

**Strategic Environmental Assessment of the Tall Buildings
Design Guide & Three Spires View Management Framework
Supplementary Planning Document**

Coventry City Council

Strategic Environmental Assessment Screening Assessment

July 2022

1. Introduction

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

2. The Tall Buildings Design Guide & Three Spires View Management Framework SPD: Context

- 2.1 The Draft Tall Buildings Design Guide & Three Spires View Management Framework SPD sets out further detail on existing policies contained within the Coventry City Council Local Plan (in particular, Policy DE1: Ensuring High Quality Design), and also the policies and allocations in the adopted City Centre AAP (especially Policy CC7: Tall Buildings which commits to providing further detail). The Local Plan and AAP form the City Council's statutory planning framework which sets out how and where new homes, jobs, services and infrastructure will be delivered and the type of places and environments that will be created, enhanced and protected.
- 2.2 Delivering high quality design over the Plan period to 2031 is a key objective of the adopted Coventry Local Plan, and the complementary adopted AAP provides further elaboration including specific guidance for the City Centre relating to the protection of the views of the iconic Three Spires of St. Michael, Holy Trinity and Christchurch. The aim of this SPD is to facilitate the delivery of good design in relation to tall buildings, including the need to protect important city views as set out in the adopted plans and in compliance with the most up to date national policy as set out in the National Planning Policy Framework.
- 2.3 The additional guidance provided within the SPD sets out a series of principles for good design of tall buildings overall whilst also ensuring through the View Management Framework that proposals for tall buildings are appropriately considered within the context of key views of the spires, to protect the setting of important heritage assets.

¹ Reference ID: 11-008-20140306

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

3. The Screening Process

3.1 The screening assessment is undertaken in two parts: the first will assess whether the SPD requires screening for SEA and the second part of the assessment will consider whether the SPD is likely to have a significant effect on the environment, using criteria drawn from Schedule 1 of the SEA Regulations.

Table 1: Is SEA screening required?

Environmental Regulations Paragraph detail	Comments
<p>2.(1) In these Regulations- [...] "plans and programmes" means plans and programmes, including those co-financed by the European Community, as well as any modifications to them, which— (a) are subject to preparation and adoption by an authority at national, regional or local level; (b) are prepared by an authority for adoption, through a legislative procedure by Parliament or Government; and, in either case, (c) are required by legislative, regulatory or administrative provisions</p>	<p>Yes, this applies.</p> <p>The SPD is subject to preparation and adoption at local level. Whilst the SPD is not a requirement and is optional under the provisions of the Town and Country Planning Act it will, if adopted, supplement the development plan and be a material consideration in the assessment of planning applications.</p>
<p><u>Environmental assessment for plans and programmes; first formal preparatory act on or after 21st July 2004</u> 5.(2) The description is a plan or programme which— (a) is prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, and (b) sets the framework for future development consent of projects listed in Annex I or II Directive 2011/92/EU(4) of the European Parliament and</p>	<p>Yes, this applies.</p> <p>The SPD is prepared for town and country planning purposes. It supplements the planning policy framework of the Coventry City Local Plan, by providing detailed guidance as to how these policies are interpreted for future consent of projects listed in Schedule II of Directive 2011/92/EU(4).</p>

<p>of the Council on the assessment of the effects of certain public and private projects on the environment.</p>	
<p>3) The description is a plan or programme which, in view of the likely effect on sites, has been determined to require an assessment pursuant to Article 6 or 7 of the Habitats Directive.</p>	<p>No this does not apply.</p> <p>The SPD is not likely to affect sites and has been determined not to require an assessment pursuant to any law that implemented Article 6 or 7 of the Habitats Directive.</p> <p>Habitat Regulations Assessment is not required. The Habitat Regulation Assessment undertaken in 2016 for the Coventry City Local Plan concluded that the plan would not cause a negative effect alone or in combination with other plans. The SPD does not provide any guidance which alters the impact of the policy on designated sites.</p>
<p>6) An environmental assessment need not be carried out— (a)for a plan or programme of the description set out in paragraph (2) or (3) which determines the use of a small area at local level, or (b)for a minor modification to a plan or programme of the description set out in either of those paragraphs,</p>	<p>Yes this applies. The SPD elaborates on city – wide design issues in relation to tall buildings, with an additional view-management focus which relates to the spires of the city centre. However SEA / SA was already undertaken for the adopted Local Plan and AAP from which this SPD stems, the SPD does not introduce new policy.</p>
<p><u>Determinations of the responsible authority³</u> 9.—(1) The responsible authority shall determine whether or not a plan, programme or modification of a description referred to in— (a)paragraph (4)(a) and (b) of regulation 5; (b)paragraph (6)(a) of that regulation; or (c)paragraph (6)(b) of that regulation, is likely to have significant environmental effects. (2) Before making a determination under paragraph (1) the responsible authority shall—</p>	<p>This screening opinion has been prepared using the criteria specified in Schedule 1 as presented in Table 2.</p> <p>The statutory bodies (Natural England, Historic England and the Environment Agency) are to be consulted as required.</p>

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

(a)take into account the criteria specified in Schedule 1 to these Regulations; and (b)consult the consultation bodies.	
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Table 2: will the SPD have a significant effect on the environment⁴

SEA requirement	Comments
1: The characteristics of plans and programmes, having regard, in particular, to	
(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;	The SPD forms a material consideration in decisions on planning applications, it operates within the scope of the adopted Local Plan and AAP but provides further elaboration.
(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;	The SPD does not create new policies but will support the policies in the adopted Local Plan and AAP. Other plans and programmes may outlive the SPD and during their preparation will be steered by national legislation and policy.
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	The purpose of the SPD is to provide guidance to support the design policy of the adopted Local Plan and AAP. The Local Plan SA/SEA assessed this. The purpose of the SPD is to ensure these beneficial impacts of that policy are delivered and maintained which contributes to promoting sustainable development.
(d) environmental problems relevant to the plan or programme; and	There are no environmental problems relevant to this SPD: it elaborates adopted Local Plan and AAP policy.
(e) the relevance of the plan or programme for the implementation of retained EU law on the environment (for example, plans and programmes linked	The SPD has no relevance to the implementation of retained EU law.

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

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

Community or international protection status.	is proposed via the SPD, which elaborates on existing policy, none of these matters are likely to be affected by the SPD. Any site-specific matters would be addressed through a planning application specific to an individual proposal.
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4. Conclusion and Screening Recommendation

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