



**Coventry Local Plan Review
2021-2041
Issues & Options
Regulation 18 Consultation**

**Sustainability Appraisal (SA)/
Strategic Environmental Assessment (SEA)
Initial SA Report**

May 2023

enfusion



Coventry Local Plan Review 2021-2041: Issues & Options Regulation 18 Consultation

SUSTAINABILITY APPRAISAL (SA) (incorporating Strategic Environmental Assessment SEA)

Initial SA Report:

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CONTENTS

Non-Technical Summary (NTS)

	Page
1 Introduction	
Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA)	1
Habitats Regulations Assessment (HRA)	3
The Coventry Local Plan Review (CLPR) 2021-2041: Issues & Options	3
Purpose and Structure of this SA Report	5
2 Approach & Methods	
The SA/SEA Process & Approach Taken	7
Scoping & the SA Framework	7
Options in Plan-making & Alternatives in SA	12
3 Sustainability Context & Summary Baseline Characteristics	
Introduction	13
Policy Context	13
Summary Baseline Conditions	15
Key Issues & Opportunities for Sustainable Development	17
Likely Evolution of Area without the Plan	20
4 SA of Strategic Options for the CLPR	
Identifying the Strategic Options	22
SA of Strategic Options: Quantum of Housing	25
SA of Strategic Options: Residential Density	31
SA of Strategic Options: Progressing Coventry's Climate Change Strategy	34
SA of Strategic Options: Nature & Biodiversity	37
5 Consultation & Next Steps	41

TABLES

- 2.1: SA Framework
- 2.2: SA Objectives & Suggested Indicators
- 2.3: SA Significance Key
- 4.1: Strategic Options
- 4.2: Summary of SA of Strategic Options

FIGURES

- 1.1: SA and Plan-making Stages and Tasks
- 1.2: Location of the Coventry Local Plan area

APPENDICES

- I Statement of Compliance (to be completed at Regulation 19 stage)
- II SA Scoping Report (March 2023, available separately)
- III SA of Strategic Options

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 Initial SA Report that accompanies the draft Issues & Options plan for Regulation 18 public consultation in summer 2023. 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. It is anticipated that many of the current policies will need only minor amendment. However, some 20-30 policies will need significant updating to address the new requirements and to accommodate the predicted increasing population and the needs for new development. The Regulation 18 Issues & Options draft Plan comprises 15 chapters. Each chapter covers a topic that sets out the issues, lists the policies, discusses the options, makes suggestions, and invites comments to questions.

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 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 for 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. Most 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. Although Coventry is mainly a built environment habitats, 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 in 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 technical studies and early development of issues and options for plan-making, certain strategic options were identified for topics, as follows:
- Amount of housing
 - Density of Housing
 - Climate Change & Standards for Building Regulations
 - Standards for Biodiversity Net Gain (BNG) & Green Infrastructure (GI)
15. These strategic options were tested with high level appraisal through SA using the SA framework of objectives and in a comparable and consistent manner. 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.

Initial Findings of the SA

16. The population of Coventry is predicted to increase and the Council is investigating 3 alternative calculations for how much housing and new development will be needed. Good quality housing and access to employment is well established as contributing to better health and wellbeing – physical and mental. Planning for the housing needs will have positive effects for all 3 options for objectives on housing, communities, and health. However, the higher amounts of housing are likely to be difficult to accommodate due to the land constraints in Coventry. Homes might need to be small, more densely located and thus less able to meet the variety and adaptability of needs.
17. The higher amounts of calculated housing were found to have likely negative effects on SA objectives for sustainable transport, natural resources of soil and water, nature and biodiversity, and townscapes/landscapes. Whilst there is uncertainty of the significance of such negative effects, it was found to be unlikely that the Coventry area could absorb such changes with the higher levels of new development. Possibilities for mitigating such negative effects are limited and there would be considerable pressures on the open and green spaces in the city that are so important for healthy urban environments.
18. The Council is investigating possibilities for increasing the density of residential development outside the ring road in certain locations where this might be suitable and sustainable. The SA found that for the densities in adopted policy, there is likely negative effects on soils and water resources since it is uncertain whether there is sufficient previously developed land to meet with the higher figures, and on biodiversity. The SA found that 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 green and blue infrastructure, and for improving biodiversity.

19. The Council is investigating the implications for increasing the requirements for Building Standards over and above that required by Government so that the plan may further support Coventry's Climate Change Strategy. The SA found considerable uncertainty but overall, such higher standards would be likely to have more positive effects for SA objectives on climate change, health, economic growth, and a healthier urban environment.
20. The importance of green spaces in the city is understood and therefore, the Council is investigating possibilities for increasing the standards for green infrastructure and biodiversity net gain over and above those required by Government. The SA found that such an approach would likely have more positive effects for many SA objectives, including health, climate change, reducing pollution, conserving soils and water resources, enhancing nature, and the quality and character of townscapes and landscapes.
21. Overall, the SA found that the higher levels of development were likely to have negative effects particularly through pressures on sustainable transport, and the open and green spaces in the city that are so important for people's health and active living, soil and water resources, and for building resilience to climate change. All these factors are interconnected and contribute to helping Coventry achieve its ambitions for addressing the climate crisis and supporting the One Coventry Vision.

Consultation & Next Steps

22. This Initial SA Report is being published alongside the Issues & Options draft Coventry Local Plan Review for Regulation 18 consultation. Any comments on the SA will be taken into consideration at the next stage of the draft plan review preparation – Pre-Submission draft CLPR for Regulation 19 consultation anticipated for late 2023/early 2024 (to be confirmed).
23. The Council will review and analyse the representations made on the Regulation 18 consultation. These comments will be taken into account, together with further technical studies, so that a preferred approach to the review of the plan can be prepared. This emerging further draft of the CLPR will be subject to SA to inform plan-making and the findings of the SA will be presented within a SA Report that will accompany the draft CLPR on Regulation 19 consultation.

1.0 INTRODUCTION

Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA)

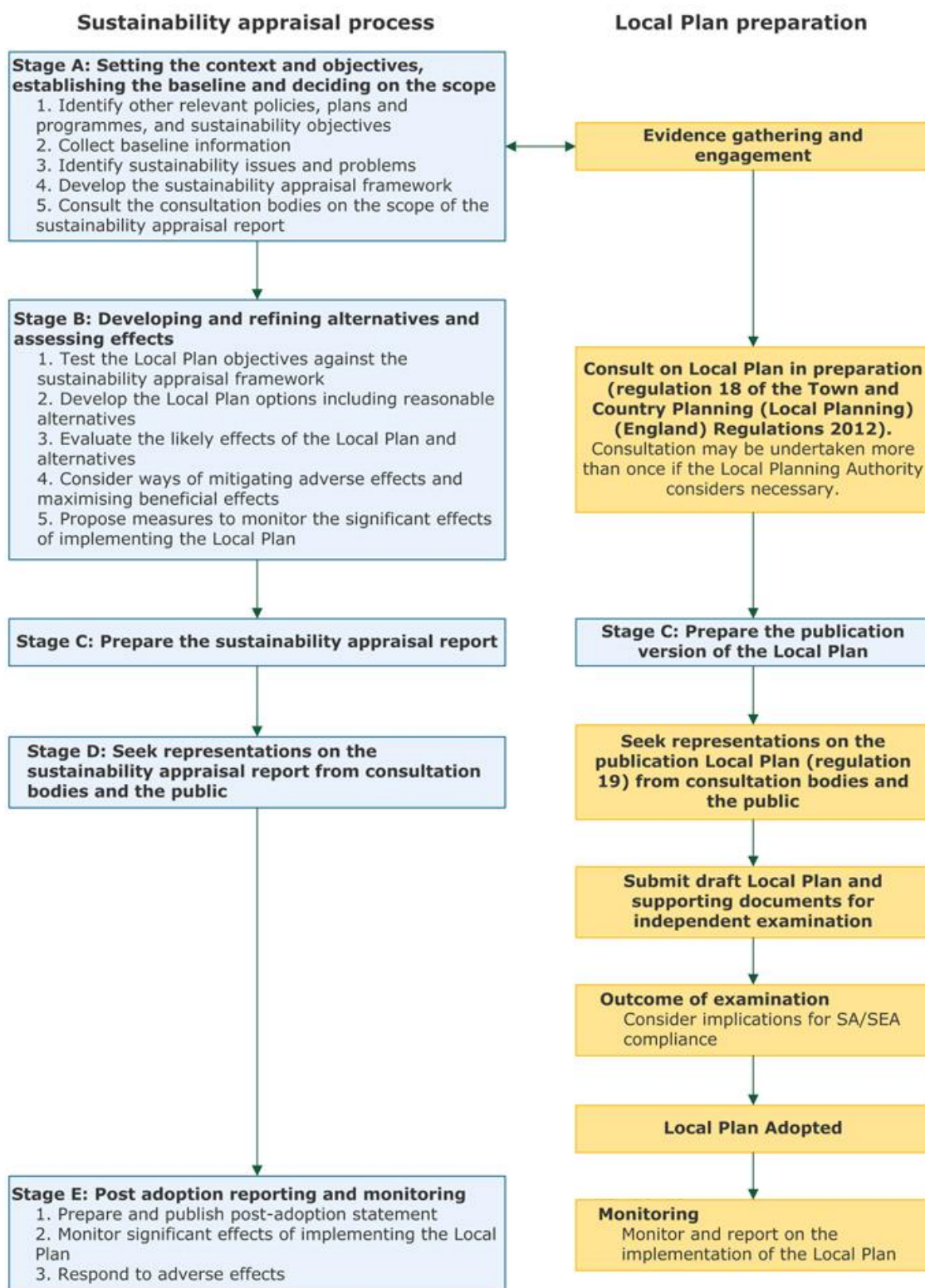
- 1.1 Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. The purpose of a Sustainability Appraisal is to promote sustainable development through assessing the extent to which an emerging plan, when judged 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 2021)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 initial findings of Stage B Alternatives & Assessment and comprises in part Stage C Preparation of the SA Report. This Initial SA Report accompanies the Coventry Local Plan Review Issues & Options Regulation 18 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 will be undertaken separately and the findings of the HRA screening (and any appropriate assessment) will be taken into account in the next stage of 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, updated 2021), Development Plan Documents (DPDs), Supplementary Planning Guidance (SPDs), and Neighbourhood Plans (NPs), comprise the planning framework through which decisions are made on planning applications.
- 1.8 It may be noted that the review of the CLP is being carried out during a time of proposed planning reform and these changes could have a profound impacts on plans and projects. During 2020-2021, Government consulted on proposed changes to the planning system with planning for the future, revisions to the NPPF and the National Model Design Code. These consultations included the changes to the standard method for assessing local housing need. The Levelling-up & Regeneration Bill⁸ (consultation December 2022 – March 2023) sought views on Government's proposed approach to updating the NPPF, and to preparing National Development Management Policies. At the time of preparing this Initial SA Report, the outcomes of the consultation process were not yet known.
- 1.9 The Coventry Local Plan covers the entire administrative boundary for Coventry City Council. The remit of the plan extends beyond the City Centre boundary to cover an area of 99km² located in central England,

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

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

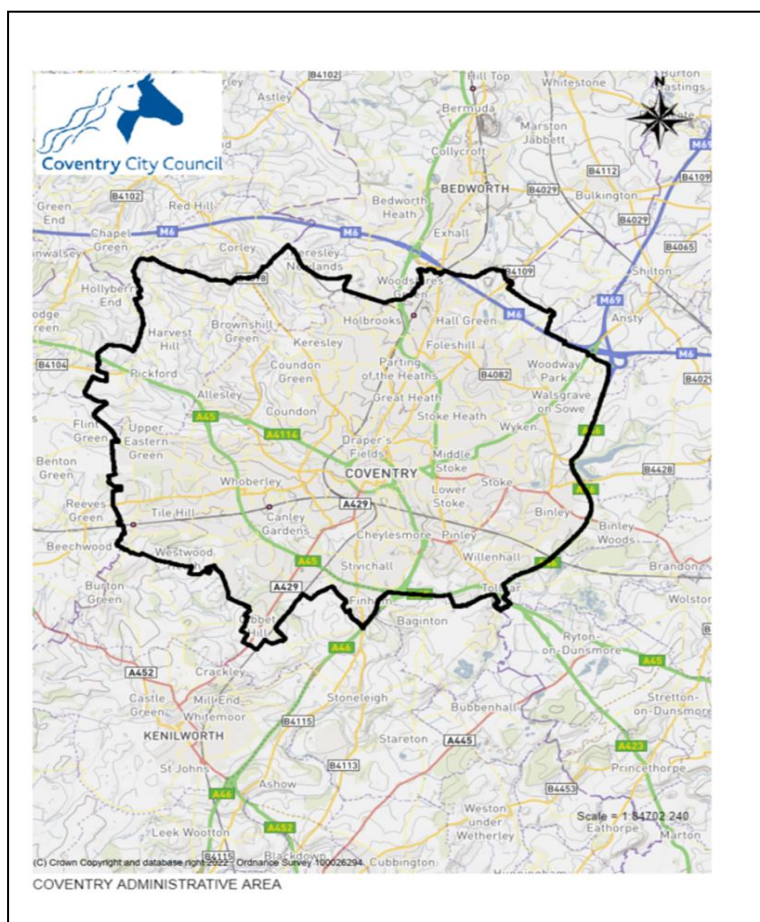
⁶ <https://www.legislation.gov.uk/uksi/2017/1012/contents/made>

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

⁸ <https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy>

approximately 15km south east of Birmingham and approximately 10km north of Leamington Spa – and as shown in the following figure.

Figure 1.2: 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 decided that it was more effective to undertake a full rather than a partial review.
- 1.11 It is anticipated that many of the extant policies will only need minor amendment or updating. Around 20-30 key policy areas have been investigated with updated evidence, most notably associated with the new Coventry & Warwickshire Housing and Economic Development Needs Assessment (HEDNA, November 2022)⁹. 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.

⁹ <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/3>

- 1.12 The studies for the preparation of the Local Plan Review identified 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, and standards for Biodiversity Net Gain (BNG) and Green Infrastructure (GI).
- 1.13 The draft Issues & Options Plan published for Regulation 18 consultation has considered the updated evidence, reviewed the extant policies, and explored the issues and options arising. The draft Plan aligns with the contents of the adopted CLP for ease of understanding the issues, options and implications for updating. It comprises 15 chapters supported by appendices, as follows:
- 1 Introduction
 - 2 Health & Wellbeing
 - 3 Review of the Overall Levels of Growth & the Duty to Co-operate
 - 4 Jobs & Economy
 - 5 Housing
 - 6 Retail & Centres
 - 7 Communities
 - 8 Green Belt & Green Environment
 - 9 Design
 - 10 Heritage
 - 11 Accessibility
 - 12 Environmental Management, Minerals & Waste
 - 13 Connectivity
 - 14 Infrastructure – updates
 - 15 Coventry City Area Action Plan
- 1.14 Each chapter presents the relevant evidence, explains the issues associated with the topic, suggests realistic options that could be progressed, and asks questions of consultees to inform decision-making and the further development of the Local Plan. It is important to note that the draft plan is not a new local plan – it is a review – and as such, seeks to be proportionate and to focus on those areas that need updating. It focuses on strategic matters as these are likely to have the most impacts. In particular, the issues and options for the review are framed within the context of changed national requirements, the Council's One Coventry Plan (2022-2030)¹⁰, and the five development pathways to sustainability set out in the draft Coventry Climate Change Strategy (2022-2030 – consultation draft)¹¹.
- 1.15 The next stage of plan preparation will take into account the consultation responses and ongoing technical studies. This further draft plan will comprise those policies that required none or only minor amendment, and those policies that have been significantly reviewed and updated. The draft Plan will be subject to SA before its Regulation 19 consultation.

¹⁰ <https://www.coventry.gov.uk/onecoventryplan>

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

Purpose and Structure of this Initial SA Report

- 1.16 This document reports the initial assessment stage of the SA process for the Coventry Local Plan Review. 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 sets out the requirements for consultation and commenting on the report, and explains the next steps
- 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.

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 (2021) in paragraph 35b that states that evidence should be proportionate. Planning guidance advises¹² 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:

¹² <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	<p>Reduce the potential for social isolation by encouraging safe social connectivity</p> <p>Have particular regard for potentially disadvantaged groups (cultural, ethnic, poor, ageing, physical & mentally disabled, single parents, carers, travellers, migrants/refugees)</p> <p>Encourage/support community participation in activities & democratic decision-making</p>
SA No 2: To provide accessible essential services and facilities for all residents	<p>Maintain & improve social & community facilities – meet needs of facilities that support new housing</p> <p>Support the provision of and access to education & training opportunities</p> <p>Encourage facilities that are adaptable to future changes in technology</p> <p>Encourage & support people to live healthy, active lives</p> <p>Ensure facilities are accessible to all, including those with physical or mental disabilities</p> <p>Enable & encourage accessibility to green infrastructure network</p>
SA No 3: To improve health and promote active living	<p>Reduce health inequalities</p> <p>Reduce deprivation with particular regard to deprivation pockets in Coventry</p> <p>Promote active living by facilitating active travel & encouraging healthy lifestyles</p> <p>Improve physical health & mental wellbeing for the ageing with better resilience (both physical & cognitive reserve)</p> <p>Create safe neighbourhoods & help reduce crime, including violence especially against women & girls</p>
SA No 4: To provide decent and affordable housing for all	<p>Provide suitable mix & tenure of housing, with particular regard to affordable homes and for younger people including Coliving & HMOs</p> <p>Provide suitable housing for the ageing, including for adaptability & resilience (physical & cognitive)</p> <p>Ensure that the best use is made of existing housing stock</p> <p>Meet the needs of potentially disadvantaged groups, including Travellers, single parents, carers</p>
SA No 5: To support sustainable inclusive economic growth	<p>Promote jobs & skills development</p> <p>Provide access to a range of employment opportunities</p> <p>Renew vitality and viability of local centres</p> <p>Support the retail & leisure sectors to recover/renew after Covid 19</p>
SA No 6: To help achieve the Council's ambition to reach net zero carbon emissions	<p>Promote energy hierarchy – fabric first, reducing energy use, then mitigating residual emissions</p> <p>Incorporated consideration of embodied carbon</p> <p>Support retrofitting of existing development</p> <p>Promote/deliver renewable or low carbon energy generation</p> <p>Proximity of development to sustainable transport see also SA No 8</p>

SA No 7: To build resilience to climate change	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
SA No 8: To reduce traffic & improve sustainable transport choices	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
SA No 9: To reduce air, noise & light pollution	Help to improve air quality – outdoors and indoors Help to reduce noise pollution & avoid noise disturbance Help to reduce light pollution & avoid light disturbance
SA No 10: To protect & conserve natural resources - soil, water, minerals & waste	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
SA No 11: To protect and enhance nature & biodiversity	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)
SA No 12: To protect and enhance the historic environment, and its setting	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
SA No 13: To protect and enhance the quality and character of townscapes and landscapes	Protect & enhance local character, distinctiveness & sense of place Protect & enhance visual amenity Restore degraded townscapes & landscapes Affect the purposes of the Green Belt

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: To protect and enhance nature & biodiversity	% biodiversity net gain (NE draft metric) Provision of, & connectivity to, GI/BI networks Enhancement & provision of long term management

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, secondary¹³, cumulative¹⁴ and synergistic¹⁵) 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:

Table 2.3: Significance Key

¹³ Any aspect of a plan that may have an impact (positive or negative), but that is not a direct result of the proposed plan.

¹⁴ 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.

¹⁵ These arise from the interaction of a number of impacts so that their combined effects are greater than the sum of their individual impacts.

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 Guidance¹⁶ 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 topics, as follows:
- Quantum of housing
 - Residential density

¹⁶ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

- Climate Change & Standards for Building Regulations
- Standards for Biodiversity Net Gain (BNG) & Green Infrastructure (GI)

2.13 These strategic options were tested with high level appraisal through SA using the SA framework of objectives and in a comparable and consistent manner. The SA made suggestions for mitigating likely negative effects and for enhancing any likely positive effects. There can be much uncertainty of the significance of effects at the strategic level, particularly for issues associated with climate change.

2 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 Report¹⁷ (draft January 2023; final March 2023) and summaries are presented in this Section 3 of the SA Report.

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)

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)

A Green Future: Our 25 Year Plan to Improve the Environment (2018, updated 2021) includes actions to reduce pollution by tackling air pollution

¹⁷ Available on the Council's website

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) 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);

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 recently (HEDNA, November 2022) 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. Self-build and custom housebuilding is a growing sector of the housing market; also the potential for co-living to be considered. 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.

- 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 LEPs 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. Historically coal mining has been a dominant industry in Coventry but there are now 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 16 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. The first focused on the city centre where we worked with partners to transform Coventry through heritage.
- 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 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

	<ul style="list-style-type: none"> ■ 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 longer, 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, flooding and the resultant detriment to wellbeing, the economy and the environment ■ Increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK

Transport & Air Quality	<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
Natural Resources	<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
Nature & Biodiversity	<ul style="list-style-type: none"> ■ Need 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 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 ■ 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 emerging recession are likely to have negative effects on socioeconomic factors. The economic outlook for Coventry¹⁸ 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 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

¹⁸ <https://www.coventry.gov.uk/facts-coventry/coventry-72>

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 SA OF STRATEGIC OPTIONS

Identifying the Strategic Options

- 4.1 During the progression of initial technical studies and early development of issues and options for plan-making, certain strategic options were identified and considered should be tested through the SA process. The strategic options identified are outlined, 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 be need to be planned for up to the year 2041. The Housing Topic Paper¹⁹ 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 figures. 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 29,200 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 ²⁰ (with ONS population projections from 2014) ²¹
2	39,280 dwellings (1,964 per annum) – HEDNA method ²² (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 ²³

¹⁹ Coventry City Council (May 2023) Housing Topic Paper

²⁰ <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

²¹ 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>

²² 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>

²³ 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 need as possible. Further work will be undertaken to see 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. The initial SA investigated through high level assessment two scenarios, as follows:

Table 4.1b: Options for Residential Density	
1	Greenfield 30 dph ²⁴ ; 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 Strategy²⁵:** At the time of writing, responses to the consultation draft were being analysed and it is anticipated that the final Strategy will be published in summer 2023. The Strategy aims for a dramatic reduction of carbon emissions and sets out five development pathways to sustainability:

- Low emissions – new economic opportunities
- Nature-based – enhance biodiversity & urban ecosystems
- Circular economy – new models of production & consumption
- Resilient -anticipate, prevent, absorb, and recover from shocks
- Equitable and people centred – inclusive urban communities & addressing poverty

- 4.5 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. 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. The initial SA investigated through high level assessment two scenarios, as follows:

²⁴ Dwellings per hectare

²⁵ Coventry Climate Change Strategy 2022-2030 (consultation draft 2023)
<https://www.coventry.gov.uk/draftclimatechangestrategy>

Table 4.1c: Options for progressing Coventry's Climate Change²⁶ 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 ²⁷ & Future Buildings Standard ²⁸ 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

- 4.6 **Strategic Options for Nature & Biodiversity:** There have been significant recent changes in requirements nationally aiming 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 are set out in the Green Infrastructure & Biodiversity Topic Paper²⁹. 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) ³⁰ , and Green Infrastructure (GI) standards ³¹
2	Planning policy requirements that are over and above national requirements for BNG & GI standards

- 4.7 **Overall Approach:** The plan-making and SA teams worked in an iterative way to identify the meaningful strategic options for investigation. These 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. The detailed findings of the SA of the strategic options are presented in Appendix III of this SA Report.

²⁶ Coventry's draft Climate Change Strategy 2023-2030

<https://www.coventry.gov.uk/downloads/download/7434/coventry-s-draft-climate-change-strategy>

²⁷ For example, please see: <https://www.futurehomes.org.uk/delivery-at-scale>

²⁸ <https://www.gov.uk/government/consultations/the-future-buildings-standard>

²⁹ Coventry City Council (May 2023) Green Infrastructure & Biodiversity Topic Paper

³⁰ Environment Act 2021, and for example, please see <https://consult.defra.gov.uk/defra-net-gain-consultation-team/consultation-on-biodiversity-net-gain-regulations/>

³¹ <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx>

SA of Strategic Options: Quantum of Housing

- 4.8 **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.
- 4.9 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 3 options.
- 4.10 **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 Option 3 is less likely to overload the capacity of services and facilities – and indicated by initial capacity studies - with less negative effects and therefore, overall more likely positive effects.
- 4.11 **Health & Active Living:** Coventry became a Marmot City³² 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 3 options.
- 4.12 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 & 2.
- 4.13 **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

³² <https://www.coventry.gov.uk/policy-1/coventry-marmot-city>

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. According to recent initial capacity studies, Option 3 could deliver the identified need for housing indicating major positive effects for housing objectives.

- 4.14 Further capacity studies will be undertaken as the review of the CLP progresses. 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 & 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.
- 4.15 **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 (Nov 2022) considered population, housing growth and the economy in tandem based on the 2021 census figures. Taking into account the initial capacity studies, it seems that Option 3 could potentially be accommodated, indicating minor positive effects for employment objectives but with some uncertainty of significance at this stage until more studies are undertaken.
- 4.16 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.
- 4.17 **Climate Change – Carbon Emissions:** The Council recognises the climate crisis and at the time of writing is finalising its updated Strategy (2022-2030). 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 3 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 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.
- 4.18 **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.

- 4.19 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 - but uncertainties of significance at this stage of assessment.
- 4.20 **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.
- 4.21 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 quantum of housing in Option 3 is 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 & more extensive.
- 4.22 **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 & 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. Light pollution disturbance can adversely affect health & wellbeing, including fatigue, insomnia, stress & 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.
- 4.23 **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 will recommend that priority is given to continuing to build on previously developed land (PDL) where effectively located – and indicating negligible effects on 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 & 2 may incur minor negative effects but with some uncertainty at this stage. 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.

- 4.24 **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.
- 4.25 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 initial capacity studies have suggested that there could be capacity in the city for the quantum in Option 3 and therefore, likely negligible or neutral effects. Overall, some uncertainties of significance of effects as dependent upon locations, densities, and any possibilities for sufficient offsite measures.
- 4.26 **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 of climate change are a particular challenge for heritage assets and their setting.
- 4.27 CLP policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. However, the quantum of housing in Option 1 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.
- 4.28 **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.

- 4.29 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. Therefore, positive effects are likely for Option 3 as it has been indicated by the initial capacity studies that such housing numbers can be accommodated within the urban area.
- 4.30 The summary findings of the initial high level SA of strategic options for the quantum of housing need are presented in Table 4.2a, as follows:

Table 4.2a: Strategic Options for Quantum of Housing Development	1_Standard Method (2014)	2_Standard Method (2022)	3_Standard Method less 35%
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?
9: To reduced air, noise & light pollution	0?	0?	0?
10. To protect & conserve natural resources – soil, water, minerals & waste ³³	- 0?	-? 0	0 0
11: To protect and enhance nature & biodiversity	--?	-?	0?
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?	+?

³³ First cell refers to land/soil & water resources; second cell refers to minerals & waste

SA of Strategic Options: Residential Density

- 4.31 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 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. 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.
- 4.32 **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). There is some uncertainty about whether the extant density arrangements will be able to accommodate the increased housing requirements.
- 4.33 **Services & Facilities:** 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 and facilities - and mitigation measures will be proposed through updating of relevant policies such that there should be no significant adverse effects. Some uncertainties as effects will depend on overall quantum of housing confirmed and locations.
- 4.34 **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, 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.
- 4.35 **Housing for All:** It is unclear whether the current approach to residential densities would actually be able to accommodate all the identified housing needs but it would progress provision such that positive effects are indicated for Option 1, with some 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.

- 4.36 **Economy:** Options for housing densities will not directly affect objectives for economic growth and therefore, neutral effects for SA No 5.
- 4.37 **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 & No 7.
- 4.38 **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.
- 4.39 **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 both options.
- 4.40 **Natural Resources:** Some uncertainty of effectiveness of policy mitigation measures to protect natural resources from the scale of development; therefore potential minor negative effects. 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 and location.
- 4.41 **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 as depends on extent of quantum of housing, extent of densification and location.
- 4.42 **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 both options.

- 4.43 **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 & 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 at this stage of assessment.
- 4.44 The summary findings of the initial high level SA of strategic options for residential density presented in Table 4.2b, as follows:

Table 4.2b: Options for Residential Density		1_Outside ring road minimum 35 dph		2_Outside ring road >35 dph in certain locations	
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	
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		0	
9: To reduced air, noise & light pollution		0		0	
10: To protect & conserve natural resources – soil, water, minerals & waste ³⁴		-	0	++ ?	0

³⁴ 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?	++?

SA of Strategic Options: Climate Change

- 4.45 **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.
- 4.46 **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.
- 4.47 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.
- 4.48 **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.

- 4.49 **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.
- 4.50 **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 of significance at this stage.
- 4.51 **Transport & Movement; Reduce Pollution:** Changes to Building Regulations will not affect these SA objectives numbers 8 & 9, and therefore, neutral/not applicable effects.
- 4.52 **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.
- 4.53 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.
- 4.54 **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 so that there could be some positive effects for nature and biodiversity – but uncertainty as depends upon quantum of new development and extent of associated biodiversity gain.

- 4.55 **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 – but uncertainty as depends upon extent of development and location.
- 4.56 **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.
- 4.57 The summary findings of the initial high level SA of strategic options for climate change presented in Table 4.2c, as follows:

Table 4.2c: Options for Coventry's Climate Change Strategy – Building Regulations Standards		
Sustainability Objective	1_In line with FHS & FBS	2_Over & above Building Regulations
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 ³⁵	-?	0	0?	+
11: To protect and enhance nature & biodiversity	0?		+	
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?	

SA of Strategic Options: Nature & Biodiversity

- 4.58 **Vibrant 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 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.
- 4.59 **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 in active living with positive effects for health and wellbeing.
- 4.60 **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 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.

³⁵ First cell refers to land/soil & water resources; second cell refers to minerals & waste

- 4.61 **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.
- 4.62 **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.
- 4.63 **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.
- 4.64 **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.
- 4.65 **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.
- 4.66 **Nature & Biodiversity:** Provision of GI – both green and blue – will contribute to protecting & 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.

- 4.67 **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.
- 4.68 **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.
- 4.69 The summary findings of the initial high level SA of strategic options for nature and biodiversity are presented in Table 4.2d, as follows:

Table 4.2d: 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 ³⁶	+	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	+		++?	

³⁶ First cell refers to land/soil & water resources; second cell refers to minerals & waste

5 CONSULTATION & NEXT STEPS

- 5.1 This Initial SA Report is being published alongside the Issues & Options draft Coventry Local Plan Review for Regulation 18 consultation. Any comments on the SA will be taken into consideration at the next stage of the draft plan review preparation – Pre-Submission draft CLPR for Regulation 19 consultation anticipated for late 2023/early 2024.
- 5.2 The Council will review and analyse the representations made on the Regulation 18 consultation. These comments will be taken into account, together with further technical studies, so that a preferred approach to the review of the plan can be prepared. This emerging further draft of the CLPR will be subject to SA to inform plan-making and the findings of the SA will be presented within a SA Report that will accompany the draft CLPR on Regulation 19 consultation.

APPENDICES:

- I **Statement of Compliance** (to be completed at Regulation 19 stage)
- II **SA Scoping Report** (March 2023, available separately on Council's website)
- III **SA of Strategic Options** (April 2023)

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 ³⁷ (with ONS population projections from 2014) ³⁸
2	39,280 dwellings (1,964 per annum) – HEDNA method ³⁹ (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 ⁴⁰

IIIb: Options for Residential Density	
1	Greenfield 30 dph ⁴¹ ; 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

IIIc: Options for progressing Coventry's Climate Change Strategy⁴²	
1	Planning policy requirements in line with national Future Homes Standard ⁴³ & Future Buildings Standard ⁴⁴ 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

³⁷ <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

³⁸ 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>

³⁹ 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>

⁴⁰ 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>

⁴¹ Dwellings per hectare

⁴² 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\"](https://www.coventry.gov.uk/downloads/download/7434/coventry-s-draft-climate-change-strategy-that-aims-for-\)

⁴³ For example, please see: <https://www.futurehomes.org.uk/delivery-at-scale>

⁴⁴ <https://www.gov.uk/government/consultations/the-future-buildings-standard>

IIId: Options for Nature & Biodiversity	
1	Planning policy requirements in line with national requirements & standards, including 10% Biodiversity Net Gain (BNG) ⁴⁵ , and Green Infrastructure (GI) standards ⁴⁶
2	Planning policy requirements that are over and above national requirements for BNG & GI standards

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		

⁴⁵ Environment Act 2021, and for example, please see <https://consult.defra.gov.uk/defra-net-gain-consultation-team/consultation-on-biodiversity-net-gain-regulations/>

⁴⁶ <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx>

IIla: 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

		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)
1: To enable vibrant and inclusive communities	<p>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 Council⁴⁷ 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 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</p>	+	+	+

⁴⁷ <https://www.coventry.gov.uk/facts-coventry/population-demographics>

	<p>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 3 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 3 options.</p> <p>Thus extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and 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 minority groups compared to the regional and national averages⁴⁸. 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: 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>			
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⁴⁸ (ONS, 2021) <https://www.coventry.gov.uk/facts-coventry/population-demographics>

<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 Option 3 is 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 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: 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 JSNA⁴⁹ 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)⁵⁰ 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</p>	+?	+?	+

⁴⁹ <https://www.coventry.gov.uk/facts-coventry/joint-strategic-needs-assessment-jsna>

⁵⁰ <https://coventry-city-council.github.io/imd/2019/>

	<p>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 City⁵¹ 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 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 & mental⁵². These factors are covered by the following SA Nos 4 & 5.</p> <p>Overcrowding is more likely to be experienced by minority ethnic groups⁵³ – 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.</p>			
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⁵¹ <https://www.coventry.gov.uk/policy-1/coventry-marmot-city>

⁵² For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

⁵³ The Marmot Review 10 Years On (February 2020) <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

	<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 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 SPD⁵⁴ 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: 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>			
4: To provide decent and affordable housing for all	<p>New demographic projections have been modelled recently (HEDNA 2022)⁵⁵ 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 housebuilding⁵⁶ 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-living⁵⁷ to be considered. It is understood that there is a sizeable amount of student accommodation in Coventry which provides the potential to reduce the number of students in the wider housing market.</p>	+	++	++

⁵⁴ Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

⁵⁵ <https://www.coventry.gov.uk/downloads/download/7374/coventry-and-warwickshire-housing-and-economic-development-needs-assessment-hedna>

⁵⁶ <https://www.gov.uk/guidance/self-build-and-custom-housebuilding>

⁵⁷ For example, please see <https://coliving.com/what-is-coliving>

	<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. However, according to recent initial capacity studies, Option 3 could deliver the identified need for housing indicating major positive effects for housing objectives. Therefore, positive effects likely for all three options but uncertainties of significance for the higher quanta of housing numbers. Further capacity studies will be undertaken as the review of the CLP progresses.</p> <p>Whilst delivery has not been an issue for the Council⁵⁸, 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 2020/21⁵⁹ 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 potentially become available for the wider housing market. It is 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>			
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⁵⁸ See AMR 2021/22 <https://www.coventry.gov.uk/downloads/file/39439/authority-monitoring-report-2021-22>

⁵⁹ <https://www.coventry.gov.uk/downloads/file/37391/authority-monitoring-report-2020-2021>

	<p>The Affordable Housing SPD (March 2022)⁶⁰ 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: Is there any scope for considering any particular housing needs from cultural, ethnic or migrants/refugees groups?</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. The evidence so far indicates that employment need could be met from renewal of existing sites and redevelopment⁶¹.</p> <p>The HEDNA (Nov 2022) considered population, housing growth and the economy in tandem based on the 2021 census figures. Taking into account the initial capacity studies, it seems that Option 3 could 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 not clear at this stage whether the higher quanta of housing in Options 1 & 2 could be accommodated due to the constraints within the Coventry boundary. These options 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>	--?	-?	+

⁶⁰ <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

⁶¹ <https://www.coventry.gov.uk/downloads/download/7374/coventry-and-warwickshire-housing-and-economic-development-needs-assessment-hedna>

<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 Strategy⁶². 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 intends to publish the Future Homes Standard (FHS) in 2024 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 been decarbonised^{63,64}. The UK has committed to decarbonise the electricity system by 2035⁶⁵ 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 3 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 SPD⁶⁶ 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</p>	<p>+</p>	<p>+</p>	<p>+</p>
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⁶²A Green Future for a Changing City(2022 – 2030) <https://www.coventry.gov.uk/draftclimatechangestrategy>

⁶³ <https://www.futurehomes.org.uk/delivery-at-scale>

⁶⁴ <https://www.benuk.net/Decarbonising-the-Grid.html>

⁶⁵ <https://www.gov.uk/government/news/plans-unveiled-to-decarbonise-uk-power-system-by-2035>

⁶⁶Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) <https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

	<p>higher than Building Regulations, in order to support Coventry's aspirations for addressing the climate change crisis.</p> <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: Circular economy principles⁶⁷ 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>			
7: To build resilience to climate change	<p>There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK.⁶⁸ 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 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). Increased densification may increase the urban heat island effect.</p>	-?	-?	+

⁶⁷ For example, please see RIBA, 2021 https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy_9781859469545

⁶⁸ For example, see <https://earth.org/climate-change-in-the-uk/>

	Overall, provision of green spaces and sustainable drainage are key elements to progress objectives for climate change. The higher quantum 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.			
8: To reduce traffic & improve sustainable transport choices	<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 Plan⁶⁹ for England includes an aim for half of all journeys in cities to be cycled or walked by 2030 & Coventry's Transport Strategy⁷⁰ aims to significantly improve conditions to encourage more people to walk and cycle.</p> <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 quantum of housing in Option 3 is less likely to be associated with significant cumulative negative effects and therefore, negligible or neutral effects are indicated.</p>	--?	-?	0?

⁶⁹ <https://www.gov.uk/government/publications/environmental-improvement-plan>

⁷⁰ <https://www.coventry.gov.uk/transport-strategy-2/transport-strategy>

	<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 (HEDNA, 2022) 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> <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)</p> <p>SA Suggestions: 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>			
9: To reduce air, noise & light pollution		0?	0?	0?

	<p>In the UK, air pollution has been recently reported (2022) as being the largest environmental risk to public health⁷¹. Reducing vehicle emissions will continue to improve air quality. Indoor air pollution is becoming an increasing proportion of the problem⁷².</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 Europe⁷³ & the UK⁷⁴. 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>Light pollution disturbance can adversely affect health & wellbeing, including fatigue, insomnia, stress & anxiety⁷⁵ (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: Continue to focus on reducing vehicle use to help reduce air pollution Consider the implications of environmental noise for particularly sensitive social groups Consider the implications of light pollution explicitly in building design & including the indoor environment</p>			
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⁷¹ 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>

⁷² Chief Medical Officers' annual report 2022: air pollution <https://www.sciencemediacentre.org/chief-medical-officers-annual-report-2022-air-pollution/>

⁷³ EEA, 2020 <https://www.eea.europa.eu/publications/environmental-noise-in-europe>

⁷⁴ 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>

⁷⁵ For example, please see <https://www.darksky.org/light-pollution/human-health/>

	Consider cumulative effects Consider the implications of air, noise & light pollution for nature & biodiversity						
10: To protect & conserve natural resources – soil, water, minerals & waste ⁷⁶	<p>The vast majority of development completions (90%) in 2021/22⁷⁷ 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 3 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 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.</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: 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>	-	0?	-?	0	0	0

⁷⁶ First cell refers to land/soil & water resources; second cell refers to minerals & waste

⁷⁷ <https://www.coventry.gov.uk/downloads/file/39439/authority-monitoring-report-2021-22>

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 gain⁷⁸. 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 initial capacity studies have suggested that there could be capacity in the city for the quantum in Option 3 and therefore, likely negligible or neutral effects. Overall, some uncertainties of significance of effects as depend upon locations, densities and any possibilities for sufficient offsite measures.</p> <p>SA Suggestions: 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 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>	--?	-?	0?
12: To protect and enhance the historic	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	-?	0?	0

⁷⁸ Biodiversity Metric 4.0 (JP039) 2021 <https://publications.naturalengland.org.uk/publication/6049804846366720>

<p>environment, and its setting</p>	<p>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 Option 1 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. Whilst the amount of development is reduced in Option 2 and effects towards negligible or neutral might be indicated, there is still some uncertainty of cumulative effects that will depend on location. The reduced quantum of housing in Option 3 indicates 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. 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 the current homes built before 1919 (about 20% in England) with appropriate energy improvement solutions is key to cutting carbon emissions⁷⁹.</p> <p>SA Suggestions:</p> <p>Increasing density of housing in suitable locations could take the loading off land availability & risks of negative effects for historic environment</p> <p>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</p> <p>Are there areas of the city that have changed significantly with changing population such that the local value & importance has changed?</p> <p>Are there opportunities with the review to focus on protecting heritage assets at risk?</p> <p>Are there opportunities to resolve existing problems with the historic environment & enhancing access/context/setting?</p>			
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⁷⁹ Historic England (March 2022) <https://historicengland.org.uk/whats-new/features/climate-change/our-strategy/>

	Consider proactive support for reuse of buildings pre 1919 with suitable energy improvements			
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. 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 Belt⁸⁰ 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 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>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 infrastructure⁸¹. 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. Mitigation measures, such as for design, location and offsetting, are likely to be effective for the lowest quantum of housing as capacity has been indicated in Option 3. 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</p>	--?	0?	+

⁸⁰ <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

⁸¹ 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>enhancement of quality and human wellbeing to the built environment. Therefore, positive effects are likely for Option 3 as it has been indicated by the initial capacity studies that such housing numbers can potentially be accommodated within the urban area.</p> <p>Some uncertainty at this stage as significance will depend on location & design, mitigation possibilities.</p> <p>SA Suggestions: 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 ⁸² ; 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

		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. Outside ring road minimum 35 dph	2. Outside ring road >35 dph in certain locations
1: To enable vibrant and inclusive communities	<p>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 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.</p> <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</p>	0?	+

⁸² Dwellings per hectare

	<p>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 suburbs⁸³. However, a series of poetry films⁸⁴ 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 research⁸⁵ 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 with appropriate standards 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.</p> <p>SA suggestions: 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.</p>		
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⁸³ 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>

⁸⁴ *Disappear Here* project funded with grants from Coventry City Council & Arts Council England

⁸⁵ 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>

	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 reported ⁸⁶ ?		
2: To provide accessible essential services and facilities for all residents	<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 are likely.</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>	0?	0?
3: To improve health & promote active living	<p>Overcrowding, poor housing conditions, and affordability problems have increased in recent years, as well as health inequalities⁸⁷.</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.</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</p>	0?	+

⁸⁶ 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>

⁸⁷ 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>

	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		
4: To provide decent and affordable housing for all	Overcrowding, poor housing conditions, and affordability problems have increased in recent years ⁸⁸ . It is unclear whether the current approach to residential densities would actually be able to accommodate all the identified housing needs but it would progress provision such that positive effects are indicated for Option 1, with some uncertainty of significance at this stage of assessment. 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.	+	++
5: To support sustainable inclusive economic growth	Options for housing densities will not directly affect objectives for economic growth and therefore, neutral effects for SA No 5.	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 as set out in Coventry's draft Climate Change Strategy. . Therefore, neutral effects for SA No 6.	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, neutral effects for SA No 7.	0	0
8: To reduce traffic & improve sustainable transport choices	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.	0	0

⁸⁸ 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>9: To reduce air, noise & light pollution</p>	<p>In the UK, air pollution has been recently reported as being the largest environmental risk to public health⁸⁹. Reducing vehicle emissions will continue to improve air quality. Indoor air pollution is becoming an increasing proportion of the problem⁹⁰. The Coventry Air Quality Action Plan⁹¹ 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 Europe⁹². 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 requirements⁹³ with acoustic separation & sound insulation can ensure that mitigation measures are implemented to acceptable levels/effects. Similarly, good quality design of buildings & their location can reduce the implications for light pollution on health & wellbeing.</p> <p>Light pollution disturbance can adversely affect health & wellbeing, including fatigue, insomnia stress & anxiety⁹⁴ (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 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 both options.</p> <p>SA Suggestions:</p>	<p>0</p>	<p>0</p>
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⁸⁹ 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>

⁹⁰ Chief Medical Officers' annual report 2022: air pollution <https://www.sciencemediacentre.org/chief-medical-officers-annual-report-2022-air-pollution/>

⁹¹ <https://letstalk.coventry.gov.uk/improvingag Ring Road Junction 7>

⁹² EEA, 2020 <https://www.eea.europa.eu/publications/environmental-noise-in-europe>

⁹³ 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>

⁹⁴ For example, please see <https://www.darksky.org/light-pollution/human-health/>

	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				
10: To protect & conserve natural resources – soil, water, minerals & waste⁹⁵	Some uncertainty of effectiveness of policy mitigation measures to protect natural resources from the scale of development; therefore potential minor negative effects. 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.	-	0	++?	0
11: To protect and enhance nature & biodiversity	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. 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.	-?		++?	
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	
13: To protect and enhance the quality and character of townscapes & landscapes	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. 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	0?		+	

⁹⁵ First cell refers to land/soil & water resources; second cell refers to minerals & waste

	<p>taken from other places; with high quality design, positive effects could be indicated but with uncertainty at this stage of assessment.</p> <p>SA Suggestions: Consider highest design possibilities & including for reuse/refurbishment to resolve existing sustainability/townscape issues</p>		
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IIIc: Options for progressing Coventry's Climate Change Strategy⁹⁶	
1	Planning policy requirements in line with national Future Homes Standard ⁹⁷ & Future Buildings Standard ⁹⁸ 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	Other factors are more likely to have potential effects on objectives for inclusive communities than requirements in line or above Building Regulations.	0	0

⁹⁶ Coventry's draft Climate Change Strategy 2023-2030 <https://www.coventry.gov.uk/downloads/download/7434/coventry-s-draft-climate-change-strategy>

⁹⁷ For example, please see: <https://www.futurehomes.org.uk/delivery-at-scale>

⁹⁸ <https://www.gov.uk/government/consultations/the-future-buildings-standard>

inclusive communities			
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 shelter⁹⁹. 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>¹⁰⁰. 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 health¹⁰¹.</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?	++?

⁹⁹ WHO (October 2021) <https://www.who.int/news-room/fact-sheets/detail/climate-change-and-health>

¹⁰⁰ 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>

¹⁰¹ UCL (July 2021) <https://www.ucl.ac.uk/bartlett/news/2021/jul/climate-change-and-mental-health>

SA No 4: To provide decent and affordable housing for all	<p>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 materials¹⁰².</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.¹⁰³ 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>	0?	?
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>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 century¹⁰⁴, and the recently published Net Zero Growth Plan (March, 2023)¹⁰⁵ 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 impacts¹⁰⁶ - and thus, this would support progressing higher standards sooner with some positive effects indicated for the economy.</p>	0?	+

¹⁰² For example, please see <https://www.environmentalleader.com/2022/02/uk-construction-industry-cites-these-barriers-to-net-zero-emissions/>

¹⁰³ 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/>

¹⁰⁴ <https://www.gov.uk/government/news/net-zero-review-uk-could-do-more-to-reap-economic-benefits-of-green-growth>

¹⁰⁵ DESNZ (March, 2023) <https://www.gov.uk/government/publications/powering-up-britain>

¹⁰⁶ <https://www.ucl.ac.uk/news/2021/sep/economic-cost-climate-change-could-be-six-times-higher-previously-thought>

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 ¹⁰⁷ . 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?	++?
	<p>Direct greenhouse gas (GHG) emissions from buildings accounted for 17% of UK GHG emissions in 2019¹⁰⁸. It has been reported that the construction industry needs to decarbonise more urgently¹⁰⁹ 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 “will not be enough to ensure a safe future for humanity”¹¹⁰.</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>		
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. ¹¹¹ 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.	0?	+
	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.		
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 ¹¹² .	0	0

¹⁰⁷A Green Future for a Changing City(2022 – 2030) <https://www.coventry.gov.uk/draftclimatechangestrategy>

¹⁰⁸ UK Climate Change Committee <https://www.theccc.org.uk/wp-content/uploads/2020/12/Sector-summary-Buildings.pdf>

¹⁰⁹ For example, please see RAEng 2021 <https://raeng.org.uk/news/construction-sector-must-move-further-and-faster-to-curb-carbon-emissions-say-engineers>

¹¹⁰ 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>

¹¹¹ For example, see <https://earth.org/climate-change-in-the-uk/>

¹¹² <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 & waste ¹¹³	<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 plans¹¹⁴. 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?	+

¹¹³ First cell refers to land/soil & water resources; second cell refers to minerals & waste

¹¹⁴ UK Horizon scanning (April 2021) <https://post.parliament.uk/soil-as-an-essential-national-asset/>

11: To protect and enhance nature & biodiversity	<p>The need for addressing biodiversity loss & climate change issues together is being increasingly recognised¹¹⁵. 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 Solutions¹¹⁶.</p> <p>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. 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>	0?	+
12: To protect and enhance the historic environment, and its setting	<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 emissions¹¹⁷.</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. 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>	0	+
13: To protect and enhance the	The national design guide (2019) ¹¹⁸ sets out the characteristics of well-designed places & includes consideration of minimising carbon emissions. Circular economy principles in building design ¹¹⁹ will	0	0?

¹¹⁵ 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>

¹¹⁶ Defra (January 2023) Environmental Improvement Plan 2023 <https://www.gov.uk/government/publications/environmental-improvement-plan>

¹¹⁷ Historic England (March 2022) <https://historicengland.org.uk/whats-new/features/climate-change/our-strategy/>

¹¹⁸ <https://www.gov.uk/government/publications/national-design-guide>

¹¹⁹ 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/>

<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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IIId: Options for Nature & Biodiversity	
1	Planning policy requirements in line with national requirements & standards, including 10% Biodiversity Net Gain (BNG) ¹²⁰ , and Green Infrastructure (GI) ¹²¹ standards ¹²²
2	Planning policy requirements that are over and above national requirements for BNG & GI standards
<p>The recent Environmental Improvement Plan (January, 2023)¹²³ 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)¹²⁴ 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 	

¹²⁰ Environment Act 2021, and for example, please see <https://consult.defra.gov.uk/defra-net-gain-consultation-team/consultation-on-biodiversity-net-gain-regulations/>

¹²¹ Includes both green and blue (water-related) infrastructure

¹²² <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx>

¹²³ Defra (January 2023) Environmental Improvement Plan 2023 <https://www.gov.uk/government/publications/environmental-improvement-plan>

¹²⁴ Natural England, Feb 2023 <https://www.gov.uk/government/news/natural-england-unveils-new-green-infrastructure-framework>

		Options for Nature & Biodiversity	
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. 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.	0	0
2: To provide accessible essential services and facilities for all residents	<p>It is likely that implementation of the proposed national standards for GI will increase provision of, and accessibility to, green infrastructure – with positive effects.</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 – that are likely to be synergistic & cumulative, particularly in the longer term.</p>	+	++
3: To improve health & promote active living	<p>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.</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 health & wellbeing – that are likely to be synergistic & cumulative, particularly in the longer term.</p>	+	++

	<p>Coventry has been a Marmot City¹²⁵ since 2013 & there has been progress in outcomes across health & society. The Marmot Review¹²⁶ 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>		
4: To provide decent and affordable housing for all	<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>	+	+
5: To support sustainable	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.	0?	0?

¹²⁵ <https://www.coventry.gov.uk/policy-1/coventry-marmot-city>

¹²⁶ <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

inclusive economic growth	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 ¹²⁷ . 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

¹²⁷ 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>

9: To reduce air, noise & light pollution	<p>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) & 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 & waste¹²⁸	<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>	+		++?	

¹²⁸ First cell refers to land/soil & water resources; second cell refers to minerals & waste

