market Way •Associated residential provision of at least 40 homes as part of upper floors above retail uses. •Complimentary leisure, office and hotel uses as part of upper floors above retail uses. 		
CC20	<p>Policy CC20: Primary Shopping Area regeneration – North</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"> •An increase of at least 10,000sq,m gross retail floor space •A range of shop sizes that reflect market requirements; •High quality entrances at Smithford Way and Corporation Street; 	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"> •Enhanced linkages to Belgrade Plaza and Spon Street. •Associated residential provision of at least 300 homes as part of upper floors above retail uses. •Associated leisure, office and hotel uses on upper floors above retail uses. 		
CC21	<p>Policy CC21: Cathedral Lanes</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>Policy CC22: Primary and Secondary Frontages</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	Policy CC23: Technology Park Area - Parkside	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"> •Hi-Tech industry use; •Research and Development activity; •Other Education facilities; •Residential provisions; •Leisure and recreation uses; •Social and community uses; •Office use; •New multi-storey car parking; <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>		<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.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"> •land East of Cheetah Road (2); •land situated bounded by Mile Lane and Puma way (3); •The site of the former Formula One hotel (4) •Land south of Parkside (5) <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>Policy CC24 University and Enterprise Area</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"> 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; and VI. Multi-story car parks (subject to evidence of need). <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"> •Jordan Well/Gosford Street to Far Gosford Street (7); •Gulson Road and the River Sherbourne (8); and •Cox Street between the junction with Fairfax Street and junction with Jordan Well (9) 		
CC25	Policy CC25: Regeneration Areas	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"> • Office; • Retail and commercial; • Social, community and leisure uses; • Education uses (including those linked to the university); <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>Policy CC26: The Warwick Row Area</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>AAP Policy CC1 (Part E) – City Centre Character Areas</p> <ul style="list-style-type: none"> • 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 	<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>The Friargate Area</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"> • Office Development • High quality City Centre Residential Dwellings • Leisure and recreation uses, including hotels; • Social and community uses; • Provisions for public transport infrastructure. 	

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>Cathedral and Cultural Area</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>Civic Area</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"> • High Quality Residential Dwellings • Social and community uses; • Leisure and recreation uses; • Educational uses, including new university and research provisions; • Office use; <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>Far Gosford Street Area</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>Stoney Stanton Road Area.</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"> •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; <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>Corporation Street Area</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>Mixed Use Core - 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>Parkside Area</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"> •Hi-Tech industry use; •Research and Development activity; •Other Education facilities; •Residential provision; •Leisure and recreation uses; •Social and community uses; 	

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"> •Office use; •Car parking; <p>b. Improvements in pedestrian connections from the area around Junction 5 toward London Road Cemetary to the South will be encouraged</p> <p>University and Enterprise Area</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"> 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. <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>Northern Regeneration Area</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"> •Office; •Retail and commercial; •Social, community and leisure uses; •Education uses (including those linked to the university); <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>The Warwick Row Area</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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Public report
Cabinet

Cabinet
Council

10th December 2024
14th January 2025

Name of Cabinet Member:
Cabinet Member for Housing and Communities – Councilor N Akhtar

Director Approving Submission of the report:
Director of Adult Services and Housing

Ward(s) affected:
All

Title: Agreement and Adoption of the Homelessness and Rough Sleeping Strategy 2025-29

Is this a key decision?

Yes - the proposals are likely to have a significant impact on residents or businesses in two or more electoral wards in the city

Executive summary:

There is a statutory duty on all Local Authorities in England to publish a Homelessness and a Rough Sleeping Strategy following a review of homelessness in their area every 5 years.

Following engagement with key stakeholders and people who use the homeless service as well as using the findings from the latest homelessness review 2024, a strategy has been developed for the period 2025 - 2029 (the “Strategy” set out at Appendix A to the report) detailing how the City Council’s responsibilities will be delivered. The results of the consultation that was undertaken are summarised in Section 3 of this report and as Appendix C to the report.

The Homelessness and Rough Sleeping Strategy (2025 - 2029) focuses on three main themes:

- Early intervention and prevention
- Targeted and crisis support
- Move on and tenancy sustainment

And is underpinned by 4 key principles:

- Partnership
- Intelligence led
- Improving life chances and health outcomes
- Maximizing opportunities.

The Strategy is supported by a delivery plan that will remain a live document and be monitored and delivered by the City Council and its relevant partners.

Recommendations:

Cabinet is recommended to request that Council:

- 1) Note the consultation responses received to the draft homelessness and Rough Sleeping Strategy 2025/2029 (set out at Appendix C to the report).
- 2) Adopt the new Homelessness and Rough Sleeping Strategy (2025/29), (set out at Appendix A to the report), and the supporting Delivery Plan (set out at Appendix B to the report).
- 3) Delegate responsibility to the Director of Adults and Housing and Director of Finance and Resources, following consultation with the Cabinet Member for Housing and Communities, to make variations and updates to the Homelessness and Rough Sleeping Delivery plan.

Council is requested to:

- 1) Note the consultation responses received to the draft homelessness and Rough Sleeping Strategy 2025/2029 (set out at Appendix C to the report).
- 2) Adopt the new Homelessness and Rough Sleeping Strategy 2025/29, (set out at Appendix A to the report), and the supporting Delivery Plan (set out at Appendix B to the report).
- 3) Delegate responsibility to the Director of Adults and Housing and the Director of Finance and Resources, following consultation with the Cabinet Member for Housing and Communities, to make variations and updates to the Homelessness and Rough Sleeping Delivery plan.

List of Appendices included:

The following appendices are attached to the report:

Appendix A – Homelessness and Rough Sleeping Strategy
Appendix B – Delivery plan
Appendix C - Consultation report
Appendix D – Equality Impact Assessment
Appendix E - Coventry City Council Homelessness review 2024

Background papers:

None

Other useful documents

N/A

Has it or will it be considered by Scrutiny?

The draft Homelessness and Rough Sleeping Strategy was considered by the Communities and Neighbourhoods Scrutiny Board (4) at its meeting on 5th September 2024 and resolved that the Board 1) Agree the priorities and themes within the new strategy and 2) Supports the draft strategy and the development of a comprehensive action plan that will deliver the key priorities and themes.

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

No

Will this report go to Council?

Yes - 14th January 2025

Report title: Agreement and Adoption of the Homelessness and Rough Sleeping Strategy 2025/29

1. Context (or background)

- 1.1. The council has a statutory duty to carry out a periodic review of homelessness in the area and to publish a Homelessness Strategy. The current Housing and Homelessness Strategy was published in 2019 and runs until 2024. It was aimed at providing a high-level plan to set out the main priorities for the Council and its partners for the life of the strategy, to guide the allocation of resources and investment, and provide a framework to inform project development, to achieve the vision that:
 - *Coventry Citizens will be able to access a suitable, affordable, and decent home, with the support they need to sustain their housing.*
- 1.2. In 2019 when the new strategy was developed the previous Homelessness Strategy and Housing Strategy were combined into one document, this was done as it was recognised that activities to prevent homelessness were to a degree dependent on the availability of permanent housing.
- 1.3. Coventry published its first Rough Sleeping Strategy in December 2019, in line with a requirement by the Government for all areas to have a strategy to prevent and tackle rough sleeping. From the outset it was accepted that the successful delivery of the Rough Sleeping Strategy and Action Plan was not in the Council's power alone. Therefore, a One Coventry partnership approach was adopted as the only way that we will be able to ensure successful realisation of our vision, therefore the strategy needed to be owned, supported, and delivered by ensuring effective collaboration and partnership working.
- 1.4. The Rough Sleeping Strategy and its Action Plan were reflective of and intrinsically linked to the Council's Housing and Homelessness Strategy at that time. The two strategies needed to be considered and delivered in tandem. The Housing and Homelessness Strategy set the vision for housing in the city and our priorities whilst the Rough Sleeping strategy detailed specific and targeted interventions for those who were rough sleeping.
- 1.5. The Homelessness element of the previous Housing and Homelessness Strategy has now been combined with the Rough Sleeping Strategy, creating a new Homelessness and Rough Sleeping Strategy.
- 1.6. The new combined Homelessness and Rough Sleeping Strategy focuses on what we as a local authority are doing to prevent people from becoming homeless, what we are doing when people find themselves homeless and how we are supporting people to end their homelessness. There is a focus on partnership alongside how we can ensure we are improving life chances and health outcomes for those affected by homelessness.

2. Options considered and recommended proposal

2.1. **Option 1 – Recommended option - To adopt and implement the Rough Sleeping Strategy and Action Plan.** This option is the recommended option. It meets the statutory requirement to publish a Homelessness and Rough Sleeping Strategy, and its creation has taken in the views and comments of the public, key stakeholders and the views of people with experience of homelessness. A partnership approach was used to develop the draft document and once agreed it will form the basis of a co-ordinated and creative work across the city to address homelessness in all its forms.

2.2. **Option 2 – Not recommended. To not adopt the Homelessness and Rough Sleeping Strategy and action plan.** This is not recommended as an option. There is a statutory duty on all Local Authorities to have a published Homelessness and Rough sleeping strategy.

3. Results of consultation undertaken

3.1 The development of the Homelessness and Rough Sleeping Strategy and delivery plan was carried out in partnership with key external and internal stakeholders as well as people with lived experience of homelessness. There were also discussions at the Coventry Homelessness Forum as well as workshop sessions that were held with key agencies directly working with and supporting people who are homeless and rough sleeping. These sessions considered the current position, what the collective vision was for homelessness and rough sleeping in Coventry and what actions would be needed to achieve the vision.

3.2 As part of consultation on the strategy it was shared with and presented to a number of key forums both internally and externally including:

- The Marmot Partnership
- The Coventry Care Collaborative
- The Integrated Care Board Inequalities Forum
- The Coventry Homelessness Forum (with direct invitations for members to comment and feedback)
- Coventry City Council's Housing and Homelessness front line staff and managers

3.3 A public consultation exercise was also carried out on the identified key themes and principles set out in the strategy.

3.4 The survey was created on the Let's Talk platform and the consultation was open for a period from 23rd August 2024 to the end of September 2024 and was promoted via a newsletter on 10th September that was delivered to 7,182 recipients.

3.5 The survey was completed by 48 individuals/organisations, the Draft Homelessness and Rough Sleeping Strategy was downloaded 62 times, and the Review document had 57 downloads.

- 3.6 The key messages and findings that came out of the consultation were:
- Most responses were from members of the public (31)
 - 1 in 5 responses were on behalf of a charity, voluntary or community sector organisation (10)
 - All the priorities received agreement of over 96%
 - Common themes from the open-ended comments received, focused on, the need for holistic support, and that different groups needed different support.
 - Partner organisations will be key to delivering this strategy.
 - Questions were raised whether we were making best use of accommodation opportunities such as repurposing student blocks.
 - All the principles received agreement.
 - A need to focus on actions on how they are going to implement the principles.
- 3.7 These findings have been considered and incorporated where appropriate into the body of the strategy and the delivery plan.

3. Timetable for implementing this decision

- 4.1 If the recommendations in this report are approved, the Homelessness and Rough Sleeping Strategy would be adopted and come into effect from 1st January 2025.

4. Comments from the Director of Finance and Resources and the Director of Law and Governance

5.1 Financial Implications

The recommendations in this report will not incur any additional financial implications and will be managed within existing resources.

Elements of the Homelessness and Rough Sleeping Strategy and Action Plan may have financial implications. These will be subject to further Cabinet and Council reports as appropriate or subject to individual business case reports as necessary.

Funding to resource the work set out in the Homelessness and Rough Sleeping Strategy is a mixture of core and grant funding. The service receives several grants from MHCLG including Homeless Prevention Grant and Rough Sleeping Initiative (RSI) funding. Grant allocations for Coventry post 31st March 2025 are yet to be confirmed, and any reduction or growth in overall funding would necessitate changes to services as defined by the grant conditions.

5.2 Legal Implications

Adoption of the Homelessness and Rough Sleeping Strategy (2025/29) ensures compliance with the Homelessness Act 2002 which requires all housing authorities to develop and publish a homelessness strategy based on a review of all forms of homelessness within their district.

The Homelessness Code of Guidance for Local Authorities, published by MHCLG clarifies that this means a strategy for:

- a) Preventing homelessness in the district
- b) Securing that sufficient accommodation is and will be available for people in the district who are or may become homeless
- c) Securing the satisfactory provision of support for people in the district who are or may become homeless or who have been homeless and need support to prevent them becoming homeless again.

The Code also states that “Housing authorities must consult public or local authorities, voluntary organisations or other persons as they consider appropriate before adopting or modifying a homelessness strategy. Housing authorities will also wish to consult with service users and specialist agencies that provide support to homeless people in the district.”

Failure to have an updated Homelessness Strategy may impact the Council’s ability to defend challenges to decisions made under the Housing Act 1996 as amended by the Homelessness Reduction Act 2017. In accordance with s1(4) of the 2002 Act the Council must ensure that the new homelessness strategy is published within the period of five years beginning with the day on which the last homelessness strategy was published; failure to do so would mean that the council has not complied with its legal obligation.

5. Other implications

6.1 How will this contribute to the One Coventry Plan?

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

The adoption of the new Homelessness and Rough Sleeper Strategy will contribute to meeting the priorities in the One Coventry plan particularly in relation to:

- Improving outcomes and tackling inequalities within our communities.

6.2. How is risk being managed?

There are no specific risks from the decision to adopt the Homelessness and Rough Sleeping Strategy.

6.3. What is the impact on the organisation?

The adoption of the new strategy will ensure the council meets its statutory duty to publish its Homelessness and Rough Sleeping Strategy. It will also provide a formal platform to work with partners to further address homelessness and rough sleeping in the city and provide support to people who are currently homeless or at risk of homelessness.

6.4. Equalities / EIA?

By having a shared partnership approach to address homelessness and rough sleeping in Coventry, it will improve the wellbeing and life chances of people with protected characteristics, who are homeless or at risk of being homeless, and it will, therefore, have a positive impact.

In the development of the Homelessness and Rough Sleeping Strategy the Council have had due regard to the public sector equality duty under s149 of the Equality Act 2010.

An Equalities Impact Assessment Analysis (EIA) was carried out during the development of the Draft Housing & Homelessness Strategy 2025-29 (Appendix D to the report).

The outcome of the EIA is that the Homelessness & Rough Sleeping Strategy (2025-29) will have a positive impact of groups with protected characteristics. By Recognising homelessness as part of a wider system of inequalities, we will seek to improve life chances and health outcomes, through our partnership approach to tackling homelessness and joining systems up. This will include:

- Raising awareness of the impact of homelessness on health and wellbeing outcomes, including how homelessness can exacerbate existing problems, issues and support needs, particularly in relation to mental health.
- Carry out specific initiatives around health and wellbeing for homeless households as well as ensuring our approach to preventing homelessness and supporting households into settled sustainable accommodation provides a basis upon which they can thrive.
- Working in partnership with all agencies and organisations responsible for health and care services when there is a risk of homelessness, or it is the presenting issue.

The results of the formal round of consultation did flag a number of key points in relation to equalities, including:

- It will be important to ensure monitoring of key household characteristics to ensure trends and issues can be tracked and monitored through the Homefinder system and housing decisions.
- The strategy will provide more support to vulnerable citizens and help provide better quality accommodation.
- There are national issues that the council cannot influence that may continue to have negative impacts on vulnerable households – e.g. benefit reform and universal credit.
- The need to make information available in other languages.
- Need to do more to help homeless households into work.

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

No impact

6.6. Implications for partner organisations?

There are positive implications for partner organisations. The Homelessness and Rough Sleeping Strategy highlights the role of partner organisations and the importance of collaborative working. A number of the actions set out in the delivery plan will be delivered in partnership.

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Jim Crawshaw	Head of Housing and Homelessness	Adult Services and Housing	6/11/2024	07/11/24
Names of approvers for submission: (officers and members)				
Chris Whiteley	Finance Manager	Finance and Resources	6/11/2024	12/11/2024
John Redfern	Corporate and Commercial Lawyer	Law and Governance	6/11/2024	12/11/2024
Pete Fahy	Director of Adult Services and Housing	-	08/11/24	14/11/2024
Barry Hastie	Director of Finance and Resources (S151)	-	15/11/24	19/11/2024
Councillor N Akhtar	Cabinet Member for Housing and Communities	-	15/11/24	18/11/2024

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



Homelessness and Rough Sleeping strategy 2025/29



Homelessness and Rough Sleeping Strategy 2025- 2029

Draft

1. Preface

Housing is fundamental to the wellbeing of people, their families, and their communities. Decent housing provides a stable base on which people can build their lives and build successful communities. Poor or unsuitable housing, however, can have negative impacts on many other areas of personal and community life as well as physical and mental health and wellbeing. If you do not have decent housing, everything else becomes much more difficult. Improving housing options, conditions, and neighbourhoods within the city is essential for economic growth, improving outcomes for residents and children including their educational attainment, health and wellbeing, and community cohesion.

Coventry's new Homelessness and Rough Sleeping Strategy sets out the vision, strategic direction, and priorities for the city for the next five years.

It has been co- produced with customers, partner organisations and stakeholders.

The strategy supports Coventry City Council's corporate priorities and is reflective of the One Coventry vision for the city. It complements other strategies and programmes that support independence, and targets help at the most vulnerable. It is compliant with key legislation that sets out the Council's duties in respect to homelessness and rough sleeping. The strategy ensures we deliver on the requirements to prevent homelessness, provide support, and ensure sufficient accommodation is available.

Information about the local context and the challenges our customers face is provided in the most recent homelessness review which has been used to inform this strategy and should be read in conjunction with the Strategy.

2. Background

Coventry City Council no longer owns its own housing, having transferred its stock to Whitefriars Housing Group (now Citizen Housing) in 2000. However, the Council still has strategic housing responsibilities and a duty to carry out a periodic review of homelessness and to publish a Homelessness & Rough Sleeping Strategy.



2.1. Housing and Homelessness Strategy 2019-2024

The current Housing and Homelessness Strategy was published in 2019 and runs until 2024. Its aim is to provide a high-level plan to set out the main priorities for the Council and its partners for the life of the strategy, to guide the allocation of resources and investment, and provide a framework to inform project development to achieve the vision that:

- Coventry Citizens will be able to access a suitable, affordable, and decent home, with the support they need to sustain their housing.

In 2019 when the current strategy was developed the previous Homelessness Strategy and Housing Strategy (2014-2019) were combined into one document. The rationale of this decision was that it was recognised that activities to prevent and relieve homelessness were to a certain degree dependent on the availability of permanent housing.

Whilst great achievements have been seen and the delivery of the housing and homelessness function and strategy have moved, developed, and changed since its initial publication, we have also seen a shift in terms of some of the priorities and the challenges that sit alongside these.

Rather than combine strategies in the way we did in 2019 this strategy has a specific focus on homelessness and rough sleeping as key issues.

The Covid pandemic has changed the way we operate and deliver homeless services in the city. Our teams began working from home in the early stages of the pandemic and, now a model of hybrid working with a combination of in person work and remote (home working) has become the norm. This has meant that online contact and telephone based work has replaced much of what was done in person. Working this way also makes us more accessible for some as residents are not required to attend our premises in order to engage with us. There will always be people do not have access to the appropriate technology to engage remotely, or prefer face to face contact, so the option to come into the office and meet in person remains open to them.

The financial crisis is having a significant effect on households in the city. Many people are faced with making a choice between rent, heating, and food. We have seen an increase in people approaching for homelessness support both nationally and locally, with the top 3 reasons for homelessness being in line with national and historical trends.

The implementation of the Homelessness Reduction Act (2017) in 2018 changed the way that homelessness services are delivered by local authorities. There have also

been further changes to legislation, such as the Domestic Abuse Act, which placed further duties on local authorities to provide temporary accommodation to all who are homeless because of domestic abuse. The decision to leave the European Union has also been an influential factor, and changes made as part of the UK's withdrawal from Europe have impacted on who is eligible to receive homelessness assistance.

The culmination of these factors alongside other challenges such as the Local Housing Allowance falling some way short of local rental values, has resulted in the council seeing greater numbers of households approaching for assistance and support than we have previously experienced.

2.2. Rough sleeping Strategy and action plan 2019-2024

Coventry published its first Rough Sleeping Strategy in December 2019, in line with a requirement by the Government for all Local Authorities to have a strategy to prevent and tackle rough sleeping. From the outset it was accepted that the successful delivery of the Rough Sleeping Strategy and Action Plan was not in the Council's power alone. Therefore, a partnership approach is the only way that we will be able to ensure successful realisation of our vision, therefore the strategy needed to be owned, supported, and delivered by ensuring effective collaboration and partnership working.

The Rough Sleeping Strategy and its Action Plan were reflective of and intrinsically linked to the Council's Housing and Homelessness Strategy. The two strategies were considered and delivered in tandem at this point in time where the Housing and Homelessness Strategy set the vision for housing in the city and our priorities as well as preventing and tackling homelessness.

Since the approval of the strategy in 2019 there has been a world-wide pandemic. Obviously, this has had a number of serious and negative impacts on individuals and society as a whole. In regard to rough sleeping there have been a number of positive outcomes in regard to our ability to accommodate and support some of the most entrenched rough sleepers in Coventry. The impact of this can be seen in the number of people accommodated as part of the 'Everyone-In' initiative.

The current Rough Sleeping strategy was reviewed during 2022 to reflect the shifts that had happened as a result of the covid 19 pandemic and the increased funding and support that was being provided for those rough sleeping or at risk of rough sleeping.

Achievements and Impact from the previous strategies



Since adopting the last strategy in 2019 we have seen a number of changes and impacts on homelessness and rough sleeping in Coventry, these include but are not limited to:

- The Homelessness Reduction Act duties have been fully integrated into the homelessness service.
- Recruitment of Head of Housing, Housing and Homelessness Operational Lead (Accommodation Team) and Housing & Homelessness Commissioning and Partnerships Lead – as a result housing and homelessness is led at the appropriate level to drive forward continuous improvement in the service
- Creation and expansion of Rough Sleeper Outreach Team who carry out outreach 5 mornings per week – as a result of this we have regular face to face to contact with rough sleepers in the city and have built a number of trusting relationships. This enables us to provide better support rough sleepers when they are on the street and respond quickly when there is a change in circumstances
- Creation of additional accommodation options for rough sleepers including short-, medium- and long-term provision – as a result should any one rough sleeping want to be off the street, even for a night, we can respond to this. Spending nights off the street can provide a useful first step to considering moving into more permanent accommodation.
- Creation of the Temporary Accommodation Team- which has enabled us to purchase our own temporary accommodation and ensure the use of B&B accommodation for families is minimised.
- Created our own internal Supported temporary accommodation offer (STA) for those who are most vulnerable, with on-site wrap around support which means individuals are supported to address the wider challenges that impact upon their homelessness.
- The Service adapted and continued to deliver services during the Covid-19 pandemic and restrictions.
- Regular training is provided to various council services and external partners in relation to homelessness and rough sleeping which has resulted in better joined up support for individuals who find themselves homeless.
- There has been a Redesign of the Coventry Homelessness Forum which now has in excess of 100 members on the mailing list and is chaired by someone with lived experience of homelessness.
- A Co-creation panel was set up for those with lived experience of homelessness – as a result we are listening, in a structured way, to the experience of people who have been or are homeless which enables us to



ensure the support we offer is relevant to the needs of the homeless community.

- The housing related support services were recommissioned and launched in April 2020 – the redesign of the provision has meant that support is provided at multiple points of someone’s homelessness, including early intervention and tenancy sustainment
- Carried out a full review of our home finder policy which now means that we are more effectively allocating our housing stock based on housing need.

Operating environment

Since 2019 homelessness has increased both nationally and locally. The pandemic has had devastating impacts on our communities, affecting their health, causing social and economic disruption. More recently, the cost of living has increased steeply, and previous economic downturns suggest the impact of an economic crisis on homelessness presentations will be seen over two or three years

Since 2010 Councils have faced a significant reduction to core funding from the Government and more recently have seen significant increases in costs as a result of the high rates of inflation alongside increasing demand for services. Many of our partners have also experienced these issues and there is an ongoing need for efficiencies and savings.’

There has been significant national investment into Rough Sleeper services which has made a significant impact to our ability and capacity to support rough sleepers, but this funding is time limited and currently confirmed up to 31 March 2025 only.

When people do need to move, their housing options are limited. Average private rents in Great Britain have risen to record highs, with annual rental growth in hotspot locations, specifically Coventry increasing by 19.5% between Q1 2023 and Q1 2024 <https://www.rightmove.co.uk/news/content/uploads/2024/04/Rental-Trends-Tracker-Q1-2024-FINAL.pdf>

Homelessness and rough sleeping go beyond housing. They affect mental wellness, physical health, independence, self-esteem, and life choices. Without homes and the sense of community they can provide, it is easy to feel isolated and alone.

We realise how hard it is to ask for help and how easy it can be to feel defined by the label of homeless or rough sleeping. This strategy is not about simply ticking boxes, assigning labels or making assumptions about why somebody needs our help. At its heart, it is about breaking stigmas to understand and support people out of homelessness. We will work hard to see the stories behind the situation people find



themselves in. Losing a tenancy and or being unable to find suitable and safe accommodation can be a frustrating and traumatic experience. It is therefore important that we focus on preventing people who are at risk of homelessness from losing their homes. We want to move beyond a reactive response. We will focus on reducing population-wide risks of homelessness by developing stable, supportive and inclusive environments. The longer someone is homeless, the greater the risk of worsening physical and mental health problems. It is crucial that we intervene as early as possible to provide support and work quickly to help people find a suitable home or where appropriate remain in their current accommodation and preventing homelessness. It is also important that when we intervene, the support we provide ensures long-term solutions and reduces the risk of repeat homelessness.

3. The New Homelessness and Rough Sleeping Strategy

Homelessness and rough sleeping are part of wide set of challenges.

The legal definition of homelessness is that a household has no home in the UK or anywhere else in the world available and reasonable to occupy. The following housing circumstances are examples of homelessness:

- Rooflessness (without a shelter of any kind, sleeping rough)
- Houselessness (with a place to sleep but temporary, in institutions or a shelter)
- Living in insecure housing (threatened with severe exclusion due to insecure tenancies, eviction, domestic violence, or staying with family and friends known as 'sofa surfing')
- Living in inadequate housing (in caravans on illegal campsites, in unfit housing, in extreme overcrowding)

The causes of homelessness are typically described as either structural or individual and can be interrelated and reinforced by one another. Causes and their relationship vary across the life course.

Structural factors include:

- Poverty
- Inequality
- Housing supply and affordability

- Unemployment or insecure employment
- Access to social security

Individual factors include:

- Poor physical health
- Mental health problems, including the consequences of adverse childhood experiences
- Experience of violence, abuse, neglect, harassment or hate crime
- Drug and alcohol problems (including when co-occurring with mental health problems)
- Bereavement
- Relationship breakdown
- Experience of care, prison or time serving in the Armed forces
- Refugees

For our new Strategy we will be focussing on Housing and Homelessness. This new strategy will consider interventions, services, challenges and accommodation provision for people who are homeless (in all its forms) or threatened with homelessness.

Through delivering our new strategy and action plan we will continue to meet the duties placed upon us by the Homelessness Reduction Act 2017 and the Housing Act 1996 (as amended). Preventing Homelessness is a critical due to the impact on lives of people affected by homelessness and the resource implications associated with responding to it. We will work in partnership with other providers and stakeholders to prevent and alleviate homelessness. The Positive Pathways model will be used as our roadmap for addressing homelessness and rough sleeping within the city, working in partnership with statutory services, commissioned partners, the voluntary and community sector, and people with lived experience of homelessness.

Over the next 5 years and beyond we want to ensure that we are equipped and able to focus on prevention and recovery – whilst still responding to crisis. We know that by working up stream to prevent people becoming homeless or those with a history of rough sleeping returning to the street and by ensuring people are supported in their recovery we will reduce the need for crisis intervention.



To achieve our prevention objectives and priorities it is crucial that we work in tandem with a range of partners including, NHS organisations, Ministry of Justice (MOJ), substance misuse services, advice agencies and internal partners as well as accommodation providers in the city to be able to identify and respond quickly to those on the cusp of homelessness and rough sleeping.

In terms of recovery, connecting people with services and into their communities is key to sustainability of both their home and their own well-being.

We will use data and qualitative information to inform our practices and priorities to ensure our approach is effective and achieves the best possible outcomes for the widest possible group.

3.1. Positive pathway

Everyone needs somewhere to live and good housing underpins success in other areas of a person's life. The Positive Pathway is about avoiding housing crisis and trying to work to ensure that homelessness is not part of people's life experiences. Too often different parts of the wider "systems" "work in 'silos', but homelessness relies on working together, not only within local authorities but also with other public bodies, voluntary organisations, individuals and families. The Positive Pathway framework does not look at housing and homelessness in isolation because addressing homelessness is more challenging than simply finding housing. The objective of the pathway is to move from a crisis response to upstream prevention and effective supply to help people move on from homelessness and tenancy sustainment.

Prevention and early intervention as defined in the positive pathway are an important part of this strategy. There are very real and re-occurring reasons why people are at risk of homelessness or end up homeless. The solution needs to be a cross-cutting, council-wide and collaborative, multi-agency approach. Some people also need more support than others to build skills and confidence to maintain a tenancy, so we want to make sure our housing pathways are simple, clear and effective. Whether you are a care leaver, somebody leaving an institution such as prison, a single person sleeping rough, or a family you should be able to find out and have a voice in your journey to a place you can call home.

Where homelessness cannot be prevented it is imperative that there is effective and appropriate targeted and crisis support, for anyone in Coventry whether through the council or one of its partners. Moving on from homelessness is challenging, there is significant demand and limited supply of available social and affordable rented

housing in the city. The difference between the Local Housing Allowance (LHA) rates in the city and the average rent means the private rented sector is difficult to access for those in receipt of benefits or low incomes.

Once a person has moved into accommodation, tenancy sustainment is key to breaking the cycle and the revolving door of homelessness. Therefore, we must ensure there are appropriate and robust move on options for people and we work collectively across the city to ensure tenancy sustainment.

4. Themes and Principles

In reviewing the evidence contained in the homelessness review and progress made against our previous strategy, we are confident that the priorities we agreed at that time were correct. However, we now need to update the approach to deal with the context of increases in homelessness, further reductions in public funding, and system wide issues.

This strategy and the resulting delivery and action plan is based on the principles of the positive pathway model and broken down into 3 over-arching themes. With in each theme a number of priorities have been identified, and these will be key to transforming the experience and outcomes of those at risk of homelessness, proactively addressing inequalities and dealing with gaps in service provision. Though the causes and experiences of homelessness differ for different groups and cohorts and responses will vary on a case-by-case basis the principles of the pathway model applies to all. We have also identified a number of cross cutting priorities that underpin both the themes and priority areas contained within each theme which will be considered and integrated into the delivery plan for the strategy.

4.1. Early intervention and Prevention:

We believe that everyone in Coventry should have a place to call home, we will minimise homelessness by focusing on early prevention and intervention to help people keep their home or move in a planned way. Ensuring people access services as early as possible increases the opportunities to prevent homelessness

4.2. Crisis and targeted support:

We will provide good quality accessible advice and support to ensure people can resolve their housing problems in a way that is resilient and long lasting. Where people do find themselves homeless and in need of emergency accommodation it will be of good quality, appropriate and conducive to their health and well-being.



Targeted support will be provided for individuals and households who need support and find themselves in crisis.

4.3. Move on and Tenancy sustainment:

There will be a focus on creating and increasing move on options for people and ensuring the right tools and support is in place to help people sustain tenancies once their homelessness has ended. Our focus will not just be in terms of bricks and mortar but will also consider and reflect the wider social detriments that impact someone's ability to secure and maintain a settled home.

4.4. Rough Sleeping

Rough sleeping is the most visible form of homelessness, therefore eliminating rough sleeping will run through our 3 overarching themes and will not be seen as a stand-alone theme. Though our interventions and responses maybe different, the aspiration to prevent rough sleeping, deal with crisis and support move on and tenancy sustainment is the same.

4.5. Principles

Underpinning the identified themes are the following 4 principles which will run through and underpin the priority areas and subsequent actions that will be taken to deliver the strategy:

- Partnership
- Intelligence led
- Improving life chances and health outcomes
- Maximising opportunities

4.6. Partnership

We recognise that partnerships are the key to preventing and relieving homelessness and to supporting people who are either homeless or facing homelessness. The causes of homelessness are multiple and complex and require solutions which reflect this and therefore we will ensure:

- We continue to engage partners across our public, business, voluntary and faith sectors, recognising the importance of each to coordinate a comprehensive approach to homelessness prevention that delivers sustainable outcomes for residents.

- We work to strengthen our existing partnerships, both with other services in the Council and with external organisations, as well as building new working relationships.
- Ensure partnership working underpins what we do by ensuring we are working with our partners to pool our knowledge, skills, and resources, to improve prevention methods and provide effective support whilst addressing system wide issues that are a barrier to good outcomes.
- Through strong partnership working we will provide a strong safety net for people who do become homeless and make sure they have the support they need to move on to permanent and sustainable new homes.
- We will work across the city in transparent and shared spaces with partners to ensure plans for people and projects are designed together and the most effective they can be, saving time and money while creating long standing change in provision and frontline service for those we find rough sleeping

4.7. Intelligence led

Our approach to tackling homelessness and rough sleeping will be intelligence-led, building on the work done through the homelessness needs assessment, with dashboards covering each of the priority areas, tracking trends and monitoring the impact of the implementation of the strategy. Focusing on the data;

- We will assess any new and emerging issues and ensure we understand how the Coventry picture compares regionally and nationally, ensuring our approach remains focussed on making a difference to our residents.
- Recognising that homelessness is not random, we will overlay this with wider factors to ensure that we have a holistic approach which enables us to direct our resources to provide support at the earliest stage possible.
- This will be supported by the experiences of people who have experienced homelessness, ensuring our approach is always shaped by their experiences and feedback around what works and what doesn't.

4.8. Improving life chances and health outcomes

Recognising homelessness as part of a wider system of inequalities, we will seek to improve life chances and health outcomes, through our partnership approach to tackling homelessness and joining systems up. This will include;



- Raising awareness of the impact of homelessness on health and wellbeing outcomes, including how homelessness can exacerbate existing problems, issues and support needs, particularly in relation to mental health.
- Carry out specific initiatives around health and wellbeing for homeless households as well as ensuring our approach to preventing homelessness and supporting households into settled sustainable accommodation provides a basis upon which they can thrive.
- Working in partnership with all agencies and organisations responsible for health and care services when there is a risk of homelessness, or it is the presenting issue.

4.9. Maximising opportunities

Homelessness and rough sleeping services operate against a complex back drop of legislation and policy which is ever emerging and developing

- We will ensure that where policy and legislation offer opportunities to change how we work we will embrace this whilst being bold and creative in our approach to finding solutions
- We will maximise any impact of changing legislation and policy ensuring that our services reflect changes and capitalise on the opportunities they offer including where funding is available.

5. Priorities (What we will do)

Our priorities for the coming 5 years have been developed through a process of engagement and consultation. We have talked with partners about the challenges we are facing in the city including the rising number of households requiring support. We have used feedback from customers to help identify what matters most to them and we have talked to internal stakeholders about the challenges they face in terms of their service areas in relation to homelessness and rough sleeping. This information, alongside our own knowledge of the current operating environment, has helped us identify the high-level thematic priorities which together with the cross-cutting principles will be the overarching framework for the Strategy delivery plan.

5.1. Early intervention and prevention



We believe that Everyone in Coventry should have a place to call home, we will minimise homelessness by focusing on early prevention and intervention to help people keep their home or move in a planned way.

1. We will move beyond a reactive response and focus on reducing individual and population-wide risks of homelessness across the city by providing timely, appropriate, and effective interventions to alleviate homelessness and help those sleeping rough.
2. We will work on building early intervention/early prevention approach with partners into all our interactions.
3. We will continually review our self-help offer via the website and self-help information available and ensure it is fit for purpose.
4. We will increase the awareness of duty to refer across the city and other services with regular stakeholder sessions to ensure customers get the right support at the earliest opportunity.
5. We will use our specialist in-house resources to increase visits to mediate with friends/family to increase prevention of homelessness and avoid the need for temporary accommodation.

We will work across the homelessness partnership to ensure we are making the best use of our resources to deliver Information Advice and Guidance (IAG).

5.2. Targeted and crisis support:

We will provide good quality accessible advice and support to ensure people can resolve their housing problems in a way that is long lasting. Where people do find themselves homeless and in need of emergency accommodation it will be of good quality, appropriate and conducive to their health and well-being. Targeted support will be provided for individuals and households who find themselves in crisis;

1. We will support rough sleepers across their period of homeless, ensuring rough sleeping is prevented wherever possible, that it is rare in occurrence, it is brief where it is unavoidable and re-occurrences or returns to rough sleeping are prevented.
2. We will provide a quick, responsive, flexible and creative approach to helping someone manage and end their rough sleeping and to be person centred, patient, persistent and creative in supporting people to maintain and not return to sleeping rough.
3. Where homelessness cannot be avoided, stays in temporary accommodation will be for as short a time as possible and placements will be suitable for the needs of the households.
4. We will ensure that pathways for all those that are homeless guarantee crisis and targeted support is available and accessible
5. Our provision of temporary accommodation will be sufficient to manage the demand and meet homelessness duties.



6. Temporary Accommodation will be suitable, to a good standard and procured to ensure value for money is achieved.
7. We will use Bed & Breakfast (B&B) accommodation when unavoidable and have the ambition to eliminate the use of B&B.
8. Our commissioned support services will be accessible relevant, and solution focussed.

5.3 Move on and Sustainment

There will be a focus on creating and increasing move on options for people and ensuring the right tools and support is in place to help people sustain tenancies once their homelessness has ended , our focus will not just be in terms of bricks and mortar but will also consider and reflect the wider social detriments that impact someone's ability to secure and maintain a settled home .

1. We will ensure that there is targeted support for all homeless households to recover from homelessness and to secure and sustain settled accommodation.
2. We will further develop our positive working relationships with the private rented sector and supported housing Landlords to increase the accommodation options available.
3. Develop resources to support households to understand the various housing options available to them.
4. Ensure that individuals and families that need it, are supported to settle into their new homes.
5. Supported housing in the city will provide a basis for an individual to recover from homelessness, with pathways to move into independent accommodation where appropriate.

6. Delivery, monitoring, and review

To realise the ambitions of this strategy, a delivery plan has been developed and will be reviewed annually. This will be shaped by partners through the multi-agency homelessness forum, whilst taking account of local, regional and national changes and pressures. As identified throughout this strategy, tackling homelessness requires a partnership approach and all key partners will have a role to play in progressing the identified actions under the delivery plan.

The Council's housing and homelessness team will be responsible for the coordination and management of the strategy and overseeing the activity contained within it. We will conduct an annual homelessness review to reflect on progress



against the strategy and the current context in relation to homelessness which will be made available on the Council's website.

The statutory requirement to publish a Homeless & Rough Sleeping Strategy sits with the local authority, however, our One Coventry approach means that this is a Partnership Strategy. Accountability and the monitoring and scrutiny of its delivery will be equally through the city's homelessness partnership forum and through our own internal governance structures

As part of our continued commitments to co-creation and power sharing with people who have and still use services, we will facilitate feedback mechanisms and opportunities to ensure progress is shared. The homelessness forum will receive regular updates from action holders and receive report against progress on delivery.

7. Public Consultation

A public consultation exercise has been carried out on the strategy and the identified themes and principles.

The survey was created on the Let's Talk platform and advertised as part of the live consultation page, the consultation was open for a period from 23rd August 2024 to the end of September 2024 and was promoted via a newsletter on 10th September and delivered to 7,182 recipients.

There were 48 people who completed the survey, the Draft Homelessness and Rough Sleeping Strategy was downloaded 62 times, and the Review document had 57 downloads.

The key messages and findings that came out of the consultation were:

- Most responses were from members of the public (31)
- 1 in 5 responses were on behalf of a charity, voluntary or community sector organisation (10)
- All of the priorities received agreement of over 96%
- Common themes from the open-ended comments received, focused on, the need for holistic support, and that different groups needed different support.
- Partner organisations will be key to delivering this strategy.
- Questions were raised whether we were making best use of accommodation opportunities such as repurposing student blocks.
- All of the principles received agreement.



- From the open-ended comments some respondents raised the issue of the terminology being confusing.
- Others pointed to the need to focus on actions on how they are going to implement the principles

These findings have been considered and incorporated where appropriate into the body of the strategy and the delivery plan.

Sophie Hall

5/11/2024



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Appendix B – Homelessness and Rough Sleeping Strategy

Themes and priorities

The actions contained in the delivery plan all aim to ensure we are delivering the vision in the Homelessness and Rough Sleeping Strategy and are linked to our identified themes and priorities.

In producing this delivery plan we recognise that is produced at a point in time based on the knowledge, feedback and evidence used in producing the strategy and this associated action plan. For this reason we will remain fluid in how we achieve the ambitions of the strategy. If new intelligence or findings come to use we will respond and if an action committed to becomes redundant we will not pursue for the sole reason that its contained in this plan.

1. Early intervention and prevention

We believe that everyone in Coventry should have a place to call home. We will minimise homelessness by focusing on early prevention and intervention to help people keep their home or to move in a planned way.

2. Targeted and crisis support:

We will provide good quality accessible advice and support to ensure people can resolve their housing problems in a way that is long lasting. Where people do find themselves homeless and in need of emergency accommodation it will be of good quality, appropriate and conducive to their health and well-being. Targeted support will be provided for individuals and households who find themselves in crisis;

3. Move on and Sustainment

There will be a focus on creating and increasing move on options for people and ensuring the right tools and support are in place to help people sustain tenancies once their homelessness has ended. Our focus will not just be in terms of bricks and mortar but will also consider and reflect the wider social detriments that impact someone's ability to secure and maintain a settled home.

Principles

When formulating the actions in the delivery plan that support our key themes and priorities, we have ensured they impact on and support our 4 identified key underpinning principles which are referenced and linked back to the themes and priorities.

- Partnership
- Intelligence led
- Improving life chances and health outcomes
- Maximising opportunities

1, Partnership

We recognise that partnerships are the key to preventing and relieving homelessness and to supporting people who are either homeless or facing homelessness. The causes of homelessness are multiple and complex and require solutions which reflect this and therefore we will ensure:

- We continue to engage partners across our public, business, voluntary and faith sectors, recognising the importance of each to coordinate a comprehensive approach to homelessness prevention that delivers sustainable outcomes for residents.
- We work to strengthen our existing partnerships, both with other services in the Council and with external organisations, as well as building new working relationships.
- Ensure partnership working underpins what we do by ensuring we are working with our partners to pool our knowledge, skills, and resources, to improve prevention methods and provide effective support whilst addressing system wide issues that are a barrier to good outcomes.
- Through strong partnership working we will provide a strong safety net for people who do become homeless and make sure they have the support they need to move on to permanent and sustainable new homes.
- We will work across the city in transparent and shared spaces with partners to ensure plans for people and projects are designed together and the most effective they can be, saving time and money while creating long standing change in provision and frontline service for those we find rough sleeping.

2, Intelligence led

Our approach to tackling homelessness and rough sleeping will be intelligence-led, building on the work done through the homelessness needs assessment, with dashboards covering each of the priority areas, tracking trends and monitoring the impact of the implementation of the strategy. Focusing on the data we will ensure;

- We will assess any new and emerging issues and ensure we understand how the Coventry picture compares regionally and nationally, ensuring our approach remains focused on making a difference to our residents.
- Recognising that homelessness is not random, we will overlay this with wider factors to ensure that we have a holistic approach which enables us to direct our resources to provide support at the earliest stage possible.
- This will be supported by the experiences of people who have experienced homelessness, ensuring our approach is always shaped by their experiences and feedback around what works and what doesn't.

3, Improving life chances and health outcomes

Recognising homelessness as part of a wider system of inequalities, we will seek to improve life chances and health outcomes, through our partnership approach to tackling homelessness and joining systems up. This will include;

- Raising awareness of the impact of homelessness on health and wellbeing outcomes, including how homelessness can exacerbate existing problems, issues and support needs, particularly in relation to mental health.
- Carry out specific initiatives around health and wellbeing for homeless households as well as ensuring our approach to preventing homelessness and supporting households in to settled, sustainable accommodation provides a basis upon which they can thrive.
- Working in partnership with all agencies and organisations responsible for health and care services when there is a risk of homelessness, or it is the presenting issue.

4, Maximising opportunities

Homelessness and rough sleeping services operate against a complex back drop of legislation and policy which is ever emerging and developing;

- We will ensure that where policy and legislation offer opportunities to change how we work we will embrace this whilst being bold and creative in our approach to finding solutions
- We will maximise any impact of changing legislation and policy, ensuring that our services reflect changes and capitalise on
- the opportunities they offer including where funding is available.

Themes and Priorities

Theme 1: early intervention and prevention

We believe that Everyone in Coventry should have a place to call home, we will minimise homelessness by focusing on early prevention and intervention to help people keep their home or move in a planned way.

	Action	Lead	Date	Evidencing success	What success looks like	Underpinning principles
T1.1	Periodically review the approach to daily Rough Sleeping Outreach walks to ensure we maximise its impact and effectiveness.	CCC Rough Sleeping Manager (RSM)	6 monthly	Street link KPIs Outreach data	All referrals are actioned, and all city locations are visited daily. Interaction with new rough sleepers ASAP to minimise time sleeping rough	Partnership ILC&H Intelligence led
T1.2	Through the homelessness forum provide support and advice to partner organisations to ensure they have the skills and knowledge to recognise signs of people at risk of homelessness and access to tools to prevent homelessness wherever possible.	Housing & Homelessness Service SMT	Quarterly	Data returns to Government Forum minutes and actions	A decrease in households approaching as homeless. A Decrease in rough sleeping numbers. An increase in the number of households where homelessness is prevented An increase in Duty to refers of households seeking prevention advice	Partnership ILC&H Intelligence led
T1.3	Build early intervention/early prevention approach with partners into all our interactions with those at risk of homelessness	Housing & Homelessness Service SMT Key partners	On-going	H-CLIC data RS delta returns	A decrease in the number of households approaching at risk of homelessness. Reduced proportion of households requiring temporary accommodation through early intervention A Decrease in rough sleeping numbers.	Partnership ILC&H Intelligence led

	Action	Lead	Date	Evidencing success	What success looks like	Underpinning principle
T1.4	Coordinate work across the homelessness partnership to ensure we are making the best use of our resources to deliver Information Advice and Guidance (IAG) that prevents homelessness.	Housing & Homelessness Service SMT	On/going	Hcllc data	There is a reduction in the number of households present at the point of crisis. An increase in the number of households whose homelessness is prevented	Partnership ILC&H Intelligence led
T1.5	Carry out a review of our online information including pages for professionals and our self-help offer and self-help information available	H&H Operational Lead people	March 2025 and twice yearly	Updated web site	Our on-line offer to professionals and customers is effective at supporting early intervention and prevention	Partnership ILC&H Intelligence led
T1.6	Increase the number of duties to refers that are made by both statutory and voluntary organisations to the service	H&H Operational Lead people	On-Going Annual report	Using Baseline data from 2023/24 seek to increase referrals for both single people and families	There is an increase in referrals for those who are at risk of homelessness	Partnership ILC&H Intelligence led
T1.7	Deliver advice sessions for internal and external partners raising awareness of early intervention and the housing situation/demand in Coventry	H&H Operational Lead people	December 2025	Series of sessions delivered to key partners	There is a Reduction in households presenting at the point of crisis.	Partnership ILC&H Intelligence led
T1.8	Produce annual infographics that demonstrate the housing supply and demand in Coventry and ensure these are shared widely	H&H Operational Lead people	August 2025 and annually	Annual infographic document	Customers and partners have a clear understanding of the housing challenges in the city	Partnership ILC&H Intelligence led

	Action	Lead	Date	Evidencing success	What success looks like	Underpinning principle
T1.9	To produce annual infographics that demonstrate the homelessness demand and ensure these are shared widely	H&H Operational Lead people	August 2025 and annually	Annual infographic document	Customers and partners have a clear understanding of the homelessness demand and challenges in the city	Partnership ILC&H Intelligence led
T1.10	As part of the re commissioning of the housing related support services consider how early intervention and prevention can be maximised	Housing and homelessness commissioning and partnerships lead ()HHCP	March 2026	Hclic data Commissioned services performance reports	There is an increase in the number of households whose homelessness is prevented	Partnership ILC&H Intelligence led
T1.11	Hold annual sessions with partners to ensure any new preventative measures and initiatives are shared or identified	H&H Operational Lead people	May 2025	Annual session held	Partners are aware of demand and challenges and are maximising all opportunities to prevent homelessness in the city	Partnership ILC&H Intelligence led

Theme 2: Targeted and crisis support

We will provide good quality accessible advice and support to ensure people can resolve their housing problems in a way that is long lasting. Where people do find themselves homeless and in need of emergency accommodation it will be of good quality, appropriate and conducive to their health and well-being. Targeted support will be provided for individuals and households who find themselves in crisis;

	Action	Lead responsibility	Date	Evidencing success	What success looks like	Underpinning principle
T2.1	Create a formal process to analyse rough sleeping trends to help understand what has led to an individual's rough sleeping and design and flex services to address this	RSM & HHCP	April 2025	Delta indicators report and dashboard WMCA comparison data	There is a Reduction in the number of RS found through a targeted approach	Partnership ILC&H Intelligence led
T2.2	Across the homelessness partnership create appropriate accommodation pathways for households that are homeless (families, singles, women, under 25s, DA survivors) ensuring crisis and targeted support is available and accessible if needed and is delivered in a trauma informed way	HHCP	March 2026	Reduction in numbers of people returning as homeless (revolving door) through sustaining appropriate accommodation	The offer of support is varied accessible and appropriate for those who require it	Partnership ILC&H Intelligence led
T2.3	Support rough sleepers across their period of homelessness, ensuring rough sleeping is prevented wherever possible, that it is rare in occurrence, it is brief where it is unavoidable and re-occurrences or returns to rough sleeping are prevented.	RSM	April 2025 and on-going	Data indicators report and dashboard WMCA comparison data	There is a Reduction in the numbers of RS found When people are rough sleeping, it is rare, brief and non-reoccurring.	Partnership ILC&H Intelligence led
T2.4	Work with partners to ensure we are able to provide a quick, responsive, flexible and creative approach to helping someone to end their rough sleeping.	RSM	April 2025 on-going	Delta indicators report and dashboard WMCA comparison data	There is a reduction in the numbers of RS found When people are rough sleeping, it is rare, brief and nonrecurring	Partnership ILC&H Intelligence led

	Action	Lead responsibility	Date	Evidencing success	What success looks like	Underpinning principle
T2.5	Review our ending rough sleeping plan and service offer to ensure it is person centered, and creative and is designed and delivered to support people to maintain accommodation and not return to sleeping rough.	HHCPL	April 2025 and on-going	Data indicators report and dashboard WMCA comparison data	There is a Reduction in the numbers of RS found When people are rough sleeping, it is rare, brief and non-reoccurring.	Partnership ILC&H Intelligence led
T2.6	As part of the re commissioning of the housing related support services ensure that our floating support services are suitable, appropriate, value for money and can be reactive in crisis.	HHCPL	March 2026	New Housing related support specifications and provision	We have good quality, vfm Housing related support services that meet the needs of people in housing crisis or who are homeless in the city	Partnership ILC&H Intelligence led
T2.7	As part of the re commissioning of the housing related support services in ensure that accessibility of support services is considered alongside our accommodation offers for single people or those who have complex needs (men, women, under 25s)	HHCPL	March 2026	New Housing related support specifications and provision	We have good quality, vfm Housing related support services that meet the needs of people in housing crisis or who are homeless in the city	Partnership ILC&H Intelligence led
T2.8	As part of the re commissioning of the housing related support contracts carry out a review of our front door arrangements for those who are in crisis (men, women, under 25s, families, DA survivors)	HHCPL	September 2025	New Housing related support specifications and provision	We have good quality, vfm Housing related support services that are accessible meet the needs of people in housing crisis or who are homeless in the city	Partnership ILC&H Intelligence led

	Action	Lead responsibility	Date	Evidencing success	What success looks like	Underpinning principle
T2.9	Where homelessness cannot be avoided, we have systems in place to ensure that stays in temporary accommodation will be for as short a time as possible, and placements will be suitable for the needs of the households.	H&H Operational Lead Property	On going	TA average length of stay data	There is a reduction in how long households spend in temporary accommodation	ILC&H Intelligence led
T2.10	Carry out an analysis into PRS evictions to understand trends and underlying reasons for evictions and develop options and incentives to help reduce evictions	H&H Operational Lead People	June 2025	Completed analysis and review	We have a clear understanding of the drivers that impact PRS, and a robust attractive landlord offer	ILC&H Intelligence led
T2.11	Review of our provision of temporary accommodation to ensure it is sufficient to manage the current and future demand and it is suitable, to a good standard and procured to ensure value for money is achieved.	H&H Operational Lead Property	April 2025 Ongoing	Various schemes delivered. Meriden St Chace Ave	Our emergency accommodation offer is good quality, meets demand and is VFM.	ILC&H Intelligence led
T2.12	Ensure that families are only placed into B&B accommodation as an emergency and for no longer than 6 weeks	H&H Operational Lead Property	On-going	As close to zero as possible	No families are accommodated in B&B	ILC&H Intelligence led

Themes 3: Move on and tenancy sustainment

There will be a focus on creating and increasing move on options for people and ensuring the right tools and support are in place to help people sustain tenancies once their homelessness has ended. Our focus will not just be in terms of bricks and mortar but will also consider and reflect the wider social detriments that impact someone's ability to secure and maintain a settled home

	Action	Lead responsibility	Date	Evidencing success	What success looks like	Underpinning principles
T3.1	Work across the homelessness partnership to understand and agree tenancy readiness processes and definitions.	HHCPL & H&H Operational Lead Property	April 2025	Agreed definition Reduction in number of households being skipped Reduction in length of time in TA	As a partnership we have a collective understanding of what tenancy ready means for different cohorts and groups and there is Reduction in the number of households being Skipped	Partnership ILC&H Intelligence led
T3.2	As a part of the re-commissioning of the housing related support contracts ensure that services are designed so that customers requiring support are able to engage with support services as part of the move on process	HHCPL	March 2026	New housing related support specifications Increased tenancy sustainment Reduction in returners	Time limited move on support is available for households who require it	Partnership ILC&H Intelligence led
T3.4	Use insight and intelligence regarding tenancy failure and lack of options for key groups (women/ complex singles, Victims of DA, ex-offenders) to develop alternative bespoke pathways and housing solutions.	Housing & Homelessness Service SMT	March 2026	RS delta returns (returners) Hcllc data – repeated homelessness	There are Bespoke housing and support pathways for complex groups	Partnership ILC&H Intelligence led
T3.5	Explore investment opportunities to increase the number of permanent homes available to households in housing need	H&H Operational Lead Property	June 2025	Agreed delivery partner(s)	There are Increased move on options for families and single people in the city	

	Action	Lead responsibility	Date	Evidencing success	What success looks like	Underpinning principles
T3.6	Work with Registered Provider partners to ensure best use of existing social housing stock within the city	Housing & Homelessness Service SMT	September 2025	New builds Citizen rightsizing LLPs in areas where required Nominations agreements	An increase in family accommodation availability	Partnership ILC&H Intelligence led
T3.7	Implement initiatives that seek to reduce the HB subsidy loss incurred through provision of temporary and exempt supported accommodation.	H&H Operational Lead Property	On going	Reduction in HB subsidy loss	A minimum of 80% of all exempt supported accommodation in the city is operated by RSLs Proportional reduction in TA subsidy loss	Intelligence led
T3.8	Further develop our positive working relationships with the private rented sector and supported housing landlords to increase the accommodation options available.	H&H Operational Lead Property	On going	Increased numbers of households moving from TA and reduced length of time in TA	There are Increased move on options for families and single people in the city	Partnership ILC&H Intelligence led
T3.9	Develop resources to communicate and support households to understand the various housing options available to them.	Housing & Homelessness Service SMT	July 2025	Increased numbers of households moving from TA and reduced length of time in TA	There are Increased move on options for families and single people in the city	Intelligence led
T3.10	Review options to procure access into additional PRS properties and implement the scheme.	H&H Operational Lead Property	May 2025	Increased numbers of households moving from TA and reduced length of time in TA	Successful procurement for a PRS move on scheme, increasing move on options for families and single people in the city	

	Action	Lead responsibility	Date	Evidencing success	What success looks like	Underpinning principles
T3.11	Work with trusted providers with RP status to increase supported accommodation options in the city particularly for the most complex and ensure that Supported housing in the city provides a basis for an individual to recover from homelessness, with pathways to move into independent accommodation where appropriate.	HHCPL	April 2025	Decrease in numbers of single people and length of time in TA	Supported housing is of good quality, is accessible and meets the needs of those who require it	Partnership ILC&H Intelligence led
T3.12	Review our approach to how we deal with and manage households who do not respond to an offer of permanent accommodation	H&H Operational Lead People	March 2025	Reduced number of households being skipped following Homefinder offers	There is a reduction in households being skipped due to non-contact	Intelligence led
T3.13	Develop our approach and relationships with the PRS sector to understand the blockages and challenges in regard to offering accommodation to households who have been homeless including our incentive scheme and support offers	H&H Operational Lead Property	April 2025	Increase in the numbers of households moving out of TA and reduced length of time in TA	There are increased move on options for families and single people in the city	Partnership ILC&H Intelligence led

Principles

1, Partnership

We recognise that partnerships are the key to preventing and relieving homelessness and to supporting people who are either homeless or facing homelessness. The causes of homelessness are multiple and complex and require solutions which reflect this and therefore we will ensure:

	Principle	Lead responsibility	Evidencing success	What success looks like	Priority theme
P1.1	Continue to engage partners across our public, business, voluntary and faith sectors, recognising the importance of each coordinating a comprehensive approach to homelessness prevention that delivers sustainable outcomes for residents.	One Coventry Homelessness Partnership	Reduction in homeless households in the city	There is a one Coventry approach to homelessness in the city with all parties understanding the role they play in preventing and relieving homelessness	Early intervention and prevention
P1.2	Ensure partnership working underpins what we do by working with our partners to pool our knowledge, skills, and resources, to improve prevention methods and provide effective support whilst addressing system wide issues that are a barrier to good outcomes.	One Coventry Homelessness Partnership	Reduction in homeless households within the city	There is a one Coventry approach to homelessness in the city with all parties understanding the role they play in preventing and relieving homelessness	Early intervention and prevention
P1.3	Through strong partnership working we will provide a safety net for people who do become homeless and make sure they have the support they need to move on to permanent and sustainable new homes.	One Coventry Homelessness Partnership	Reduction in length of stay in emergency accommodation	There is a one Coventry approach to homelessness in the city with all parties understanding the role they play in preventing and relieving homelessness and	Crisis and targeted support

				supporting households to move on from homelessness	
P1.4	Work across the city in transparent and shared spaces with partners to ensure plans for people and projects are designed together and the most effective they can be, saving time and money while creating long standing change in provision and frontline service for those we find rough sleeping	One Coventry Homelessness Partnership	Reduction in numbers found rough sleeping. Delta report (Rough sleeping is rare, brief non reoccurring)	We have a robust, appropriate and effective offer for those we find rough sleeping that is shared and supported across the homelessness partnership	Targeted and crisis support

2 Intelligence led

Our approach to tackling homelessness and rough sleeping will be intelligence-led, building on the work done through the homelessness needs assessment, with dashboards covering each of the priority areas, tracking trends and monitoring the impact of the implementation of the strategy. Focusing on the data;

	Principle	Lead responsibility	Evidencing success	What success looks like	Priority theme
P2.1	We will assess any new and emerging issues and ensure we understand how the Coventry picture compares regionally and nationally, ensuring our approach remains focused on making a difference to our residents.	One Coventry Homelessness Partnership	Hcllc data Delta returns WMCA comparison data Annual review Partner information and data	As a homeless partnership we understand homelessness in Coventry, and we work collectively to address the challenges for our residents.	Early intervention and prevention Targeted and crisis support Move on and tenancy sustainment

P2.3	Recognising that homelessness is not random, we will overlay what we know with wider factors to ensure that we have a holistic approach which enables us to direct our resources to provide support at the earliest stage possible.	One Coventry Homelessness Partnership	Hcllc data Delta returns WMCA comparison date Annual review Partner information and data	As a homeless partnership we understand homelessness in Coventry, the reasons for it and the wider impacts of being homeless and we work collectively to support those who are homeless holistically.	Early intervention and prevention Targeted and crisis support Move on and tenancy sustainment
P2.4	Our approach to addressing homelessness will be supported by the experiences of people who have experienced homelessness, ensuring our approach is always shaped by their experiences and feedback around what works and what doesn't.	One Coventry Homelessness Partnership	Customer feedback	The voice of those who use our services will be heard, listened to and considered in our approach to addressing homelessness in the city	Early intervention and prevention Targeted and crisis support Move on and tenancy sustainment

3 Improving life chances and health outcomes.

Recognising homelessness as part of a wider system of inequalities, we will seek to improve life chances and health outcomes, through our partnership approach to tackling homelessness and joining systems up. This will include.

	Principle	Lead responsibility	Evidencing success	What success looks like	Priority theme
P3.1	Raise awareness of the impact of homelessness on health and wellbeing outcomes, including how homelessness can exacerbate existing problems, issues and support needs, particularly in relation to mental health.	One Coventry Homelessness Partnership	Hcllc data Delta returns Annual review Partner information and data Health and homelessness action plan	Health and wellbeing services understand the challenges that being homeless can bring in terms of health and life chances and are open to being flexible and deliver interventions in a way that does not exclude or create barriers for people.	Early intervention and prevention Targeted and crisis support Move on and tenancy sustainment

P3.2	Carry out specific initiatives around health and wellbeing for homeless households as well as ensuring our approach to preventing homelessness and supporting households in settled sustainable accommodation provides a basis upon which they can thrive.	One Coventry Homelessness Partnership	Hcllc data Delta returns Annual review Partner information and data Health and homelessness action plan	Health and well-being services will understand the role they play in preventing homelessness and There will when needed be a bespoke / alternative health offer for those who are homeless.	Early intervention and prevention Targeted and crisis support Move on and tenancy sustainment
P3.3	Work in partnership with all agencies and organisations responsible for health and care services when there is a risk of homelessness, or it is the presenting issue.	One Coventry Homelessness Partnership	Hcllc data Delta returns Annual review Partner information and data Health and homelessness action plan	Through partnership working we will create clear pathways both in terms of access to homelessness services and access to primary and secondary care for people who are homeless or at risk of homelessness	Early intervention and prevention Targeted and crisis support Move on and tenancy sustainment

4 Maximising opportunities

Homelessness and rough sleeping services operate against a complex back drop of legislation and policy which is ever emerging and developing

	Principle	Lead responsibility	Evidencing success	What success looks like	Priority theme
P4.1	We will ensure that where policy and legislation offer opportunities to change how we work we will embrace this whilst being bold and creative in our approach to finding solutions	One Coventry Homelessness Partnership	Annual review	Our response as a homeless partnership to homelessness in the city will be bold and creative whilst allowing flexibility to change and flex services.	Early intervention and prevention Targeted and crisis support Move on and tenancy sustainment

P4.2	We will maximise any impact of changing legislation and policy, ensuring that our services reflect changes and capitalise on the opportunities they offer including where funding is available.	One Coventry Homelessness Partnership	Annual review Increased revenue / grant funding	As a partnership we will continually review our approach to supporting people through their homelessness journey and seek out and embrace opportunities that arise to support homeless households and individuals	Early intervention and prevention Targeted and crisis support Move on and tenancy sustainment
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Consultation Findings:
Coventry Homelessness and Rough Sleeper
Strategy 2024 - 2029

Insight Engagement Team October 2024

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EXECUTIVE SUMMARY

- 48 people completed the survey
- Most responses were from members of the public (31)
- 1 in 5 responses were on behalf of a charity, voluntary or community sector organisation (10)
- All of the priorities received agreement of over 96%
- Common themes from the open ended comments received, focused on, the need for holistic support, and that different groups needed different support.
- Partner organisations will be key to delivering this strategy.
- Questions were raised whether we were making best use of accommodation opportunities such as repurposing student blocks.
- All of the principles received agreement.
- From the open ended comments some respondents raised the issue of the terminology being confusing.
- Others pointed to the need to focus on actions on how they are going to implement the principles.

INTRODUCTION

The survey was created on the Let's Talk platform, advertised as part of the live consultation page, and open for a period from 23rd August 2024 to the end of September 2024. This was circulated via a newsletter on 10th September and delivered to 7,182 recipients.

There were 48 people who completed the survey, the Draft Homelessness and Rough Sleeping Strategy was downloaded 62 times, and the Review document had 57 downloads.

A detailed response was sent in by CELC which is included in Appendix 1 and Appendix 2 shows all other comments.

SURVEY RESPONSES

How are you responding to this survey?

This question was answered by 48 respondents, most of whom said they were responding as a member of the public (31 responses 65% of respondents)

Responding as	Number	Percentage
As a member of the public	31	65%
On behalf of a charity, voluntary or community sector organisation (VCS)	10	21%
As a Coventry City Council employee	2	4%
Other (please specify)	5	10%

Others include:

Teachers, health professionals, NHS staff members working in partnership,

EARLY INTERVENTION AND PREVENTION

We believe that everyone in Coventry should have a place to call home, we will minimise homelessness by focusing on early prevention and intervention to help people keep their home or move in a planned way. Ensuring people access services as early as possible increases the opportunities to prevent homelessness

Do you agree with this priority?

This was responded to by 48 respondents. The majority of those responding to the survey, 98% agree with this priority. Only 1 person said they disagreed.

Do you agree with this priority?	Number	Percentage
Yes	47	98%
No	1	2%

Is there anything you would like to tell us about this priority

This question received 26 comments

The responses to this question were themed, high-level themes are within the table below.

Theme	Number of responses
Equity	6
Support	4

Women	3
Other	3
Partnership	2
Stigma	1
Young people	1

A number of respondents referred to the fact that the strategy needs to reflect the needs of all homeless people.

- *Firstly the policy needs to apply to all Coventry residents regardless of gender*
- *Whatever happened to people being on the council list. It appears that they are now discounted. With the prices of homes they can't afford to buy and rents that are charged are going through the roof*

Providing necessary support was also mentioned.

- *It is ok to have this as a priority but the quality of housing and relevant support is vital*
- *Many homeless folk lack the knowledge and skills to maintain a tenancy and require help with basic tasks such as budgeting and organising their affairs. Support to help prevent anti social behaviour is also often needed when people do have a home.*

Specific support for women was highlighted.

- *As a person who has worked in both frontline statutory services and the third sector, I have seen the change in the way those rough sleeping are supported. A person shouldn't need to be seen three times in order to be supported to end their homelessness. There needs to be more of a focus on the support provisions available for women who present with multiple and complex needs, particularly when coming out of prison or there is knowledge that a woman is selling street based sex.*

Reducing the stigma and working with partner organisations was also highlighted.

- *Make people more aware of what help there is and try to help minimise people feeling ashamed or that they are a failure if they need to access help*
- *The focus of this priority needs to be focused on a multi-agency response. As you will know, experiences of homelessness are complex and those experiencing homelessness present with many unmet needs. To meet this*

need the local authority should work in partnership with specialist services, both commissioned and none commissioned.

CRISIS AND TARGETED SUPPORT

We will provide good quality accessible advice and support to ensure people can resolve their housing problems in a way that is resilient and long lasting. Where people do find themselves homeless and in need of emergency accommodation it will be of good quality, appropriate and conducive to their health and well-being. Targeted support will be provided for individuals and households who need support and find themselves in crisis.

Do you agree with this priority?

Do you agree with this priority?	Number	Percentage
Yes	47	98%
No	1	2%

This was responded to by 48 respondents. The majority of those responding to the survey 98% agree with this priority. Only 1 person said they disagreed.

Is there anything you would like to tell us about this priority

The responses to this question were themed, high-level themes are within the table below.

Theme	Number of responses
Women	7
Multiple Needs	7
Supported Accommodation/Staff	6
Yp turning 18	3
Benefits/No address	3
Partner Organisations	2
Private Rental	1

This question received 19 comments,

There were a lot of comments referencing the needs of groups, such as women and young people, and recognition that homelessness is not simple to resolve.

- *Landlords who provide accommodation to the local authority need to be rigorously assessed. There needs to be an increased provision of targeted supported accommodation for women experiencing homelessness. It*

needs to be acknowledged by the local authority that women will not always be found rough sleeping in the way a man would be found rough sleeping and so the strategy needs to take into account the needs of women who present as homeless.

- *Individual needs need to be taken into consideration when providing temporary accommodation. This would prevent the revolving door of homelessness, particularly when placements are in HMO settings. HMO settings prove incredibly challenging for those with multiple unmet needs. The placement of those with similar needs together leads to numerous issues that often result in duties being discharged which perpetuates the cycles of homelessness and adds further layers of complexities. Considering individual needs and ensuring that those experiencing homelessness can access specialist support is essential to break the cycle of homelessness.*

The definition of targeted support was raised.

- *What does targeted support mean? This should be detailed. Does it mean creating pathways for young people, for people released from prison, for women for NRPF people? If the support is not tailored to certain groups of the population, then it won't work.*
- *The way that services are delivered should be driven by service user needs, and be fully accessible by considering and mitigating barriers such as digital exclusion, literacy levels, language barriers, and physical disability.*

Tackling this with partner organisations was highlighted as a way forward to deliver this priority.

- *CELC would also suggest the Council's housing department work more closely with third sector organisations who already have established relationships with homeless people, as well as working constructively with other Council departments and public authority partners, to address crises more quickly and holistically.*

MOVE ON AND TENANCY SUSTAINMENT

There will be a focus on creating and increasing move on options for people and ensuring the right tools and support is in place to help people sustain tenancies once their homelessness has ended. Our focus will not just be in terms of bricks and mortar but will also consider and reflect the wider social determinants that impact someone's ability to secure and maintain a settled home

Do you agree with this priority?

Do you agree with this priority?	Number	Percentage
Yes	45	96%
No	2	4%

This was responded to by 47 respondents. The majority of those responding to the survey, 96%, agree with this priority. Only 2 (4%) respondents said they disagreed.

Is there anything you would like to tell us about this priority

This question received 22 comments, these were themed as below.

Theme	Number of responses
Support	7
Types of Housing	6
Will strategy deliver	3
Terminology	3
Partner Orgs	2
Success	1

Support was mentioned the most by respondents, ensuring that it continues after tenancies have been secured.

- *Often when those, who have experienced long-term homelessness, secure their tenancy support drops off. This is when the support is essential as the person is usually at their most vulnerable. Support needs to be intense and person-centred to avoid issues such as cuckooing, rent arrears, and anti-social behaviour*

- *Part of this may need to include life skill training, health and tenancy support for street homeless people. For those including families who are homeless then until you are able to increase the stock of family accommodation the problem will remain no matter how higher a priority you deem it to be.*

Also the type of accommodation that would be offered and whether we are making the best use of opportunities.

- *We are also interested in whether the council is exploring the use of vacant purpose built student accommodation (PBSA) to meet the need for accommodation of homeless households. Coventry has a large surplus of PBSA and managers/owners are seeking planning permission to alter the conditions of occupation. We are also aware that other cities with a surplus of PBSA are exploring this option e.g. Plymouth*
- *Unsure if this aim is focused on making best use of existing accommodation, or aims to influence local provision and planning for new housing - those aspects are difficult to consider without yet having the draft housing strategy.*

A few respondents pointed to the lack of clarity of the terminology used in the priority and also questioned whether the strategy will result in any change.

- *Doesn't seem to be written in layman's terms*
- *What does move on mean*
- *This looks good on paper but will this priority be actioned?*
- *Yet again just by saying it does not make it happen, actions and commitments are needed*

PRINCIPLES

Underpinning the identified themes are the following 4 principles which will run through and underpin the priority areas and subsequent actions that will be taken to deliver the strategy:

- Partnership – we will work in partnership to address homelessness in the city
- Intelligence led – we will use intelligence and research to influence what we do had how we do it
- Improving life chances and health outcomes – we will ensure our actions help to life chances and health outcomes for people at risk of homelessness or are homeless.
- Maximising opportunities – capitalises on the opportunities available to prevent and relieve homelessness

Do you agree these are the right principles?

Principal	Yes	No
Partnership – we will work in partnership to address homelessness in the city	47	1
Intelligence led – we will use intelligence and research to influence what we do had how we do it	44	3
Improving life chances and health outcomes – we will ensure our actions help to life chances and health outcomes for people at risk of homelessness or are homeless.	44	3
Maximising opportunities – capitalises on the opportunities available to prevent and relieve homelessness	46	2

As shown, most respondents (92% – 98%) agree with the principles

Do you have any comments about the principles?

Respondents who did not agree with the proposals stated:

- *I think all 4 need to be re-written in plain English. I found all 4 hard to comprehend.
Partnership with whom?
What kind of intelligence?
"we will ensure our actions help to life chances and health outcomes" - this makes no sense
"Maximising opportunities" - is this not obvious? Why would you not. This appears to be stating the obvious*

- *It's very simple. We need social housing including supported social housing*
- *Intelligence and research does not necessarily capture the true extent of how people feel or the help required to individual circumstances*

A number of respondents that agreed with the principles raised the following suggestions and the need for action as well as principles:

- *Could the strategy also include a focus on proactively seeking out funding streams / taking up national initiatives eg when capital monies are released, as part of maximising opportunities? Similarly, looking at ways of combining with partners to access government funding*
- *The fundamental principles of secure employment, financial stability, education and community are important*
- *The strategy shouldn't just mention big principles, it should mention action plans. Nothing has been mentioned about the youth hub. Nothing has been mentioned about the women's census. Workshops / meetings / training outcomes about housing / homelessness / rough sleeping should be largely communicated and implemented.*

ABOUT YOU

How would you best describe yourself?

The majority of those responding to the survey identify as female. 3 people did not wish to state their gender,

Gender	Number	Percentage
Female	28	58%
Male	15	31%
Prefer not to say	3	6%

How old are you?

This question received responses from all groups 24+, most responses are from the 35 – 44 and 65+ age groups (12) with the 24 – 34 age group receiving the least responses (3).

How old are you?	Number	Percentage
24 - 34	3	6%
35 - 44	12	25%
45 – 54	10	21%
55 – 64	10	21%
65+	12	25%

Which of the following best describes your ethnic background?

This question was answered by 48 people, most of whom 85% describe themselves as White English, Welsh, Scottish, Northern Irish or British. No one who responded to the survey identified themselves within any of the Ethnic Minority Black or Asian groups.

Ethnic Identity	Number	Percentage
White English, Welsh, Scottish, Northern Irish or British	41	85%
Prefer not to say	2	4%
White Irish	2	4%
White Gypsy or Irish Traveller	1	2%
Other White background	1	2%

Do you consider yourself to be a disabled person?

This question was answered by 48 people, most of whom 83% said they are not disabled.

Do you consider yourself to be a disabled person?	Number	Percentage
No	40	83%
Yes	8	17%

APPENDIX 1

Response from CELC

"CELC strongly supports this priority, and is of the view well-resourced and widely accessible early prevention and intervention work is absolutely vital in tackling homelessness in Coventry. In realisation of this priority CELC would suggest the Council consider the following matters:

- Increased prevention and intervention provision will regrettably not alleviate all instances of homelessness. It is, therefore, essential that the Council pursues this priority in parallel with ensuring fast, responsive and constructive approaches to crisis homelessness situations are developed.
- CELC would urge the Council to be led by individual need, rather than attempt to adopt a one-size-fits-all approach to prevention and intervention provision. In our experience intensive wraparound support is sometimes needed by individuals to overcome barriers to reaching housing stability, including in navigating burdensome administrative processes.
- Early access to specialist Legal Advice is a key component of wider prevention and intervention work, particularly as housing problems often occur shortly after, or in conjunction with, other unmet social welfare needs.
- Whilst we accept self-help resources can be valuable to more legally-literate and capable individuals, CELC would strongly caution the Council against overreliance on these, as this can alienate and marginalise the most vulnerable and render it less likely their housing problems (and other interrelated legal difficulties) will be effectively resolved. In CELC's experience self-help tools are rarely effective when targeted solely at marginalised individuals themselves, because such individuals may be digitally excluded or otherwise may need support to engage with information/resources to address their social welfare problems. The issues faced by the most disadvantaged in society are often complex and require more nuanced analysis and consideration than online information tools – however sophisticated - are currently capable of delivering. Moreover, those with multiple issues, such as many of those CELC represents, are unlikely to be able to access and make use of all of the information they need without becoming overwhelmed. Legal problems relating to housing, like many social welfare problems, can be made significantly worse where the wrong information is followed, the wrong steps are taken, the right steps are taken in the wrong order and/or limitation/appeal periods are missed.
- CELC would urge the Council to review its decision-making processes in relation to exercise of the 'prevention duty' under the Housing Act 1996, to ensure that the desire to keep people in their homes for as long as possible, whilst laudable, does not conversely inhibit timely decision-making in relation to wider housing duties that have the potential to increase housing stability for individuals and families in the long-term."

"CELC strongly agrees with this priority, and would certainly welcome more rigor by the Council in ensuring emergency and temporary accommodation provided to homeless people is appropriate and of a sufficient standard. CELC would urge the Council to consider particularly closely the needs of those with children, and of those with disabilities and mental health conditions, in determining the adequacy of emergency and temporary accommodation placement options in the City.

CELC would also suggest the Council's housing department work more closely with third sector organisations who already have established relationships with homeless people, as well as working constructively with other Council departments and public authority partners, to address crises more quickly and holistically. "

"As with other aims, it would be helpful to consider how success will be measured – percentage of homelessness cases successfully resolved, reduced average length of stay in TA, reduced repeat homelessness?

Does this aim relate only to those owed a homelessness duty, or does it envisage pathways for those with No recourse to public funds?

Unsure of phrase social detriments – should this read determinants?

The priority refers to bricks and mortar, and to support; there is also the aspect of furnishings/curtains/floor coverings, which are recognised as contributing to tenancy sustainment. Is there a vision that move on accommodation will be appropriate, affordable and furnished with the essentials?

Unsure if this aim is focused on making best use of existing accommodation, or aims to influence local provision and planning for new housing - those aspects are difficult to consider without yet having the draft housing strategy."

CELC is in agreement with these stated principles, and would encourage the Council to be mindful of the following factors in seeking to implement these:

- Greater coordination between the Council's housing department and social services departments is, in CELC's view, needed as a matter of urgency. CELC frequently works with homeless families, and homeless people with disabilities or mental health conditions, where timely communication and practical cooperation between Council departments is, in our view, lacking. Homeless people undergo unnecessary indignities and experience additional traumas as a result. CELC firmly believes partnership working is effective when supporting homeless people and those threatened with homelessness.
- Access to generalist and specialist legal advice is important in meeting unmet social welfare needs, which cause or compound housing problems. The advice sector can support the Council in addressing homelessness, so long as the sector is sufficiently manned, financially viable and retains its independence.
- Various third sector organisations in Coventry have significant skill and expertise in working with homeless people from different demographic groups. These intermediary

organisations play a pivotal role in supporting those they work with to access and engage with services and sources of help. Intermediary organisations are also essential in facilitating lived-experience engagement in coproduction/stakeholder engagement opportunities. Funding precarity and resource constraints, however, often limit their activities. CELC would, therefore, urge the council to supportively partner third sector organisations, whilst recognising their unique aims and independence, to ensure a healthy and sustainable network of intermediary organisations continues to flourish in the city, working with and for the benefit of homeless people.

- CELC would welcome the development of more evidence-based and intelligence-led solutions to homelessness issues and social welfare problems more broadly. Use of the LIFT dashboard to target interventions and preventative work towards those subject to the benefit cap and/or those who have been sanctioned by the DWP, has proven successful.
- To improve the life chances of those experiencing or threatened with homelessness, resource needs to be targeted at improving the general quality of accommodation in Coventry. CELC would welcome increased use of housing enforcement measures to safeguard against poor maintenance, disrepair and unsafe accommodation; where conditions fall below legislative and regulatory standards.
- CELC is of the view the Council, in seeking to improve life chances of homeless people, should: *aim to improve the quality of emergency and temporary accommodation; *attempt to reduce the length of time vulnerable people (especially children and those with mental health conditions) spend therein; and *regularly review the impact placement in such accommodation is having on homeless people's health/wellbeing/ability to thrive, with a view to ensuing moves can be facilitated where welfare is deteriorating.
- Additionally, whilst we accept the Council is not legally obligated in every case to ensure homeless people are placed close to their children's schools/existing childcare/their employment and/or support networks, we would encourage these issues to be considered wherever possible, so as to evade any potentially avoidable detrimental impacts on development, welfare and stability ensuing.
- CELC welcomes the Council's ambition to maximise opportunities available through new legislation and regulations to prevent and relieve homelessness. However, CELC would question whether the Council is, at present, making full use of opportunities that existing legal provisions offer (such as the opportunity open to the Council to use its general competence under s1 Localism Act 2011 to reduce and alleviate homelessness of those subject to 'NRPF' conditions, by providing sufficient funding to third sector organisations that work with people with NRPF to enable them to develop accommodation provision options).

APPENDIX 2

Priority 1 Early intervention
Please can you consider how we consider looked after children or school leavers who are estranged from their parents/families. At 18 a lot of children support services are removed, and many young people are faced with homelessness. Let help all young people transition into adult life in a supported way - regardless to their personal circumstances, so that they can avoid homelessness!
What do you do for women who have just been released from prison?
As a person who has worked in both frontline statutory services and the third sector, I have seen the change in the way those rough sleeping are supported. A person shouldn't need to be seen three times in order to be supported to end their homelessness. There needs to be more of a focus on the support provisions available for women who present with multiple and complex needs, particularly when coming out of prison or there is knowledge that a woman is selling street based sex.
Make people more aware of what help their is and try to help minimise people feeling ashamed or that they are a failure if they need to access help
The focus of this priority needs to be focused on a multi-agency response. As you will know, experiences of homelessness are complex and those experiencing homelessness present with many unmet needs. To meet this need the local authority should work in partnership with specialist services, both commissioned and none commissioned.
Work with the salvation army they are the best at dealing with these situations getting people back into society
Firstly the policy needs to apply to all Coventry residents regardless of gender
But don't let them squat in other's properties. If they need time to move out of a property then charities should pay their rent.
Give them jobs
It is ok to have this as a priority but the quality of housing and relevant support is vital
Many homeless folk lack the knowledge and skills to maintain a tenancy and require help with basic tasks such as budgeting and organising their affairs. Support to help prevent anti social behaviour is also often needed when people do have a home.
There needs to be specific homeless accommodation for women only, including access to specialist support
Well why not reduce the burden by not being greedy with council tax people on a low income are forking out a fortune, especially married couples.
In theory I do but I do not think that you do priorities this.
Whatever happened to people being on the council list.It appears that they are now discounted. With the prices of homes they can't afford to buy and rents that are charged are going through the roof . However we have noticed if you are not from Coventry or Great Britain you. Can just walk in and get a home..
I hope that it doesnotmwan there are no resources for people who are homeless now.
I think homelessness affects men and women differently so you need different responses
You need to prioritise social housing for the homeless
We would expect to see a delivery plan that includes targets and KPIs focussing on early prevention and intervention

<p>How are you going to promote this message? People do not know where to turn and then end up accessing the support too late</p>
<p>Prevention is always better than crisis. However this requires properly funded and resources services to support vulnerable individuals and families can receive support at the earliest possible opportunity. This support needs to be holistic and trauma-informed, understanding and responding to any intersecting needs that may put them at risk of homelessness. Without adequately resourced and coordinated services, prevention will not succeed.</p>
<p>I think the prevention should be taking place at a much earlier stage. Often, the "prevention team" would wait for the last day of eviction to actually offer TA, instead of taking measures to prevent the eviction.</p>
<p>Strongly support this priority with some additional points:</p>
<p>For all priorities, it would be helpful to define what success looks like, and what can be measured to show the strategy is having the desired effect. For this priority I would suggest that progress would be shown by an increase in the percentage of homelessness cases taken at Prevention Stage, rather than at Relief.</p>
<p>Could the strategy acknowledge that certain groups are at higher risk of homelessness - eg people with experience of care, low-income households, those fleeing domestic violence - and consider how resources will be used to support those cohorts specifically.</p>
<p>The strategy does not make significant reference to people with No recourse to public funds. If the strategy is intended to apply to all Coventry residents, it would be helpful to acknowledge the additional barriers this group faces and what the aim is to mitigate those barriers.</p>

<p>Crisis and targetted support</p>
<p>Please can we focus on the appropriateness of the accommodation - for example if a looked after child who turns 18 during upper sixth their foster home package is removed as technically they are an adult, despite the fact they are still in full time education. Placing them in a hostel with drug addicts in not appropriate - in fact it is terrifying</p>
<p>This looks good on paper but will this priority be actioned? I don't believe this has been facilitated in the past for women who have just been released from prison?</p>
<p>Landlords who provide accommodation to the local authority need to be rigorously assessed. There needs to be an increased provision of targeted supported accommodation for women experiencing homelessness. It needs to be acknowledged by the local authority that women will not always been found rough sleeping in the way a man would be found rough sleeping and so the strategy needs to take into account the needs of women who present as homeless.</p>

<p>As part of the targeted support response, a recognition that homelessness is a gendered issue should be prioritised. Women's homelessness, the correlation to violence against women and girls and the subsequent impact of this needs to be recognised to ensure that better, long-term outcomes for women.</p> <p>Individual needs need to be taken into consideration when providing temporary accommodation. This would prevent the revolving door of homelessness, particularly when placements are in HMO settings. HMO settings prove incredibly challenging for those with multiple unmet needs. The placement of those with similar needs together leads to numerous issues that often result in duties being discharged which perpetuates the cycles of homelessness and adds further layers of complexities. Considering individual needs and ensuring that those experiencing homelessness can access specialist support is essential to break the cycle of homelessness.</p>
<p>Work alongside the salvation army</p>
<p>Whilst this is how it should be sadly it is not how you treat people, staff should be caring and understanding but they treat people like non entities that are beneath them, they treat people with contempt</p>
<p>Who determines need?</p>
<p>Give them jobs.</p>
<p>From 2013 -2020 I regularly walked through the city centre to the railway station as I worked in Birmingham. I saw and chatted to several homeless people, mainly rough sleepers and got to know them by name. I regularly gave them money to secure a bed for the night, usually £15 for the Salvation Army hostel.</p>
<p>One man seemed quite ill and he said he had a chest infection and the doctor (at the walk-in centre I assume) had given him a prescription for antibiotics. However, he didn't have the almost £10 needed to pay for them so I gave it to him.</p>
<p>It was clear to me that mental health was a key issue for these people. One young woman had been offered a place in Tile Hill and was reluctant to take her only offer as she didn't like the area. When she did, she was back on the street during the day, still trying to get cash as she said she had no bedding and couldn't afford the electricity. I have no idea how true that is but clearly she was in need on individual support both on budgeting and in how to equip her home cheaply.</p>
<p>It may be different now but none of these people could access any benefits (such as free prescriptions) as they did not have a fixed address. If they could use a council office as an address, would they then qualify for benefits and be able to rebuild their lives?</p>
<p>As 4, accommodation needs to be safe and women only for females.</p>
<p>Loads of people are in crisis not just the homeless.</p>
<p>Why are so many people sleeping around the city centre they are homeless I would like to know what you are doing for them. Please try as see if they can be accommodated put in a place where they feel safe a bed and a warm hearty meal would mean the world to homeless people. Who knows how they came to be in this situation. It's a very sad. State of affairs to see this in our time.</p>
<p>You need social housing with on site support</p>

<p>The latest MHCLG live data on homelessness for Coventry indicates that the ending of a private rented tenancy is the main reason for loss of a settled home (over 38%). The provision in the Renters Rights Bill especially the ending of section 21 evictions will help address this issue. So is the Council developing plans based on the Bill?</p>
<p>It is of utmost importance that there is safe and suitable accommodation for those vulnerable groups that require emergency accommodation. This is essential in ending the revolving door of homelessness that many vulnerable individuals and families can find themselves. HMO's do not provide good quality, appropriate accommodation that is conducive to their health and wellbeing. Emergency accommodation must include access to intensive holistic support. There needs to be more women's-only supported accommodation.</p>
<p>This could reference signposting to other relevant health and care services, with a focus on ensuring seamless pathways eg for mental and physical health needs</p>
<p>What does targeted support mean? This should be detailed. Does it mean creating pathways for young people, for people released from prison, for women for NRPF people? If the support is not tailored to certain groups of the population, then it won't work.</p>
<p>As above it would be good to consider how this will be measured - eg with property inspections, or gathering feedback from service users - and what outcome would show the strategy had been successful.</p> <p>The way that services are delivered should be driven by service user needs, and be fully accessible by considering and mitigating barriers such as digital exclusion, literacy levels, language barriers, and physical disability.</p> <p>Regarding emergency accommodation, not all those in need of accommodation will be eligible for it. Does the aim to provide good quality emergency accommodation refer only to those who are eligible and in priority need? What is the vision for those who are not eligible?</p> <p>I would add that emergency accommodation needs to be affordable, as well as suitable.</p> <p>It would be good to note if targeted support will be designed to meet the needs of specific cohorts eg young people, women, those with substance misuse concerns.</p>
<p>Move on and Tenancy Sustainability</p>
<p>This looks good on paper but will this priority be actioned? People who have suffered significant trauma, what will you do to prioritise them?</p>
<p>Landlords should not be able to make lots of money from peoples situation of being homeless</p>
<p>Often when those, who have experienced long-term homelessness, secure their tenancy support drops off. This is when the support is essential as the person is usually at their most vulnerable. Support needs to be intense and person-centred to avoid issues such as cuckooing, rent arrears, and anti-social behaviour</p>
<p>Have a partnership with the salvation army</p>
<p>Need to ensure local residents aren't impacted negatively by noise or anti social behaviour.</p>
<p>Good aim but with rented houses in short supply hard to achieve particularly for single working men</p>
<p>Yet again just by saying it does not make it happen, actions and commitments are needed</p>

<p>I know people who have been in exempt supported living in Coventry. It fails to properly support those who have become homeless primarily because of addictions. Those who against the odds find a job are hit with very expensive rents. Tenants are not advised of rent increases and end up in debt owing thousands of pounds. This creates mental health problems. This system is not fit for purpose. There is a lack of proper support for the tenants and help in moving on from supported living.</p>
<p>Give them jobs.</p>
<p>Part of this may need to include life skill training, health and tenancy support for street homeless people. For those including families who are homeless then until you are able to increase the stock of family accommodation the problem will remain no matter how higher a priority you deem it to be.</p>
<p>Although not quite sure what this statement means. Doesn't seem to be written in layman's terms</p>
<p>Others are not so secure.</p>
<p>What does move on mean. Shocking terminology</p>
<p>We welcome, in particular, the reference to what is termed as 'individual factors' in the plan. This will require partnership working with a wide range of public and third sector agencies.</p>
<p>Move on accommodation: Presumably there will be a continued priority to provide a 'housing first' offer as well as using the local authority housing fund?</p>
<p>We note with concern that nearly 1,200 households are in temporary accommodation of which 20% are in bed and breakfast accommodation. We would expect to see a target to not use bed and breakfast accommodation and to ensure that temporary accommodation meets high standards.</p>
<p>We are also interested in whether the council is exploring the use of vacant purpose built student accommodation (PBSA) to meet the need for accommodation of homeless households. Coventry has a large surplus of PBSA and managers/owners are seeking planning permission to alter the conditions of occupation. We are also aware that other cities with a surplus of PBSA are exploring this option e.g. Plymouth</p>
<p>I agree that the focus should not only be on the house but also support, however there is a need for more social housing that reflects the needs and demographics of those presenting needing help. This should include more self-contained accommodation.</p>
<p>The strategy could also recognise the impact of when tenancies are not sustained on other parts of the public sector, for example increasing attendances at accident and emergency departments, and creating delays for people leaving hospital. Actions which help people sustain tenancies also ensures public money is used effectively - investing in the cause not the symptoms.</p>
<p>Until the one property offer is in place, I don't think move on options will be as efficient as they could be.</p>
<p>Do you have any comments about the principles?</p>

As long as they are actioned adequately, then they should work, but will they be? How can a CSR of the homeless team, think that a woman who has just been released from prison, is stable and therefore does not need adequate accommodation?
It would be beneficial for partners to have a greater understanding of how the local authority wish to implement these principles. It would be helpful to have an understanding of how they plan to improve life chances and health concerns of those rough sleeping, taking into account the number of people known to homeless services, have passed away.
As long+3:13 as they are actioned adequately, then they should work, but will they be? How can a CSR of the homeless team, think that a woman who has just been released from prison, is stable and therefore does not need adequate accommodation?
The fundamental principles of secure employment, financial stability, education and community are important
Health concerns from rough sleeping should be a priority.
Good but very top level and need working out in practice
I think all 4 need to be re-written in plain English. I found all 4 hard to comprehend. Partnership with whom? What kind of intelligence? "we will ensure our actions help to life chances and health out comes" - this makes no sense "Maximising opportunities" - is this not obvious? Why would you not. This appears to be stating the obvious
Intelligence and research does not necessarily capture the true extent of how people feel or the help required to individual circumstances
Maximising opportunities is too expansive. What type of opportunities?
I agree with them all but the priority of those proving supported living does not seem to be to help tenants increase their life chances but is more about making a lot of money by landlords.
Give them jobs.
When the council is struggling to fund services do you have the money to achieve these noble aims?
In partnership with whom? Whose intelligence? These statements have no substance
There needs to be more housing options, locally there is little accommodation especially safe for female victims of domestic abuse

What about the ones under threat? Don't these people exist?
It leaves out employment and the role of faith organisations
Its very simple. We need social housing including supported socialhousing
Intelligence-led: We were surprised that there was not more use made of the quarterly and annual data on Coventry in the MHCLG live tables on homelessness in the review document to analyse long term trends and future prospects. This would help in setting targets that are challenging yet achievable.
I would like to know about how you will ensure that these are being delivered and how will you know these have been successful and measure the success of these principles.
Could the strategy also include a focus on proactively seeking out funding streams / taking up national initiatives eg when capital monies are released, as part of maximising opportunities? Similarly, looking at ways of combining with partners to access government funding
The strategy shouldn't just mention big principles, it should mention action plans. Nothing has been mentioned about the youth hub. Nothing has been mentioned about the women's census. Workshops / meetings / training outcomes about housing / homelessness / rough sleeping should be largely communicated and implemented.
Again it would be helpful to consider what can be measured to show these principles are being applied; for example will feedback be gathered from partners to understand their experiences of local approaches? Partnership working could be assessed using the Homeless Link partnership assessment toolkit. Strongly support the use of intelligence and data. I would suggest this could be strengthened further with a commitment to include a broad range of information from internal and external partners, alongside statutory reporting, and to use this to inform and commission local services. (As an example, the women's census gives a very different picture of women's homelessness to the rough sleeper estimate, and the data could lead to different services being commissioned.) I would suggest further principles for consideration: A strong supported sector – the homelessness workforce will be informed, connected, trained and supported, to retain experienced staff and improve the services provided to residents A trauma informed approach – services will be commissioned and work in a trauma informed way, to benefit service users and to support staff in the sector

As with other aims, it would be helpful to consider how success will be measured – percentage of homelessness cases successfully resolved, reduced average length of stay in TA, reduced repeat homelessness?

Does this aim relate only to those owed a homelessness duty, or does it envisage pathways for those with No recourse to public funds?

Unsure of phrase social detriments – should this read determinants?

The priority refers to bricks and mortar, and to support; there is also the aspect of furnishings/curtains/floor coverings, which are recognised as contributing to tenancy sustainment. Is there a vision that move on accommodation will be appropriate, affordable and furnished with the essentials?

Unsure if this aim is focused on making best use of existing accommodation, or aims to influence local provision and planning for new housing - those aspects are difficult to consider without yet having the draft housing strategy.

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Title of EIA		Homelessness and Rough Sleeping Strategy
EIA Author	Name	Sophie Hall
	Position	Housing and Homelessness Commissioning and Partnerships Lead
	Date of completion	18/07/2024
Head of Service	Name	Jim Crawshaw
	Position	Head of Housing and Homelessness
Cabinet Member	Name	CIlr David Welsh
	Portfolio	Housing & Communities

EIA	<ul style="list-style-type: none"> • Having identified an EIA is required, ensure that the EIA form is completed as early as possible. • Any advice or guidance can be obtained by contacting Jaspal Mann (Equalities), Mamta Kumar (Equalities), Alicia Philips (Health Inequalities), Lisa Young (Health Inequalities).
Sign Off	<ul style="list-style-type: none"> • Brief the relevant Head of Service/Director/Elected Member for sign off • Have the EIA Form ready for consultation if it is required • Amend according to consultation feedback and brief decision makers of any changes
Action	<ul style="list-style-type: none"> • Implement project / changes or finalise policy/strategy/contract • Monitor equalities impact and mitigations as evidence of duty of care

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)

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

The council has a statutory duty to carry out a periodic review of homelessness in their area and to publish a Homelessness Strategy.

The current Housing and Homelessness Strategy was published in 2019 and runs until 2024. It is aimed at providing a high-level plan to set out the main priorities for the Council and its partners for the life of the strategy, to guide the allocation of resources and investment, and provide a framework to inform project development, to achieve the vision that:

- Coventry Citizens will be able to access a suitable, affordable, and decent home, with the support they need to sustain their housing.

In 2019 when the new strategy was developed the previous Homelessness Strategy and Housing Strategy were combined into one document, this was done as it was recognised that activities to prevent homelessness were to a degree dependent on the availability of permanent housing.

Coventry published its first Rough Sleeping Strategy in December 2019, in line with a requirement by the Government for all areas to have a strategy to prevent and tackle rough sleeping. From the outset it was accepted that the successful delivery of the Rough Sleeping Strategy and Action Plan was not in the Council's power alone. Therefore, a One Coventry partnership approach was crucial to ensure successful realisation of our vision, the strategy needed to be owned, supported, and delivered by ensuring effective collaboration and partnership working.

The Rough Sleeping Strategy and its Action Plan were reflective of and intrinsically linked to the Council's Housing and Homelessness Strategy. The two strategies needed to be considered and delivered in tandem.

It has been decided that we will be separating back out the Housing element of the Housing and Homelessness strategy and we will instead have a combined Homelessness and Rough Sleeping Strategy. This will focus on the positive pathway model and will consider interventions, services, challenges and accommodation provision for people who are homeless or threatened with homelessness.

The homelessness review that has been undertaken and will be the basis of the new Homelessness and Rough Sleeping Strategy and will help us identify actions and priority areas for the next 5 years.

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

People who are homeless or at risk of rough sleeping/currently rough sleeping
 People who require support and assistance to maintain a tenancy or independent living
 Households at risk of losing their current accommodation
 Coventry City Council's Housing and Homelessness Service
 Homelessness organisations and charities operating in Coventry including supported accommodation providers
 Advice agencies operating in Coventry
 Registered Providers (Housing Associations)



Private Landlords

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

Sophie Hall- Housing & Homelessness Commissioning and Partnerships Lead

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>)

[Homeless review 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	Nature of impact and any mitigations required
Age 0-18	p	Support for individuals and households who are homeless, at risk of becoming homeless and those rough sleeping or at risk of rough sleeping in this age group
Age 19-64	P	Support for individuals and households who are homeless, at risk of becoming homeless and those rough sleeping or at risk of rough sleeping in this age group
Age 65+	P	Support for individuals and households who are homeless, at risk of becoming homeless and those rough sleeping or at risk of rough sleeping in this age group
Disability	P	Support for individuals and households who are homeless, at risk of becoming homeless and those rough sleeping or at risk of rough sleeping with a disability
Gender reassignment	P	Support for individuals and households who are homeless, at risk of becoming homeless and those rough sleeping or at risk of rough who have undergone gender reassignment
Marriage and Civil Partnership	p	Support for individuals and households who are homeless, at risk of becoming homeless and those rough sleeping or at risk of rough sleeping who are married or in a civil partnership
Pregnancy and maternity	p	Support for individuals and households who are homeless, at risk of becoming homeless and those rough sleeping or at risk of rough sleeping who may be pregnant
Race (Including: colour, nationality, citizenship ethnic or national origins)	p	Support for individuals and households who are homeless, at risk of becoming homeless and those rough sleeping regardless of colour, nationality, citizenship ethnic or national origins
Religion and belief	p	Support for individuals and households who are homeless, at risk of becoming homeless and those rough sleeping regardless of religion or belief
Sex	p	Support for individuals and households who are homeless, at risk of becoming homeless and those rough sleeping regardless of sex



Sexual orientation	p	Support for individuals and households who are homeless, at risk of becoming homeless and those rough sleeping regardless of sexual orientation
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HEALTH INEQUALITIES

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

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

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

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

If you need assistance in completing this section please contact: Alicia Philips or Lisa Young in Public Health for more information. More details and worked examples can be found at [https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-\(EIA\).aspx](https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx)

Question	Issues to consider	
2.3a What HIs exist in relation to your work / plan / strategy	<ul style="list-style-type: none"> • Explore existing data sources on the distribution of health across different population groups (<i>examples of where to find data to be included in support materials</i>) • Consider protected characteristics and different dimensions of HI such as socio-economic status or geographical deprivation 	
	<p>Response:</p> <p>There are strong correlations between single homelessness/rough sleeping and complex needs such as substance misuse and a multiplicity, and heightened severity, of both physical and mental health conditions. Research demonstrates that those who are homeless/rough sleeping:</p>	



- 50 times more likely to have Hepatitis C
- 34 times more likely to have Tuberculosis 1
- 12 times more likely to have epilepsy
- 6 times more likely to have heart disease 2
- 9 times more likely to commit suicide

According to the Local Government Association (LGA) homelessness is a measure of our collective success, or otherwise, in reducing inequalities – (Local Government Association (2017) and ill health can be both a cause and a consequence of homelessness – Public Health England (2019). In order to help people sustain stable accommodation, it has been suggested that more action is required to enable better integration of health and social care, and to help people access the healthcare services they require – NICE NG214 (2022). Unsatisfactory experiences following previous contacts with health services can lead to avoidance of further contact with NHS services and therefore people being less likely to receive healthcare despite high needs – NHS England (2023).

Core20PLUS5 is a national NHS England approach to support the reduction of healthcare inequalities at both national and local level. The core 20 PLUS5 groups identified for Coventry and Warwickshire are newly arrived and transient communities, including people who are homeless. They were identified because of the significant inequalities they experience including in healthcare access, experience and outcomes.

People who are homeless, rough sleeping or living in insecure housing typically experience multiple risk factors for poor health (such as poverty, violence, and complex trauma). They experience stigma and discrimination and are not consistently accounted for in records such as healthcare databases – variation in name spellings being one such reason, as does frequent changes or absences of an address. These experiences and factors frequently lead to barriers in access to healthcare and result in extremely poor health outcomes. Without appropriate access to primary and community care, and early / preventative interventions, people in inclusion health groups are likely to turn to acute services:

For instance, A&E attendance is 6-8 times higher for people experiencing homelessness and 28 times higher for people who experience both homelessness (rough sleeping) and alcohol dependency.

Despite inclusion health groups being disproportionately smaller in number than the general population, volume of attendance and consistently poor health outcomes lead to the cost of providing health and social care services (where required) being disproportionately higher. People experiencing homelessness



often face some of the most significant health inequalities of all; with average life expectancy around 30 years lower than that of the general population.

Homeless people are more likely to die young, with an average age of death of 47 years old for men and even lower for homeless women at 43, compared to 77 for the general population, 74 for men and 80 for women.

Registration with a general practice is essential since general practitioner (GP) referrals are needed for most specialist treatment. The Anchor Centre is commissioned to provide a specialist service for people experiencing homelessness and the Meridian Centre for people with no recourse to public funds. However, many people experiencing homelessness are registered at other practices. The Anchor Centre accepts patients who have been rough sleeping, living in hostels, sofa surfing, or in temporary accommodation; around a third of the 610 patients have previously slept rough.

The city has a rough sleeping service that works proactively with people rough sleeping or at risk of rough sleeping, often supporting individuals with complex health needs to access medical interventions. Our commissioned homelessness support services have specific KPI measures around accessing health care and GP registration.

CWPT employ a homeless pathway Mental Health social worker who works closely with the rough sleeping team as well as supporting those living in temporary and supported accommodation to access support and MH interventions.

A palliative care team for those who are homeless has recently been established to support people at end of life. The vulnerable persons and complex needs forum provides a case management “team around the person” approach to supporting people at risk of homelessness due to MCN and health challenges.

Homelessness services have strong working relationships with both Adults health services and social care and with public health colleagues in terms of infectious diseases and health protection and until recently hosted an infectious disease outreach worker on behalf of the health protection function.

There has historically been a specific challenge around hospital discharge, as people were at times being discharged at night without statutory services being informed that they need accommodation. Homeless patients also have substantially higher rates of self-discharge from hospital, often linked to substance misuse. The creation of a homelessness pathway lead role at UHCW in December 2023 has already had a positive impact in terms of appropriate



discharges and discharges for those who are homeless are being better coordinated and facilitated.

Homelessness services work closely with sexual health services (ISH) including support for testing and treatment when needed.

Research and local consultation have demonstrated that the following health service and patient led issues impact on the health of the cohort which may mean that they access secondary care services at a higher level of severity which may result in longer stays and early death.

- many homeless people do not see their health as important due to other pressing needs such as accessing a bed for the night, food, and drugs.
- healthcare services are generally highly structured and inflexible and rely on the individual contacting and going to the health care service, this may be more difficult for the cohort if they do not have a phone, or credit to use their phone and do not have the money to access the service
- chaotic lifestyles and or a cognitive behaviour deficit may mean they forget appointments and do not adhere to or complete treatment

The DoH (2010) research into the NHS costs of treating single people sleeping rough, the hidden homeless or living in a hostel concluded that the total cost of hospital usage by this cohort is conservatively estimated to be £85 million per annum. This is around 4 times the level of the general population, with inpatient costs (the bulk of the usage for this client group) being 8 times higher than for the comparison population (aged 16-64). These extra costs are thought to arise from the severity of their health conditions and because they are more likely to be admitted as emergency admissions.

Although single homeless people are more likely to suffer the detrimental health impacts from homelessness children and adults within families also have an increased risk of poor mental health. Research shows that long term stays in temporary accommodation, particularly shared accommodation, can have negative health impacts on families.

2.3b How might your work affect HI

Consider and answer below:



<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"> • Think about whether outcomes vary across groups and who benefits the most and least, for example, the outcome for a woman on a low income may be different to the outcome for a woman a high income • Consider what the unintended consequences of your work might be
	<p>Response:</p> <p>Underpinning the identified themes in the new Strategy there will be 4 key principles one of which is Improving life chances and health outcomes.</p> <p>By Recognising homelessness as part of a wider system of inequalities, we will seek to improve life chances and health outcomes, through our partnership approach to tackling homelessness and joining systems up. This will include;</p> <ul style="list-style-type: none"> • Raising awareness of the impact of homelessness on health and wellbeing outcomes, including how homelessness can exacerbate existing problems, issues and support needs, particularly in relation to mental health. • Carry out specific initiatives around health and wellbeing for homeless households as well as ensuring our approach to preventing homelessness and supporting households into settled sustainable accommodation provides a basis upon which they can thrive. • Working in partnership with all agencies and organisations responsible for health and care services when there is a risk of homelessness, or it is the presenting issue.



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

N/A

DIGITAL INCLUSION

2.5 The Covid-19 pandemic accelerated the uptake of digital services nationally, whereby people who are digitally enabled have better financial opportunities, can access new information and are better connected to others (Lloyds Consumer Digital Index, 2021). However, for those who are digitally excluded, the digital divide has grown during the last two years, and without intervention people will be left behind with poorer outcomes across employment, health and wellbeing, education and service access. Some people are more likely to be excluded including: older people, people from lower income households, unemployed people, people living in social housing, disabled people, school leavers before 16 with fewer educational qualifications, those living in rural areas, homeless people, or people who’s first language is not English ([NHS Digital.](#))

Some of the barriers to digital inclusion can include lack of:

- **Access** to a device and/or data
- **Digital skills**
- **Motivation** to get online
- **Trust** of online safety

Digital exclusion is not a fixed entity and may look different to different people at different times.

Example 1. Person A, has access to a smartphone and monthly data and can access social media apps, however lacks the digital skills and confidence, and appropriate device to create a CV, apply for jobs and attend remote interviews, and/or access educational and skills resources.

Example 2. Person B, is digitally confident and has their own laptop, however due a lower household income and other financial priorities, they cannot afford their monthly broadband subscription and can no longer get online to access the services they need to.

Example 3. Person C has very little digital experience and has heard negative stories on the news regarding online scams. Despite having the financial resource, they see no benefit of being online and look for alternatives whenever possible. A new council service requires mandatory online registration, therefore they do not access it.

It is important that we all consider how we can reduce digital inequalities across our services, and this may look very different depending on the nature of our work.

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



<p>If you need assistance in completing this section please contact: Laura Waller (<i>Digital Services & Inclusion Lead, CCC</i>). More details and worked examples can be found at https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx</p>	
Question	Issues to consider
<p>2.5 What digital inequalities exist in relation to your work / plan / strategy?</p>	<ul style="list-style-type: none"> • 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.
	<p>Response:</p> <p>The Strategy has a focus on prevention and early intervention including ensuring our services are accessible to all. The strategy does not assume or require people to have digital skills or be able to access digital tools to benefit from any element.</p>
<p>2.5b How will you mitigate against digital inequalities?</p>	<ul style="list-style-type: none"> • 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.
	<p>Response:</p> <p>We will work with partner organisations to reduce digital inequality and improve access to services</p>

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

The strategy will have its own delivery plan, progress against the plan will be monitored by our own internal monitoring mechanisms as well as via regular reporting to the city’s Homelessness Partnership Forum.

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



No

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

3.0 Completion Statement

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

No impact has been identified for one or more protected groups



Positive impact has been identified for one or more protected groups x

Negative impact has been identified for one or more protected groups

Both positive and negative impact has been identified for one or more protected groups

4.0 Approval

Signed: Head of Service: Jim Crawshaw	Date: 23/07/24
Name of Director: Pete Fahy	Date sent to Director: 23/7/24
Name of Lead Elected Member: David Welsh	Date sent to Councillor: 26/7/24

Email completed EIA to equality@coventry.gov.uk

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COVENTRY HOMELESSNESS REVIEW 2024

This Homelessness Review provides information on the needs of people who have approached Coventry City Council's housing service for help since the last homelessness strategy was adopted in 2019.

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1. Preface

This Homelessness Review provides information on the needs of people who have approached the Coventry City Council's housing service for help since the last homelessness strategy was adopted in 2019. It considers what we have achieved, what has changed, and how this relates to the changing environment and Government policy. The information contained in this review, what it has told us, as well as the information we have received from both internal and external partners will be used as the foundation for the development of the new Homelessness and Rough Sleeping Strategy and action plan.

The new strategy and plan will run until 2029 and be our road map for service delivery and improvements. It will illustrate our priorities and include clear, measurable outcomes and outputs. The strategy will be a partnership strategy and be inclusive of all functions, services and individuals that link to, or are impacted by homelessness in the city.

2. Background

Housing and homelessness strategy

The current Housing and Homelessness Strategy was published in 2019 and runs until 2024. It is aimed at providing a high-level plan to set out the main priorities for the Council and its partners for the life of the strategy, to guide the allocation of resources and investment, and provide a framework to inform project development, to achieve the vision that:

- Coventry Citizens will be able to access a suitable, affordable, and decent home, with the support they need to sustain their housing.

In 2019 when the strategy was developed the Homelessness Strategy and Housing Strategy were combined into one document, this was done as it was recognised that activities to prevent homelessness were to a degree dependent on the availability of permanent housing.

Whilst great achievements have been made and the delivery of the housing and homelessness function and strategy have moved, developed, and changed since its initial publication, we have also seen a shift in terms of some of the priorities and the challenges that sit alongside these.

The Covid pandemic has changed the way we operate and deliver homeless services in the city. Staff began working from home in the early stages of the pandemic and, although there has been a drift back to the office, many staff still work from home. This has meant a swing from face-to-face to online contact or the telephone. Some people do not have the appropriate technology for this or prefer face-to-face contact, so the option to come into the office remains open to them.

The reported inflation rate stands at 3.2% (march 2024) , and translates to an increase in housing, heating, and food expenses for households. These increases obviously have a significant impact on households with lower incomes. Concurrently, there is an increase in households approaching homelessness support with the top 3 reasons for losing settled accommodation (friends & family no longer willing to accommodate, PRS eviction, and Domestic Abuse) being in line with national and historical trends.

The implementation of the Homelessness Reduction Act in 2018 changed the way that homelessness services are delivered by local authorities. There have also been further changes to

legislation, such as the Domestic Abuse Act, which placed further duties on local authorities to provide temporary accommodation to all who are homeless because of domestic abuse. Brexit has also been an influential factor, and changes made as part of the UK's withdrawal from Europe have impacted who is eligible to receive homelessness assistance.

Alongside the wider changes and associated challenges, we are seeing a record number of households approaching the council for assistance and support.

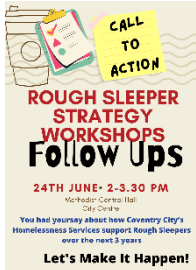
Coventry published its first Rough Sleeping Strategy in December 2019, in line with a requirement by the Government for all Local Authorities to have a strategy to prevent and tackle rough sleeping. From the outset it was accepted that the successful delivery of the Rough Sleeping Strategy and Action Plan was not in the Council's power alone. Therefore, a One Coventry partnership approach is the only way that we will be able to ensure successful realisation of our vision, therefore the strategy needed to be owned, supported, and delivered by ensuring effective collaboration and partnership working.

Rough sleeping Strategy

The Rough Sleeping Strategy and its Action Plan were reflective of and intrinsically linked to the Council's Housing and Homelessness Strategy. The two strategies needed to be considered and delivered in tandem. Since the approval of the strategy in 2019 there has been a worldwide pandemic. Obviously, this has had a number of serious and negative impacts on individuals and society as a whole. In regard to rough sleeping there have been a number of positive outcomes in regard to our ability to accommodate and support some of the most entrenched rough sleepers in Coventry. The impact of this can be seen in the number of people accommodated as part of the 'Everyone-In' initiative.

The current Rough Sleeping strategy was reviewed during 2022 to reflect the shifts that had happened as a result of the covid 19 pandemic and the increased funding and support that was being provided for those rough sleeping or at risk of rough sleeping.

2.1 Achievements Homelessness and Rough Sleeping 2019-2024

Preventing homelessness and supporting those who do become homeless	
What we have achieved:	
<ul style="list-style-type: none"> • The Homelessness Reduction Act duties have been fully integrated into the homelessness service. • Regular reporting of metrics. • Recruitment of Head of Housing, Housing and Homelessness Operational Lead (Accommodation Team) and Housing & Homelessness Commissioning and Partnerships Lead. • Creation and expansion of Rough Sleeper Outreach Team. • Publication of a Rough Sleeper Strategy and action plan • Creation of a Temporary Accommodation Team. • Service adapted to continue to deliver services during the Covid-19 pandemic and restrictions. • Training provided to various council services and external partners. • Duty to Refer procedures in place and training provided to relevant teams/organisations. • Redesign of the Coventry Homelessness Forum. • Regional work through the WMCA Homelessness Task Force • Co-creation panel set up for those with lived experience of homelessness. • Values and behaviours training for staff • Updated information and advice on the website 	

- Dedicated Landlord Liaison Officer was recruited, and regular Landlord Forums were held.
- Focus on early identification and intervention for people at risk of homelessness.
- Homelessness commissioned services in place from April 2020
- Project to purchase properties for TA and Supported TA use.



- Creation of the Let's Rent scheme.
- Improvement of TA options to reduce B&B use.
- New Homefinder Policy approved and implemented.
- Housing First scheme delivered



The impact

- Range of good quality temporary accommodation with a reduction in use of B&B type accommodation
- Enhanced provision for rough sleepers in regards to support and accommodation options following
- Increased preventions and reliefs resulting in more people either securing alternative accommodation or remaining in their existing homes .
- Increased focus on prevention through the vulnerable person and complex needs forum and eviction prevention panel
-

3. Homelessness review

Housing authorities are required by legislation (Housing Act 2002 and the Homelessness Reduction Act 2017) to carry out a periodic review of homelessness in their area. The purpose of the review is to determine the extent to which the population in the district is homeless or at risk of becoming homeless, assess the likely extent in the future, identify what is currently being done and by whom, and identify what resources are available to prevent and tackle homelessness.

Local housing authorities should use this understanding of homelessness in their area to inform their Homelessness Strategy and they are obliged by legislation to involve partners in this process. In addition, the Homelessness Code of Guidance for local authorities sets out some requirements for a Homelessness Strategy. It should:

- Link to the wider contributory factors of homelessness, such as health, wellbeing, employment, and economic factors.
- Be consistent with other corporate strategies and objectives. Involve partners in implementing the strategic homelessness objectives.
- Have an Action Plan to show how the strategic objectives will be achieved.
- Be monitored and reviewed during the life of the Strategy.

4. Legislation and policy

The legislation and policies that impact homelessness are varied has counter impacts and presents its own challenges in terms of levels and causes of homelessness which are multi factored and intricate.

4.1. Homeless Reduction Act 2017.

The homelessness legislation is set out in Part 7 of the Housing Act 1996 and provides the statutory framework and duties for local housing authorities to assist people who are homeless or threatened with homelessness. The legislation was amended via the Homelessness Act 2002 and the Homelessness (Priority Need for Accommodation) (England) Order 2002. These amendments required housing authorities in England to formulate and publish a homelessness strategy based on the results of a review of homelessness in their district. They also extended the groups of people whom housing authorities had a homeless duty towards, now including homeless 16- and 17-year-olds, care leavers aged 18-20, people who were vulnerable as a result of being in care, the armed forces, prison or custody and people who were vulnerable because they had fled their home due to violence.

The Homelessness Reduction Act 2017 (HRA) came into effect on 3 April 2018 and significantly reformed England's homelessness legislation by placing duties on local authorities to intervene at earlier stages to prevent homelessness. It also required housing authorities to enhance homelessness services to every household who is homeless or threatened with homelessness, and not just those who are considered to be in 'priority need'.

4.2. Rough sleeping - Ending rough sleeping for good in 2022.

Ending rough sleeping for good is a cross-government strategy setting out how the government and its partners will end rough sleeping for good. The strategy sets out how the whole government is taking action to meet its ambition to end rough sleeping, reflecting on the significant progress that has been made since the initial 2018 Rough Sleeping Strategy. The strategy is built on 3 pillars – prevention, crisis, and relief.

4.3. The Tenant Fees Act 2019

This Act prohibits landlords and letting agents from requiring a tenant, licensee or other 'relevant person' to pay fees, other than 'permitted payments', in connection with specified private rented sector tenancies/licenses. This would normally come in the guise of renewal fees or credit check fees. It also caps all deposits to 5 weeks' equivalent rent. This is a positive change as it makes access to the private rented sector more affordable as up-front fees and rent deposits are minimized.

4.4. The Homes (Fitness for Human Habitation) Act 2018

This requires a landlord to ensure a property meets minimum safety standards. Violations can range from mould, small, cramped living spaces, lack of adequate sanitation facilities, insecure doors, and windows, excess cold and potential for trips and falls. This Act empowers tenants to obtain redress in the courts for sub-standard accommodation. Poor standard accommodation in the private sector can increase the need for tenants to move home.

4.5. Rented Homes Bill 2021 / Renters Reform Bill

This Bill proposes to amend the Housing Act 1988 to abolish Assured Shorthold Tenancies. Thereby disabling a landlord's ability to commit to a fast-track eviction under Section 21 of the Housing Act, as this section will be repealed. Although more grounds for eviction will be introduced in the bill, it will oblige landlords to prove the grounds of eviction to a court. Removing the fast-track to evictions approach substantially increases the security of tenure for private renters.

4.6. The Supported Housing Regulatory Oversight Act 2023

The act came into force on the 29th of August 2023 and was passed as a response to the issues with the quality of some of the accommodation, providers and the care and support provided in exempt accommodation. Some providers were seen to place profits over the actual provision of care and support which is an essential part of supported exempt accommodation.

The Act will allow the Government to create new National Supported Housing Standards which will set out minimum standards for supported exempt accommodation and will aim to address the type or condition of accommodation, as well as the care or support provided whilst ensuring provision is value for money. There is no set date for these standards to be introduced and it is not currently known what the standards will specify. Alongside an introduction of minimum expected standards, The Act will introduce new licensing regulations specifically to exempt supported accommodation. It also sets out how a new Supported Housing Advisory Panel will work and makes changes to the rules on intentional homelessness when a person leaves accommodation which does not meet national standards. The act will also require local authorities in England to review supported housing in their areas and develop Supported Housing Strategies.

4.7. Domestic Abuse Act 2021

The Domestic Abuse Act makes provisions about domestic abuse, for the granting of measures to assist individuals in certain circumstances and has changed the homelessness legislation to give automatic priority need to victim/survivors of domestic abuse. n.

5. Understanding homelessness nationally

Local authorities are working in an increasingly challenging environment, we have faced the Covid-19 pandemic, the rising cost of living, and we are seeing an increase in complex and diverse groups requiring support from local authorities. As a result, there is a rising demand for homelessness and housing services, with increasingly limited options to provide support and relief.

The [Government's Statutory Homeless Annual Report](#) outlines that in England alone, 298,430 households were assessed as either being at risk of homelessness or already homeless from April 2022 to March 2023, which is a 7.3% increase from the 2021 financial year.

5.1. Covid-19, and a new national strategy

In 2020, during the Covid-19 pandemic, the Government implemented the 'Everyone In' policy. This policy equipped local authorities with the mandate and resources to provide temporary accommodation for all rough sleepers to keep them safe during the pandemic. Around 37,000 rough sleepers in England were housed in temporary accommodation. The policy enabled housing teams to help even the hardest-to-reach and street-attached rough sleepers.

However, [Shelter's 2021 'Everyone In: Where Are They Now?'](#) report estimated that more than 77% of those 37,000 rough sleepers that the policy helped, had not moved into settled accommodation. This policy was a short-term solution that successfully provided rough sleepers with temporary accommodation. Yet, it did not tackle the issue of limited affordable accommodation for people to move into. It also did not ensure that there was adequate support to help people maintain long-term tenancies.

5.2. Housing affordability and availability

There is a growing lack of affordable housing in the UK. Recent global factors, such as the cost-of-living crisis, rising energy bills, and inflation rising at unprecedented levels, have made it much more challenging for residents to pay essential housing bills. As well as this, welfare support, such as

Universal Credit and the Local Housing Allowance, have not increased in line with rising costs (though LHA rates will increase from April 2024. Figures from the [ONS](#) indicate that the average home in 2000 cost 4 x the average salary. By 2022, this had risen to) 8.3 x the average salary. The rise in interest rates between August 2022 and March 2023 further impacted on the affordability of mortgages for homeowners and prospective buyers. Landlords are also impacted by the challenge in paying mortgages and as a result, many increased their rental rates.

There is also a shortage of available accommodation. There has been a [decline of national housebuilding](#), from a peak of just over 350,000 completions in 1968 to an average of 165,000 completions over the five years to 2022 (DLUHC Live Table 244). This includes a drop in new social homes being built – just over 9,500 new social homes were built in 2022/23, alongside just over 24,000 Affordable Rent homes. The number of Social rented homes also continues to decrease as tenants purchase their properties under the Right to Buy scheme. The pool of available private rented accommodation is also reducing as many landlords are selling up and exiting the sector entirely. So, whilst residents are increasingly struggling to afford housing costs, there is a growing lack of available accommodation. Therefore, people are struggling to find affordable housing to buy or to rent, and there is an increasingly long waiting list for social housing both locally and nationally. People face a lack of viable options if they do become homeless or are threatened with homelessness.

Local councils are having to use temporary accommodation in higher numbers and for longer periods to house people who are homeless. In England, the number of people living in temporary accommodation has risen by an alarming 89% in the last 10 years, according to the [Local Government Association](#), which costs Local Authorities about £1.74billion, depleting spending from other vital interventions. This is largely due to a reduction in options of affordable accommodation for people to move into.

5.3. Refugees and EU Nationals

Local authorities have faced additional demands on their housing with international developments resulting in UK policy changes. Local authorities have a duty to provide accommodation for people who have been evacuated from danger, under various schemes. This includes the Afghan Relocations and Assistance Policy (ARAP) and Afghanistan Citizens Resettlement Scheme, Ukrainian placement schemes, and the Hong Kong UK Welcome Programme. For example, Ukrainian nationals were hosted by UK families, but many placements have now ended. Therefore, local authorities have a responsibility to help them secure housing and avoid homelessness.

The impact of Brexit also means that there is a new sub-group of European nationals who no longer have the right to work in the UK. If they are homeless or sleeping rough, they no longer qualify for public funding and their housing options through local authorities are highly limited. This inevitably impacts local health services and frontline workers who face worsening health conditions for those people due to their unresolved housing situation.

6. Types of homelessness

Rough sleeping is the most visible form of homelessness but there are a wide range of situations that are also described as homelessness.

Understanding each type of homelessness leads to better support and a better view of homelessness as a whole. Building a picture of the number of people who are homeless is complicated. This is due to the different ways each type is counted and the limitations of each approach.

6.1. Rough sleeping

Rough sleeping is the most visible and dangerous form of homelessness. The longer someone experiences rough sleeping the more likely they are to face challenges around trauma, mental health, and drug misuse.

According to the Annual snapshot count figures published on 29th February 2024

At a national level:

3,898 people were found to be sleeping rough, up by 27% (829 people) on the previous year. This is a 120% increase above the level in 2010 when the current annual snapshot count methodology was first introduced.

The rate of people sleeping rough on a single night in England in 2023 is 6.8 people per 100,000. This has increased since 2022 (5.4 per 100,000) though remains lower than the peak in 2017 (8.5 per 100,000).

Most people sleeping rough in England are male, aged over 26 years old and from the UK. This is similar to previous years. However, rough sleeping is rising among women with 568 seen to be rough sleeping in 2023, up from 464 in 2022, a rise of 22%. Most people sleeping rough were from the UK, similar to previous years. In 2023, 62% were from the UK, 18% were EU nationals and 9% were from outside the EU and the UK. 11% were recorded as 'not known'.

6.2. Statutory homelessness

In 2022/2023, 298,430 households were accepted as being owed a duty from their local authority because they were either homeless, or at risk of becoming homeless.

For 24,260 people, the main reason they needed support to try to prevent their homelessness was due to them being issued a Section 21 eviction notice by their landlord. This means they had to leave the property due to no fault of their own. (Statutory Homelessness in England 22-23, DLUHC)

As defined by the homelessness legislation, Local Authorities have a duty to make one suitable offer of settled accommodation to those who meet the tests of homelessness and are therefore owed the main housing duty.

6.3. In Temporary Accommodation

At the end of September 2023, there were over 109,000 families and individuals in England who were staying in temporary accommodation provided by their local council because they were homeless, (sources: [DLUHC](#)). Note that the length of time people can stay in temporary accommodation can range from a single night to many years.

6.4. Hidden homelessness

Although everyone is eligible to receive information, advice, and guidance on housing & homelessness from Local Authorities, not all are eligible for support under homelessness duties or provided emergency accommodation. Additionally, there are also many people who do not approach their councils for help. Many people who experience homelessness are hidden from statistics and services as they are dealing with their situation informally. This means staying with family and friends, sofa surfing, or living in unsuitable housing such as squats or in 'beds in shed' situations. Crisis undertakes an annual study (the Homelessness Monitor) which attempts to highlight the overall number of homeless households in England.

All these situations leave the person extremely vulnerable, and many have to sleep rough at some time.

Crisis Skylight a leading homelessness charity estimates that homelessness is experienced by 227,000 households in Great Britain on any single night. These figures try and show the scale of all forms of homelessness and includes an estimate of people who are not accessing services or recorded in official government data.

6.5. At risk of homelessness due to insecure accommodation

Some people are more at risk of being pushed into homelessness than others. People in low-paid jobs, living in poverty, and poor quality or insecure housing are more likely to experience homelessness and insecure accommodation.

7. Causes of Homelessness, Risk factors and Impacts

7.1. Risk factors.

According to Public Health England many personal risk factors related to childhood experiences including being part of a homeless family as a child, missing school, running away from home or residential care, and moving house frequently means a person is more likely to experience homelessness.

Researchers from Heriot Watt University challenge the notion that “we are all two pay cheques away from homelessness” and that homelessness is not randomly distributed across the population [Homelessness in the UK: Who is most at risk? — Heriot-Watt Research Portal \(hw.ac.uk\)](https://www.heriot-watt.ac.uk/research-portal/homelessness-in-the-uk-who-is-most-at-risk/) It suggests that individual, social, and structural risks are largely predictable and that, although individual causes are important in many cases, the main risks are structural. Homelessness risk factors highlighted include:

- The centrality of poverty particularly childhood poverty.
- The impact of local labour and housing market conditions.
- The absence of social support networks, particularly family.

There are many different reasons why people become homeless in the UK, and these include a range of social, economic, and personal factors. According to the charity Crisis, [Homelessness: Causes, Types and Facts | Crisis UK](https://www.crisis.org.uk/homelessness-causes-types-and-facts/) some of the main causes of homelessness include losing a job, relationship breakdown, and health issues such as addiction or mental illness. However, the most frequent reason is being unable to pay for housing, rent, groceries, and bills.

The cost-of-living crisis has made it increasingly difficult for low-income households to keep up with their expenses, and this can contribute to homelessness. Many people simply cannot afford to pay their rent or mortgage and are forced to rely on temporary accommodation or the support of friends and family. In addition, the severe lack of affordable homes in many areas of the UK means that households are often stuck in temporary housing or forced to move around frequently, which can exacerbate their situation.

The impact of the cost-of-living crisis is particularly severe for vulnerable populations, including those with physical or mental health issues, immigrants, and the elderly. For example, those with mental health problems may struggle to keep a job or maintain stable relationships, which can lead to homelessness. Immigrants may face language barriers, discrimination, and a lack of support systems, which can make it difficult for them to access housing and other services. The elderly may have limited income and resources and may be more vulnerable to health problems and other challenges that can contribute to homelessness.

It is clear that the causes of homelessness are multifaceted and complex and require a comprehensive approach that addresses both the root causes and the immediate needs of those affected.

7.2. The impact of homelessness

The negative impact of homelessness on health and well-being is well established, although national evidence is mostly focused on those experiencing chronic homelessness (rough sleepers and those living in hostels). Poor health and well-being outcomes for those experiencing chronic homelessness are exacerbated by disadvantages in accessing the healthcare system. Providing healthcare for the chronically homeless population is far more costly than the general population due to much higher levels of use of acute services (A&E) and lower use of primary services.

According to the British journal of general practise in an article published in October 2023 entitled "Inclusion health and missingness in health care": People who are homeless, rough sleeping or living in insecure housing typically experience multiple risk factors for poor health (such as poverty, violence, and complex trauma). They experience stigma and discrimination and are not consistently accounted for in records such as healthcare databases – variation in name spellings being one such reason, as does frequent changes or absences of an address. [Inclusion health and missingness in health care: dig where you stand \(bjgp.org\)](https://bjgp.org) These experiences and factors frequently lead to barriers in access to healthcare and result in extremely poor health outcomes. Without appropriate access to primary and community care, and early / preventative interventions, people in inclusion health groups are likely to turn to acute services: For instance, A&E attendance is 6-8 times higher for people experiencing homelessness and 28 times higher for people who experience both homelessness (rough sleeping) and alcohol dependency.

National research on the negative impacts of homelessness on children is more rounded and extensive and includes children living in Temporary Accommodation. Living in Temporary Accommodation affects the emotional well-being and development of children as well as their physical and mental health and education. The negative impacts increase with the longer a child lives in Temporary Accommodation or unsuitable housing. Homelessness among young people is often the result of family breakdown and can exacerbate existing mental health and substance misuse problems.

Unemployment can be both a cause and consequence of homelessness, with research emphasising the difficulty of maintaining a job when homeless. In England during 2022/2023, 33.9% of the households owed a homeless duty were registered as unemployed, 14.3% were full-time employed, 10.6% were working part-time, 1.5% were students or training, 3.33% were seeking a job, 13.8% were not working due to long term illness and 2.97% were retired. This shows worklessness is much higher among the chronic homeless population. Although, most homeless people want to work, but face significant barriers: low-level qualifications, an absence of soft employability skills, lack of confidence/self-esteem, and limited employment history. The labour market and benefit system are also seen as disincentivising employment among homeless people with welfare sanctions a particular issue.

A history of homelessness and insecure housing is very high among the prison population. Stable housing solutions are vital in preventing reoffending. People reporting as homeless are often the victim of criminal behaviour and domestic abuse. Rough sleepers are disproportionately victims of crime (77% say they suffered ASB (Anti-Social Behaviour) or crime in the last year) but tend not to report incidents to the police. Police custody and the Courts provide many opportunities for addressing the underlying causes of homelessness such as mental ill health.

In addition to the personal toll of homelessness, there are also wider social and economic impacts. Homelessness can lead to increased crime and antisocial behaviour and can place a strain on public services such as healthcare, policing, and social services. It can also harm local businesses and tourism, as well as property values and community cohesion. [Homelessness: The Cost of Living Crisis | GN Law](#)

The cost of homelessness is also significant, which includes emergency accommodation, healthcare, and other support services. Investing in preventative measures to address the root causes of homelessness could save the government money in the long run, as well as improving the lives of those affected. According to government figures the cost to the public purse for homelessness and rough sleeping in the UK was over £1.7 billion in 2022/2023.

It is clear that homelessness is not just a personal or individual issue, but a systemic one that requires a coordinated and sustained response from the government, civil society, and the private sector.

8. Coventry

8.1. Coventry's Demographic

According to the 2021 census, Coventry's population amounted to a total of 345,324 people, representing a 9% growth rate from 2011. Based on this figure, the demographics of Coventry's population are as follows:

Christians accounted for 43.9% of the population, maintaining their status as the largest religious group since 2011, albeit with an -11% decline in growth rate.

In the 2021 census, 45% of Coventry's population identified as an ethnic minority, up from 33% in 2011, which is higher than both the regional (28%) and national average (26%)

Of the ethnic minority population, Asian Indians formed the largest group making up 9% of Coventry's total population compared to 3% in England and 5% in the West Midlands. Within Coventry, Foleshill West, Foleshill East, and Hill fields had the largest percentage of their population identifying as an ethnic minority with 80% or more doing so.

Coventry boasts of a youthful demographic, with the median age ranging from 25 to 34 years and the top 75th percentile falling within the age group of 35 to 49. Conversely, individuals aged above 74 represent the smallest proportion of the population.

54% of the population are said to be economically active, 5% are unemployed and students and 41% are economically inactive.

8.2. Summary of Coventry's population

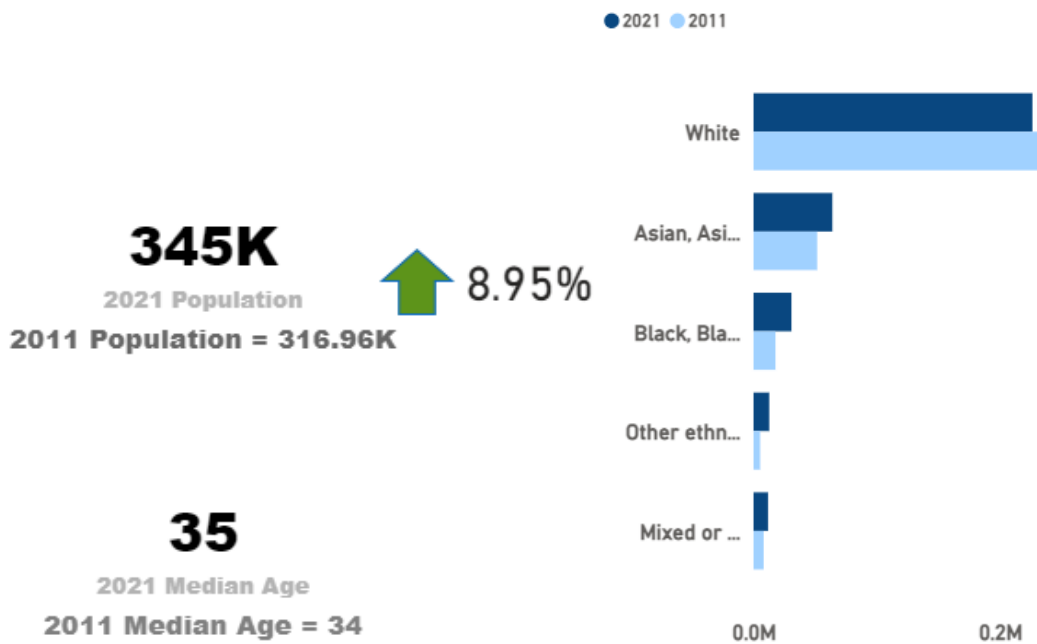


Figure 1 Ethnicity of Coventry's Population

Figure 2 Coventry's Age Breakdown

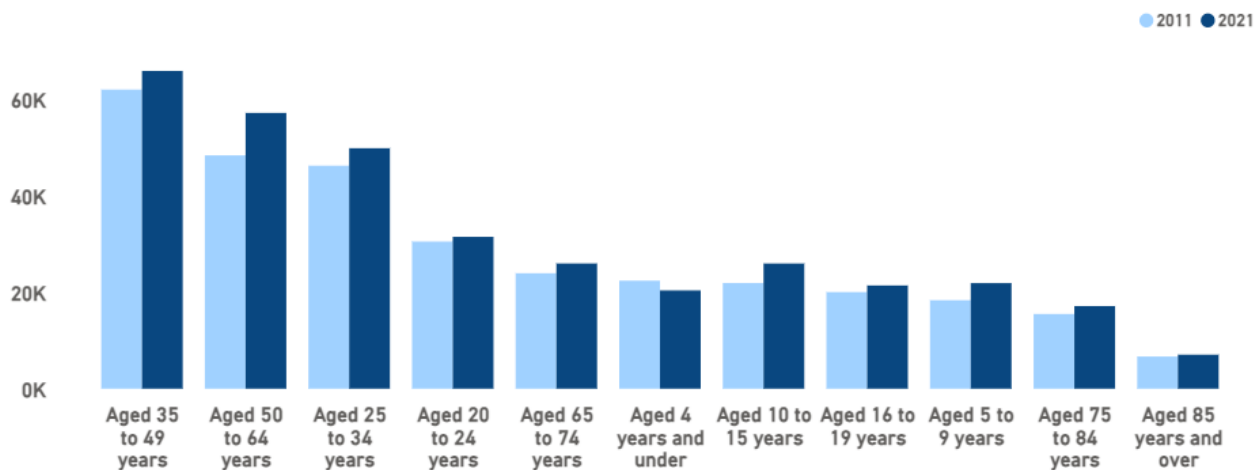


Figure 4 Economical Activities of Coventry's Population

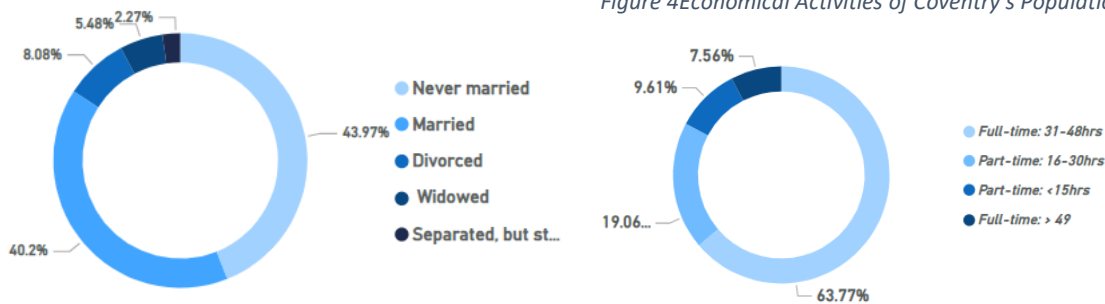


Figure 3 Breakdown of Marriage Demographics

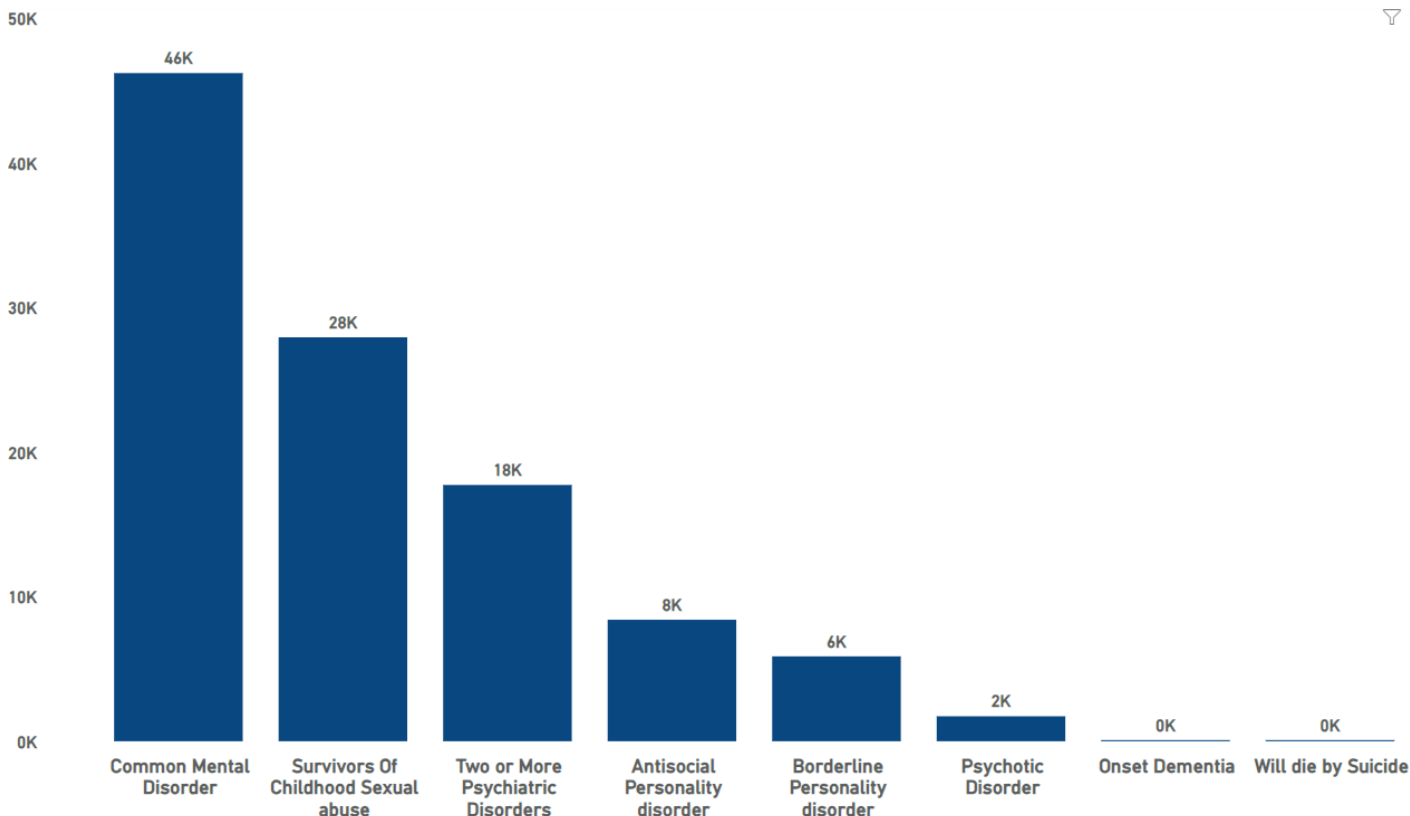
The percentage of Coventry neighbourhoods that are amongst the 10% most deprived in England reduced from 18.5% to 14.4% between 2015 and 2019. Based on this measure, Coventry ranked

64th nationally in 2019 (with 1st being the most deprived), an improvement in ranking from 46th in 2015. These pockets of deprivation limit people’s opportunities to succeed in life; and transforming life chances requires addressing the social inequalities that are established right from the earliest years. The latest available data, for 2020/21, suggest that 23% of Coventry children aged 0-15 live in relatively low-income families compared to 19% nationally.

8.3. Mental health

There are approximately 46,221 people in Coventry living with a common mental disorder such as depression.

Projected numbers of people aged 18-64 in Coventry with specific mental health needs.



Note: dependant on drugs figure covers all drugs not just opiates and crack.

Source: Mental Health Market needs assessment 2021/26

Cited: PANSI data 2020. Note that there will be overlap between these groups.

8.4. Health and life expectancy

Overall health in the city is below average, life expectancy has remained below the regional and national averages.

Life expectancy for females in Coventry is 82 years and for males is 78. from 2018 to 2020. This is below the national average of 83.1 for women and 79.4 for men. Healthy life expectancy for Coventry males is lower than the national (63.1) and regional (61.9) averages whereas for Coventry females it is slightly higher (62.6) and (63.9). The trends show little change in recent years for women, but it has fallen a little for men.

There are significant health inequalities across Coventry's neighbourhoods that effect certain communities disproportionately. Males living in less deprived areas of the city can, on average live up to 10.7 years longer than those living in the most deprived areas of Coventry, and for females, the gap is 7.8 years.

8.5. Substance misuse

Coventry has an average number of citizens who are dependent on substances and an above-average number of citizens whose alcohol consumption is considered harmful.

During 2021/22

There were an estimated 5416 people in Coventry who were alcohol-dependent (<https://www.gov.uk/government/publications/alcohol-dependence-prevalence-in-england>)

Note: but this reflects dependency, not "at risk of alcohol-related health problems" and approximately 700-800 people who are dependent access treatment each year.

There is an estimated 2,500 heroin and crack users in Coventry (the estimate has recently been increased from 1,800). Approximately 1200 drug users will access treatment each year.

Note: This is the current estimate of people who are using/misusing heroin (or other illegal opiates) and / or crack cocaine. It does not include any other substances; it also does not include those who are using / misuse prescription only opiates, etc.

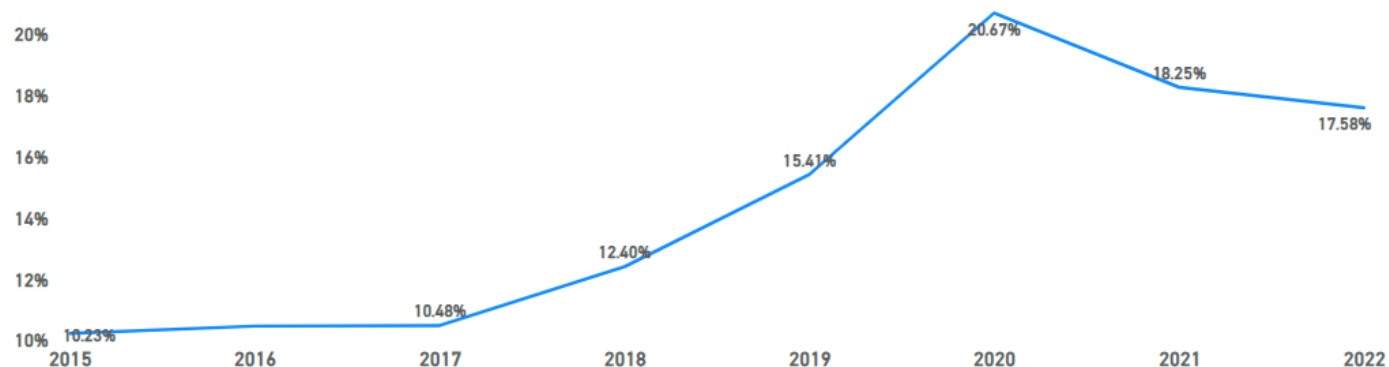
In 2021/22, there were 858 presentations (new starts) to structured treatment. Of these 28 (3%) were NFA, and 118 (14%) had a housing problem at assessment. This does not include those who accessed non-structured treatment.

Source: Office for Health Inequalities and Disparity

<https://www.gov.uk/government/organisations/office-for-health-improvement-and-disparities/about#:~:text=OHID%20supports%20the%20delivery%20of,health%20across%20the%20regional%20system>

8.6. Domestic abuse

There has been an average growth rate of 9% domestic abuse cases in West Midlands Police area force, in which by 2022, 17.6% of the total crimes reported were due to domestic Abuse, according to ONS. The breakdown of crimes and the trend of domestic abuse in West Midlands is as follows.



Estimating the number of people affected by domestic abuse is difficult due to the hidden nature of the problem and the difficulties for individuals in recognizing domestic abuse.

8.7. Housing affordability

Affordability of housing is a contributory factor to homelessness, as the price of privately renting accommodation or indeed being able to buy a property is increasing however household incomes are not directly proportional. With this ratio, it allows a measure of what it takes to afford a house in Coventry based on earnings of the individual. The measure will be based on the ratio of house price to yearly earnings, private rent to earnings and Private rent to Local Housing Allowance (LHA) rates.

Based on the ratio of House Price to Yearly Earnings: In 2022, an average house in Coventry cost 6 times the average earnings of a household. This number has been on an upward trend, which means it is becoming more expensive to purchase a house with the average earnings in the city. Below is the trend of the house affordability ratio from 1995.

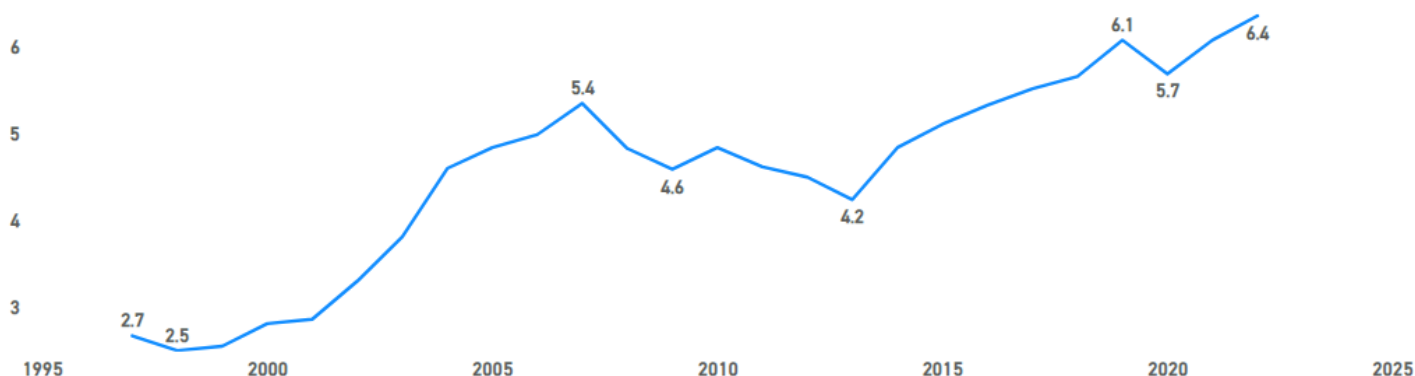


Figure 5 Ratio of House Price to Yearly Earnings

Based on the Ratio of Private Rent to Earnings: According to [ONS](#), an area is deemed affordable, if the average ratio of Private Rent to Earnings is below 0.30. The ratio of PRS to earnings in Coventry is 0.31 which is higher than the ratio of West Midlands and England, which are 0.28 and 0.26, respectively. Although, Coventry's ratio has been stagnant for the last 4 years, while the affordability ratio in West Midlands and England has had an average growth rate of 2% and 1%, respectively.

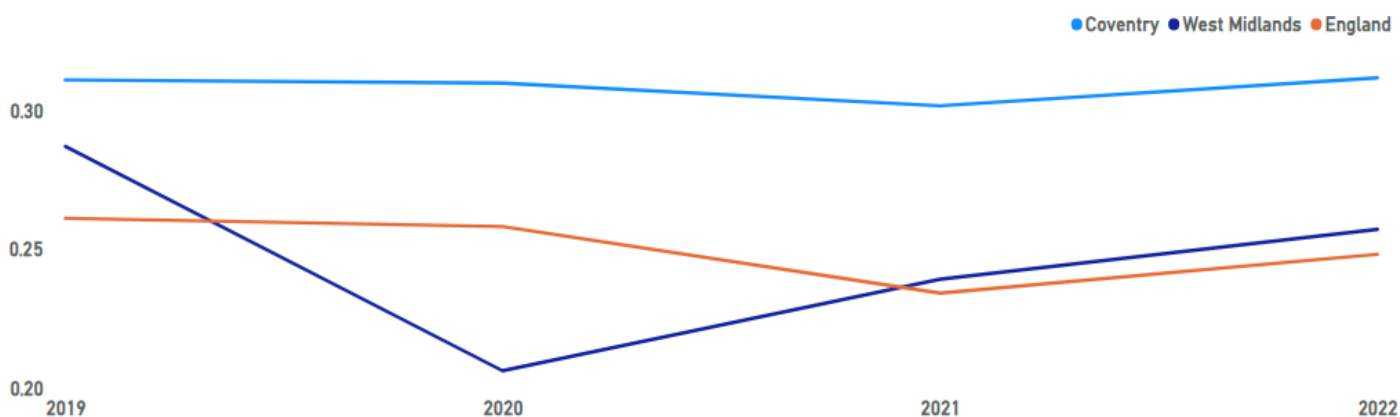


Figure 6 Ratio of Monthly Private Rent to Monthly Earnings

Based On the Ratio of Private Rent to LHA Rates: LHA rates are determined by The Department for Work and Pensions (DWP), it is calculated based on the private market rents being paid by tenants in a Broad Rental Market Area (BRMA). In 2020, the rates were frozen and it was last set based on the 30th percentile of local rents in April 2020 ([Commons Library](#)). This means with the rents increasing over the years, LHA rates will not be significant enough for claimants, which makes this factor significant in causing homelessness. However, the rates have been increased from April

2024 and it is intended to cover the 30th percentile for properties based on rental levels in September 2023.

Table of LHA Rates, Average Rent and 30th Lower Quartile Rent

Size of property	2024 LHA Rates	2023 LHA Rates	2022 LHA Rates	LHA (2021)	LHA (2020)	LHA (2019)
Room	432.4	£335.83	£335.83	£335.83	£335.83	£302.64
One	575	£488.67	£488.67	£488.67	£488.67	£399.98
Two	675	£573.43	£573.43	£573.43	£573.43	£498.94
Three	775	£673.14	£673.14	£673.14	£673.14	£573.73
Four or more	1000	£872.60	£872.60	£872.60	£872.60	£763.85

Figure 7 LHA Rates Table

Size of property	Mean (2023)	Mean (2022)	Mean (2021)	Mean (2020)	Mean (2019)
Room	464	480	436	405	368
One Bedroom	698	665	623	613	592
Two Bedrooms	814	767	746	705	678
Three Bedrooms	946	883	848	807	766
Four Bedrooms or more	1,483	1,296	1,425	1,322	1,191

Figure 8 PRS Mean Rate

Size of property	Lower quartile 2023	Lower quartile 2022	Lower quartile 2021	Lower quartile 2020	Lower quartile 2019
Room	438	433	390	373	355
One Bedroom	625	595	540	525	500
Two Bedrooms	710	675	650	625	595
Three Bedrooms	800	780	750	725	695
Four Bedrooms or more	1,100	1,050	1,000	950	895

Figure 9 PRS Lower Quartile

Summary of 30th Lower Quartile rents to LHA Rates in Coventry City

Nb: For a ratio greater than 1, signifies it's less affordable.

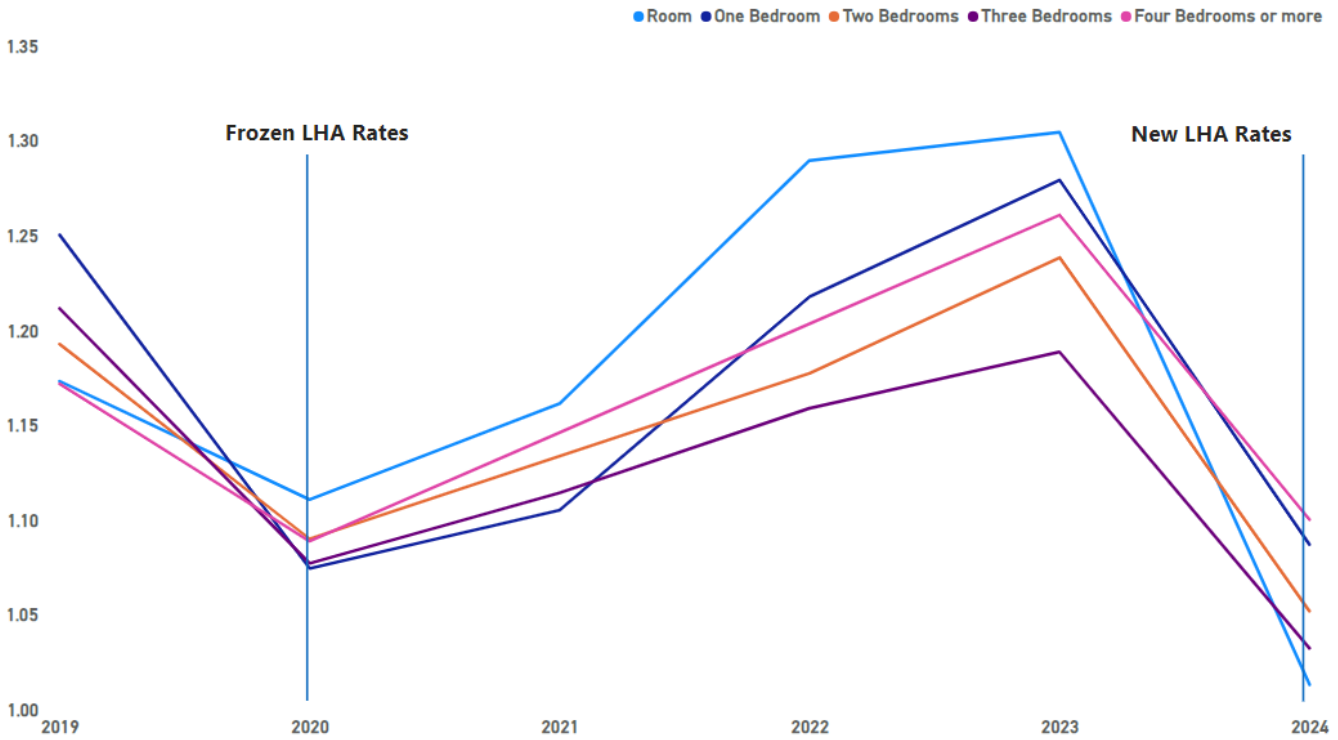


Figure 10 Trend of LHA Ratio to 30th Lower Quartile Rents in Coventry City

NB: The number of houses that fall under the 30th lower quartile will not be accessible to most of the claimants of LHA as the number of claimants is greater than the number of properties in the 30th lower quartile.

Comparisons of 2023 Lower Quartile Rent Ratio of (2024 LHA Rates) to 2023 Mean Rent Ratio of (2024 LHA Rates)

Nb: For a ratio greater than 1, signifies it's less affordable.

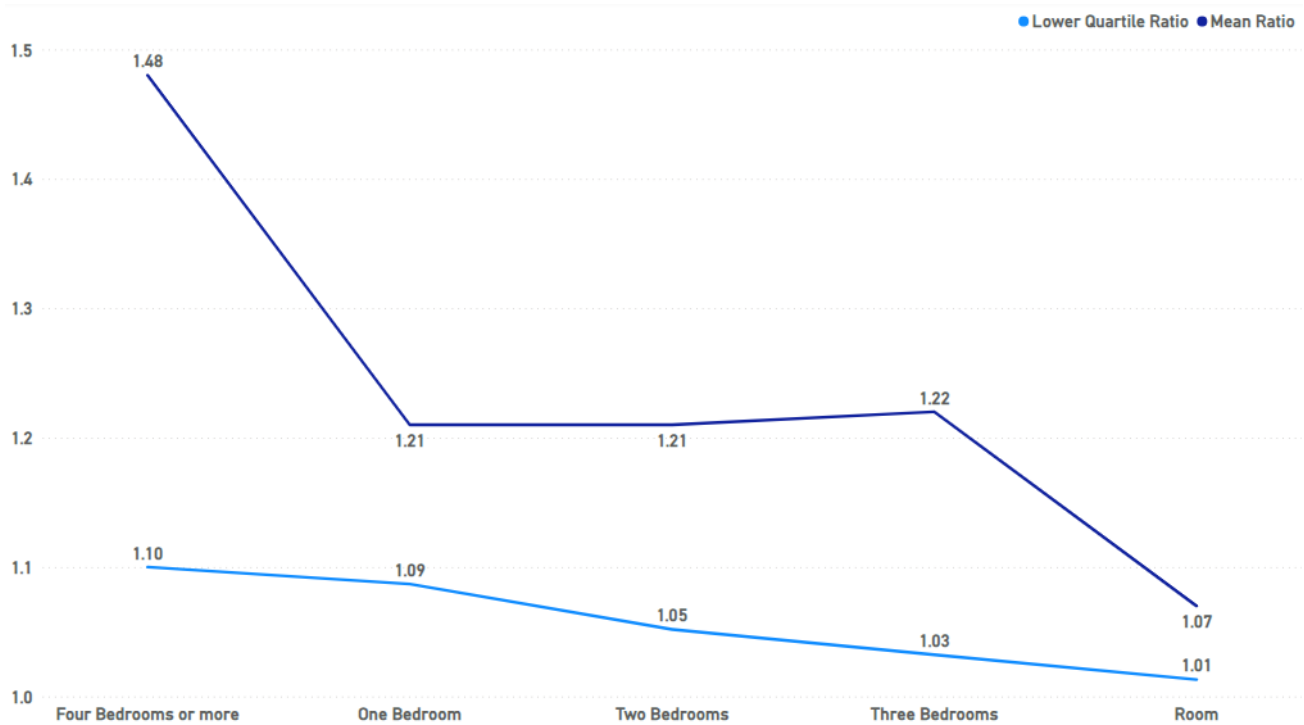
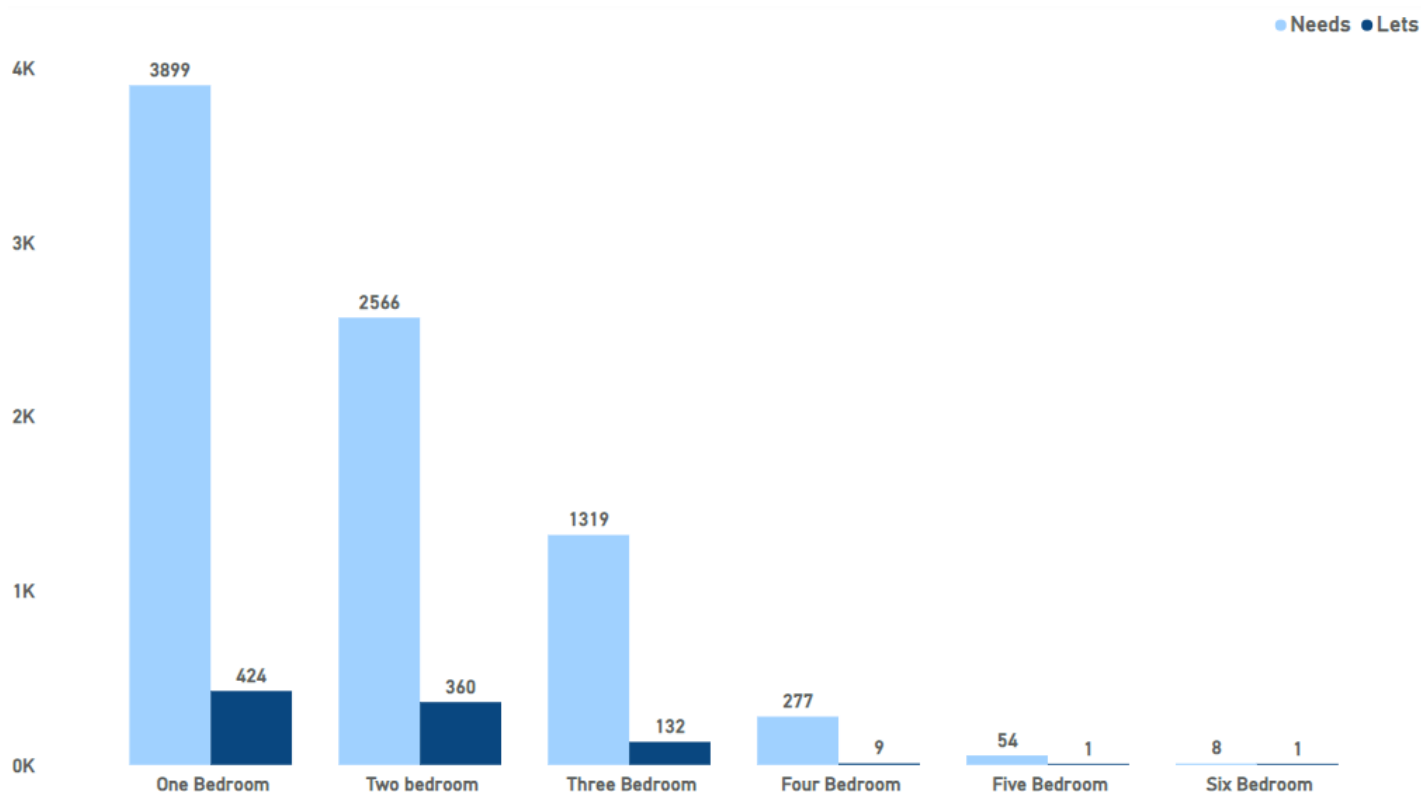


Figure 11 Comparison of 2024 LHA Rates Ratio to Mean and Lower Quartile Rent

8.8. Availability of Affordable Housing in Coventry City

As a non-stock holding local authority (all council housing stock was transferred in 2000 to Whitefriars Housing, now Citizen), social housing in Coventry is owned and managed by Registered Providers. 35 Registered Providers operate in Coventry, but most of the stock is held by the ten Registered Providers who are partners in Coventry Homefinder, the choice-based lettings scheme by which social housing is let in the city. There are just over 25,600 Registered Provider properties in Coventry <https://www.gov.uk/government/statistics/private-registered-provider-social-housing-stock-and-rents-in-england-2022-to-2023> (22,341 general needs, 2,633 supported housing/housing for older people, 634 shared ownership). In 2022/2023 927 houses were let via Home Finder and the breakdown of these lettings' vs the housing needs in 2022/2023 is as follows:



9. Reasons for Homelessness in Coventry

Homelessness is a social and political issue. The reasons for homelessness include poverty, systemic inequality, and incomes that are failing to keep up with rapidly rising rents and the cost of living. Life events can also be a source of considerable strain and be a cause of homelessness, this could be a job loss, domestic abuse in the home or a relationship breakdown. Physical and mental health conditions and substance misuse can also be both a cause or a result of housing insecurity and homelessness.

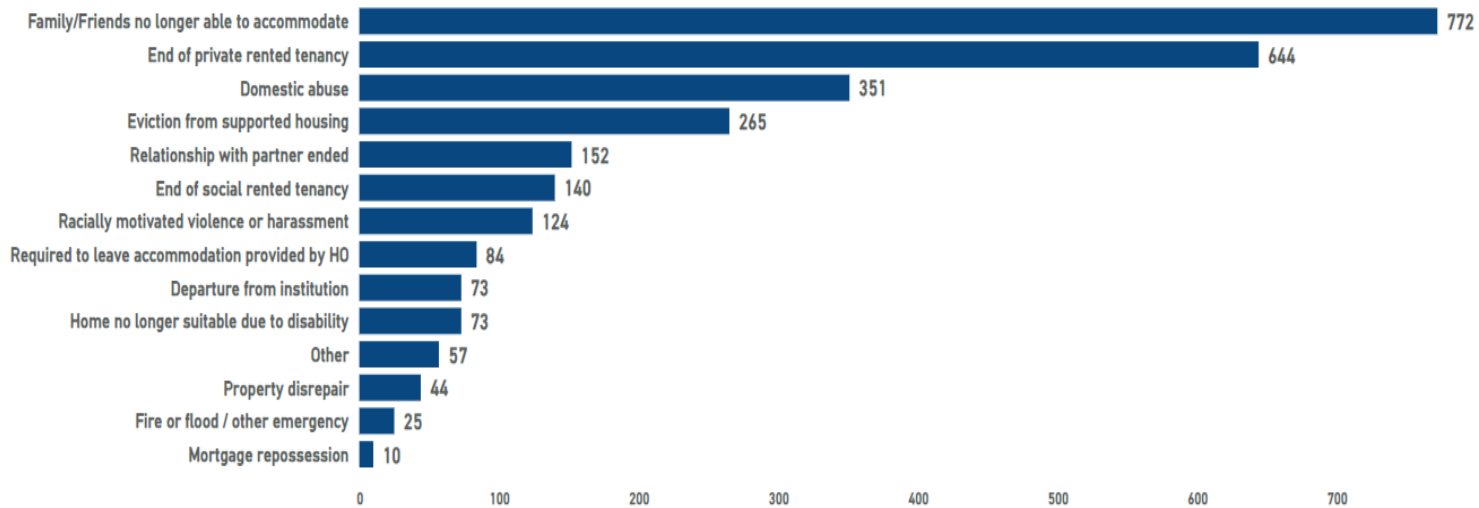
Homelessness stems from various structural, social, and personal factors, including a dearth of affordable housing, poverty, unemployment, and life-altering events.

In determining why households are homeless, we took a holistic view of the data collected during the assessment of households that approached the council for homelessness support. The main reasons for approaches to the local authority for assistance were.

- Family/Friends no longer wanting to accommodate,
- End of private rented or social rented tenancy,

- Domestic Abuse,
- Eviction from supported housing,
- Relationship ended with partner,

Breakdown of top main reasons for households losing their last settled accommodation in 2022/2023.



10. Duty to refer.

The Homelessness Reduction Act 2017 introduced a duty on specified public bodies in England to refer consenting people they believe to be homeless or threatened with homelessness within 56 days to a Council's Homelessness Service. The duty applies to a range of public bodies:

- Social Services Authorities (Adults and Children's Social Care)
- NHS Services - A&E Services and Urgent Treatment Centres (Walk in Centre)
- NHS Services – Hospitals (when providing in-patient care)
- Job Centre Plus
- Prisons (Public and Private)
- Probation Services (including Community Rehabilitation Companies)
- Youth offender institutions
- Youth Offending Teams
- Secure Colleges and Training Centres
- The Secretary of State for Defence (in relation to members of Royal Navy, Royal Marine, Army)

In addition to the above agencies who have a statutory duty to refer, Coventry City Council actively encourages referrals from all agencies who work with households who are at risk of homelessness.

Summary of 2022/2023 Referrals by Agencies

In 2022/2023, the council received 606 referrals from agencies that had a duty to refer, and an additional 539 referrals from agencies that do not have a duty to refer. Most referrals came from the National Probation Service and Supported Housing. The breakdown of the agencies and the number of referrals made is as follows:

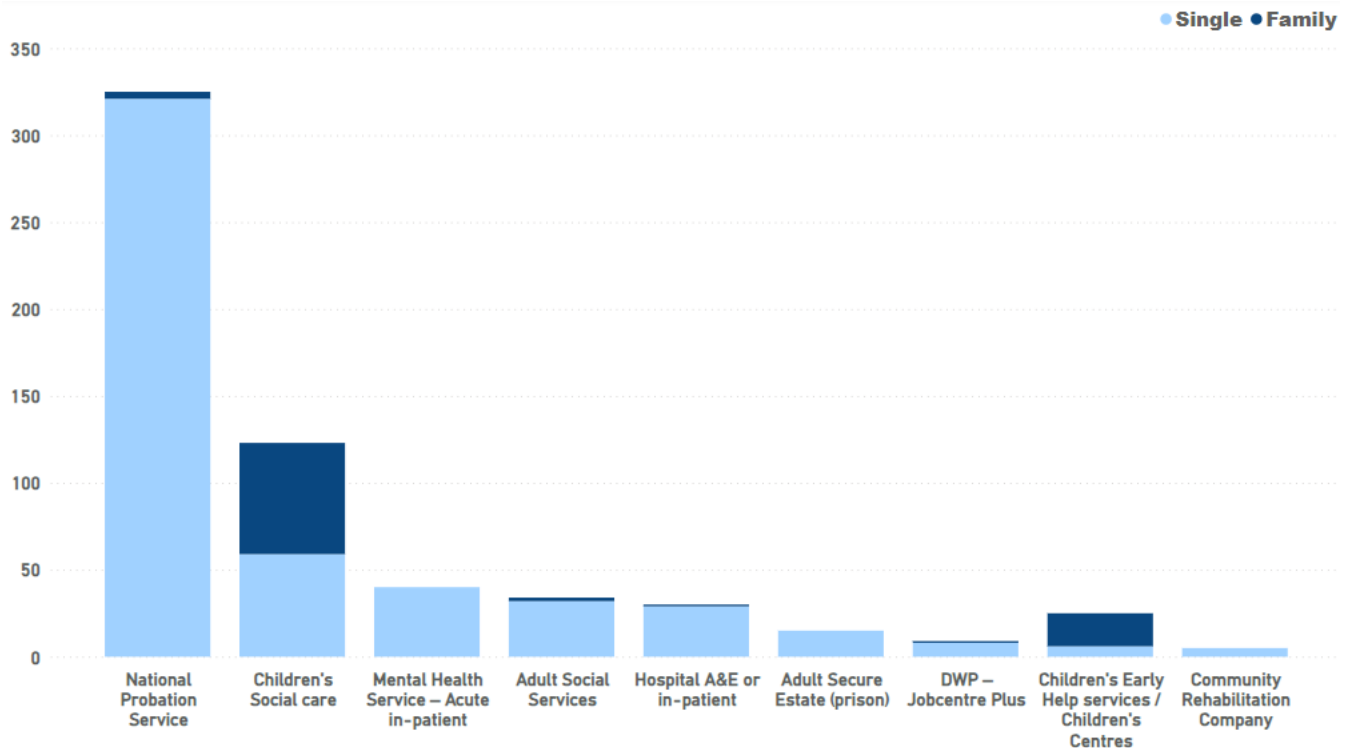


Figure 12 Families and Singles Referred by Agencies (No Duty to Refer)

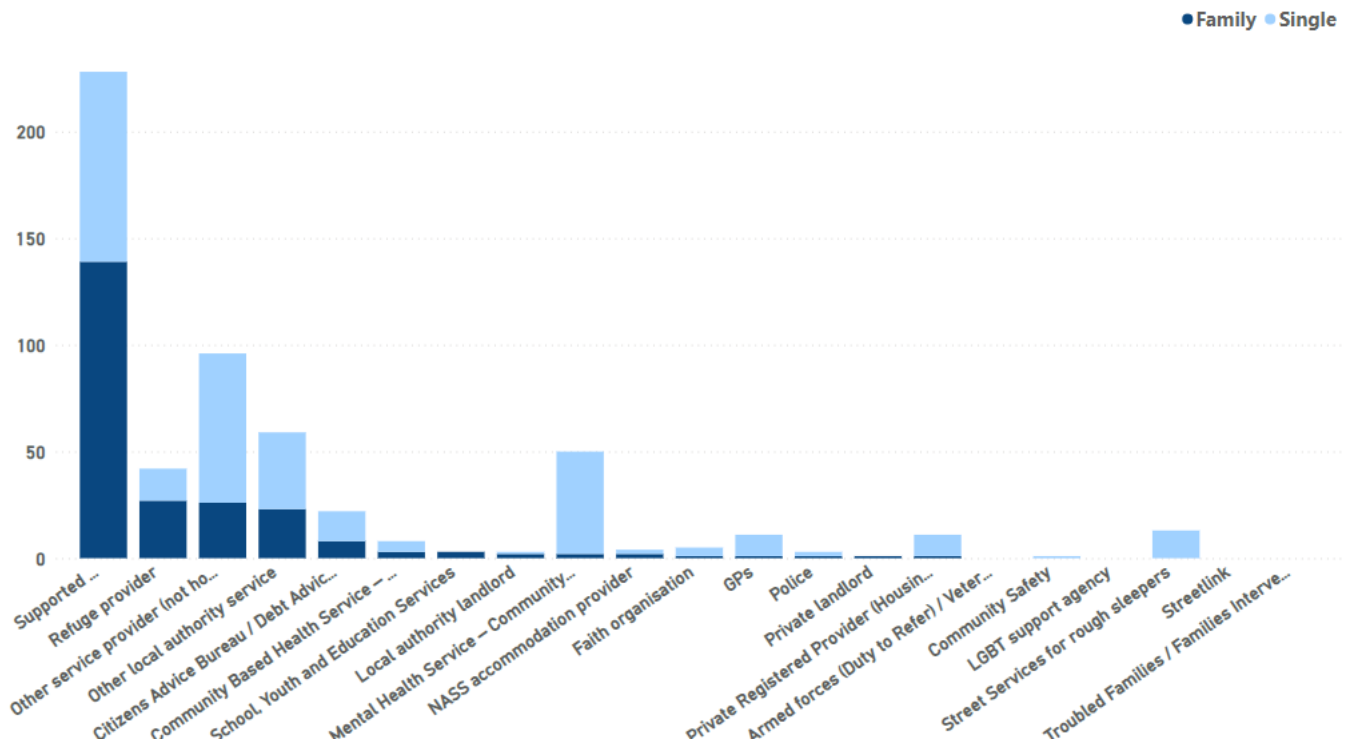


Figure 13 Families and Singles Referred by Agency (No Duty to Refer)

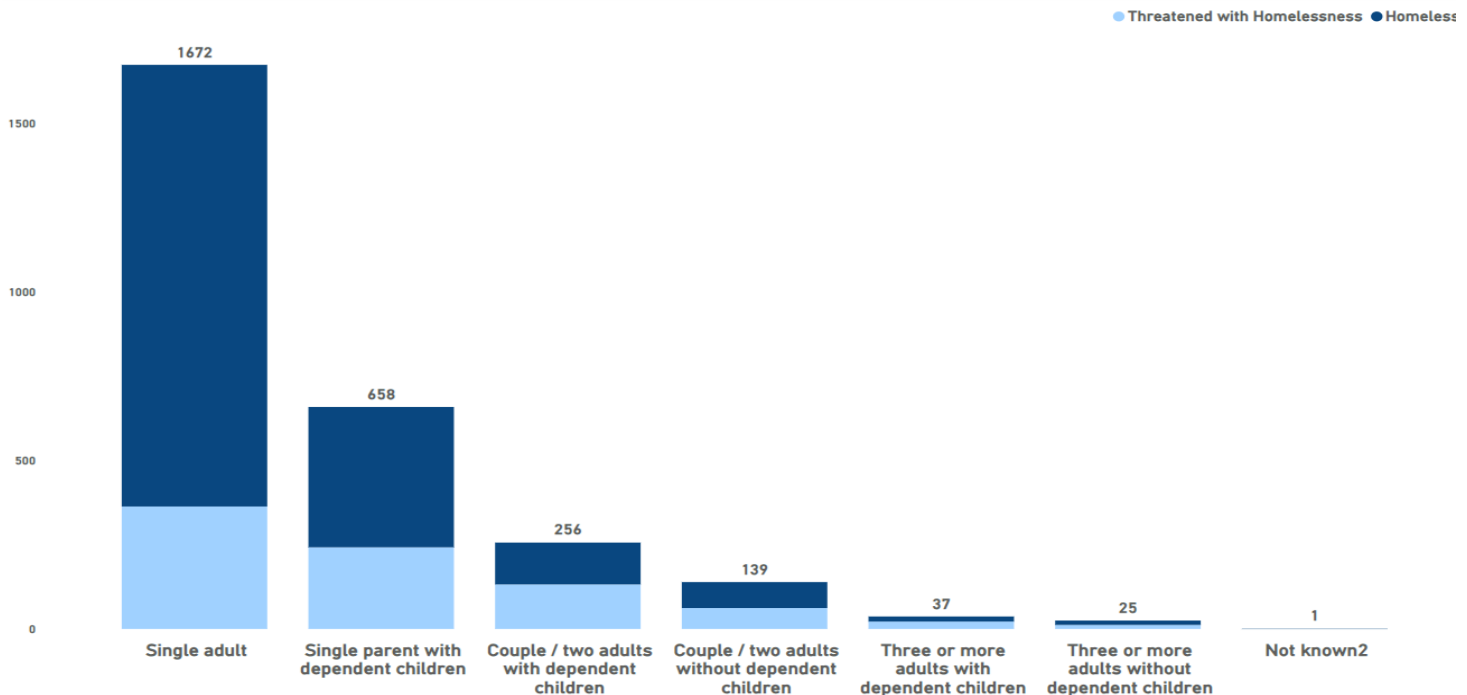
11. The scale of Homelessness in Coventry

The following is a detailed analysis of the assessments carried out by the service to evaluate the current scale of the homelessness in terms of households and individuals approaching the homelessness service in Coventry. This evaluation gives a scope of the demand for the service, who requires the service, duties carried out, and the outcome of the duties.

11.1. Front line approaches

In 2022/2023, the council had 5797 individual household approaches to its homelessness front-line service which translates to an average of 16% growth rate since 2019. Among the households that approached the council, 2848 completed a homelessness assessment which resulted in 2788 households being owed a housing duty. 30% of the households being owed a duty were assessed as being threatened with homelessness and 70% were assessed as already homeless. The 2949 households who did not complete a full homelessness need assessment were provided with housing-related advice.

Summary of Assessments carried out (by Household Make Up)



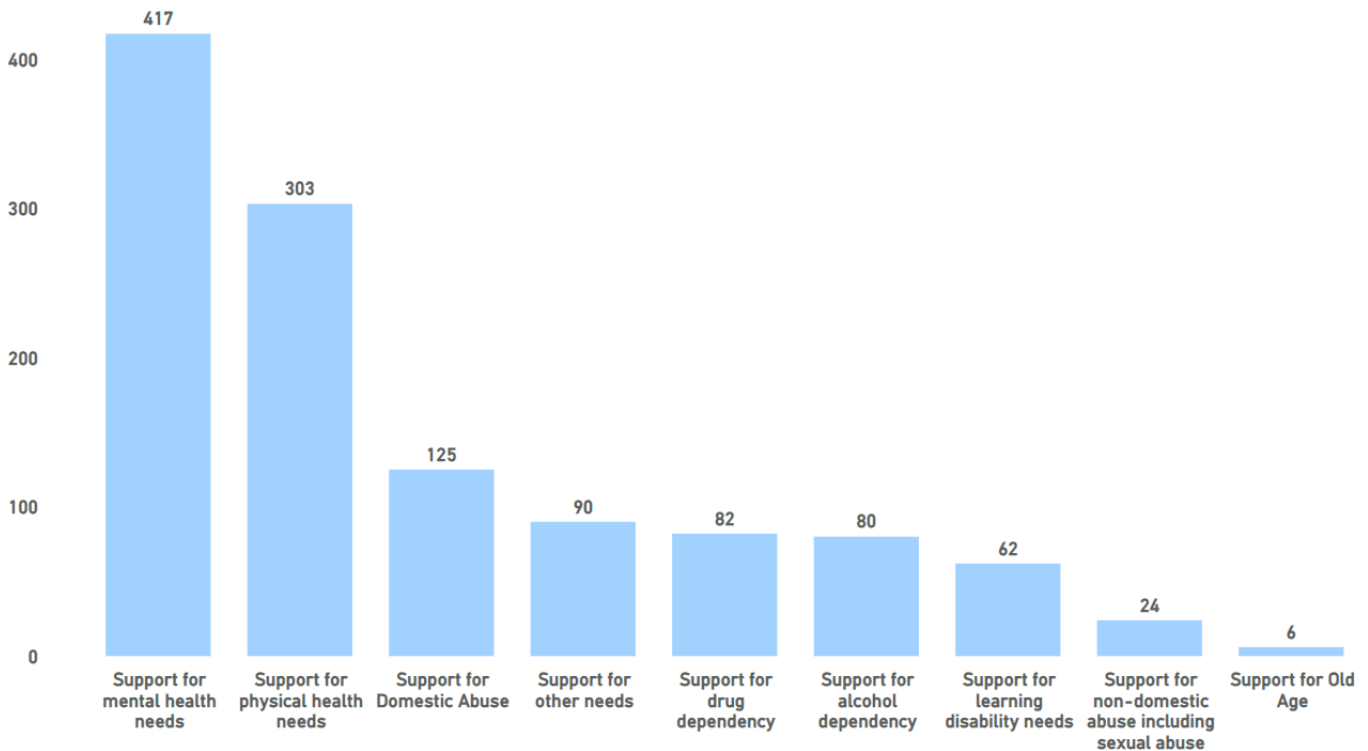
11.2. Demographic of households approaching

The demographic profile of those who approached the councils homeless service generally mirrors the national picture. In Coventry, the majority of applicants were white, constituting 53.4% of the assessed households. Moreover, the demographics skewed towards younger age groups, with 53.4% of those threatened with homelessness or already homeless falling within this category. Among those assessed, 42.2% were unemployed, and 12.2% were unable to work due to a long-term illness or disability—a figure significantly lower than the national average of 14.1%. Single applicants comprised the largest portion of those facing homelessness or the threat of it, aligning with the national trend observed in 2022/23.

11.3. Support Needs of homeless Households in 2022/2023

When a homelessness application is made, a housing needs assessment is completed, the assessment looks to quantify the support needs of the household/ individual.

In 2022/2023, 1189 households were assessed as having identified support needs. The breakdown of the needs are as follows.



During 2022/23, a notable number of cases presented complexities requiring more than just housing support, notably mental health assistance. Out of 1189 who were assessed as being owed a prevention or relief duty, additional support needs were identified. Mental health emerged as the primary support requirement, accounting for 35.5% of cases, followed by physical health needs at 25.5%. Substance misuse also played a significant role, comprising 13.6% of cases among individuals seeking assistance from the council's homeless service.

12. Statutory interventions

12.1. Breakdown of Homelessness Duties

Homelessness Duties, the following are the duties the council owes an eligible household, ([Gov.uk](https://www.gov.uk))

- **Prevention duty:** where a local authority must take reasonable steps to help someone threatened with homelessness within 56 days to secure accommodation. To successfully discharge the duty, the applicant must have suitable accommodation available to them for 6 months or more.

- **Relief duty:** where a local authority must take reasonable steps to assist someone who is already homeless. The local authority has a duty at this point to provide interim accommodation to those who are in priority need. The duty ends successfully where the accommodation has suitable accommodation available to them for 6 months or more.

- **Main duty:** Is owed to applicants following the Relief Duty where it has been assessed that the applicant is not homeless intentionally and that they have a local connection to the area. To successfully discharge the main housing duty, the local authority must make one suitable offer of accommodation to the applicant, which will be available for at least 12 months.

In 2022/2023, 835 households were owed the prevention duty, with 49.46% of these successfully prevented from becoming homeless. A total of 2,114 relief duties were conducted, with 31.08% being successful. Furthermore, 944 households were assessed as being owed a main duty after the relief duty had ended. 748 main duties were discharged in 2022/2023.

Summary of Duties owed 2022/2023.



12.2. Outcome of Duties owed in 2022/2023.

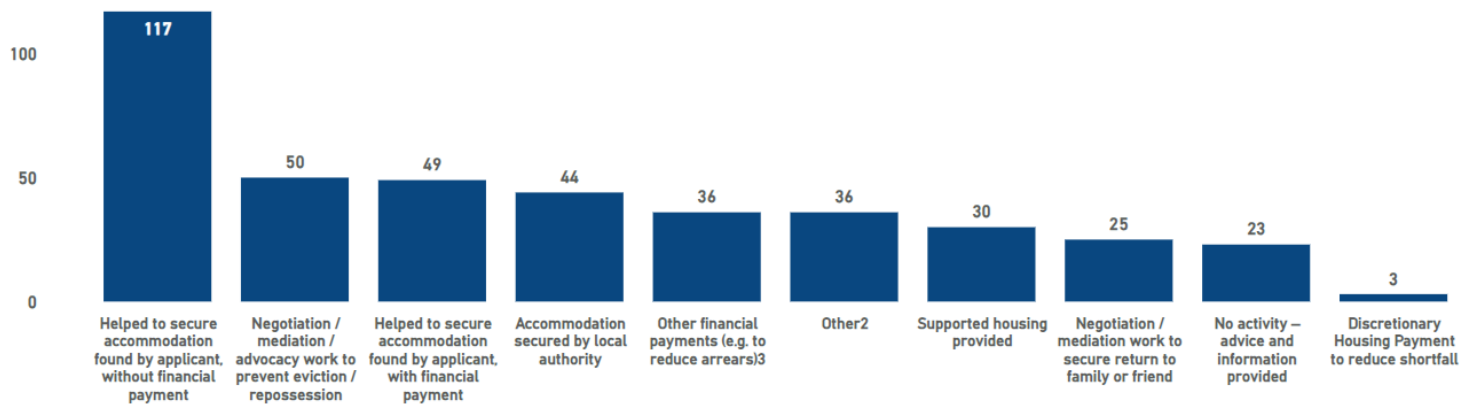
Examining the successful prevention cases in 2022/2023, 54% moved into alternative accommodation, while 46% remained in their existing accommodation. Also, 48.91% of the households who were successfully prevented from being homeless accessed the private rented sector, while 36.32% secured social rented housing, and 11.86% stayed with family or friends. The composition of households whose homelessness was prevented showed a predominance of single/couple households at 55.93%, compared to family households at 44.07%. A detailed analysis of the unsuccessful cases revealed that 83.18% became homeless, 11.14% resulted from contact loss, 2.84% were due to the elapse of 56 days, and 2.13% occurred because the household withdrew its application.

An analysis of the successful relief duties indicated that 50.99% secured socially rented housing, 30.14% secured privately rented accommodation, and 11.57% stayed with families or friends, the remaining successful relief duties ended with the applicants securing other types of accommodation. The unsuccessful relief duties revealed that the majority, constituting 85.59%, were unsuccessful within the 56-day timescale. Additionally, 8.6% resulted from contact loss, 4.19% involved withdrawn applications, 0.3% were intentionally homeless with no further duty being owed to either of these groups and 0.5% were ended due to a local connection referral to an alternative local authority.

Of the households where the main housing duty was discharged, 69.8% accepted an offer of social housing, 4.5% refused an offer of social housing, 5.7% accepted an offer of a Private Rented Sector (PRS) property, 0.4% refused an offer of PRS, and 19.5% did not go on to receive a final offer of accommodation as the main housing duty was discharged due to them refusing a suitable offer of temporary accommodation, ceased to occupy the temporary accommodation that had been made available to them, ceasing to be eligible for assistance or withdrawing their application for assistance.

Summary of the Successful Outcome of Duties Owed by the Council.

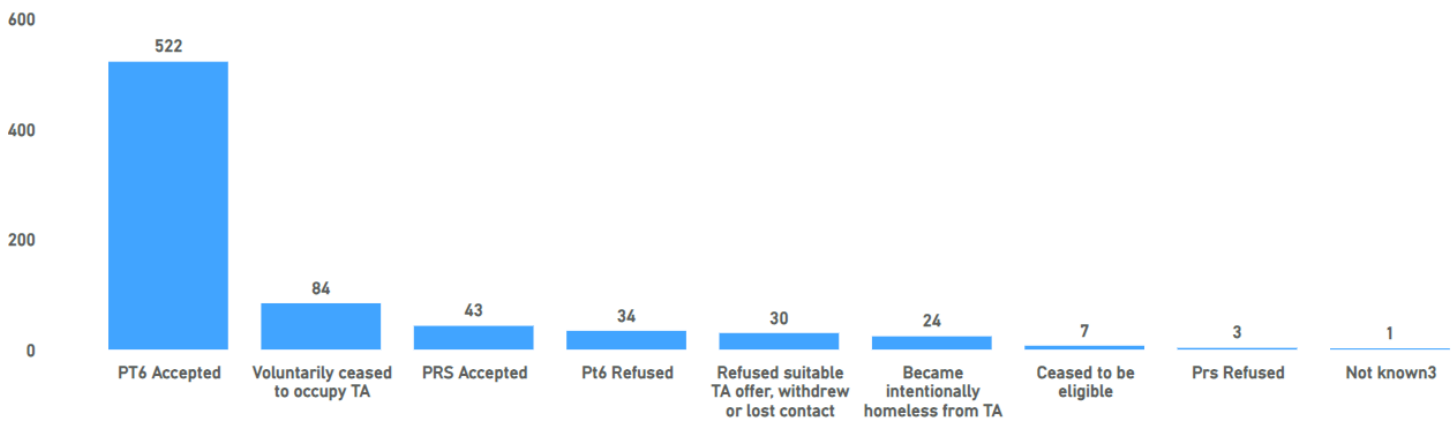
Prevention Duty:



Relief Duty:



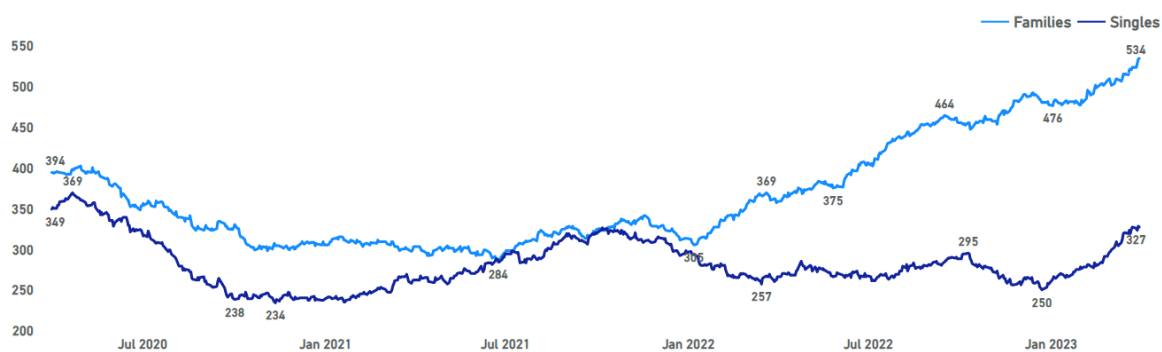
Main Duty:



12.3. Temporary accommodation provision

In 2022/2023, over 2495 households were accommodated in temporary accommodation, which was a 24% growth rate from the last financial year. With a significant portion of the accommodation being for family households.

Trend of Households Accommodated in Temporary Accommodation



In addition to the general temporary accommodation, there is a specialist Supported Temporary accommodation (STA) service run by the council for single people with high and/or complex support needs.

The STA opened in November 2020 and became fully operational the following March with the opening of 96-98 Holyhead Road. STA provides emergency, temporary accommodation for 92 single homeless people, many of whom have complex needs and/or entrenched behaviours who have been determined as being owed a homeless duty in-line with Coventry City Councils statutory obligations under Part 7 of the Housing Act 1996. The service sits alongside the Accommodation Team and within the wider Housing & Homelessness service. One benefit of STA is the reduced reliance on private temporary accommodation and reduced financial burden on the council by using our own, council owned accommodation and recovering all costs via Housing Benefit, at the same time as providing increased support and helping residents to find long-term settled accommodation.

Service make-up

STA consists of 13 HMO properties and one larger 26 bed accommodation building. The HMOs are spread across the city and are made up of 3–6-bedroom properties. The HMOs are male only, whilst the female STA provision is based at 96-98 Holyhead Road where staff control access in and out of the building. This decision was made to ensure the safety of women accessing the service and who may be fleeing or trying to move away from an abusive relationship. The accommodation at 96-98 Holyhead Road typically provides accommodation for the most complex people accessing the service, helping them to live more independently before hopefully moving them to one of the HMO's ahead of a move into long-term settled accommodation



Communal space at one of the HMO properties

The STA team

The team is made up of two service managers and eight Supported Accommodation Housing Officers (SAHO's) and is supported by our own in-house repairs and maintenance team. Whilst the SAHO's provide the housing management for all the properties, the resident support comes from our commissioned support provider, P3. The P3 team provides 'housing related' support for all residents in living in STA. All three teams are based out of the STA office at 100 Holyhead Road which is located adjacent to 96-98 Holyhead Road and can therefore respond quickly to the support needs of the most vulnerable residents.

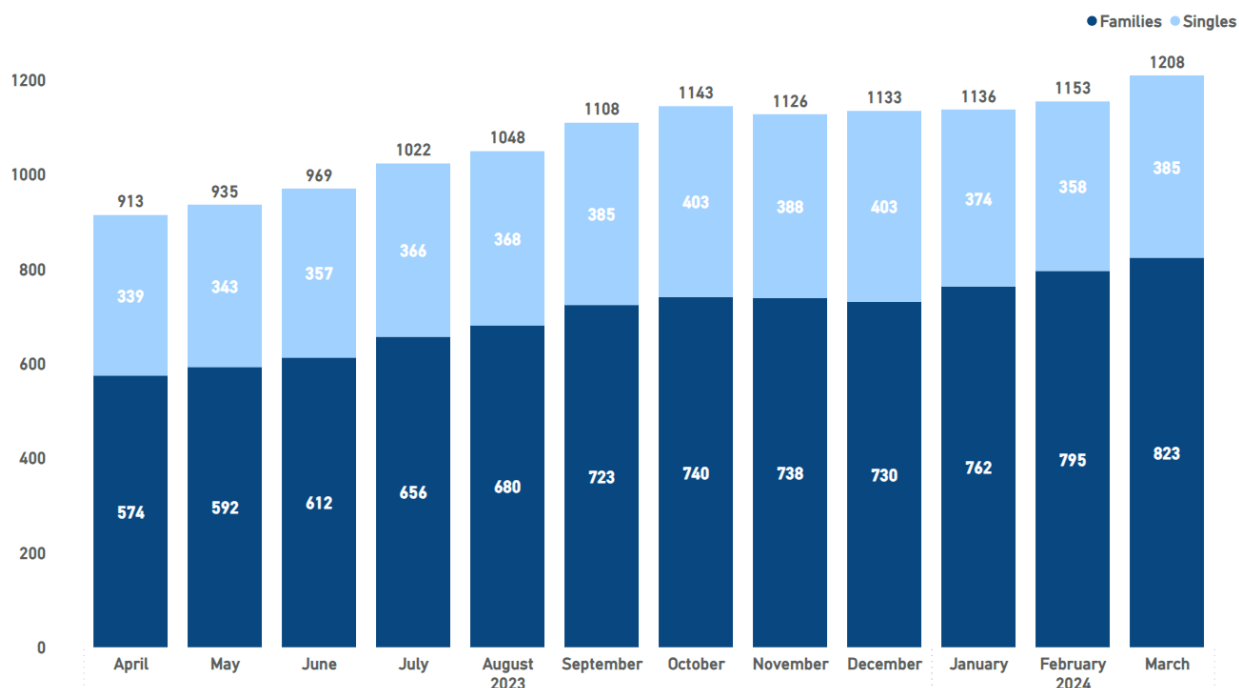
2022/23

- During the 2022 calendar year moved-on **200** people
- Of those moving out of STA in 2022/23, **139** moved-on in a planned way
- This included **128** moving to either PRS, RSL or further long-term Supported Accommodation
- **34** of those moving on from STA were women
- The average length of stay of those leaving STA in 2022/23 was just **122** days
- Throughout the whole of the 2022/23, only **10** people were evicted

NOTE

This review focuses on the last full financial year 2022/23, however, we noted that during 2023/24, 5710 households had already approached the services as of December (quarter 3), in which the council has carried out 819 prevention duties, of which 58% has been unsuccessful and 42% were successful. 2181 relief duties have been carried out with 24% being successful and 76% unsuccessful. Finally, 1424 households have been deemed eligible for main duty which 1071 were owed a duty and 631 main duties have been concluded so far, of which 71% accepted either a Part 6 social housing offer or a Private rented housing offer. Finally, the council accommodated 2492 in temporary accommodation during 2023/24.

Summary of 23/24 Temporary Accommodation households.



13. Non-Statutory Interventions

13.1. Housing related support

Alongside the council's statutory duty regarding homelessness there are 4 commissioned contracts that deliver both accommodation and floating support for individuals who are at risk of homelessness or are homeless. The commissioned support provision uses the positive pathway which is a nationally recognised framework and model for supporting those in housing need with an emphasis not only on supporting people in crisis but recognising that prevention and recovery are key to enable long term tenancy sustainment. The housing related support contracts went live on 1st April 2020 – at that point, the country had been in a national lock down due to the Coronavirus pandemic for approximately 1 week.

13.2. P3- families and Singles floating support

The P3 commissioned service provides comprehensive support aimed at preventing homelessness for families and single adults aged 25 and over in transitioning to safe and secure accommodation. This includes early intervention to identify and address housing-related support needs impacting wellbeing and tenancy management. Floating support services offer time-limited assistance to individuals and families in temporary accommodation and move-on support to aid in the transition to an independent tenancy by providing essential support such as setting up utilities and acquiring necessary household items. P3 collaborates closely with Coventry City Council and other agencies to deliver these services effectively, with a focus on empowering individuals to achieve their own housing goals.

In 2022/2023, P3 supported 358 families and 153 singles, in which a total of 339 families and 89 singles achieved a positive move on.

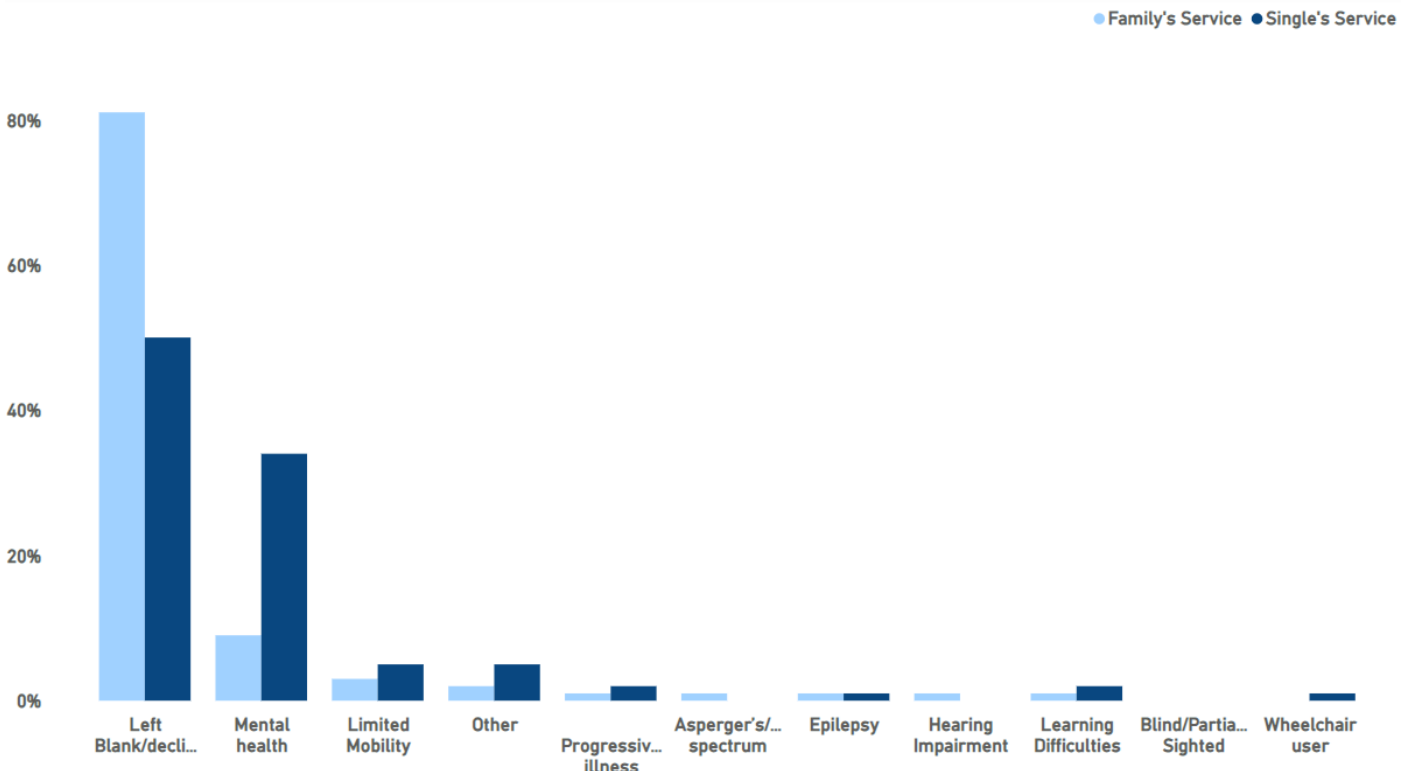


Figure 14 Disability breakdown for households supported by P3

13.3. The Salvation Army- complex needs and Ex offenders

The Salvation Army plays a vital role in addressing homelessness and supporting individuals with complex needs in Coventry through various programs and services. The Steps for Change initiative operates as a drop-in hub, offering housing advice, referrals to supported accommodation, benefit advice, access to essential resources like food bank vouchers and computers, and general support to single homeless people or those at risk of homelessness. Steps for change collaborates with partner agencies to deliver interventions effectively, serving an average of 68 unique individuals daily and assisting over 1600 individuals in 2022/2023.

Additionally, the Salvation Army provides supported accommodation across two sites for those with complex needs, Harnall Lifehouse and Axholme House, totalling 100 units, with specific provisions for vulnerable females. Moreover, in partnership with Langley House Trust and Green Square Accord, they offer specialist services for individuals with offending behaviour, providing 52 units of supported accommodation.

In 2022/2023, the Salvation Army supported 1634 individuals via steps for change with 1271 being supported regarding Accommodation (Referrals made or enquiries) , provided accommodation for 210 rough sleepers via the emergency bed provision with the longest stay being 26 nights , and accommodated 267 individuals at Harnall Lifehouse and Axholme House, additionally 143 individuals were accommodated via the ex-offender service.

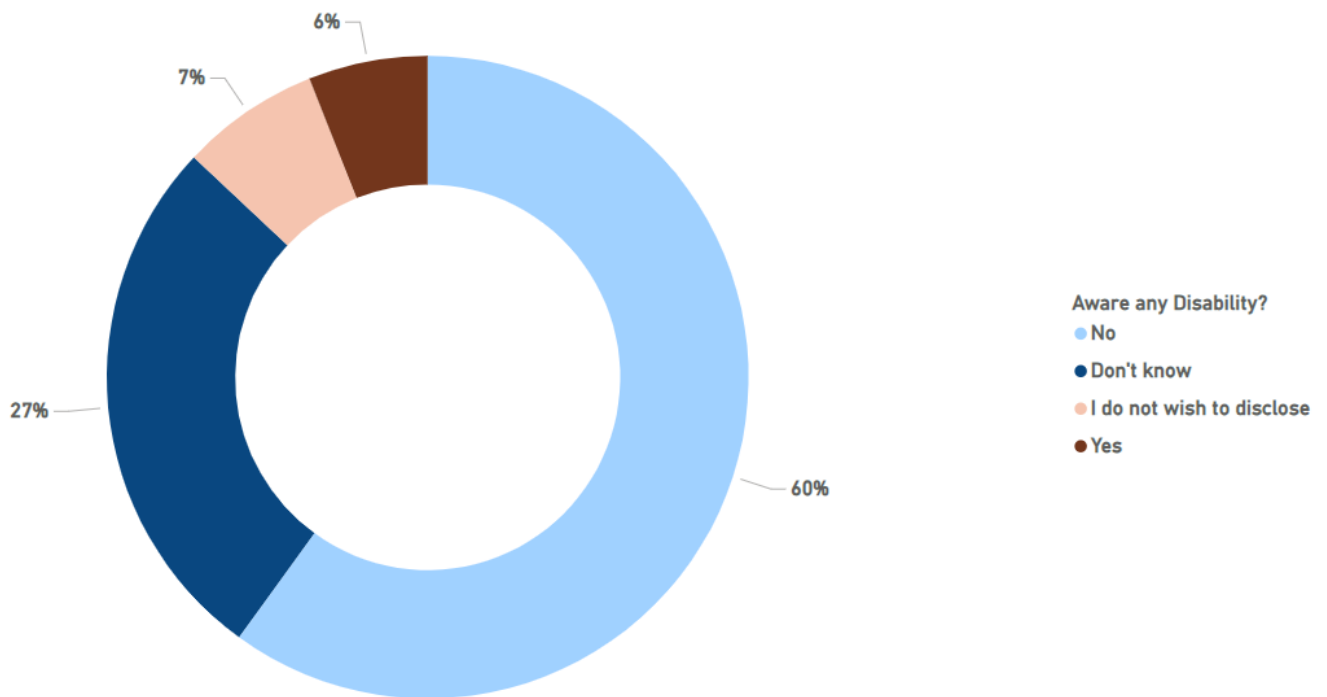
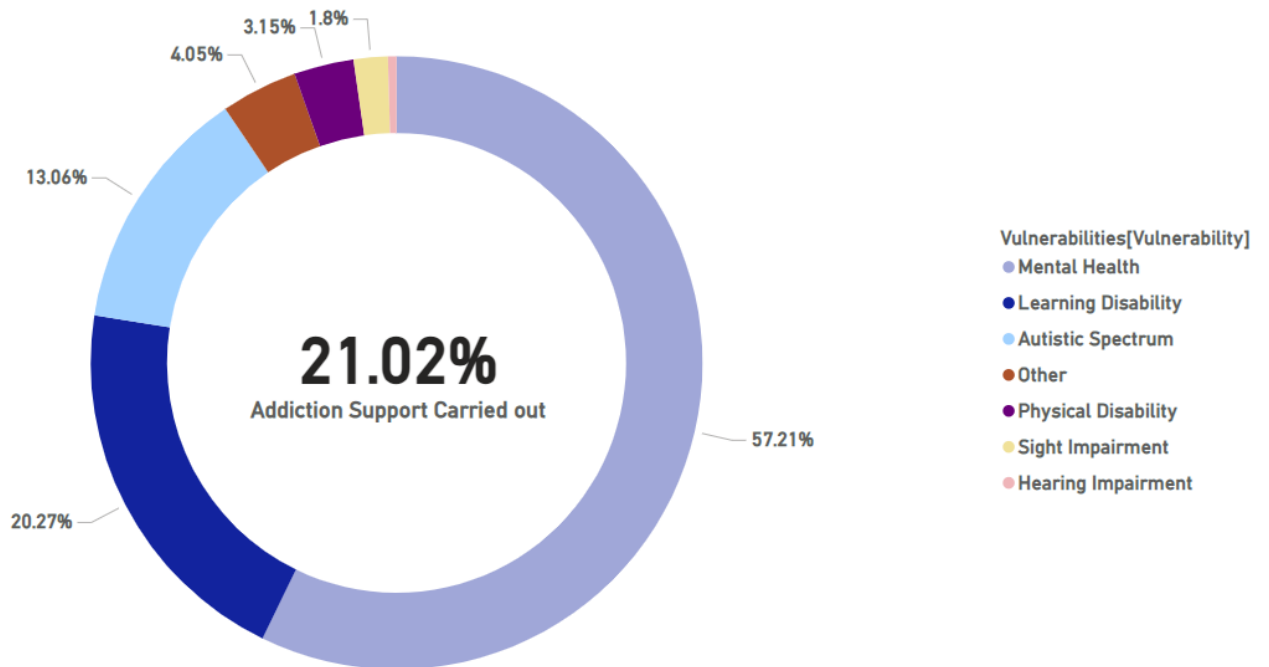


Figure 15 Disability breakdown of households supported by The Salvation Army

13.4. St Basils

St Basil's plays a crucial role in addressing youth homelessness in Coventry through two main programs. Firstly, they provide supported accommodation for singles and couples aged 18-24, including care leavers. This service offers direct access beds and flexible support tailored to each individual's journey towards independent living. St Basil's emphasizes achieving successful outcomes for their residents, aiming to maximise the number of young people transitioning to or maintaining independent accommodation while empowering them to live independently and contribute positively to the community. Additionally, St Basil's offers floating support and prevention services for young people under 25 who are homeless or at risk of homelessness. This includes early intervention to support those at risk of losing their tenancies and ongoing support for individuals in temporary accommodation or transitioning to independent living. The focus remains on achieving positive outcomes, facilitating independent living, and promoting engagement in education, training, or employment.

In 2022/2023, St Basil supported 246 individuals through its floating support and accommodation provision.



Summary of Demographics of households supported through the Commissioned services.

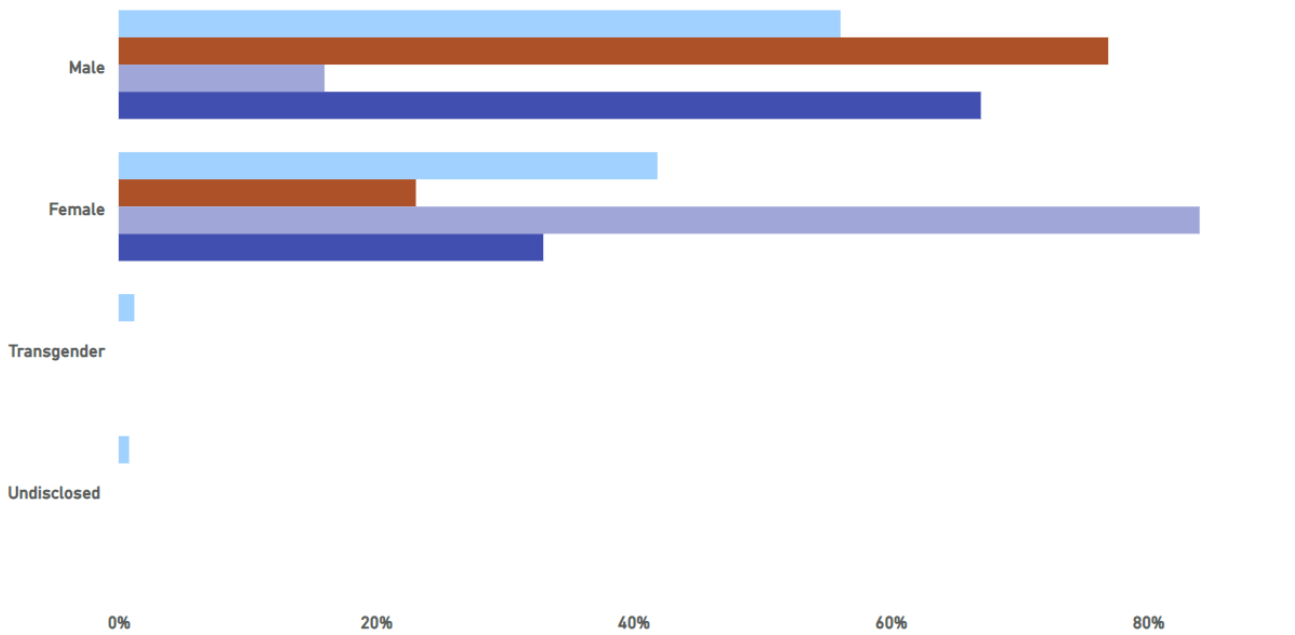


Figure 16 Gender Breakdown of the households supported through the Commissions.

66% percent of people supported via the commissioned support services were males, this correlates to the number of approaches of single people who approached the council for support. There are more single females with dependent children supported than single males with dependent children.

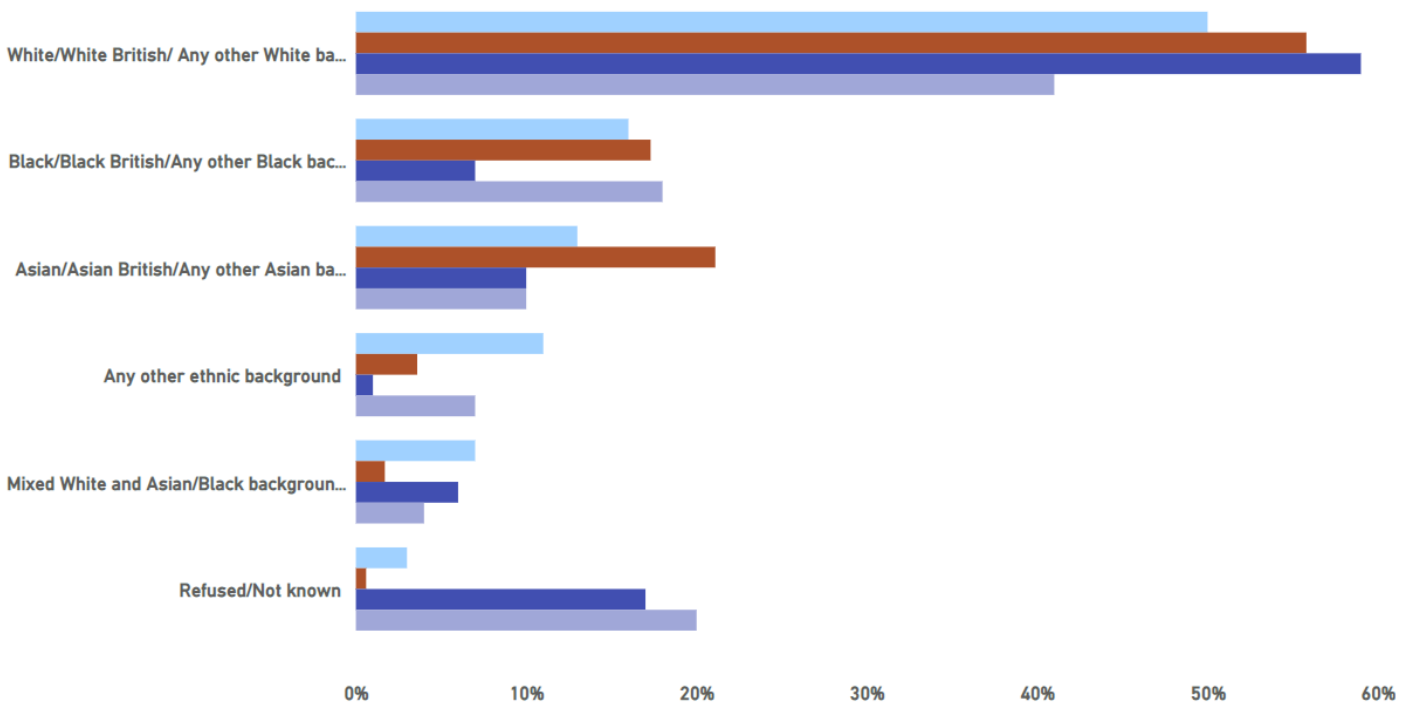


Figure 17 Ethnicity Breakdown of Households Supported through the Commissions.

The majority of households receiving support via the commissioned support services were White British which is reflective of the demographic profile of the city. Furthermore, black ethnic groups make up 16% of the households, and Asian ethnic groups make up 17% of households receiving support via the support services. Comparing this to the demographic profile of the city shows that the numbers are relative which means support services are inclusive.

Rough sleeping support

Alongside the commissioned housing related support provision, the city has a Department of Levelling Up Communities and Housing (DLUHC) grant funded rough sleeping service.

The funding is used to employ a team of outreach workers including specialist roles (Complex needs, Women, NRPF, Prison release and dedicated housing solutions officer).

The rough sleeping team works closely with partner services to support rough sleepers to move on to both interim and settled accommodation. The provision is dual in terms of its function; engaging those it finds rough sleeping along with supporting those newly accommodated, by removing barriers and increasing opportunities in persistent and creative ways.

The team carries out early morning outreach 5 days per week, The team is well connected in the city and works closely with partners to seek shared solutions, using what they know about individuals, the resources available, and the gaps and challenges those who rough sleep face to find appropriate solutions.

Rough Sleeping work is both localised and ever evolving, using resources and interventions to meet the complex needs of those that are found rough sleeping.

In the calendar year of 2023, an average of 12 individuals were found rough sleeping in a single night with an average of 64 unique individuals being found per month. A total of 168 individuals moved into long-term accommodation.

In the calendar year of 2023, the people rough sleeping who had been released from either hospital or prison were 8.7%, while 29% were long-term rough sleepers who were well known to the service and 8.6% had returned to the street after a period in settled accommodation.

Percentage Makeup of Different Rough Sleeping Indicators per Month.

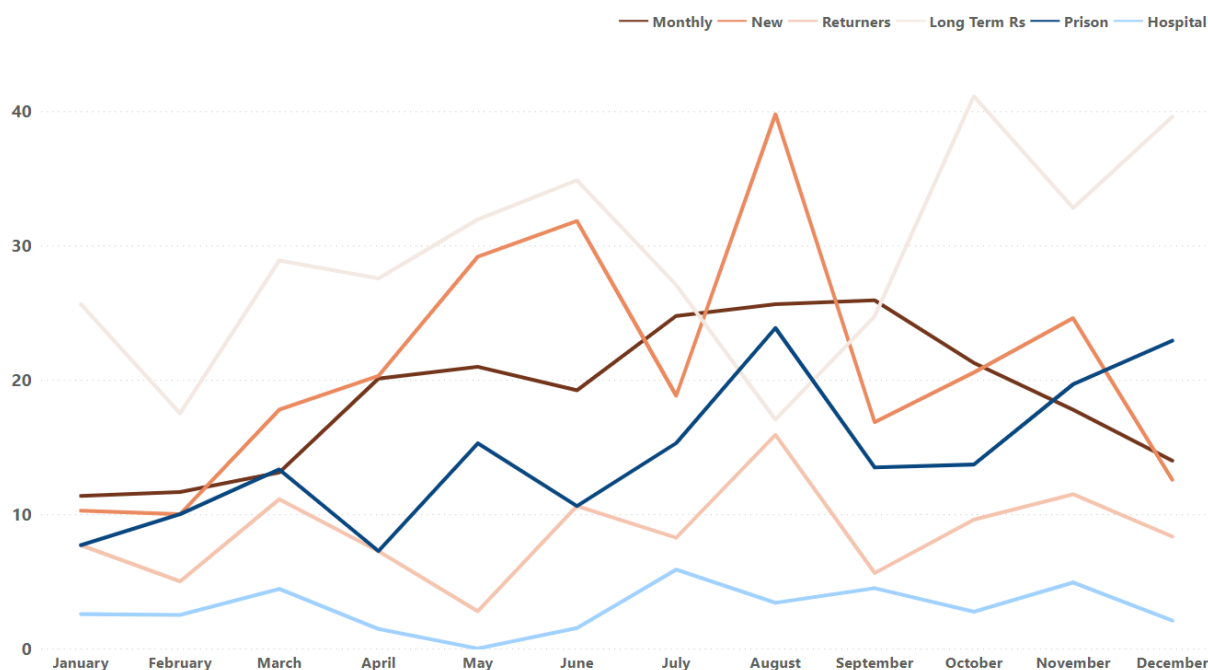


Figure 18
Trend of
Rough
Sleepers
Indicators per
Month

Summary of Rough Sleepers demographics (Numbers Found Per Month)

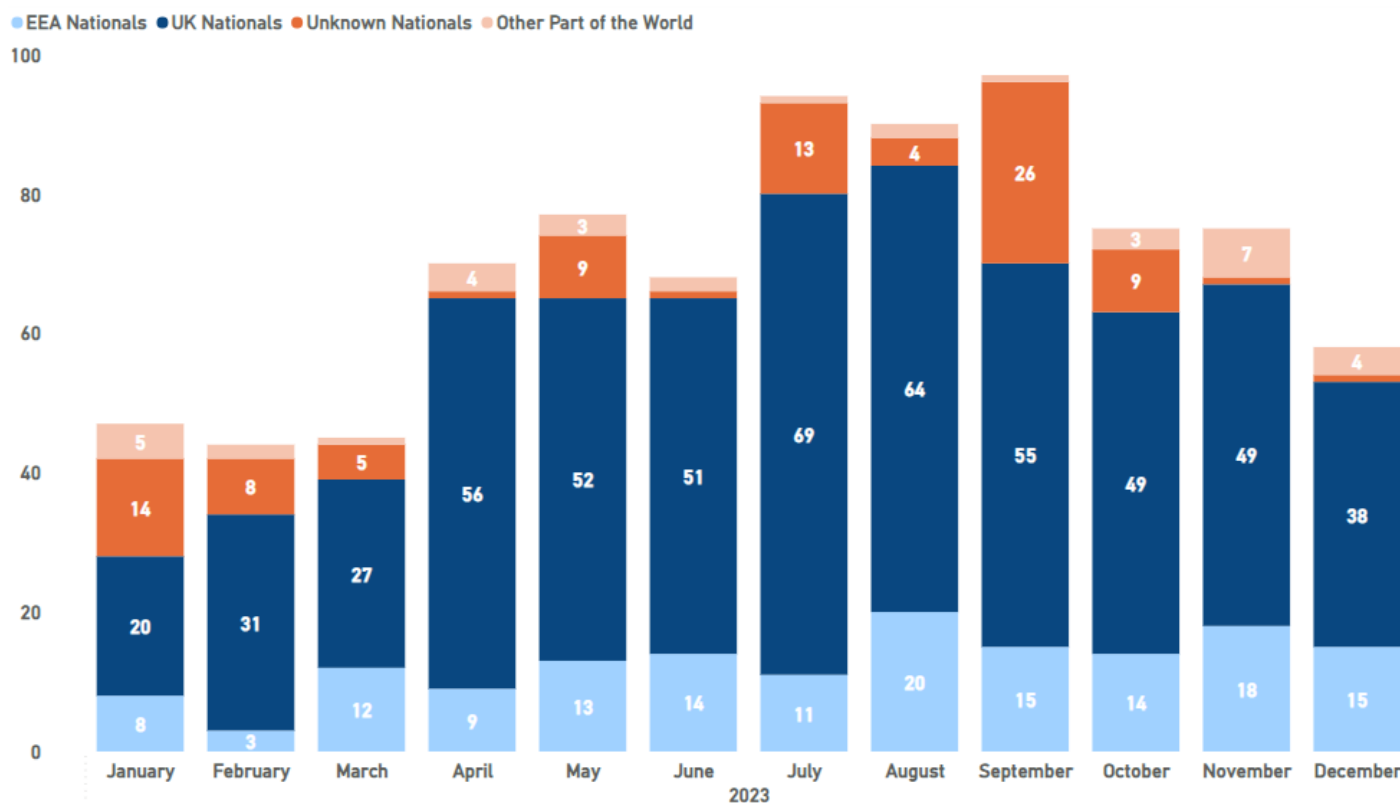


Figure 19 Breakdown of Nationality for Rougher Sleepers Per Month

SWEP (Server Weather Emergency Protocol)

SWEP is a provision of shelter for people particularly when the temperature feels like zero although can also be activated in times of prolonged heat. The provision is activated under a harm reduction approach to prevent serious harm to those that would otherwise have nowhere else to go.

During 2022/23 **SWEP** was activated from 01/11/2022 to 04/04/2023 in which The Salvation Army provided 540 emergency additional **bed spaces** as part of the SWEP response.

Although there is no strict definition of what counts as 'severe weather,' SWEP will normally operate when the temperature falls below freezing and is forecast to remain below freezing for a period of at least three consecutive nights. Coventry activates SWEP when the Met Office forecasts that there is a feel like factor of 0c, for one night or more.

During 2022/23 SWEP provision in Coventry consisted of

- 5 'off the street' ensuite rooms in the Salvation Army
- 7 camp beds located in 4 separate rooms in the Salvation Army
- Plus, spot purchased hotel rooms when required

2022-23

Services saw **252** unique individuals' approach for accommodation under SWEP.

The longest period **SWEP** ran for 2022/23 was **17** nights consecutively. **SWEP** was active for 45 nights in total.

During the period of **SWEP**, the service met the needs of a diverse group of people who were seeking support and help for a variety of different reasons and circumstance including: relationship breakdowns, people with no recourse to public funds, people out of area, people that have been asked to leave by family or friends. During SWEP, no body rough sleeping is refused accommodation.

During **SWEP**, predominately Harnall Lifehouse is used as a place of safety, however if due to demand Harnall Lifehouse reach capacity a referral is made to the Councils EDT (Emergency Duty Team) who offer a placement under **SWEP** in other emergency or temporary accommodation.

Once an individual is in service under **SWEP** staff will seek to engage with the individual and work under a personalised approach to find suitable accommodation, seek to bring into service on a more permanent basis or refer onto services more appropriate to the need.

November 2022: Not activated.

December 2022: 70 people over the month – max on one night - 31

January 2023: 88 – max on one night - 45

February 2023: 81 – max on one night - 39

March 2023: 66 – max on one night 33

Emergency beds

As part of the covid response all shared sleeping spaces were closed in the city. In partnership with The Salvation Army, the opportunity was taken to remodel the old shared sleeping space in Harnall Lifehouse and create 5 emergency of the street rooms. As people are found rough sleeping or known rough sleepers return to the streets the outreach team are able to offer a of the street "Ebed" at The Salvation Army Harnall Lifehouse for up to three nights.

During 2022/23 210 individuals were accommodated via the ebeds with the longest stay being 26 nights

Gateway

The Gateway is a 63-bed hostel managed by Citizen Housing, that provides accommodation to homeless individuals over the age of 18. In March 2020, the COVID-19 pandemic forced the closure of winter night shelters/shared sleeping spaces, this highlighted a gap in accommodation

provision for rough sleepers. Therefore, a funding application was submitted to create new bed spaces across Coventry for rough sleepers and those with a history of rough sleeping. A successful funding bid was submitted to the then Ministry of Housing Communities and Local Government (MHCLG) which allowed Citizen to build an extra 16 flats at The Gateway. The introduction of another 16 flats, has increased The Gateway's capacity to 79 flats. The 16 flats created are available for use by those with a history of or at risk of rough sleeping. During 2022/23 20 individuals were accommodated via the Gateway rough sleeping provision.

RSAP (Rough Sleeping Accommodation Programme)

Coventry City Council partnered with Citizen Housing and Stonewater to provide 15 self-contained properties for the sole use of rough sleepers. The project aims to provide move-on accommodation for those who are rough sleeping or at risk of rough sleeping. The Rough Sleeper Team at Coventry City Council has a dedicated worker who offers intensive support to those who have been referred to the project working alongside housing officers from Citizen and Stonewater. Stonewater have purchased 5 properties and Citizen 10 properties that are dotted around the city. While CCC offers support to the clients to work with them to make sure they are tenancy-ready the RP is responsible for housing management which makes it easier for us to support the client. Clients are given 2 years to work with their support worker to make them tenancy-ready before they can move into alternative permanent affordable housing.

During 2022/23 17 individuals were accommodated via the RSAP rough sleeping provision

Housing First

There are a small number of people for whom traditional supported housing models (hostels and HMO's do not work) and for those the evidence shows that more dispersed models of support, such as Housing First maybe more appropriate. There is currently a Housing First scheme in Coventry, run by the council, which has supported 80 individuals throughout the project into permanent self-contained accommodation. The scheme is part of the DLUHC funded national Housing First Pilot that was administered through the WMCA and was commissioned by Coventry City Council in 2019. Housing First is a support service for individuals with complex needs or a history of entrenched/repeat homelessness that traditional services do not work for, for a variety of different reasons. The key difference between housing first and other supported housing provision is that there are no conditions around 'housing readiness' before providing someone with a home, rather secure housing is viewed as a stable platform from which other issues can be addressed. Housing First offers a choice-led approach, which fully respects the choices of each individual.

During 2022/23 46 individuals were supported via the housing first programme.

Stepping stones

As part of the cities response to rough sleeping the council works in partnership with Spring housing to deliver the Stepping Stones Project. Stepping Stones allows rough sleepers up to 3 months accommodation to stabilise before accessing and securing settled accommodation. The project is funded so where individuals are not in receipt of benefits due to immigration issues the cost of accommodation is covered by a grant from DLUHC. The project operates out of an existing supported housing project which is staffed 24 hours a day – this ensures tenancy breakdown due to ASB is minimal. Individuals who access Stepping Stones have the opportunity to transition along the pathway into more settled accommodation and/or resolve any immigration issues.

During 2022/23 7 individuals were accommodated via stepping stones

CRMC house

Coventry Refugee and Migrant centre (CRMC) provide 4 rooms for people who are NRPF (not in receipt of public funds) and work intensively via a navigator to resolve peoples immigration status and support individuals into employment/settled accommodation.

During 2022/23 14 individuals were accommodated via CRMC

Rough sleeping drug and alcohol treatment grant

Change Grow Live (CGL) is the substance misuse service in the city, providing treatment for drug and alcohol misuse to adults. CGL receives funding via the Rough sleeping drug and alcohol treatment grant to deliver a targeted rough sleeping provision for individuals currently rough sleeping or at risk of rough sleeping.

The current team consists of Outreach workers, community worker, women's worker, Polish support worker, Complex worker, and an Outreach Nurse. The support that the team offers is person centred and ensures a non-judgemental approach from the first point of entry.

The primarily objective is to support clients with their substance misuse need, either through Medication Assisted Treatment (MAT), Psychosocial Intervention and ongoing Recovery Support.

Mental health homelessness pathway lead

As part of the Mental transformation programme across Coventry and Warwickshire in 2022 the role of a Mental health pathway lead was created by Coventry and Warwickshire partnership trust (CWPT). The pathway lead works specifically with people who are at risk of homelessness or are currently homeless (temporary accommodation / rough sleeping) and acts as a conduit into mental health teams, as well as supporting the crisis team in terms of engagement and the execution of mental health act assessments for those who are homeless.

There is no formal data available in terms of outcomes for the role, however as we know from our data the largest support need for those accessing the homelessness services is mental health, therefore it can be assumed that the role is fundamental in terms of both supporting individuals, and also in regards to supporting staff who work with in homelessness service to navigate the mental health care system.

Vulnerable persons and complex needs forum

The Vulnerable Person and complex needs Forum consist of a range of partners who meet monthly to discuss individuals who are both in permanent accommodation and those who are homeless or at risk of becoming homeless due to MCN.

There are (broadly three cohorts for the forum.

- 1- Vulnerable but housed (any housed)
- 2- Multiple needs
- 3- Homeless/Rough sleeping.

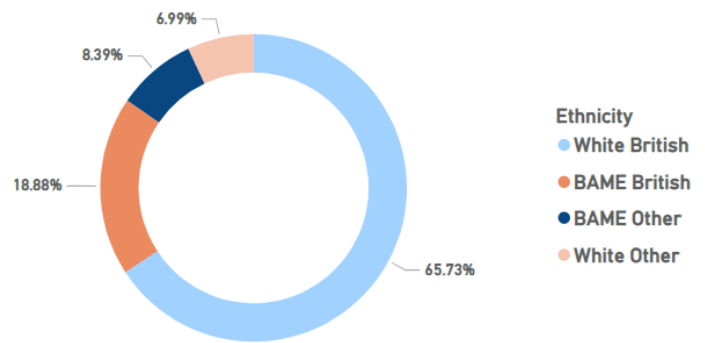
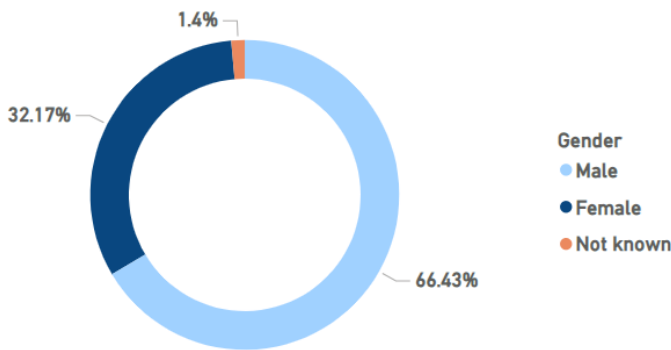
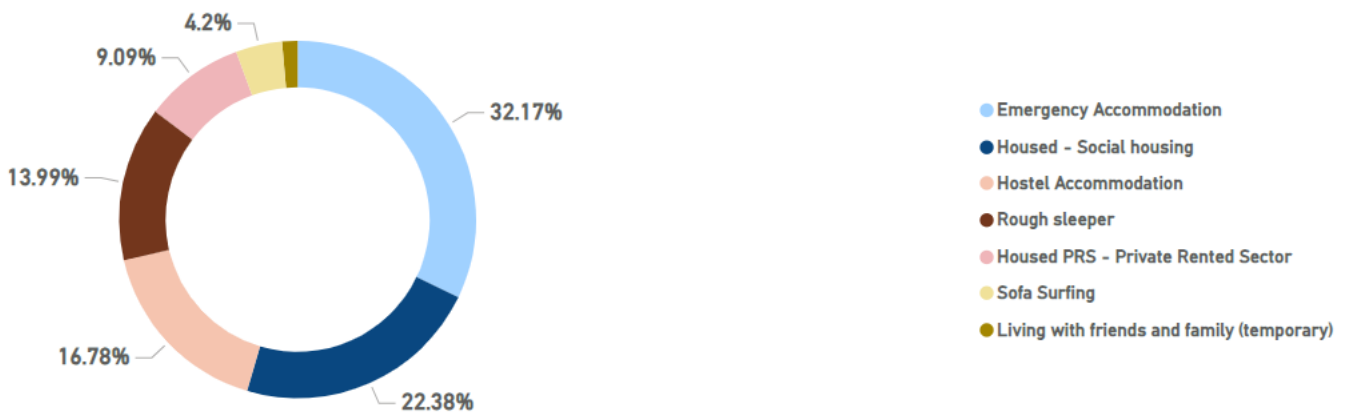
The purpose of the forum is to identify, and case manage individuals:

- Who are at risk of losing accommodation?
- A tenancy either social housing or private rented
- Hostel licence agreement
- Unsettled sofa surfing
- Hospital discharge
- Prison release
- Leaving children's care services (18-25)
- Street homeless due to complex needs or vulnerability

And to identify appropriate support, ensuring they are kept safe from harm, exploitation and if subject to hate crime appropriately supported, the forum will identify the needs of individuals and enable them to access support through a co-ordinate offer through a multi-disciplinary team to work together to support an individual and prevent homelessness .

In 2022/2023, 143 individuals were referred to the forum, with 66% identifying as male and 32% identifying as female. Among these individuals, 122 had housing needs, 95 had mental health needs, 81 had substance misuse issues, 20 were victims of abuse, 75 were involved with the criminal justice system, and 59 were disabled. Finally, 83.2% of cases of homelessness was prevented.

Accommodation on Referral



Pre eviction panel

The pre- eviction panel was set up in February 2023 and is open to all commissioned and none commissioned exempt accommodation providers. The purpose of the panel is to identify all individuals at risk of homelessness from commissioned and none commissioned exempt accommodation who have been served a notice to quit and seek to find collective solutions to stay the eviction.

The panel will support housing providers in identifying innovative approaches to reduce the need for evictions, be a vehicle to share good practices, look to ensure individuals are housed in the most suitable accommodation, and review direct moves between housing providers if needed.

Between Feb 2023 and Feb 2024, 374 cases were discussed at the panel, in which 276 individuals were prevented from homelessness, 82 individuals were evicted, and 16 individual's cases remain opened to the panel.

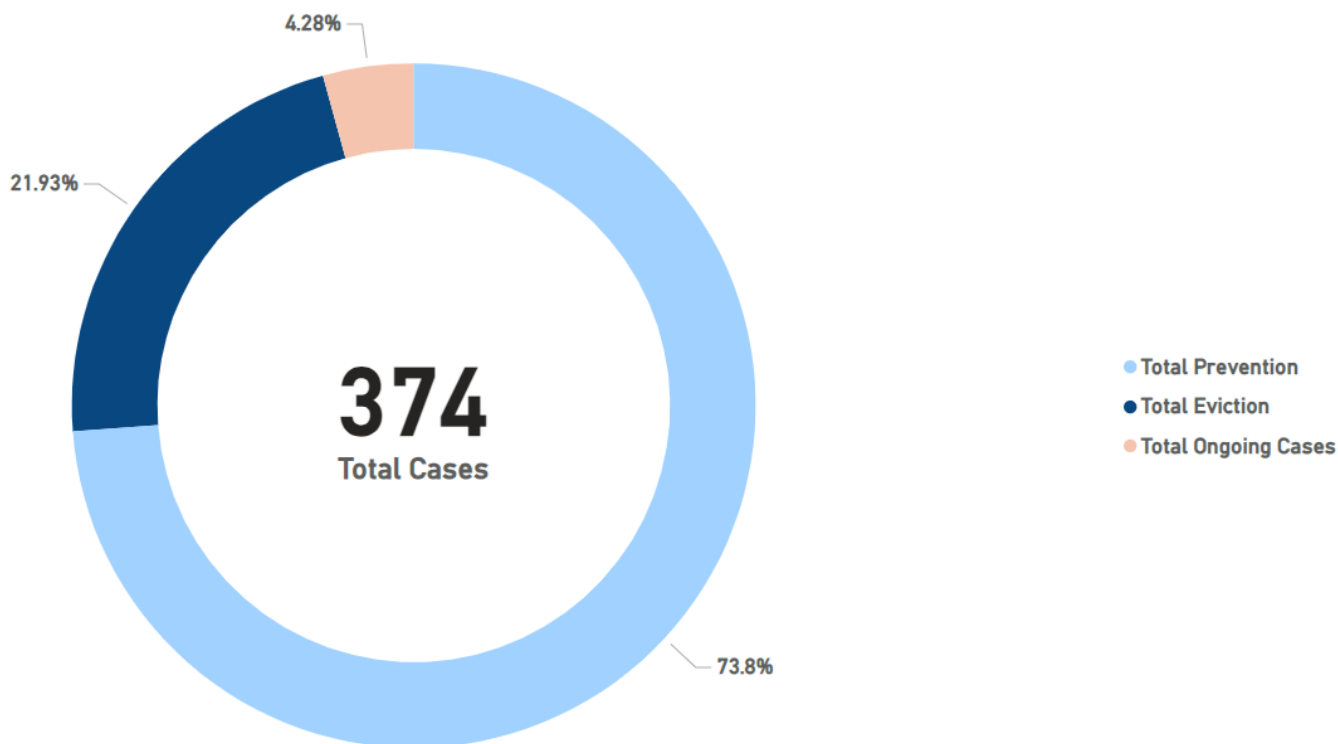


Figure 20 PEP Cases Breakdown

What our data tells us

- **Affordability:** The cost of housing, whether through buying or renting, is rising faster than household incomes, creating a disparity and the LHA rates have struggled to keep pace with the rising rents.
- **Health and homelessness:** it is well evidenced that people who are homeless experience worse health outcomes than the rest of the population, this includes both physical health as well as mental health and medical interventions and support for the use of substances.
- **Domestic abuse:** Domestic abuse is a key factor in terms of homelessness within Coventry.
- **Increased demand:** There has been a year-on-year increase in demand for support in regard to homelessness in the city particularly from young people, single adults, and single parents with dependent children.
- **Homelessness Prevention:** Early advice and intervention is key in preventing homelessness and our data tells us that households have better outcomes when they approach the service as early as possible.
- **Temporary accommodation:** The increased demand for temporary accommodation and length of stay, against the availability of permanent accommodation suggests that the number of households accommodated in temporary accommodation will continue to rise if the supply of affordable housing does not increase.

- **Private rented accommodation:** PRS accommodation possesses two distinct challenges for homelessness services. Ending of a PRS tenancy is a key reason for the loss of the last settled accommodation and affordability in terms of moving on from temporary accommodation.
- **Supply:** The housing needs in terms of the number of households on the housing list in the city outpaces the availability of social rented housing, highlighting the gap in supply and demand.
- **Duty to refer:** Although the duty to refer have increased there are still key services who are not maximizing the opportunity to prevent homelessness by using the duty to refer.
- **Support needs:** The primary support need for those approaching the homelessness service is in relation to Mental Health closely followed by physical health, substance misuse, and domestic abuse.
- **Rough sleeping:** The number of individuals found rough sleeping is on an upward trend, with a notable increase in non-nationals being found.

Our partners

It is not only the Housing and Homelessness service that has a role or function in terms of homelessness in the city – a number of internal and external partners work with people who are homeless or at risk of homelessness daily. As part of this review our internal colleagues (Migration Team, Housing Enforcement, Children’s Service, Public Health, Adult Social Care, Benefits Service etc) were contacted and asked for information/data that may be relevant to this review.

The Coventry Homelessness Forum is a partnership of organisations in the city who work with people experiencing or who have experienced homelessness, or those at risk of homelessness. It provides a space to share information, guidance, and best practice, as well as networking and joining up services. The forum meets at least 4 times each year and has over 100 members. Members of the forum were contacted regarding the review and given the opportunity to contribute and comment in regard to how homelessness impacts their service.

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