



**Coventry City Council**

**Coventry Local Plan Review  
2021-2041:  
Proposed Submission  
Regulation 19 Consultation**

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

**October 2024**

*enfusion*



# Coventry Local Plan Review 2021-2041: Proposed Submission Regulation 19 Consultation

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

### SA Report:

date:	May 2023 Initial August-September 2024 Drafts October 2024 Final	
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## NON-TECHNICAL SUMMARY (NTS)

### This is the NTS of the Sustainability Appraisal (SA) Report

1. This is the NTS of the SA Report documenting the processes of Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) within an integrated appraisal for the Coventry Local Plan Review (CLPR, 2021-2041). This summary is an integral part of the SA Report that accompanies the proposed submission draft of the plan for Regulation 19 public consultation in autumn 2024. It provides an outline of the SA process and findings in non-technical summary.

### The Coventry Local Plan Review (CLPR) 2021-2041

2. The Coventry Local Plan 2021-2041 covers the entire administrative boundary for Coventry City Council, extending beyond the city centre, and located some 15 km to the south-east of Birmingham. Since the current Local Plan was adopted in 2017, there have been various wider reaching changes in both the national and local contexts, including major changes to climate change and environmental requirements. The longer term effects of Brexit and the Covid pandemic are still uncertain, for example, on patterns of working.
3. The Local Plan Review comprises chapters and policies in a similar format and numbering to the adopted Local Plan -Introduction, Overall Growth & Duty to Cooperate, Health & Wellbeing, Jobs & Economy, Housing, Retail & Town Centre Uses, Communities, Green Belt & Green Environment, Design, Heritage, Accessibility, Environmental Management, and Implementation/Monitoring. The current City Centre Area Action Plan has been updated and relevant elements (some are out of date now and some would be duplication) carried across to the new plan as a separate chapter. The overall development needs are set out to be a minimum of 29,100 additional homes and a minimum of 60 hectares of employment land.

### Sustainability Appraisal (SA)

4. The purpose of Sustainability Appraisal is to promote sustainable development through the integration of environmental, social, and economic considerations in the preparation of a Local Plan. SA is an iterative and ongoing process that informs plan-making by assessing developing elements of the plan, evaluating and describing the likely significant effects of implementing the plan, and suggesting possibilities for mitigating significant adverse effects and enhancing positive effects.
5. Initially the scope of the SA is determined by establishing the baseline conditions and context of the area, and by identifying issues, problems and opportunities. From this information, a SA Framework of objectives for sustainable development is prepared. This is relevant to the Coventry local authority area and the issues for

the Local Plan review, and it then forms the basis against which the draft plan is assessed.

### **Sustainability Characteristics of the Coventry City Area & Likely Evolution without the Local Plan Review**

6. The population of Coventry is predicted to increase to 422,919 by the year 2031 and to 454,534 by the year 2042 and, in line with the rest of England, there are more people in older age groups. Over the past decade, the city has become increasingly ethnically diverse with just under half of its school-aged population from an ethnic minority background. Whilst there have been improvements, there are pockets of deprivation and poor health/wellbeing in parts of the area and this limits people's opportunities to succeed in life.
7. Much of Coventry's housing stock is small, old and not built to modern energy efficiency standards. This means that many residents are living in damp, poorly insulated homes, and pay too much to keep warm. Migration is another factor affecting the housing needs. Before the pandemic, Coventry had experienced strong economic growth with particular skills in advanced manufacturing and engineering, but there have been challenges since Brexit and Covid-19. Tourism is also important, and the city is home to two successful universities.
8. The city has air quality problems, mostly associated with pollution from vehicles. Noise is a common problem – also from transport, and also light – for both people and wildlife. Pollution from wastewater remains a problem for water quality. Some of the new development completed has been on previously developed land, thus protecting agricultural land and greenfield. The city centre is generally well connected, including for sustainable transport but could be further improved to better encourage more active travel and linkages with green ways for cycling and walking.
9. Coventry has a range of unique historic sites and features that give the area its distinctive characters and cultural identity. The landscapes in the area are valued for their scenic qualities, rich wildlife, cultural associations and historic values. Coventry has many habitats associated with the built environment, and there are nationally designated sites for scientific interest, local nature reserves, and areas of ancient woodland. The area is also rich in the water environment with rivers, canals and waterbodies that form an important biodiversity network.
10. Without review of the Local Plan, there are likely to be some changes anyway in the sustainability characteristics of the Coventry area, for example, the increasing use of electric cars, and new standards for green infrastructure will lead to reduced greenhouse gas (GHG) emissions, improvements in air quality, and some recovery for the loss of nature and biodiversity.
11. However, the predicted increase in population, will challenge the ability of the Council and its partners to accommodate such changes for the quality of life of its citizens, and to be able to provide the right mix and type of homes in the most suitable locations. Without guidance from an updated Local Plan, the adverse effects from development, including cumulative effects, would not be managed

effectively. Opportunities from new development, such as improving accessibility to green space and enhancing townscape quality/character, would not be realised or optimised – including contributing towards reducing health inequities.

### How has the Coventry Local Plan Review been assessed?

12. The SA Framework, together with the baseline information, and professional judgment comprised the basis for assessment, and is summarised in the following table:

SA Objective
SA No 1: To enable vibrant and inclusive communities
SA No 2: To provide accessible essential services and facilities for all residents
SA No 3: To improve health and promote active living
SA No 4: To provide decent and affordable housing for all
SA No 5: To support sustainable inclusive economic growth
SA No 6: To help achieve the Council's ambition to reach net zero carbon emissions
SA No 7: To build resilience to climate change
SA No 8: To reduce traffic & improve sustainable transport choices
SA No 9: To reduce air, noise & light pollution
SA No 10: To protect & conserve natural resources - soil, water, minerals & waste
SA No 11: To protect and enhance nature & biodiversity
SA No 12: To protect and enhance the historic environment, and its setting
SA No 13: To protect and enhance the quality and character of townscapes and landscapes

13. The significance of effects was assessed using the categories, as follows:

Symbol	Meaning
--	Major Negative
-	Minor Negative
+	Minor Positive
++	Major Positive
?	Uncertain
0	Neutral or Negligible



## What reasonable alternatives have been considered & addressed?

14. During the progression of initial technical studies and early development of issues and options for plan-making, certain strategic options were identified and tested with high level appraisal using the SA framework of objectives, as follows:
- Amount of Housing
  - Density of Housing
  - Climate Change & Standards for Building Regulations (2 options)
  - Standards for Biodiversity Net Gain (BNG) & Green Infrastructure (GI) (2 options)
15. The SA made suggestions for mitigating likely negative effects and for enhancing any likely positive effects to inform the plan-making. It should be noted that there can be much uncertainty of the significance of effects at the strategic level, particularly for issues associated with climate change.
16. The Council considered the comments made during the initial consultation of the Issues & Options, further evidence studies, and the findings of the SA in order to identify and refine any further strategic options that should be tested through SA. The amended and additional strategic options that were tested through SA are, as follows:
- Amount of Housing (5 options)
  - Density of Housing (3 options)
  - Development in the Green Belt (2 options)
  - Amount of Employment Land (3 options)
  - Amount (3 options) & Distribution of Office Development (3 options)
  - Purpose Built Student Accommodation (PBSA) (2 options)
17. These strategic options were tested through SA using the SA framework of objectives and in a comparable and consistent manner. The findings of the SA, the comments made during consultation, and the findings of further technical studies informed the Council in its selection and rejection of options. The draft Local Plan includes those strategic options that have been tested and identified as the preferred approaches to plan-making.
18. **Amount of Housing:** Options 1 & 2 were found to have significant negative effects for many topics because the high numbers of dwellings would compromise the ability to meet with other objectives, especially for climate change and nature. Homes would have to be small and more densely located with less possibility to meet variety and adaptability of needs. Option 3 for 29,100 new homes was the preferred option as this aligns with the identified local housing needs and can be accommodated within the Coventry Council area and allows for a buffer over the plan period.
19. **Density of Housing:** Options 1 & 2 were found to not be able to accommodate the development needs. Option 3 identified four different areas according to their local character and ability to accommodate different densities of housing – and this is the preferred approach.

20. **Climate Change & Building Regulations Standards:** Compliance with national minimum standards for energy uses of new buildings as set out in Option 1 will be mandatory for the updated plan. However, such standards are unlikely to sufficiently progress the objectives for reducing greenhouse gas emissions in the Coventry Climate Change Strategy to 2030. Therefore, the Council progressed Option 2 – over and above the proposed new Building Regulations – seeking opportunities to progress towards net zero carbon beyond that controlled through Building Regulations.
21. **Nature & Biodiversity:** It was decided that a flexible approach to achieve the best outcomes through national standards is more effective than requiring standards higher than those at the national level. The Council has been applying a 10% gain in BNG for some time and this is working well with other initiatives.
22. **Development in Green Belt:** The Green Belt is very important for the Coventry plan area – it prevents urban sprawl, protects green and open space, retains openness, protects the landscapes and character of settlements. As the identified need for housing can be accommodated, the preferred approach is to avoid any development in the Green Belt, as set out in Option 2.
23. **Amount of Employment Land:** Option 1 is too high to be accommodated within the constrained boundaries of the Coventry plan area. Option 3 would result in development in the Green Belt and therefore, is not taken forward. Option 2 can be accommodated without resorting to Green Belt release and is the preferred option.
24. **Amount of Office Land:** Options 1 & 2 reflect earlier calculations of the amount of land needed for office; Option 3 is the preferred option that takes into account oversupply and reduced requirements due to changed patterns of working.
25. **Distribution of Office Land:** Option 3 with land to the City Centre and to local centres is the preferred approach as it supports a range of needs including smaller businesses.
26. **Purpose Built Student Accommodation:** Option 2 that limits student housing primarily to the city university area and the university campus is the preferred option as the student populations are more focused in more sustainable locations. It is also a more effective use of land for other housing needs.
27. The Council reviewed the status of the site allocations in the adopted Local Plan as some have been developed, some are being developed, some are consented, and others not yet started. The Council identified that 25 housing and mixed use sites, and 7 employment sites, were still suitable and should be retained in the Local Plan Review.
28. The Council assessed the site options that had been proposed through the calls for sites and found 12 new sites that were suitable and deliverable. All these sites were subject to SA and taken forward as proposed site allocations for housing and mixed use development. There was one new employment site that was being promoted and this was tested through SA. The site assessment process and the SA found that there would be negative effects for agricultural land, soils and

the Green Belt – and for these reasons, the site has not been taken forward into the new Local Plan.

### **What are the Likely Significant Effects of the draft Coventry Local Plan Review to 2041? How could negative effects be mitigated?**

29. The population of Coventry is predicted to increase and the Council has investigated how much housing and new development will be needed. The Council has prepared the draft Plan to support the Vision and priorities in the One Coventry Plan and the priorities in the draft Climate Change Strategy. The Coventry Local Plan area is heavily built-up, comprising a city centre that is rich with cultural and historical assets, surrounded by an urban area which is then defined by the encircling Green Belt land that is so important to prevent urban sprawl and coalescence. These characteristics constrain the opportunities for new development, so the Council identified updated character areas for the City Centre to better guide new development. It also identified four zones – greenfield, brownfield, city centre transition, and city centre – that better reflect precedent and context such that different densities of housing can be accommodated more sustainably with positive effects. The updated approach to development in the City Centre will support objectives for economic growth and regeneration with wider positive effects.
30. Taking into account these local circumstances, the Council has assessed that the identified need for housing and employment land can be accommodated within the urban environment and avoiding the Green Belt with significant positive effects. Good quality housing and access to employment is well established as contributing to better health and wellbeing – both physical and mental – and indicating further significant positive effects. Housing policies cover the needs of different types of people, including the young, older persons, those with special needs, students and travellers. This all contributes to positive effects for inclusive communities. Affordability is a key element of the new Plan and also adaptability and flexibility to be able to adjust to changing needs – all with significant positive effects.
31. The location and type of new development can have effects for communities and the Plan allocates sites for new development that are within good access of services and facilities. This provides mitigation measures to avoid significant negative effects. Development sites were also chosen to be easily accessible to public transport, cycling and walking routes and this will have positive effects for reducing dependence on car travel and increasing sustainable and active travel with positive effects for health and wellbeing. Transport policies further guide new development, encouraging active travel and reduce reliance on the private car, thus supporting the Council's emphasis on prioritising sustainable travel with positive effects for health and wellbeing.
32. Aiming to address the effects of climate change is a key feature of the updated Plan with new policies that reflect the new requirements for net zero carbon and Building Standards. Information and guidance is provided for new development such that in the longer term, the cumulative effects should be positive for climate change and people's health and wellbeing.

33. Updating of policies on the design of new development provide mitigation measures to ensure that potential negative effects are avoided and that possible positive effects are included. The historic environment continues to be protected and enhanced by policies that provide strong mitigation measures. The local townscapes and landscapes, including the important historic city centre and Arden rural environment, continue to be protected and enhanced by relevant policies that provide strong mitigation measures. The avoidance of new development in the Green Belt provides mitigation to avoid negative effects from urban sprawl and on communities by keeping open space. This is particularly important for the constrained land area for the Coventry Local Plan.
34. There is the potential for the overall scale of new development to have negative effects on nature and biodiversity. However, updated policies reflect the new national requirement that all development must provide at least 10% biodiversity net gain – with overall positive effects. Policies provide information and guidance of how development can link new green and blue infrastructure to benefit both nature and people with significant positive effects on health and wellbeing.
35. Strong policies remain in the Plan to reduce pollution and protect natural resources. Policies on design, air quality, light, and noise provide strong mitigation measures to avoid significant negative effects. Site allocations have been selected on previously developed land, thus making effective use of the land resources and avoiding negative effects on soils and greenfield land. Policies remain in the Plan for waste management and minerals development such that potential negative effects are mitigated.
36. All these factors are interconnected and contribute to helping Coventry achieve its ambitions for addressing the climate crisis and supporting the One Coventry Vision through mitigating potential negative effects and encouraging possibilities for positive effects.

### **Were there any difficulties encountered?**

37. There were no significant technical difficulties encountered during the preparation of this SA. There are inherent difficulties in predicting the likely future baseline and assumptions were made using professional judgment. Some uncertainties were identified – in particular for the significance of effects for climate change and with regard to nature and biodiversity.

### **How has the SA influenced the draft Coventry Local Plan?**

38. The SA made suggestions for improving the sustainability of the Plan, especially at the early stages of the plan preparation with the assessments of the strategic options for amount of housing and the density of housing. Overall, the findings of the SA were taken into account as the draft Plan was further developed.

### **Consultation**

39. The Initial SA Report (May 2023) was published alongside the Issues & Options draft Coventry Local Plan Review for Regulation 18 consultation in 2023. Comments were received from the statutory environmental bodies - Natural

England and Historic England. Comments were also received from a developer who had concerns that development should be considered in the Green Belt. These comments were taken into account during the preparation of this SA Report. The draft Coventry Local Plan Proposed Submission is being published for Regulation 19 consultation and this SA Report accompanies the draft Plan.

### **Monitoring Proposals**

40. Local planning authorities are required to produce Monitoring Reports (MRs) including indicators and targets against which the progress of the Plan can be assessed. There is also a requirement to monitor the predictions made in the SA and Government advises Councils to prepare a monitoring strategy that incorporates the needs of the two processes to make best use of shared information and resources. The Coventry City Council monitoring strategy for the Local Plan is considered satisfactory for the requirements from the SA process.

### **Next Steps**

41. Any comments on the SA will be submitted with the draft Plan and other evidence to the Secretary of State so that an independent planning inspector may be appointed for the Local Plan and its supporting evidence to be examined in public in due course.

## 1.0 INTRODUCTION

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

- 1.1 Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. The purpose of a Sustainability Appraisal is to promote sustainable development through assessing the extent to which an emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic, and social objectives<sup>1</sup>.
- 1.2 The requirement for SA is set out in Section 19 of the Planning and Compulsory Purchase Act 2004 and in paragraph 32 of the National Planning Policy Framework (NPPF, updated 2023)<sup>2</sup>. SA incorporates the requirements for Strategic Environmental Assessment (SEA,) as set out in the Environmental Assessment of Plans and Programmes Regulations 2004<sup>3</sup>. Coventry City Council has commissioned independent specialist consultants Enfusion Ltd to undertake the SA process for the Coventry Local Plan Review CLPR 2021 - 2041.
- 1.3 National planning practice guidance sets out the key stages and tasks for the SA process and their relationship with the Local Plan process – as illustrated in the following Figure 1.1. It is important to note that SA is an iterative and on-going process. Stages and tasks in the SA process may be revisited and updated or revised as a plan develops, to take account of updated or new evidence as well as consultation responses.
- 1.4 This SA Report explains the Stage A Scoping that has been undertaken and sent to the statutory consultation bodies in accordance with good practice. It reports the findings of Stage B Alternatives & Assessment and comprises Stage C Preparation of the SA Report. This SA Report accompanies the Coventry Local Plan Review Regulation 19 Draft Plan for statutory public consultation and seeks comments from the public, stakeholders and the statutory consultees.

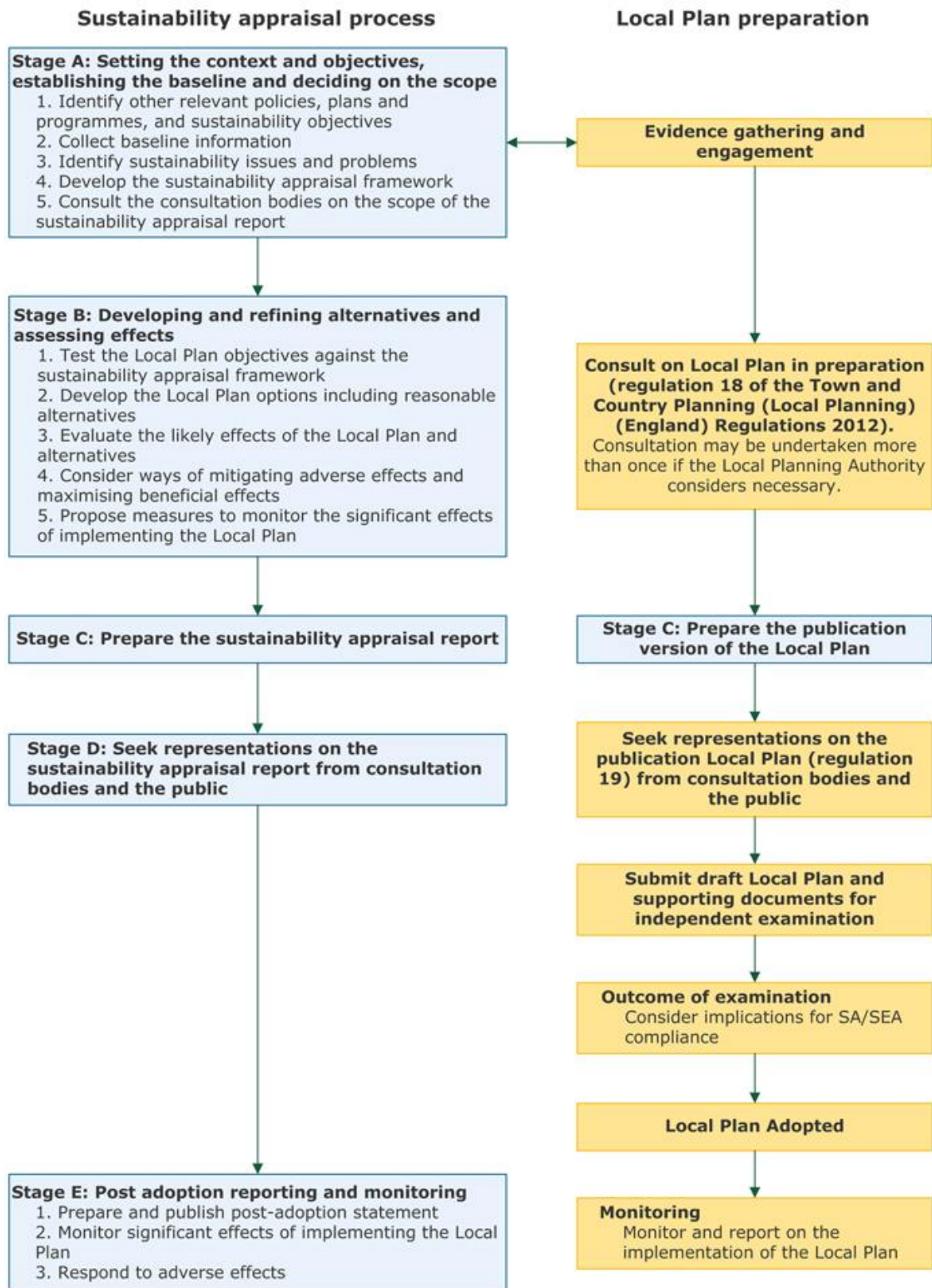
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<sup>1</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#strategic-environmental-assessment-and-sustainability-appraisal>

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

<sup>3</sup> <https://www.legislation.gov.uk/uksi/2004/1633/contents/made>

Figure 1.1: SA and Plan-making Stages and Tasks



## Habitats Regulations Assessment (HRA)

- 1.5 Coventry City Council is also required to undertake a Habitats Regulations Assessment (HRA)<sup>4</sup> of the Local Plan Review.<sup>5</sup> The Conservation of Habitats & Species Regulations (2017, amended 2018)<sup>6</sup> afford a high level of protection to sites in a network of internationally important sites designated for their ecological status. These sites comprise European Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), and Ramsar<sup>7</sup> sites. It is a requirement to consider if the plan is likely to have significant effects on the integrity of any relevant designated site.
- 1.6 HRA is a two staged process – initially screening and then appropriate assessment (if significant adverse effects are screened as likely). Planning practice guidance advises that an SA should take account of the findings of an appropriate assessment, if one is undertaken. HRA screening for the CLPR has been undertaken separately and the findings of the HRA taken into account in the SA.

## The Coventry Local Plan Review 2021-2041 (CLPR)

- 1.7 The Coventry Local Plan 2011-2031 and City Centre Area Action Plan 2011-2031 (CCAAP) (both adopted 2017), together with national planning guidance (NPPF), Development Plan Documents (DPDs), Supplementary Planning Guidance (SPDs), and Neighbourhood Plans (NPs), comprise the planning framework through which decisions are made on planning applications. The Government currently requires that the policies of an adopted Local Plan should be reviewed every five years to check that they are up to date.
- 1.8 It may be noted that the review of the CLP is being carried out during times of proposed planning reform and these changes could have a profound impact on development plans and projects. During 2020-2021, Government consulted on proposed changes to the planning system with revisions to the NPPF, the National Model Design Code and changes to the standard method for assessing local housing need. The Levelling-Up & Regeneration Act (LURA, 2023)<sup>8</sup> enacted the changes and introduced national development management policies (NDMPs). The new Government has proposed different changes to the NPPF (July 2024)<sup>9</sup> and transitional arrangements. These proposals are now being consulted upon until 24 September 2024.
- 1.9 The Coventry Local Plan covers the entire administrative boundary for Coventry City Council with an area of 99km<sup>2</sup> located in central England, approximately 15km south east of Birmingham and approximately 10km north of Leamington Spa – and as shown in the following figures:

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

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

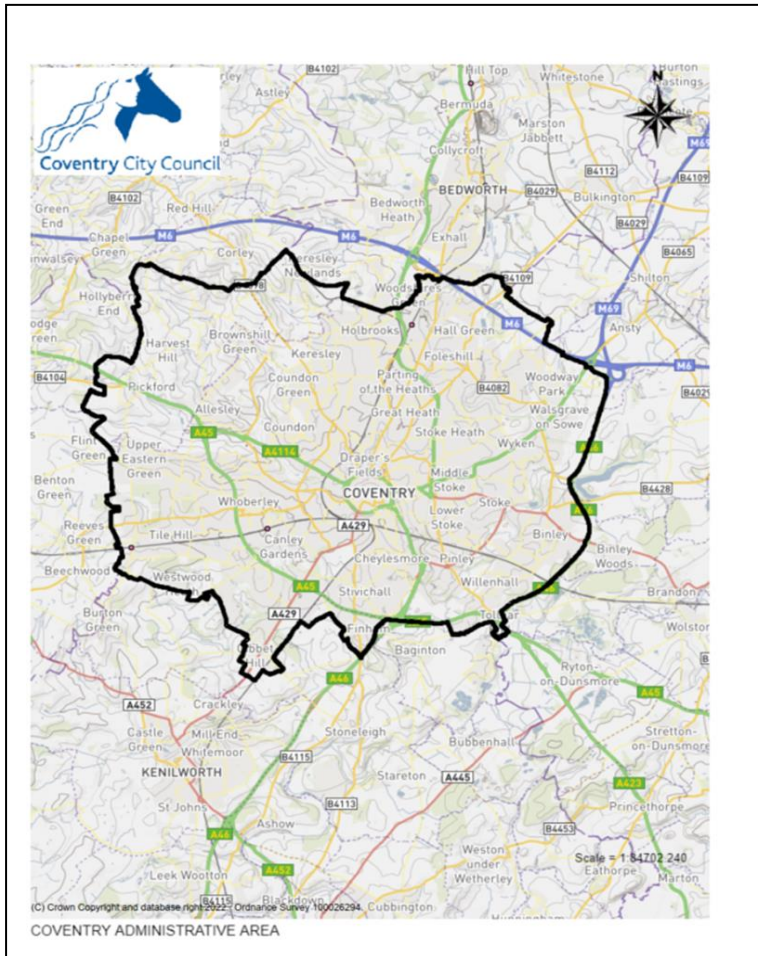
<sup>6</sup> <https://www.legislation.gov.uk/uksi/2017/1012/contents/made>

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

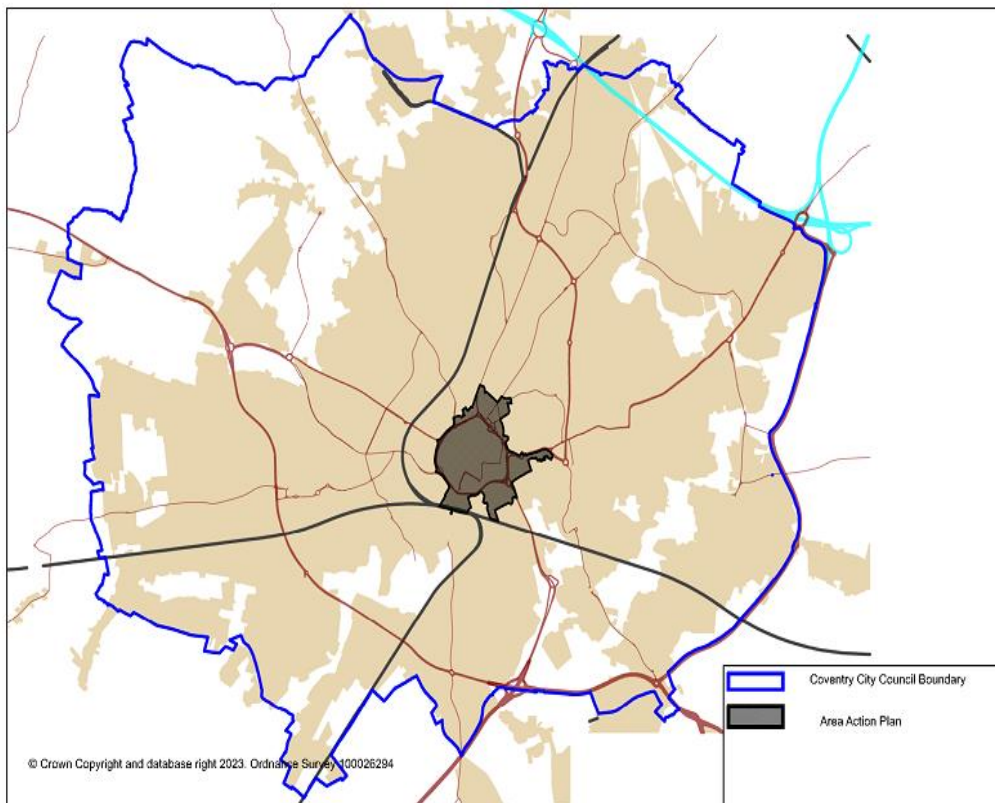
<sup>8</sup> <https://www.legislation.gov.uk/ukpga/2023/55>

<sup>9</sup> <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system>





**Figures 1.2 & 1.3:**  
Location of the  
Coventry Local Plan  
area



- 1.10 In consideration of the significant changes associated with Government calculations for housing need, as well as major changes to climate change and environmental requirements, the Council approved a full review of the Local Plan in December 2022. Since the Plan was adopted in 2017, there have been various wider reaching changes in both the national and local contexts, including effects of Brexit and the Covid pandemic. The Council's priorities now include the One Coventry Plan and the emerging Climate Change Strategy. It was decided that it was more effective to undertake a full rather than a partial review.
- 1.11 Many of the policies in the adopted LP are still relevant and needed only minor amendment or updating. Key policy areas have been updated in line with new national requirements and new evidence, most notably associated with the Coventry & Warwickshire Housing and Economic Development Needs Assessment (HEDNA, November 2022)<sup>10</sup>. This strategic study has been prepared to provide a joint and integrated assessment of the need for housing, economic growth potential and employment land needs for the city and the county. Other key evidence includes the Housing & Employment Land Availability Assessment (HELAA, 2024), the Residential Density Study (2024), and the Green Belt Technical Review (2024).
- 1.12 The studies for the preparation of the Local Plan Review indicated the possibilities for certain different strategic options for policies. These were determined to be reasonable alternatives such that they were investigated through the SA process. Strategic options were identified for the quantum of housing development, the density of housing, standards for Building Regulations, standards for Biodiversity Net Gain (BNG) and Green Infrastructure (GI), development in the Green Belt, the quantum of employment land, the quantum and distribution of office development land and the location of Purpose Built Student Accommodation (PBSA).
- 1.13 The draft Plan published for Regulation 19 consultation has considered the updated evidence, reviewed the extant policies, explored the issues and options arising, and considered the comments received from the Regulation 18 public consultation. The Plan aligns with the contents of the adopted Local Plan and comprises chapters, supported by appendices, as follows:

#### Introduction

- 1 Overall Development Needs & the Duty to Co-operate
- 2 Health & Wellbeing
- 3 Jobs & Economy
- 4 Housing
- 5 Retail & Town Centre Uses
- 6 Communities
- 7 Green Belt & Green Environment
- 8 Design
- 9 Heritage
- 10 Accessibility
- 11 Environmental Management

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<sup>10</sup> <https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

- 12 Coventry City Centre
- 13 Infrastructure, Implementation & Monitoring

1.14 The CLPR Policies with an outline of updating are listed in the Table 1.1, as follows:

**Table 1.1: CLPR Policies – Summary of Review Changes**

<b>CLPR Policy</b>	<b>Summary of Changes</b>
DS1: Overall Development Needs	<b>Strategic Policy</b> - Reflects change in quantum of development for period 2021-2041 – minimum of 29,100 additional homes & minimum of 60 hectares of employment land within the city's administrative boundary
DS2: Duty to Cooperate & Partnership Working	<b>Strategic Policy</b> - Updated
DS3: Sustainable Development	<b>Strategic Policy</b> - Updated
DS4 Parts A, B, C & D Masterplan Principles	<b>Strategic Policy</b> - Minor updating
HW1: Health & Health Impact Assessments	Updated to broaden scope & align with updated SPD
JE1: Economy & Employment Strategy	<b>Strategic Policy</b> - Updated to reflect national changes & local evidence
JE2: Provision of Employment Land & Premises	<b>Strategic Policy</b> - Updated – 52 hectares of land allocated for employment development within the city's administrative area, plus 27,100 sq m remaining floorspace at Friargate as part of wider mixed use allocation
JE3: Non-Employment Uses on Employment Land	Changes to context for policy application
JE4: Location & Type of Office Development	Updated to reflect national policy change and local evidence
JE5: Industrial & Storage Distribution Development	Previous JE5 split into 2 policies – JE5 Industrial and Storage and a new JE8 to focus on R&D
JE6: Tourism/Visitor-Related	Minor updating
JE7: Accessibility to Employment Opportunities	Updating to 'developer contributions'
JE8: Location of Research & Development (R&D)	New policy recognising that R&D has different locational needs
H1: Housing Land Requirements	<b>Strategic Policy</b> - Updated needs for 2021-2041 for a minimum of 29,100 additional dwellings
H2: Housing Allocations	<b>Strategic Policy</b> - Updated including status of remained allocations (some being developed, some consented, some not started), & new identified sites
H3: Provision of New Housing	Significant updating to reflect changes in national standards & legislation and local evidence

H4: Securing a Mix of Housing	Updating in line with HEDNA
H5: Managing Existing Housing Stock	Updated with latest climate change requirements & including emphasis on re-use & support for retrofitting
H6: Affordable Housing	Updated , including in line with HEDNA need (provision, tenure, housing size)and local evidence
H7: Gypsy & Traveller Accommodation	Updated in line with local evidence
H8: Specialist Housing, Older Persons Accommodation & Hostels	Updated & strengthened to widen scope and require accessibility & adaptability standards
H9: Residential Density	Changed policy that better reflects local character & context with four densities proposed – greenfield, brownfield, city centre transition zone, and city centre
H10: Student Accommodation	Updated policy in line with local evidence, restricting to areas close to the universities and encouraging better standards & including provision for adaptability of residences
H11: Homes in Multiple Occupation	Updating to reflect, and link to the new HMO DPD
H12: Build to Rent Housing	New Policy
H13: Co-living	New Policy
R1-R6 Retail Policies	Updating to reflect national policy & the Retail Study local evidence
CO1-3 Community Policies	Minor updating
GB1: Green Belt	<b>Strategic Policy</b> - Updating & new policy to differentiate between Green Belt & Local Green Space
GB2: Safeguarded Land in the Green Belt	<b>Strategic Policy</b> – Retained pending progress of the South Warwickshire Local Plan
GB3: Local Green Space	Updating & new policy to differentiate between Green Belt & Local Green Space
GE1: Green & Blue Infrastructure	Updated to reflect local strategy and national change
GE2: Green Space	Minor updating to reflect national change and local evidence
GE3: Biodiversity, Geological, Landscape & Archaeological Conservation	Differentiation & updating to include statutory 10% net gain biodiversity. Removal of archaeology as this will have its own separate policy.
GE4: Tree Protection	Updated & strengthened
DE1: Ensuring High Quality Design	Major revision requiring all development to follow a design-led approach; links to the Tall Buildings SPD & emerging City Wide Design Code

DE2: Delivering High Quality Places	New Policy including public realm, public art, lighting – and local context for City Centre & City Centre Transition areas
HE1: Conservation Areas	Minor updating
HE2: Conservation & Heritage Assets	Updating and strengthening
HE3: Heritage Park – Charterhouse	No change
HE4: Archaeology	New Policy to disaggregate archaeology from HE2 for clarity & detail
AC1: Accessible Transport Network	Significant updating to reflect national policy & guidance & the Council's emphasis on prioritising sustainable travel
AC2: Road Network	Updating to reflect latest transport strategy
AC3: Demand Management	Updated to reflect national policy & guidance & the Council's emphasis on prioritising sustainable travel, including mobility credits
AC4: Active Transport Provision including Walking, Cycling & Micro Mobility	Significant updating to reflect national policy & guidance & the Council's emphasis on prioritising sustainable travel
AC5: Bus & Rapid Transit	Significant updating to reflect national policy & guidance & the Council's emphasis on prioritising bus and rapid transit use
AC6: Rail	Minor updating to reflect current context
AC7: Freight	Updating to ensure better management of freight and management of HGV movements including parking, facilities, consolidation.
EM1: Planning for Climate Change Adaptation	Significant updating to strengthen strategic approach; refers to the Coventry Heat Network
EM2: Building Standards & EM3: Renewable Energy Generation	Policies deleted & replaced by EM11-EM14
EM4: Flood Risk Management	Minor updating to reflect national and local context
EM5: Sustainable Drainage Systems (SuDS)	Updated to reflect national legislation & policy
EM6: Redevelopment of Previously Developed Land	Updating to reflect Water Cycle Study (2024)
EM7: Air Quality	Minor updating
EM8: Waste Management	No change
EM9: Safeguarding Mineral Resources	No change
EM10: Non-Mineral Development in MSAs	No change
EM11: Energy Infrastructure	New Policy to address operational carbon;
EM12: Net Zero (Regulated Operational Carbon) New	New Policy to address operational carbon;

Build Non-Domestic Development	
EM13: Overheating in New Buildings	New Policy
EM14: Embodied Carbon & Waste	New Policy
EM15: Noise	New Policy as noise had not been addressed as an issue in the 2017 Local Plan
IM1: Developer Contributions	Minor updating
CC1 – City Centre Part A Development Strategy; Part B Green & Blue Infrastructure; Part C Drainage & Flood Risk; Part D Environmental Management; Part E Character Areas	Many elements of the adopted Area Action Plan are now incorporated into other CLP Policies; some key elements remain specific to the City Centre and are set out in Policy CC1 (Parts A-E) within a new chapter of the CLP

- 1.15 It is important to note that the draft plan is not a new local plan – it is a review – and, in particular, the issues and options for the review were framed within the context of changed national requirements, the Council's One Coventry Plan (2022-2030)<sup>11</sup>, and the five development pathways to sustainability set out in the draft Coventry Climate Change Strategy (2022-2030)<sup>12</sup>. The subsequent refinements to develop the plan to the Regulation 19 stage took into account the comments made on the initial consultations, further evidence from technical studies, and considered the findings from the SA and the HRA screening.

## Purpose and Structure of this SA Report

- 1.16 This document reports the SA process and its findings from the assessment of the emerging draft Coventry Local Plan Review to 2041. Following this introductory Section 1, this report is structured into further sections:
- Section 2 explains the approach to the SA, including consideration of reasonable alternatives, the SA Framework and methods
  - Section 3 summarises the sustainability context and baseline characteristics with details available in the SA Scoping Report (March 2023)
  - Section 4 summarises the findings of the SA of the Strategic Options
  - Section 5 summarises the SA Findings for the Proposed Site Allocations
  - Section 6 presents the SA Findings for the draft Local Plan
  - Section 7 reports the SA Findings for the Implementation of the CLPR as a whole
  - Section 8 considers Monitoring and Section 9 sets out the Next Steps

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

<sup>12</sup> <https://www.coventry.gov.uk/draftclimatechangestrategy>

- 1.17 Technical Appendices provide the detailed findings of the SA. Appendix I comprises the Statement of Compliance with the SEA Directive and provides signposting to where key aspects of the SA/SEA are located in the SA Report. Appendix II is the SA Scoping Report (available separately) and including the details of the baseline evidence and the development of the SA Framework for assessment. Appendix III details the SA of the Strategic Options; Appendix IV reports the consultation comments to the SA at the Regulation 18 stage; and Appendix V details the SA of the Proposed Site Allocations.

## 2.0 APPROACH & METHODS

### The SA/SEA Process & Approach Taken

- 2.1 Sustainability Appraisal incorporating Strategic Environmental Assessment is an iterative and ongoing process that aims to provide a high level of protection for the environment and to promote sustainable development for plan-making. The role of SA is to inform the Coventry Council as the planning authority; the SA findings do not form the sole basis for decision-making – this is informed also by other studies, feasibility and feedback comments from consultation. SA is a criteria-based assessment process with objectives aligned to the issues for sustainable development that are relevant to the plan and the characteristics of the plan area.
- 2.2 There is a tiering of appraisal/assessment processes that aligns with the hierarchy of plans – from international, national and through to local. This tiering is acknowledged by the NPPF (updated December 2023) in paragraph 32 that states that evidence should be proportionate. Planning guidance advises<sup>13</sup> that the SA should focus on what is needed to assess the likely significant effects of the plan. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the plan .

### Scoping & the SA Framework

- 2.3 Through the scoping process, the relevant policy context was reviewed, and baseline information was identified, collated and analysed to ensure that key issues and opportunities for the Coventry Local Plan area and relevant for a Local Plan Review were identified. The details of this analysis are presented in the SA Scoping Report (March 2023 and as Appendix II of this Initial SA Report) and a summary is provided in the following Section 3 of this SA Report.
- 2.4 The use of an SA Framework of objectives is an established method through which the sustainability and environmental effects of a plan can be described, evaluated and any options compared. SA objectives have been identified through the SA scoping process from the information collated in the policy context, baseline analysis, identification of sustainability issues and opportunities, and consultation with the statutory bodies. Each SA objective was further clarified through a number of decision-aiding criteria/questions to aid the appraisal process.
- 2.5 The SA Framework is, as follows:

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<sup>13</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>



**Table 2.1 SA Framework**

SA Objective	Decision-aiding criteria (will the option/proposal...)
<b>SA No 1: To enable vibrant and inclusive communities</b>	Reduce the potential for social isolation by encouraging safe social connectivity Have particular regard for potentially disadvantaged groups (cultural, ethnic, poor, ageing, physical & mentally disabled, single parents, carers, travellers, migrants/refugees) Encourage/support community participation in activities & democratic decision-making
<b>SA No 2: To provide accessible essential services and facilities for all residents</b>	Maintain & improve social & community facilities – meet needs of facilities that support new housing Support the provision of and access to education & training opportunities Encourage facilities that are adaptable to future changes in technology Encourage & support people to live healthy, active lives Ensure facilities are accessible to all, including those with physical or mental disabilities Enable & encourage accessibility to green infrastructure network
<b>SA No 3: To improve health and promote active living</b>	Reduce health inequalities Reduce deprivation with particular regard to deprivation pockets in Coventry Promote active living by facilitating active travel & encouraging healthy lifestyles  Improve physical health & mental wellbeing for the ageing with better resilience (both physical & cognitive reserve) Create safe neighbourhoods & help reduce crime, including violence especially against women & girls
<b>SA No 4: To provide decent and affordable housing for all</b>	Provide suitable mix & tenure of housing, with particular regard to affordable homes and for younger people including Coliving & HMOs Provide suitable housing for the ageing, including for adaptability & resilience (physical & cognitive) Ensure that the best use is made of existing housing stock Meet the needs of potentially disadvantaged groups, including Travellers, single parents, carers
<b>SA No 5: To support sustainable inclusive economic growth</b>	Promote jobs & skills development Provide access to a range of employment opportunities Renew vitality and viability of local centres Support the retail & leisure sectors to recover/renew after Covid 19
<b>SA No 6: To help achieve the Council's ambition to reach net zero carbon emissions</b>	Promote energy hierarchy – fabric first, reducing energy use, then mitigating residual emissions Incorporated consideration of embodied carbon Support retrofitting of existing development Promote/deliver renewable or low carbon energy generation Proximity of development to sustainable transport see also SA No 8

<p><b>SA No 7: To build resilience to climate change</b></p>	<p>Take the long term risk of flooding into account Reduce risks from overheating &amp; extreme weather events Provide adaptive techniques in building design such as passive heating/cooling Incorporation of GI measures such as green space &amp; tree planting to support urban cooling see also SA Nos 11 &amp; 13</p>
<p><b>SA No 8: To reduce traffic &amp; improve sustainable transport choices</b></p>	<p>Reduce the need to travel by private vehicle Discourage car travel Support &amp; improve a strong, inclusive sustainable transport network, including cycling &amp; walking opportunities &amp; buses/taxis with increased uptake for low/zero emission vehicles</p>
<p><b>SA No 9: To reduce air, noise &amp; light pollution</b></p>	<p>Help to improve air quality – outdoors and indoors Help to reduce noise pollution &amp; avoid noise disturbance Help to reduce light pollution &amp; avoid light disturbance</p>
<p><b>SA No 10: To protect &amp; conserve natural resources - soil, water, minerals &amp; waste</b></p>	<p>Make use of previously developed, degraded or under-used land Minimise the loss of best &amp; most versatile (BMV) agricultural land Encourage local food through allotments &amp; urban farming Promote efficient use of water resources Avoid loss or sterilisation of mineral resources Maximise the reuse, recycling &amp; composting of waste</p>
<p><b>SA No 11: To protect and enhance nature &amp; biodiversity</b></p>	<p>Protect, maintain or enhance features of biological importance Contribute to the positive management of local biodiversity &amp; geodiversity sites Contribute to the wider GI networks – green and blue Contribute to opportunities for wildlife to adapt to a changing climate Deliver measurable biodiversity net gain Address any issues from Transport &amp; Air Quality for nitrogen deposition &amp; designated sites &amp; sites of local importance (see also SA No 8)</p>
<p><b>SA No 12: To protect and enhance the historic environment, and its setting</b></p>	<p>Conserve and/or enhance heritage assets &amp; their setting Respect &amp; strengthen local character, distinctiveness &amp; sense of place Sustain &amp; enhance the significance of heritage assets by encouraging new viable uses Support public accessibility and/or encourage cultural/tourist use consistent with conservation Identify opportunities to focus on heritage assets at risk</p>
<p><b>SA No 13: To protect and enhance the quality and character of townscapes and landscapes</b></p>	<p>Protect &amp; enhance local character, distinctiveness &amp; sense of place Protect &amp; enhance visual amenity Restore degraded townscapes &amp; landscapes Affect the purposes of the Green Belt</p>

2.7 The SA objectives are aligned with suggested indicators to help guide assessment and potentially for future monitoring purposes, as follows:

**Table 2.2 SA Objectives & Suggested Indicators**

SA Objective	Suggested Indicators
<b>SA No 1: To enable vibrant and inclusive communities</b>	Indices of Multiple Deprivation (IMD) Provision for potentially disadvantaged people Community participation
<b>SA No 2: To provide accessible essential services &amp; facilities for all residents</b>	Proximity to, and capacity of, GPs, dentists, healthcare services Proximity to, and capacity of, nurseries, primary & secondary schools Proximity to range of retail, leisure, sports & cultural facilities Proximity to, and availability of, green infrastructure
<b>SA No 3: To improve health and promote active living</b>	Health Index for England Reduction in health inequality Increase in active living Independent living & resilience for the ageing Reduction in crime
<b>SA No 4: To provide decent and affordable housing for all</b>	Provision of housing mix Provision of affordable housing Provision of HMOs, Coliving Provision of student accommodation; PBSAs Meeting Gypsies & Travellers' needs
<b>SA No 5: To support sustainable inclusive economic growth</b>	Delivery of employment space Support for centres & revitalisation/regeneration Number of vacant units Number of unemployed
<b>SA No 6: To help achieve the Council's ambition to reach net zero carbon emissions</b>	GHG emissions Embodied carbon Energy generation/use from renewable or low carbon sources Incorporation of GI
<b>SA No 7: To build resilience to climate change</b>	Location in areas of risk from flooding Provision of sustainable drainage systems Provision of, & connectivity to, GI & Blue Infrastructure Provision of adaptive techniques in building design
<b>SA No 8: To reduce traffic &amp; improve sustainable transport choices</b>	Connectivity & proximity to sustainable transport options – bus, rail, cycle, walking Uptake of parking restrictions to discourage car use
<b>SA No 9: To reduce air, noise &amp; light pollution</b>	NO <sub>2</sub> & PM monitoring data Number of complaints – noise; light
<b>SA No 10: Protect &amp; conserve natural resources - soil, water, minerals &amp; waste</b>	Area of BMV agricultural land Reuse of previously developed or brownfield land Remediation of contaminated land Quality & quantity of water resources Mineral safeguarding areas (MSAs) Waste generation – household, commercial Rates of recycling & composting Capacities of waste management facilities
<b>SA No 11:</b>	% biodiversity net gain (NE draft metric) Provision of, & connectivity to, GI/BI networks Enhancement & provision of long term management

<b>To protect and enhance nature &amp; biodiversity</b>	
<b>SA No 12: To protect and enhance the historic environment, and its setting</b>	Potential impacts on heritage assets & their setting Historic assets on HE's Heritage at Risk Register
<b>SA No 13: To protect and enhance the quality and character of townscapes and landscapes</b>	Reuse of derelict/abandoned buildings Quality of streetscapes & the public realm Sensitivity & visual amenity studies Development in the Green Belt

- 2.8 The nature of the likely sustainability effects (including positive/negative, duration (short, medium or long term), permanent/ temporary, secondary<sup>14</sup>, cumulative<sup>15</sup> and synergistic<sup>16</sup>) were described where possible and reported in the appraisal commentary, together with any assumptions or uncertainties, such as information gaps. Where necessary, the SA made suggestions and recommendations to mitigate any potential negative effects or promote opportunities for enhancement. The appraisal was undertaken using professional judgment, supported by the baseline information and the wider Local Plan evidence base.
- 2.9 A qualitative approach was established for investigating policy areas/topics, for testing reasonable alternatives, and for assessing the implementation of the plan as a whole. Significance was estimated according to the categories as set out below:

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

<sup>15</sup> Incremental effects resulting from a combination of two or more individual effects, or from an interaction between individual effects – which may lead to a synergistic effect (i.e. greater than the sum of individual effects), or any progressive effect likely to emerge over time.

<sup>16</sup> These arise from the interaction of a number of impacts so that their combined effects are greater than the sum of their individual impacts.

**Table 2.3: Significance Key**

Key: Categories of Significance		
Symbol	Meaning	Sustainability Effect
--	Major Negative	Problematical & improbable due to known sustainability issues; mitigation difficult and/or expensive
-	Minor Negative	Potential sustainability issues: mitigation and/or negotiation possible
+	Minor Positive	No sustainability constraints and development acceptable
++	Major Positive	Development encouraged as would resolve existing sustainability problem
?	Uncertain	Uncertain or Unknown Effects
0	Neutral Negligible	Negligible effects or not applicable
SA No 10 split cell – first symbol refers to land/soil & water resources; second symbol refers to minerals & waste		

## Options in Plan-Making & Reasonable Alternatives in SA/SEA

- 2.10 The SEA Regulations require that the SEA should consider the effects of “reasonable alternatives”. Planning Policy Guidance<sup>17</sup> advises that the SA “needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted.” “Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.”
- 2.11 At the earlier and higher levels of strategic planning, options assessment is proportionate and may have a criteria-based approach and/or expert judgment; the focus is on the key differences between possibilities for scale, distribution and quality of development. At this early stage, the options presented may constitute a range of potential measures (which could variously and/or collectively constitute a policy or aspiration) rather than a clear expression of quantity and quality. Each option is not mutually exclusive and elements of each may be further developed into a preferred option. At the later and lower levels of development planning for site allocations, options assessment tends to be more specific - often focused on criteria and defined thresholds, such as walking/cycling distances to services/facilities.
- 2.12 During the progression of technical studies and early development of issues and options for plan-making, certain strategic options were identified for initial testing through SA, as follows:

<sup>17</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

- a. Quantum of Housing
- b. Residential Density
- c. Climate Change & Standards for Building Regulations
- d. Standards for Biodiversity Net Gain (BNG) & Green Infrastructure (GI)

- 2.13 The SA made suggestions for mitigating likely negative effects and for enhancing any likely positive effects to inform the plan-making. It should be noted that there can be much uncertainty of the significance of effects at the strategic level, particularly for issues associated with climate change.
- 2.14 The Council considered the comments made during the initial consultation of the Issues & Options, further evidence studies, and the findings of the SA in order to identify and refine any further strategic options that should be tested through SA. The amended and additional strategic options that were tested through SA are, as follows:
- Quantum of Housing
  - Density of Housing
  - Development in the Green Belt
  - Amount of Employment Land
  - Amount & Distribution of Office Development
  - Purpose Built Student Accommodation (PBSA)
- 2.15 These strategic options were tested through SA using the SA framework of objectives and in a comparable and consistent manner. The findings of the SA, the comments made during consultation, and the findings of further technical studies informed the Council in its selection and rejection of options. The draft Local Plan includes those strategic options that have been tested and then identified as the preferred approaches to plan-making.
- 2.16 The adopted Local Plan includes site allocations that were previously subject to the SA. The LP review process has investigated the extant allocations (some built, some being developed, some consented, some not started) to determine which are still relevant and suitable. The Council identified that 25 extant housing sites plus 7 extant employment sites remained suitable and would be retained in the CLPR. From the calls for sites, the Council assessed various development sites that were being promoted and they identified 12 new housing and mixed use sites that were considered to be suitable and deliverable. These have all been taken forward into the updated Local Plan as proposed site allocations. There were no other site options found through the assessment process to be reasonable and thus needing testing through SA. One new employment site option was subject to SA.

## 3.0 SUSTAINABILITY CONTEXT & SUMMARY BASELINE CHARACTERISATION

### Introduction

- 3.1 In order to establish a clear scope for the SA of the CLPR, it is necessary and a requirement of SEA, to review and develop an understanding of the baseline characteristics and conditions of the plan area and the wider range of plans and objectives that are relevant to the CLPR. The SA Scoping Report (March 2023) for the Local Plan Review considered the baseline conditions and policy context for the plan area that may affect or be affected by the development to be proposed in the emerging draft CLPR. Analysis of this information enabled the SA to identify the key issues and opportunities for sustainable development in the Coventry city area and create sustainability objectives to address these key issues. Full details can be found in the SA Scoping Report<sup>18</sup> (draft January 2023; final March 2023) that comprises Appendix II of this SA Report, and summary baseline characterisations are set out in the Section 3, as follows:

### Policy Context

- 3.2 A comprehensive range of relevant plans and strategies were investigated according to sustainability themes, as follows: Communities, Health & Wellbeing; Housing; Economy; Climate Change; Transport & Air Quality; Natural Resources (Soil, Water, Waste, Minerals); Nature & Biodiversity; Historic Environment; and Townscape & Landscape. Key documents investigated including the following:

#### National:

**National Planning Policy Framework** (NPPF, updated 2021, July & December 2023)

**Public Health Strategy England 2020-2025**

**Public Health England (PHE) Health Impact Assessment in Spatial Planning** (2020)

**Healthy Ageing: applying all our health** (2021)

**Health Equity in England: The Marmot Review 10 Years On** (February 2020) highlights that people can expect to spend more of their lives in poor health; the health gap between wealthy and deprived areas has grown; and place matters. Build Back Fairer: The **Covid-19 Marmot Review** (2022)

**Active Travel England** (DfT, July 2022)

**UK Net Zero Strategy: Build Back Greener** (2021) sets out approaches to keep the UK on the path to achieving net zero carbon by 2050

**Heat and Buildings Strategy** (2021)

**Severn River Basin District Flood Risk Management Plan** (2015-2021, updated 2022)

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<sup>18</sup> Available on the Council's website

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

**Clean Air Strategy** (2019) recognises that vehicles are not the only source of harmful emissions and aims for better cleaner technology and changes in behaviour

**Environment Act (2021)** provides the UK's new framework for environmental protection with new powers to set new binding targets, including for air quality water, biodiversity, and waste reduction/resource efficiency;

establishes **Local Nature Recovery Strategies** and a new system for **Biodiversity Net Gain** (BNG, 2023, updated 2024) from development projects **Environmental Improvement Plan** (January, 2023) for England includes a commitment that the public should be able to access green space or water, such as woodlands, wetlands, parks and rivers, within a 15-minute walk from their home.

**Natural England's Green Infrastructure (GI) Framework** (Feb 2023) provides a structure to analyse where greenspace in urban environments is needed most.

**Historic England (HE) Championing Heritage Improving Lives Future Strategy** (2021) and **Historic England Climate Change Strategy to 2040** (March 2022)

**National Design Guide** (2019, updated 2021) sets out the characteristics of well-designed places and demonstrates what good design means in practice

**Building for a Healthy Life (BHL)** updates and refines the BHL12 design code with its 12 considerations to help people improve the design of new & growing neighbourhoods

### Regional & Local:

**One Coventry Plan** (CCC, 2022-2030)

**Coventry Joint Needs Assessment** (JNSA, 2019)

**Coventry Health and Wellbeing Strategy** 2019-2023

**Health Inequalities Strategic Plan** 2022-2027 (Coventry & Warwickshire Health & Care Partnership)

**Coventry Cultural Strategy** 2017-2027

**Coventry Housing & Homelessness Strategy** 2019-2024 (2019) focuses on 4 key areas: Preventing & Supporting Homeless Households; Support for People & Communities; Improving the Use of Existing Homes; and Housing Development

**West Midlands Combined Authority Strategic Economic Plan** is focusing on digital innovation; building a net-zero economy and creating thousands of green manufacturing jobs; building better digital and transport links

**Coventry & Warwickshire Strategic Reset Framework** Local Enterprise Partnership (CWLEP) aims to reset the economy following the impacts of Covid-19

**Economic Growth & Prosperity Strategy for Coventry** 2018-2022

**West Midlands Combined Authority** has set a priority for the region to become net zero by 2041, and Coventry Council is working on a **revised Climate**

**Change Strategy** 2022-2030 setting out how Coventry will remain within its carbon budget

**Warwickshire Local Transport Plan** 2011-2026 and **Coventry Transport Strategy** (2022/23-2036/37)

**Coventry City Council Local Air Quality Plan** (LAQP, 2020-2024) is focused on transport and behaviour change around travel



**Warwickshire County Council Minerals Plan (2018)**  
**Severn Trent Water Resource Management Plan (2019) (& draft 2024)**  
**Warwickshire Wildlife Trust Strategy 2030**  
**Warwickshire, Coventry & Solihull Green Infrastructure (GI) Strategy**

## Summary Baseline Conditions

- 3.3 **Communities, Health & Wellbeing:** The total population of Coventry City Council was 345,300 (ONS 2021) an 8.9% growth from 2011 to 2021, and this is higher than the rate of 6.2% in the West Midlands. The population has growth particularly amongst younger adults, particularly aged 20-24. In 2020/21 academic years there were 67,255 students in Coventry universities. As with the population of England & Wales, census data confirm that there are more people in older age groups. The population of Coventry is predicted to increase to 422,919 by the year 2031 and to 454,534 by the year 2042.
- 3.4 The Index of Multiple Deprivation data (2019) for Coventry City indicate a range of deprivation (from least to most deprived) throughout the wards with the most deprived tending to be found in the city centre and radiating out towards the north/north-east, to the south-east and with a grouping of wards located near the boundary to the south-west. For the period 2015-2018, the Health Index for Coventry was 97.8, less than 100 average for England.
- 3.5 There is a need to plan for a growing, changing and increasingly diverse population that will need increasing participation and involvement to help maintain social cohesion and reduce risks for radicalisation and social exclusion. As communities grow and change, the provision of, and access to community and social facilities and services, needs to be maintained and improved for social and health wellbeing. As life expectancy is below average and health outcomes are worse in the more deprived areas of Coventry, a targeted approach has been identified. There is also a shift to focus on to prevention that will need a community-informed and culturally competent approach. Further work is needed at the local level through the place-based profiles to understand the city's avoidable outcomes, particularly around issues such as alcohol use and obesity/physical activity.
- 3.6 **Housing:** Housing delivery in the latest monitored period (AMR 2021/22) indicates that the cumulative delivery of 16,182 dwellings is 25% above the requirement of 12,900 at this stage of the Local Plan trajectory. This can be largely attributed to the recent growth of Purpose Built Student Accommodation (PBSA), reflecting Coventry's rising reputation as a leading university city that attracts students from around the world. The delivery of affordable housing was below the annualised need.
- 3.7 New demographic projections have been modelled (HEDNA, November 2022) and subsequently confirmed (HEDNA Addendum, 2024 to estimate the amount and type of housing that will be needed over the period to 2041 and 2050. The analysis indicates that the need for social or affordable rented properties should be focused on smaller properties. The older person population is projected to increase notably in the future and an ageing

population means that the number of people with disabilities is likely to increase substantially.. Coventry's housing stock is typically small and old; a lot of houses are not to modern efficiency standards. In 2021, 20% of Coventry households live in low-income low energy efficiency households, compared to just 13% nationally. It is necessary to consider a range of market and affordable housing to suit different needs. Co-living, especially for the younger demographic, can provide accommodation for younger professionals and help with graduate retention in the city once they qualify and seek local jobs.

- 3.8 **Economy:** The strengths of the city's economy, where Coventry has a competitive advantage, include advanced manufacturing and engineering; energy and low carbon; connected autonomous vehicles; business, professional and financial services; and digital, creative, and gaming. Before the pandemic hit, the Coventry & Warwickshire economy had grown at a rate higher than other Local Economic Partnership areas at that time in the country. Since Covid-19, the issues for the retail sector, and town centre retail in particular, are well known. Many hospitality and other businesses depend on the success of major tourist attractions. Overall delivery of employment land remained comfortably above the cumulative requirement of 70.40 ha at this stage of the Local Plan trajectory.
- 3.9 **Climate Change:** Coventry was one of the first cities to produce a Climate Change Strategy in 2012 with a target to reduce carbon dioxide emissions by 27.5% by the year 2020. Coventry achieved this in 2014 – six years early. The Strategy is currently under review and will set targets to reflect the current urgency of the climate crisis that is recognised by the City Council. The overall aim of the Strategy is to achieve a dramatic reduction in carbon emissions. 47% of all UK CO<sub>2</sub> emissions are linked to the construction and operation of buildings – both housing and commercial.
- 3.10 **Transport & Air Quality:** A Coventry City-Wide AQMA was declared for nitrogen dioxide in 2009 and emissions from road transport are the principal source of NO<sub>2</sub>. The main transport corridors to the north and north-east (linked to the M6) are most likely to exceed the NO<sub>2</sub> standard. Indoor air pollution is becoming an increasing proportion of the problem as improvements in outdoor air pollution occur.
- 3.11 **Natural Resources (Soil, Water, Minerals, Waste):** The vast majority of development completions (90%) in 2021/22 were on former brownfield or previously developed land, with just 10% built on greenfield sites. In the English part of the Severn River Basin District, the majority of water bodies have an objective of good ecological status. For many of the water bodies, there is low confidence of meeting their objective by 2027 and pollution from wastewater remains one of the main reasons. There are no active working collieries in the area. Sand and gravel are required for minerals planning. Around 92% of residual municipal solid waste from the Coventry area is incinerated within an Energy from Waste facility and this heats eight major buildings in the city centre.

- 3.12 **Nature & Biodiversity:** There are no internationally designated nature conservation sites (European Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), and Ramsar sites) located within 20 km of the Coventry city centre – with the exception of the somewhat isolated Ensor’s Pool SAC approximately 7.4 km to the north of the local plan boundary. There are 16 Local Nature Reserves (LNRs), and 21 designated areas of ancient woodland. The Warwickshire, Coventry & Solihull Local Biodiversity Plan (LBAP) comprises 52 action plans for species and habitats, ranging from wetlands and woodlands to urban and rural settlements. The Coventry area contains, and is in close proximity to, a number of both designated and non-designated natural habitats and biodiversity. The overall ecological network is also important for biodiversity helping to support the condition of designated sites and also enabling species to migrate in response to climate change.
- 3.13 **Historic Environment:** Coventry has a range of unique historic assets that give the area its distinctive characters and cultural identity. Coventry has over 400 Listed Buildings of national importance, together with over 280 buildings selected by the Council for Local Listing. The city has 18 Conservation Areas, 20 Scheduled Monuments, 4 Registered Parks and Gardens, and thousands of other archaeological sites, historic structures and features recorded on the Coventry Historic Environment Record. The Coventry Historic Landscape study (2011) identified 45 historic landscape character areas throughout the administrative area of the City Council. Coventry has benefited from two Heritage Action Zones.
- 3.14 **Townscape & Landscape:** Coventry is located within the Arden National Character Area (NCA) as profiled by Natural England. The NCA comprises farmland and former wood-pasture lying to the south and east of Birmingham; the eastern part abuts and surrounds Coventry. The Coventry Historic Landscape study (2011) identified 45 historic landscape character areas throughout the administrative area of the City Council. The Ancient Arden is an area of ancient countryside that stretches from just south of Atherstone in the North, running to the west of Coventry to Balsall Common in the south, and is especially important as an area of ancient countryside. The Coventry Green Belt remains an important mechanism to prevent urban sprawl, prevent towns merging; safeguard countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration.

## Key Issues & Opportunities for Sustainable Development

- 3.15 From the policy context and analysis of the baseline information, the following key sustainability issues and opportunities were identified for the Coventry Local Plan Review area:

**Table 3.1: Key Sustainability Issues & Opportunities**

Topic	Key Issue for Sustainable Development
<b>Communities, Health &amp; Wellbeing</b>	<ul style="list-style-type: none"> <li>▪ Increasing population, especially in older age groups</li> <li>▪ Need to plan for a growing, changing and increasingly diverse population</li> </ul>

	<ul style="list-style-type: none"> <li>■ As communities grow and change, the provision of, and access to community and social facilities and services, needs to be maintained and improved for social and health wellbeing</li> <li>■ Need to focus on prevention to improve health &amp; reduce inequalities - will need a community-informed and culturally competent approach</li> <li>■ Further work needed at the local level through the place-based profiles, particularly around issues such as alcohol use and obesity/physical activity</li> </ul>
<b>Housing</b>	<ul style="list-style-type: none"> <li>■ The need to maintain a mix of new homes continues into to the 2040s</li> <li>■ Housing for the increase in the ageing group that will require resilience and adaptability to enable independent living for a longer time, and then increased care &amp; support</li> <li>■ Self-build and custom housebuilding, as well as Coliving, are growing elements of the housing market</li> <li>■ High number of young people – need affordable homes</li> <li>■ Significant student population predicted to increase; as more PBSA schemes become built, other housing will be released into wider housing market</li> <li>■ need to improve the quality of the existing housing stock remains, especially with regard to damp and poorly insulated homes</li> <li>■ Climate change commitments will require, amongst other things, retrofitting existing homes to ensure that they are up to modern insulation standards</li> </ul>
<b>Economy</b>	<ul style="list-style-type: none"> <li>■ Dramatic changes, accelerated by Covid-19, are likely with the shift from retail to other uses and a change in character of the city and local centres</li> <li>■ Employment and education/training uses may be able to fill gaps, including with coworking spaces and/or encouraging start-ups</li> <li>■ Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people</li> </ul>
<b>Climate Change</b>	<ul style="list-style-type: none"> <li>■ Planning for climate change adaption should be a part of every new development</li> <li>■ Significant shifts in energy efficiency will be needed for new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure</li> <li>■ Retrofitting existing buildings will be a very significant challenge</li> <li>■ Consideration of embodied carbon is an ongoing challenge for the construction industry</li> <li>■ Planning for climate change mitigation means building resilience, including reducing risks from overheating,</li> </ul>

	<p>flooding and the resultant detriment to wellbeing, the economy and the environment</p> <ul style="list-style-type: none"> <li>■ Increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK</li> </ul>
<p><b>Transport &amp; Air Quality</b></p>	<ul style="list-style-type: none"> <li>■ Improve the sustainability of the transport system, improve integration with walking and cycling routes and green infrastructure networks, and promote more active travel</li> <li>■ Reducing vehicle emissions will continue to improve air quality; Indoor air pollution is becoming an increasing proportion of the problem</li> <li>■ Transport policies need to both encourage sustainable modes and also to discourage car use– for example, through restricted parking, zero emission zones, and reallocation of some road space to sustainable movement options</li> <li>■ Improvements in renewable transport provision and restrictions on car use in the city centre will help the city achieve zero carbon objectives</li> <li>■ Improvements to walking and cycling infrastructure need to be inclusive, for all residents and visitors, and to link within a wider network that aims to connect with the Family Hub priority areas identified for poor health</li> <li>■ Improving sustainable transport networks and associated green infrastructure (GI) will also benefit nature and wellbeing for people</li> <li>■ Encouraging active travel will help at the local level towards improving some of the city's health issues such as those associated with obesity and physical activity</li> </ul>
<p><b>Natural Resources</b></p>	<ul style="list-style-type: none"> <li>■ Continue to build on previously developed land where effectively located; minimise the use of water and minerals as natural resources; and the need to reduce waste and reuse/recycle</li> <li>■ The effective use of land could consider whether an uplift in minimum housing density requirements might be possible where sufficient infrastructure is in place</li> <li>■ This would require careful consideration of reduced car ownership/parking but would further promote the Council's objectives towards zero carbon</li> <li>■ The best agricultural land must be conserved and effects of climate change may affect food security</li> </ul>
<p><b>Nature &amp; Biodiversity</b></p>	<ul style="list-style-type: none"> <li>■ Need to consider the new requirements from the Environment Act including emerging metrics for calculating biodiversity net gain</li> <li>■ Unequal distribution, and access to, green infrastructure across the city can exacerbate health inequalities</li> <li>■ There are priority areas that would benefit particularly from greening</li> <li>■ Off-site areas for biodiversity net gain may be needed</li> <li>■ Climate change is likely to affect changes to habitats and species distribution</li> </ul>

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

## Likely Evolution of Area without the Local Plan

- 3.16 There are likely to be some changes in sustainability characteristics of the Coventry area even without the review of the Local Plan to 2041. For example, the increasing use of electric cars, revised Building Regulations, and at least 10% biodiversity net gain with new standards for green infrastructure will lead to reduced greenhouse gas (GHG) emissions, improvements in air quality, more energy-efficient homes, and some recovery for the loss of nature and biodiversity.
- 3.17 However, the ongoing impacts of Brexit, Covid-19 and the continuing challenging circumstances are likely to have negative effects on socioeconomic factors. The economic outlook for Coventry<sup>19</sup> remains challenging and uncertain, exacerbated by the rapid inflation in 2022 that threatens the city's recovery, with rapidly increasing energy prices and cost-of-living impacting on the finances of households and businesses. The predicted increase in population, with changing demographics, will challenge the ability of the Council and its partners to accommodate such changes for the quality of life of its citizens.
- 3.18 Without the Local Plan, there would be no local guidance on housing such that the particular needs of tenure and mix in the right places are unlikely to be met. This could exacerbate existing problems, particularly for affordability, overcrowding and quality, with concomitant negative effects for health and wellbeing. There is a risk that communities would become unbalanced with

<sup>19</sup> <https://www.coventry.gov.uk/facts-coventry/coventry-72>

issues for the capacities of services and facilities in some areas, and perhaps challenging those areas that are already deprived. It is less likely that objectives for social inclusivity and vibrant communities would be achieved. Active living would be less encouraged. It is possible that neighbourhoods could become less safe and crime reduction would not be enabled in the absence of spatial planning.

- 3.19 Buildings contribute a significant proportion of GHG emissions and without the Plan, there would be less progression towards aims for addressing the climate change crisis. Whilst national policy would still guide mitigation measures such as flood risk management and building regulations for building resilience to climate change, without the Plan there would be no cohesion or strategic coordination such that mitigation may not be optimised and opportunities may not be realised.
- 3.20 Increasing demands from development on green spaces and nature/biodiversity and natural resources, especially air, soil and water, will continue to have negative effects on the urban environment and people's quality of life. Without the Plan, there will be less effective use of land and this will affect other factors such as biodiversity and food security. There are priority areas that would benefit particularly from greening. The sustainable management of water is increasingly an issue with demands from new development and the needs of nature/biodiversity. Without the Plan, there is likely to be less integration of the different uses and needs of the water environment when considering new development.
- 3.21 Overall, mitigation measures of new development would not be coordinated to best avoid or reduce the adverse effects from development, including cumulative effects. Opportunities from new development, such as improving accessibility to green space and enhancing townscape quality/character, would not be realised or optimised – including contributing towards reducing health inequities.

## 4.0 SA OF STRATEGIC OPTIONS FOR THE COVENTRY LOCAL PLAN REVIEW 2021-2041

### Identifying & Refining the Strategic Options: Initial SA at Regulation 18 consultation

- 4.1 During the progression of initial technical studies and early development of issues and options for plan-making, certain strategic options were identified that should be tested through the SA process, as follows:
- 4.2 **Strategic Options for Quantum of Housing Needs:** Coventry Council, together with local authority Partners across Coventry & Warwickshire published a new Housing & Economic Needs Assessment (HEDNA, November 2022) that sets out the amount and type of housing and employment growth that will need to be planned for up to the year 2041. The Housing Topic Paper<sup>20</sup> sets out the potential housing scenarios and explains how these were identified.
- Scenario 1 is the Government's Standard Method calculation. This uses the 2014 Population Projections which have been shown to be erroneous for Coventry. This method indicates a total minimum need of 63,760 new homes over the plan period.
  - Scenario 2 is the amount identified through the HEDNA. This uses the more accurate 2021 Census data rather than the erroneous 2014 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 29,100 new homes over the plan period.

Table 4.1a: Options for Quantum of Housing Needs 2022-2041	
1	63,760 dwellings (3,188 per annum) – Government standard method <sup>21</sup> (with ONS population projections from 2014) <sup>22</sup>
2	39,280 dwellings (1,964 per annum) – HEDNA method <sup>23</sup> (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 <sup>24</sup>

<sup>20</sup> Coventry City Council (May 2023) Housing Topic Paper

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

<sup>22</sup> The ONS population data for Coventry has been found to be erroneous & overestimated. For example, please see: <https://osr.statisticsauthority.gov.uk/correspondence/sir-andrew-watson-to-ed-humpherson-and-sir-david-norgrove-population-projections-and-mid-year-population-estimates-for-coventry/> and <https://osr.statisticsauthority.gov.uk/wp-content/uploads/2021/05/Review-of-population-estimates-and-projections-produced-by-the-Office-for-National-Statistics.pdf>

<sup>23</sup> Housing & Economic Development Needs Assessment (HEDNA, November 2022)

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

<sup>24</sup> Government changes (rev December 2020) to the planning system include a 35% uplift to the housing number generated by the standard method for the 20 most populated cities & urban centres in England – and Coventry is on the list of 20 <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>



4.3 **Strategic Options for Residential Density:** It is important that the Council accommodates as much of its identified housing need as possible, including consideration of whether parts of the city can accommodate increased densification. In particular, there could be suitable possibilities for increasing densities to 200 dwellings per hectare (dph) at certain locations adjacent to, and outside of, the ring road. Therefore, the initial SA investigated through high level assessment two scenarios, as follows:

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

4.4 **Strategic Options for Progressing the Coventry Climate Change Strategy<sup>26</sup>:** At the time of preparing the initial SA, responses to the consultation draft were being analysed. The Climate Change Strategy 2023-2030 A Green Future for a Changing City was published in summer 2023. The Vision aims “*To make Coventry the UK’s leading City for environmental change, improving the quality of life for all.*” The Strategy recognises that “Achieving net zero will require changes that are unprecedented in their scale and scope, including changes to the way electricity is generated, how people travel, how land is used, and how buildings are heated.

4.5 The Strategy confirms the aims for a dramatic reduction of carbon emissions and sets out five development pathways to sustainability:

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

4.6 For the Local Plan Review, this means particular opportunities for energy efficiencies and renewables; enhancing biodiversity; high quality design that promotes active travel; accessibility to public transport and minimising need for private vehicles; reduce flood risk and heat gain, and addressing inequalities. At the early stages of the plan review, it was considered that there were possibilities for requiring standards for buildings and homes higher than is likely to be required nationally – in order to better support the ambitions of the Coventry Climate Change Strategy. Therefore, the initial SA investigated through high level assessment two scenarios, as follows:

<sup>25</sup> Dwellings per hectare

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

<b>Table 4.1c: Options for progressing Coventry's Climate Change<sup>27</sup> that aims for "The dramatic reduction of carbon emissions to achieve carbon neutrality with a 100% reduction to 1990 levels by 2050 at the very latest"</b>	
<b>1</b>	Planning policy requirements in line with national Future Homes Standard <sup>28</sup> & Future Buildings Standard <sup>29</sup> covering energy efficiency, ventilation and overheating through Building Regulations
<b>2</b>	Planning policy requirements that are over and above proposed Building Regulations to better progress Coventry's aspirational ambitions for addressing climate change effects

4.7 **Strategic Options for Nature & Biodiversity:** There have been significant recent changes in requirements nationally that aim to ameliorate the critical losses of nature and biodiversity. It is considered that the Local Plan Review has strong opportunities to strengthen the importance of nature and biodiversity in the general wellbeing of a city to improve health and support climate change resilience. The details were set out in the Green Infrastructure & Biodiversity Topic Paper<sup>30</sup>, and the initial SA investigated through high level assessment two scenarios, as follows:

<b>Table 4.1d: Options for Nature &amp; Biodiversity</b>	
<b>1</b>	Planning policy requirements in line with national requirements & standards, including 10% Biodiversity Net Gain (BNG) <sup>31</sup> , and Green Infrastructure (GI) standards <sup>32</sup>
<b>2</b>	Planning policy requirements that are over and above national requirements for BNG & GI standards

4.8 **Overall Approach:** The plan-making and SA teams worked in an iterative way to identify the meaningful strategic options for investigation. These initial strategic options were tested with high level appraisal through SA using the SA framework of objectives, the baseline information, and professional judgment. The high level assessment aimed to investigate the strategic options in a comparable and consistent manner. However, it should be noted that there is much uncertainty of significance of effects at the strategic level, including in the medium to longer term, and particularly with topics such as climate change. The SA made suggestions for the plan-making (to mitigate potential negative effects and to enhance potential opportunities) to consider to help inform decision-making as the preparation of the plan review develops further.

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

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

<sup>30</sup> Coventry City Council (May 2023) Green Infrastructure & Biodiversity Topic Paper

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

<sup>32</sup> <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx>

## Consultation Representations to the Initial SA Report (May 2023) at Regulation 18

- 4.9 The Regulation 18 consultation on the CLPR Issues & Options<sup>33</sup> was undertaken from 18 July 2023 to 29 September 2023. There were limited representations at this Issues & Options stage for the SA and these are detailed in Appendix IV of this SA Report. Historic England suggested that there should be uncertainty of effects on the historic environment for Options 2 and 3 regarding quantum and for the options for densities of development. This was agreed. Natural England commented that plan-making should be informed by SA/SEA and HRA. The SA incorporates SEA and includes suggestions for plan-making. An HRA Report has been prepared and summary findings incorporated into the SA/SEA.
- 4.10 A developer commented that the Council had not fully identified the housing needs of the City by an apparent willingness to forgo meeting the City's market and affordable housing needs and exacerbate the socio-economic consequences of the housing crisis in favour of protecting sites in the Green Belt that would otherwise be entirely appropriate for sustainable residential development. It was agreed that the potential for housing development in the Green Belt should be tested through the SA process, and compared with the strategic option for some potential development in the Green Belt.

## Identifying & Refining the Strategic Options: Developing the Options for Regulation 19 Consultation

- 4.11 As technical studies evolved and taking into consideration the findings of the initial SA, the comments received during the public consultation in summer 2023, further evidence and changes in national requirements, certain strategic options were further developed iteratively and additional strategic options identified that should be tested through the SA process.
- 4.12 **Strategic Options for Quantum of Housing Needs:** The Council has carefully considered the relevant evidence, the comments from consultations, and the findings of the assessment studies for sites that had been potentially identified for development. The Housing & Economic Development Needs Assessment (HEDNA, Nov 2022)<sup>34</sup> studies informed the three options that were tested through SA and reported in the Initial SA Report (May 2023). The HEDNA Addendum (2024) has considered the implications of more recent data post the 2021 census and has concluded that the HEDNA figures remain robust. The Housing & Economic Land Availability Assessment (HELAA, 2024)<sup>35</sup> reports a site assessment and selection process that has identified the availability, suitability and achievability of potential sites for housing in the Coventry Local Plan area. It has enabled the calculations of housing and employment land

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

<sup>34</sup> Coventry City Council (Nov 2022) Housing & Economic Development Needs Assessment (HEDNA) & HEDNA Addendum (2024) <https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

<sup>35</sup> Coventry City Council (2024) Housing & Economic Land Availability Assessment (HELAA) <https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

for identifying the quanta that can be accommodated. A Density Paper (2024) has also been prepared to inform decision-making with regard to the densities of housing that would be suitable in specific areas.

- 4.13 From these studies, and taking into account the preferred approaches for other strategic options, including residential densities and development out of the Green Belt, the Council identified from supply figures that the quantum of housing development that can be accommodated on brownfield land is approximately 31,500 dwellings (around 1,575 per annum). This thus constitutes a further option that needs to be tested through the SA in a comparable manner.
- 4.14 As the SA studies were progressing, the new Labour Government published (30 July 2024) for consultation proposed reforms to the NPPF<sup>36</sup>, including a revision to the standard method for calculating housing needs. Using the new proposed method, the Council has calculated that the housing needs for the Coventry area over the plan period would be 30,540 dwellings (1,527 per annum)<sup>37</sup>. Whilst the proposal is under consultation until 24 September 2024, it was decided to test such housing need through SA.
- 4.15 Good practice SA has established through examination and legal challenge that it is important for the strategic options to be assessed in a consistent and comparable manner. Therefore, the options that had been assessed in the initial SA have been refreshed and the additional options (No 4 & No 5) tested in the same way, as in the Table 4.1e, as follows:

<b>Table 4.1e: Options for Quantum of Housing Needs 2022-2041</b>	
<b>1</b>	63,760 dwellings (3,188 per annum) – Government standard method (with ONS population projections from 2014)
<b>2</b>	39,280 dwellings (1,964 per annum) – HEDNA method (with census population data from 2021)
<b>3</b>	29,100 dwellings (1,455 per annum) – HEDNA method as per Option 2 but minus 35% uplift for largest urban authorities
<b>4</b>	Approx. 31,500 dwellings (1,575 per annum) – HEDNA method as per Option 2 with housing numbers that can be accommodated based on supply figures
<b>5</b>	30,500 dwellings (1, 527 per annum) – calculated through proposed new standard method for assessing housing needs (July 2024)

- 4.16 **Strategic Options for Residential Density:** In their review of the Local Plan, the Council has subsumed the previous separate City Centre Area Action Plan (AAP) into the new plan. This includes the definition of the City Centre boundary as being the area previously defined within the AAP. This has enabled development of a further option (No 3) that identifies densification possibilities a city centre transition zone. Therefore, the SA of options 1 and 2

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

<sup>37</sup> Icen for Coventry City Council (July 2024) <https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

has been refreshed and a further option 3 has been tested through SA in a consistent and comparable way, as in the Table 4.1f, as follows.

<b>Table 4.1f: Options for Residential Density</b>	
<b>1</b>	Greenfield 30 dph <sup>38</sup> ; outside ring road minimum 35 dph; inside ring road minimum 200 dph. Current CLP Policy H9
<b>2</b>	As Option 1 but with >35 dph outside ring road – in certain locations
<b>3</b>	Greenfield 30 dph; Brownfield 45 dph; 125 dph in defined city centre transition zone; 250 dph in city centre

- 4.17 **Strategic Options for Progressing Coventry’s Climate Change Strategy:** There were no refinements or further options identified; the SA findings from the Regulation 18 stage informed the ongoing plan-making.
- 4.18 **Strategic Options for Nature & Biodiversity:** There were no refinements or further options identified; the SA findings from the Regulation 18 stage informed the ongoing plan-making.
- 4.19 **Strategic Options for Development in the Green Belt:** There was some concern raised through the Regulation 18 consultation that the implications of including development sites in the Green Belt had not been investigated through the SA. Nationally, there has been renewed discussion recently around development in the Green Belt and the new Labour Government has confirmed its intention to introduce a new definition of grey belt land and development in the Green Belt with proposals in the revision of the NPPF.
- 4.20 Therefore, it was clear that the strategic options for the Council's approach should be tested through SA. The technical update<sup>39</sup> to the Green Belt Review identified that all the green belt land within the Council's area is of good quality that serves the five purposes of Green Belt. However, consideration of grey belt in the NPPF is only at the consultation stage and the CLPR is being submitted under the current NPPF which does not specify requirements concerning grey belt. Therefore, there are only two options that are necessary to be tested through SA, as in Table 4.1g, as follows:

<b>Table 4.1g: Options for Development in the Green Belt</b>	
<b>1</b>	Potential for development within the Green Belt
<b>2</b>	No potential development within the Green Belt

- 4.21 **Strategic Options for Employment Land:** The HEDNA (2024) studies identified the likely employment land needs and the HELAA (2024) reports the availability, suitability and achievability of potential sites for employment in the Coventry Local Plan area. The HEDNA concluded that 147.6 general industrial land was needed for the Coventry LP area to 2041. However, capacity studies (HELAA 2024) and the employment land review (ELR 2024) indicate that this quantum of land may not be possible within the constrained nature of the Coventry area.

<sup>38</sup> Dwellings per hectare

<sup>39</sup> Coventry City Council (August 2024) Green Belt Review Technical Update

- 4.22 It has been calculated that 60 hectares for general industrial development could be accommodated within the CLP area. It was further identified that an additional site (Site North of A45 & West of Brick Hill Lane - 11.81 hectares developable area) was being promoted. However, this is located in the Green Belt, and thus needs to be tested through SA. Therefore, three reasonable approaches to allocating such land and requiring testing through SA were determined, as follows:

<b>Table 4.1h: Options for General Industrial Employment Land</b>	
<b>1</b>	156.1 hectares – HEDNA (2022) – 8.5 ha office; 147.6 ha general industrial (excluding strategic B8)
<b>2</b>	As per HEDNA 147.6 ha general industrial but with office land reduced by 30% to 5.95 ha (hybrid working reduces floorspace needs)
<b>3</b>	60 ha plus an additional 11.81 ha located in the Green Belt (Site North of A45 & West of Brick Hill Lane)

- 4.23 For Coventry, the office land needs have been calculated to be 8.5 ha to 2041 (HEDNA 2022). The Employment Land Review (ELR, May 2024) further studied existing employment land and needs. A recent Office Market Study (June 2024)<sup>40</sup> focuses on the changes and trends in the office market since the HEDNA and ELR and to identify if the conclusions and recommendations are still valid. The Study raises issues for suitability and deliverability of existing allocations, potential over-supply, growing demands for flexible leases and workspaces, together with on-site parking, and continuing flexible and hybrid working patterns.

- 4.24 The ELR Office Market Study confirmed that the 2022 HEDNA included an oversupply for office space. It also confirmed that the density of space allowed for each full-time employee could be reduced to better reflect changes in working patterns and thus better allow future flexibility and hybrid working. Therefore, three reasonable alternatives were identified for testing through SA, as follows:

<b>Table 4.1i: Options for Quantum of Office Development</b>	
<b>1</b>	8.5 hectares offices (HEDNA), assume 85,000 sq m
<b>2</b>	5.8 hectares offices (HEDNA less 2.7 hectares oversupply as per the ELR office market addendum) assume 58,000 sq m
<b>3</b>	4.12 hectares offices (reduced land take for offices as per the ELR office market addendum based on allowance of 10sqm per full time employee instead of 14sqm assumed previously, to allow for increased flexible and hybrid working patterns. This broadly equates to the more high level 30% reduction assumed by the HEDNA) assume 41,200 sq m

- 4.25 The adopted CLP (2017) took a city centre approach to allocating land for office development. However, since the Covid-19 epidemic working patterns have changed and the findings of the ELR and Office Market Study confirm the need for more flexibility and adaptability. Taking into account the over-

<sup>40</sup> DLP Planning Ltd for Coventry City council (June 2024) Coventry Office Market Study: An Addendum to the Coventry Employment Land Review

supply and changing needs, the three strategic approaches to distributing land for office development were identified, as follows:

<b>Table 4.1j: Options for Distribution of Office Development</b>	
<b>1</b>	City Centre focus including Friargate
<b>2</b>	A more dispersed approach
<b>3</b>	City Centre focus to include 39,549 sqm floorspace at Friargate <sup>41</sup> and the rest distributed to other defined centres (overall, 41,000 sq m minimum)

- 4.26 The PBSA Market Study (2024) has identified the housing needs for students. It was recognised that a significant amount of the windfall delivery has been through the provision of Purpose Built Student Accommodation (PBSA). As such, the windfall expectation has been tempered to 200 dwellings pa to take account of the reduced expectation of further PBSA schemes to come forward. Therefore, it was determined that there were two strategic approaches to student accommodation and that these should be tested through SA, as in Table 4.1k, as follows:

<b>Table 4.1k: Options for Purpose Built Student Accommodation (PBSA)</b>	
<b>1</b>	Retain Policy H10 Student Accommodation as adopted Plan (2017)
<b>2</b>	PBSA to be located at campus/city university area unless evidence demonstrates otherwise on a case by case basis

## SA Findings for Strategic Options

- 4.27 The detailed findings of the SA of the strategic options are presented in Appendix III of this SA Report. The following sections of this Chapter 4 present the findings of these SAs summarised by sustainability topic. The reasoning for why the Council has chosen to reject certain strategic options and progress other strategic options is then outlined (and as in accordance with the requirements of the SEA Regulations).

## SA of Strategic Options: Quantum of Housing

- 4.28 The summary findings of the initial and updated high level SA of strategic options for the quantum of new housing development are presented in Table 4.2a, as follows:

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

<b>Table 4.2a: Strategic Options for Quantum of Housing Development</b>	<b>1_Standard Method (2014) – 63,760 dwellings</b>	<b>2_Standard Method (2022) – 39,280 dwellings</b>	<b>3_Standard Method less 35% 29,100 dwellings</b>	<b>4. Can be Accommodated approx. 31,500 dwellings</b>	<b>5. Proposed Standard Method (2024) 30, 540 dwellings</b>
<b>Sustainability Objective</b>					
1: To enable vibrant and inclusive communities	+	+	+	+	+
2: To provide accessible essential services and facilities for all residents	+	+	++	++	++
3: To improve health & promote active living	+	+	+	+	+
4: To provide decent and affordable housing for all	+	++	++	++	++
5: To support sustainable inclusive economic growth	--?	-?	+	+	+
6: To help achieve the Council's ambition to reach net zero carbon emissions	+	+	+	+	+
7: To build resilience to climate change	-?	-?	+	+	+
8: To reduce traffic & improve sustainable transport choices	--?	-?	0?	0?	0?
9: To reduce air, noise & light pollution	0?	0?	0?	0?	0?
10: To protect & conserve natural resources – soil, water, minerals & waste <sup>42</sup>	-	-?	0	0	0
11: To protect and enhance nature & biodiversity	--?	-?	+	+	+
12: To protect and enhance the historic environment, and its setting	-?	-?	0?	0?	0?
13: To protect and enhance the quality and character of townscapes & landscapes	--?	-?	+	+	+

<sup>42</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste



- 4.29 **Vibrant Communities:** There is a need to plan for a growing, changing, ageing and increasingly diverse population that will need increasing participation and involvement to help maintain social cohesion and reduce risks for radicalisation and social exclusion. The provision of new good quality homes will have positive effects for people, and higher numbers of new homes could have positive effects for more people. However, the higher quantum of new development is likely to overload the capacity of existing communities to absorb new people and some uncertainty of effects for Options 1 & 2.
- 4.30 Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies, rather than the overall quantum of housing. The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical and mental disability, single parents, carers, travellers, but not explicitly ethnic or cultural housing needs. Overall, likely minor positive effects for all five options.
- 4.31 **Services & Facilities:** The location of new development is guided by specific policies – and these consider accessibility to physical, social and green infrastructure – including appropriate mitigation measures to ensure that services and facilities are sufficient. It is considered that the lower quantum of new housing in Options 3, 4 and 5 is less likely to overload the capacity of services and facilities – and has been found to be able to be accommodated (HELAA 2024)<sup>43</sup> - with less negative effects and therefore, overall more likely positive effects.
- 4.32 **Health & Active Living:** Coventry became a Marmot City<sup>44</sup> in 2013 and is committed to reducing inequality and improving health outcomes for all. Since 2019, the key focus is on children and young people, and following the impact of Covid19 on the city, also prioritising the effect on ethnic minority group communities. Healthy ageing is a challenge throughout England. Provision of good quality housing and access to employment is well established as contributing to better health and wellbeing – physical and mental – therefore, positive effects for all five options.
- 4.33 The effectiveness of reducing health inequalities is likely to be associated with the location of new development. In consideration of the land constraints in Coventry, the higher quanta of housing are likely to be difficult to accommodate - homes may need to be small, more densely located and thus less able to meet the variety and adaptability of needs. Such quanta would also place pressures on the capacities of the open/green spaces in the city – and thus, limit the health and wellbeing associated with such spaces. Therefore, some uncertainty of the significance of the positive effects for Options 1 and 2.

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<sup>43</sup> Coventry Housing and Economic Land Availability Assessment (HELAA, 2024)

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

<sup>44</sup> <https://www.coventry.gov.uk/marmot-monitoring-tool/coventry-marmot-city-story-far>

- 4.34 **Housing for All:** It may be asserted that opportunities to provide decent and affordable housing for all is more likely with the higher quanta of housing in Options 1 and 2 – if such numbers of homes could be accommodated within the constraints of the city area. Homes may need to be small, more densely located and thus less able to meet the variety and adaptability of needs – therefore, some uncertainties for significance of positive effects. Options 3, 4 and 5 have been found to be able to be accommodated (HELAA 2024) and therefore, could deliver the identified need for housing and indicating major positive effects for housing objectives.
- 4.35 Whilst delivery has not been an issue for the Council, there must be some uncertainty about availability of suitable land in sustainable locations to accommodate the higher quanta of housing in Options 1 and 2, and to meet with other objectives, particularly for climate change and biodiversity. It remains important to address any imbalance in the distribution of particularly affordable/social housing, and the need to improve the quality of the existing housing stock.
- 4.36 **Economy:** Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people. The HEDNA (2022) considered population, housing growth and the economy in tandem based on the 2021 census figures; the Addendum Report (2024) investigated post 2021 census data and confirmed the robustness of identified needs calculations. Options 3, 4 and 5 have been found to be able to be accommodated (HELAA, 2024), indicating minor positive effects for employment objectives through delivery of identified housing needs to support the economy.
- 4.37 The highest quanta in Options 1 and 2 could require re-allocation of some employment land and/or result in increased commuting for work, indicating likely negative effects. It remains uncertain how the effects of Covid-19 on changing patterns of working, such as home working, co-working and hybrid working, will affect requirements for employment land during the plan period. However, recent studies (Employment Land Review & Office Market Study June 2024) confirmed that there is a requirement for flexibility and adaptability to support sustainable economic growth.
- 4.38 **Climate Change – Carbon Emissions:** The Council recognises the climate crisis with its Strategy (2022-2030)<sup>45</sup> that aims to make Coventry the UK's leading City for environmental change. This will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure. All new housing development will need to meet updated national policy requirements, indicating minor positive effects for all five options in the longer term - assuming that the zero carbon trajectory can be achieved. However, there is some uncertainty that the higher quanta of housing in Options 1 and 2 would be able to meet with the enhanced requirements to meet with net zero

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<sup>45</sup> <https://www.coventry.gov.uk/draftclimatechangestrategy>

carbon – particularly in the shorter term. Viability and costs may also be an issue in the shorter term as the construction industry develops new methods.

- 4.39 **Climate Change – Resilience:** There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK. Therefore, it is vital to build resilience, including reducing risks from overheating, flooding and the resultant detriment to wellbeing, the economy and the environment. All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change.
- 4.40 There is some uncertainty that the higher quanta of housing in Options 1 and 2 would be able to meet with the enhanced requirements to build resilience – suitable land and viability (and particularly in the shorter term until technology catches up with requirements). Overall, provision of green spaces and sustainable drainage are key elements to progress objectives for climate change. The higher quanta of housing is likely to place greater pressures on these resources with minor negative effects for Options 1 and 2, that will be cumulative in the longer term.
- 4.41 **Transport & Movement:** A key objective remains for the review of the CLP - to improve the sustainability of the transport system in Coventry, improving integration with walking and cycling routes and green infrastructure networks, and promoting more active travel. Due to the predicted increase in population, transport policies need to both encourage sustainable modes and also to discourage car use – for example, through restricted parking, zero emission zones, and reallocation of some road space to sustainable movement options. It is uncertain whether such approaches could mitigate sufficiently for the higher quantum of housing in Option 1, due to boundary constraints.
- 4.42 The quantum of housing in Option 2 indicates a reduction in potential negative effects on transport objectives but with uncertainty at this stage as significance will vary with locations. The lower quanta of housing in Options 3, 4 and 5 have been found to be able to be accommodated and are less likely to be associated with significant cumulative negative effects and therefore, negligible or neutral effects are indicated. There may be some positive effects – especially in the longer term as walking/cycling/GI networks become better linked and more extensive.
- 4.43 **Reduce Pollution:** In the UK, air pollution has been recently reported (2022) as being the largest environmental risk to public health. Reducing vehicle emissions will continue to improve air quality. Indoor air pollution is becoming an increasing proportion of the problem. Noise pollution is an acknowledged issue for human health and wellbeing – physical and mental - (see SA No 3 and also certain biodiversity see SA No 11), and particularly road traffic noise (see also SA No 8) remains a major problem. Light pollution disturbance can adversely affect health & wellbeing, including fatigue, insomnia, stress and anxiety (and also certain biodiversity – see SA No 11). Environmental management and mitigation for pollution is guided by specific policies that will be updated providing mitigation measures such that there will be no

significant negative effects and overall indicating likely neutral or negligible effects for all five options.

- 4.44 **Natural Resources:** The vast majority of development completions (90%) in 2021/22 were on former brownfield or previously developed land, with just 10% built on greenfield sites. The review of the CLP has sought to give priority for continuing to build on previously developed land (PDL) where effectively located. The HELAA (2024) has identified that Options 3, 4 and 5 could be accommodated on PDL and thus indicating neutral/negligible effects for soil resources. Climate change, particularly incidences of hotter, drier, summers may exacerbate water supply issues; wetter and more flooding may overload wastewater systems. The cumulative effects of the higher quanta of housing in Options 1 and 2 may incur minor negative effects but with some uncertainty at this stage. The recent Water Cycle Study Stage 1 (June 2024)<sup>46</sup> indicates that there is water capacity for the quanta in Options 3, 4 and 5 – with potential neutral effects.
- 4.45 It is assumed that policies on minerals and waste management will be updated to address any capacity issues such that neutral effects would be indicated. However, there may be some uncertainty associated with the higher quantum of housing in Option 1.
- 4.46 **Nature & Biodiversity:** It will be necessary to consider the new requirements from the Environment Act and including emerging metrics for calculating biodiversity net gain. Unequal distribution, and access to, green infrastructure (GI) across the city can exacerbate health inequalities. There are priority areas that would benefit particularly from greening. Off-site areas for biodiversity net gain may be needed. Increased recreational pressures and water quality impacts (such as road run-off) as a result of new development can put pressure on GI and biodiversity. Climate change is likely to affect changes to habitats and species distribution.
- 4.47 The higher quanta of housing in Options 1 and 2 will challenge mitigation possibilities for Coventry – even with new development being required to provide biodiversity net gain. Land constraints will limit availability for provision of such biodiversity mitigation measures – and therefore, negative effects are indicated. The HELAA studies (2024) have indicated that the quanta of development in Options 3, 4 and 5 could be accommodated and therefore, likely negligible effects. However, all development will have to meet with the national Biodiversity Net Gain requirements, indicating positive effects. Overall, some uncertainties of significance of effects as dependent upon locations, densities, and any possibilities for sufficient offsite measures.
- 4.48 **Historic Environment:** Coventry has a range of unique historic assets that give the area its distinctive characters and cultural identity. Development pressures may continue to have potential negative effects on historic assets and their setting, especially through cumulative effects. As the population changes, local communities may change with different understandings of heritage value and importance. Mitigation of, and adaptation to, the effects

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<sup>46</sup> JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

of climate change are a particular challenge for heritage assets and their setting.

- 4.49 CLP policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment with neutral effects for Options 3, 4, and 5 but some uncertainty as depends upon details and precise locations. However, the quantum of housing in Option 1 and 2 is likely to have cumulative effects overall that will be difficult to mitigate due to the constraints within the City – therefore, minor negative effects but with some uncertainty at this stage. The historic environment is closely interwoven with townscape and good design (SA No 13). It may also be noted that new development can resolve existing sustainability problems with the historic environment, for example, by removing extant unsightliness of the setting of an asset, improving accessibility, and enhancing the asset with its context and setting.
- 4.50 **Townscape & Landscape:** It is important to promote good sustainable urban design and this should reflect the special characteristics and needs of different parts of the city. Good design should focus on people within the spaces, how they move, interact and socialise, and should ensure feelings of safety and security. Green and open spaces should be woven into the urban design, and consideration given to opportunities to enhance the blue infrastructure assets for Coventry. The administrative boundary of Coventry is tightly defined with many parts of the existing urban area abutting the Green Belt. Climate change and population growth are exacerbating environmental issues in urban areas. It is vital that space for green and blue infrastructure is retained and enhanced, including improvements to linkages and networks that will further benefit people and nature.
- 4.51 Significant negative effects are likely for Options 1 and 2, and particularly for cumulative effects, as such high quanta of development are likely to compromise the possibilities for embedded and other mitigation measures in the design process. New development that is high quality, creative and proportional to the receiving townscape and local environment can have very positive effects, and also act as a catalyst for further enhancement of quality and human wellbeing to the built environment. Positive effects are likely for Options 3, 4 and 5 as it has been indicated by the HELAA studies (2024) that such housing numbers can be accommodated within the urban area but some uncertainty remains as depends upon details and location.

### Reasons for Selection/Rejection of Options for Quantum of Housing

4.52 **Table 4.2b: Outline Reasons for Selection/Rejection of Options for Quantum of Housing**

Strategic Option		Outline Reasons for Selection/Rejection
1	63,760 dwellings (3,188 per annum)	<ul style="list-style-type: none"> <li>▪ Homes would need to be small, more densely located &amp; thus unable to meet variety &amp; adaptability of needs</li> <li>▪ Quantum could limit land for open/green space with negative effects for health &amp; wellbeing</li> </ul>

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

## SA of Strategic Options: Residential Density

4.53 The summary findings of the initial and updated high level SA of strategic options for the density of residential development are presented in Table 4.3a, as follows:

<b>Table 4.3a: Options for Residential Density</b>		<b>1_Greenfield 30 dph; Outside ring road min 35 dph; Inside min 200 dph</b>	<b>2_As Option 1 but Outside ring road &gt;35 dph in certain locations</b>	<b>3_Greenfield 35 dph; Brownfield 45 dph; 125 dph in Transition zone 125 dph; City Centre 250 dph</b>
<b>Sustainability Objective</b>				
1: To enable vibrant and inclusive communities		0?	+	++

2: To provide accessible essential services and facilities for all residents	0?	0?	+
3: To improve health & promote active living	0?	+	+
4: To provide decent and affordable housing for all	+	++	++
5: To support sustainable inclusive economic growth	0	0	0
6: To help achieve the Council's ambition to reach net zero carbon emissions	0	0	0
7: To build resilience to climate change	0	0	0
8: To reduce traffic & improve sustainable transport choices	0	0	+
9: To reduced air, noise & light pollution	0	0	0
10: To protect & conserve natural resources – soil, water, minerals & waste <sup>47</sup>	-	0	++ ?
11: To protect and enhance nature & biodiversity	-?	+++	++
12: To protect and enhance the historic environment, and its setting	0	0	0
13: To protect and enhance the quality and character of townscapes & landscapes	0?	+	+

4.54 The current CLP approach set out in Policy H9 provides mitigation measures to avoid or minimise likely potential negative effects by defining standards for residential densities according to the characteristics and capacity of the different receiving environments within the Coventry area. The need to protect greenfield land from development pressures and recognise the more rural context is recognised with a lower density of 30 dph. The opportunities for effective use of previously developed land, particularly in a central urban context, is understood and policy allows for a minimum density of 200 dph inside the ring road, which defines a separation between inside and outside. A slightly higher density of 35 dph is permissible outside the ring road on non-greenfield land. Currently housing development does not need its own parking for that land inside the ring road.

4.55 The Council has investigated possibilities for increasing residential density towards the city centre in certain locations. The City Centre is to be defined as the area currently covered by the City Centre Area Action Plan. The

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

Density study<sup>48</sup> has identified development opportunities in the vicinity of the city centre boundary, thus defining a city centre transition zone where 125 dph is appropriate. This study has also found that there could be intensification of density within the city centre boundary to 250 dph due to its urban character and the proximity of city centre services and facilities; densification possibilities are also indicated with regard to green and brownfield land.

- 4.56 **Vibrant Communities:** It is considered that there is evidence to support higher density residential developments, taking into account housing needs type and mix with local character and appropriate building forms such that there could be positive effects to enable vibrant and inclusive communities in certain locations outside the ring road. There could be synergistic and cumulative effects with other SA objectives, such as those for active travel (SA No 3), enabling provision of identified housing need (SA No 4), and promoting higher densities will better protect and conserve natural resources (SA No 10 soils). The extant density arrangements will not be able to accommodate the increased housing requirements on brownfield land. Major positive effects are indicated by Option 3 that comprises the identified densification possibilities in defined areas of the CLPR area.
- 4.57 **Services & Facilities:** The current approach to residential densities would not be able to accommodate the identified housing needs on brownfield land. The refinement of densities to more specifically acknowledge the character and ability to accommodate different types of development as set out in Option 3 makes best use of accessibility to services and facilities with positive effects.
- 4.58 **Health & Active Living:** Overcrowding, poor housing conditions, and affordability problems have increased in recent years, as well as health inequalities. CLP Policy HW1 Health Impact Assessments (HIAs) that requires major development to ensure that it has no adverse effects on health and wellbeing, and the Health SPD<sup>49</sup>, will be updated and thus there will be no significant negative effects through the current approach to densities. Since the provision of good quality housing is known to have positive effects on health & wellbeing, then ensuring that needs can be met through appropriate increases in density in certain locations is likely to have positive effects. The density studies confirm that housing needs can be met through the approach in Option 3 with more certainty of positive effects.
- 4.59 **Housing for All:** The current approach to residential densities would not be able to accommodate all the identified housing needs but it would progress provision such that some positive effects are indicated for Option 1, with uncertainty of significance at this stage of assessment. If ensuring that needs, including suitable mix and tenure for all identified groups, can be met through appropriate increases in density in certain locations, there are likely to be major positive effects for Option 2. The density study confirms that housing

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<sup>48</sup> Coventry City Council (August 2024) Housing Density Paper

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[https://www.coventry.gov.uk/downloads/download/5408/health\\_impact\\_assessment\\_supplementary\\_planning\\_documents\\_spd](https://www.coventry.gov.uk/downloads/download/5408/health_impact_assessment_supplementary_planning_documents_spd)



needs can be met through the approach in Option 3 with more certainty of positive effects.

- 4.60 **Economy:** Options for housing densities will not directly affect objectives for economic growth and therefore, neutral effects for SA No 5.
- 4.61 **Climate Change – Carbon Emissions & Resilience:** All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve dramatic reduction of carbon emissions. Therefore, neutral effects for SA No 6 and No 7.
- 4.62 **Transport & Movement:** The Coventry urban area is well connected with sustainable transport modes. Increasing housing densities in certain locations outside the ring road and where there is good accessibility and capacity to encourage sustainable and active travel will mitigate any potential negative effects. There may be possibilities to enhance sustainable travel through new development; proactive mechanisms to discourage car travel may be needed. The intensification of densities in the city centre and the transition zone could better discourage car travel and improve sustainable transport choices with positive effects, although some uncertainty as might depend on specific developments. No parking is needed in the city centre and a reduction of 50% of normal standards would be applied in the transition zone.
- 4.63 **Reduce Pollution:** Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan and these policies will be updated and improved in the review, including taking account of advances in building design and materials resources uses such that mitigation measures could be ensured to enable promotion of appropriately increased residential densities in certain locations. Therefore, likely negligible effects for all three options.
- 4.64 **Natural Resources:** Some uncertainty of effectiveness of policy mitigation measures to protect natural resources from the scale of development; therefore potential minor negative effects for Option 1. Consideration of higher density residential developments will have positive effects for more effective use of land, particularly in the Coventry area that is so constrained, with possibilities for major significance but uncertain. These effects are more certain for Option 3 where different densities have been identified according to the characteristics of the receiving communities and environment.
- 4.65 **Nature & Biodiversity:** The scale of new development needed is likely to have strong pressures on green infrastructure (GI) and biodiversity with likely significant negative effects, even with the new requirements for biodiversity net gain. Consideration of higher density residential developments will have positive effects for more effective use of land, particularly in the Coventry area that is so constrained and with such importance for protecting spaces for GI and biodiversity. There are possibilities for major significance but uncertain at this stage of assessment. These effects are more certain for Option 3 where different densities have been identified according to the characteristics of the receiving communities and environment.

- 4.66 **Historic Environment:** The adopted Plan includes policies to protect the historic environment and these policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment – regardless of residential densities with negligible effects for all three options.
- 4.67 **Townscape & Landscape:** It is important to promote good sustainable urban design and this should reflect the special characteristics and needs of different parts of the city. The approach to residential densities already recognises the different characteristics and different possibilities for accommodating changes through increased development. High quality and proportionate new development can enhance the townscape and local character. By focusing the housing needs in certain locations with appropriate densification, pressures may be taken from other places; with high quality design, positive effects could be indicated but with uncertainty. These positive effects are more certain for Option 3 where different densities have been identified according to the characteristics of the receiving communities & environment.
- 4.68 The summary findings of the initial high level SA of strategic options for residential density presented in Table 4.3a, as follows:

### Reasons for Selection/Rejection of Options for Residential Density

4.69 **Table 4.3b: Outline Reasons for Selection/Rejection of Options for Residential Density**

Strategic Option		Outline Reasons for Selection/Rejection
1	Greenfield 30 dph; outside ring road minimum 35 dph; inside ring road minimum 200 dph. Current adopted CLP Policy H9	<ul style="list-style-type: none"> <li>Identified quantum need could not be accommodated</li> </ul>
2	As Option 1 but with >35 dph outside ring road – in certain locations	<ul style="list-style-type: none"> <li>Identified quantum need could not be accommodated</li> </ul>
3	Greenfield 35 dph; Brownfield 45 dph; 125 dph in defined transition zone; 250 dph within City Centre boundary	<ul style="list-style-type: none"> <li>Identified quantum need could be accommodated</li> </ul> <p><b>Preferred Option</b></p>

### SA of Strategic Options: Climate Change – Building Regulations Standards

- 4.70 The summary findings of the initial high level SA of strategic options for building regulations standards are presented in Table 4.4a, as follows:

<b>Table 4.4a:</b> <b>Options for Coventry's Climate Change Strategy</b> <b>– Building Regulations Standards</b>  <b>Sustainability Objective</b>	<b>1_In line with FHS &amp; FBS</b>		<b>2_Over &amp; above Building Regulations</b>	
1: To enable vibrant and inclusive communities	0		0	
2: To provide accessible essential services and facilities for all residents	0		0	
3: To improve health & promote active living	0?		++?	
SA No 4: To provide decent and affordable housing for all	0?		?	
5: To support sustainable inclusive economic growth	0?		+?	
6: To help achieve the Council's ambition to reach net zero carbon emissions	0?		++?	
7: To build resilience to climate change	0?		+?	
8: To reduce traffic & improve sustainable transport choices	0		0	
9: To reduce air, noise & light pollution	0		0	
10: To protect & conserve natural resources – soil, water, minerals & waste <sup>50</sup>	-	0	0?	+?
11: To protect and enhance nature & biodiversity	+?		++?	
12: To protect and enhance the historic environment, and its setting	0		+?	
13: To protect and enhance the quality and character of townscapes & landscapes	0		0?	

4.71 **Vibrant Communities; Services & Facilities:** Other factors are more likely to have potential effects on objectives for inclusive communities and services/facilities than requirements in line or above Building Regulations. Therefore, likely negligible or neutral effects for SA numbers 1 and 2.

<sup>50</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

- 4.72 **Health & Active Living:** An approach that progresses aspirations for adapting to climate change more promptly by requiring standards above national Building Regulations is likely to have positive effects for health and wellbeing by better reducing the risks to health. Climate change affects the social and environmental determinants of health - clean air, safe drinking water, sufficient food and secure shelter. Any consequence of climate change that can bring physical ill health can also have mental health implications and climate change can negatively impact on mental health, including depression and anxiety.
- 4.73 Aligning with Government requirements may be considered to have negligible but uncertain effects for health and wellbeing. However, by requiring standards over and above Building Regulations, aspirations for reducing carbon emissions will be achieved sooner and will better support the aspirations for Coventry City with regard to building resilience to climate change effects, including those for health. By making a clear proactive commitment, such action could influence both physical and mental health with potential major positive effects. As climate change effects are global, considerable uncertainties indicated.
- 4.74 **Housing:** There is a perceived concern from the construction industry in being able to meet national net zero carbon targets because of various issues – and most notably with the embedded carbon in materials. Therefore, there is a risk that requiring higher standards than national Building Regulations will pose greater challenges for new development design and building – and particularly construction – such that costs and viability for house building may be compromised with potential negative effects, especially in the shorter term. However, the development sector has embraced sustainability with the need to achieve net zero carbon and implementation of the circular economy with design for durability, reuse, remanufacturing, and recycling. With commitment and creativity in design, higher standards may be more readily achievable; however, the effects on the delivery of the required housing is uncertain and unknown at this stage.
- 4.75 **Economy:** It is unclear whether any requirement for higher standards through Building Regulations would have any significant effects on economic growth. It could be asserted that higher standards might equate to higher costs & thus limit growth. However, Government has advised that the transition to net zero carbon is the growth opportunity of the 21<sup>st</sup> century. Coventry has strong commitments for innovation, research and development in new technology such that higher standards could be a catalyst to promote progress in the green economy and support the city's aspirations. Some research has indicated that it is cheaper to reduce greenhouse gas emissions than it is to deal with climate change impacts - and thus, this would support progressing higher standards sooner with some positive effects indicated for the economy.
- 4.76 **Climate Change – Carbon Emissions & Resilience:** Implementation of planning policy requiring higher standards to reduce GHG emissions and contribute to building resilience sooner than national requirements will have positive effects towards helping the Council achieve its ambitions but with uncertainties.

- 4.77 **Transport & Movement; Reduce Pollution:** Changes to Building Regulations will not affect these SA objectives numbers 8 and 9 - therefore, neutral effects.
- 4.78 **Natural Resources:** Soil has been recognised as an essential national asset. Climate change, particularly incidences of hotter, drier, summers may exacerbate water supply issues; wetter weather and more flooding may overload wastewater systems. The cumulative effects of increased development on soil and water resources is uncertain, particularly in the shorter-medium term before the effects of net zero carbon actions are implemented and become effective. Therefore, uncertain negative effects for Option 1.
- 4.79 Planning policy requirements in Option 2 that are over and above national building regulations requirements are likely to reduce carbon emissions earlier, thus mitigating negative effects on soils and water sooner, and thus indicating at least neutral effects – but uncertainty of significance at this stage of assessment. It is assumed that policies for minerals and waste management will be updated to address any capacity issues such that at least neutral effects would be indicated for both options.
- 4.80 **Nature & Biodiversity:** Climate change can contribute to biodiversity loss and biodiversity loss can make climate change and its effects worse. Government has recently reiterated that we cannot mitigate and adapt to climate change without Nature-Based Solutions. It could be considered that meeting the proposed national standards for building regulations and reducing GHG emissions could approach negligible effects – but uncertainty as depends upon quantum of new development. Progressing more rigorous standards would reduce GHG emissions and sooner such that mitigation measures are earlier and more effective. Therefore, there could be some positive effects for nature and biodiversity. However, this is uncertain as it depends upon the quantum of new development and the extent of associated biodiversity gain. It is noted that all development will have to meet with national requirements for 10% BNG indicating some positive effects from all development, assuming it can be delivered.
- 4.81 **Historic Environment:** Relevant policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. It could be assumed that progressing more rigorous standards would reduce GHG emissions and sooner such that mitigation measures are earlier and more effective so that there could be less risk of negative effects on the historic environment. However, some uncertainty as it depends upon the extent of development and precise location.
- 4.82 **Townscape & Landscape:** Relevant policies will be updated in the CLP review, and therefore, likely negligible effects with regard to the proposed changes to Building Regulations. There may be challenges to design and construction, particularly in the shorter term, if requirements over and above such standards are proposed and thus with some uncertainty of significance.

## Reasons for Selection/Rejection of Options for Climate Change & Building Regulations Standards

4.83 **Table 4.4b: Outline Reasons for Selection/Rejection of Options for Building Regulations Standards**

Strategic Option		Outline Reasons for Selection/Rejection
1	National Future Homes & Buildings Standards	<ul style="list-style-type: none"> <li>Viability and land values can support national standards</li> <li>Can help support investment and development in the city that would otherwise be located in areas outside the city</li> <li>Option will be progressed through mandatory requirements to meet national net zero ambitions</li> </ul>
2	Over and above proposed Building Regulations	<ul style="list-style-type: none"> <li>Can help Coventry meet its local and national net zero ambitions</li> </ul> <p><b>Preferred Option</b> if no adverse effects on viability and land values that might deter developers investing/building in the city</p>

## SA of Strategic Options: Nature & Biodiversity Standards

4.84 The summary findings of the initial high level SA of strategic options for Nature & Biodiversity standards are presented in Table 4.5a, as follows:

Table 4.5a: Options for Nature & Biodiversity – Standards for Biodiversity Net Gain (BNG) & Green infrastructure (GI)	Sustainability Objective	
	1_In line with national requirements & standards	2_Over & above national standards
1: To enable vibrant and inclusive communities	0	0
2: To provide accessible essential services and facilities for all residents	+	++
3: To improve health & promote active living	+	++
4: To provide decent and affordable housing for all	+?	+?
5: To support sustainable inclusive economic growth	0?	0?

6: To help achieve the Council's ambition to reach net zero carbon emissions	+		++?	
7: To build resilience to climate change	+		++?	
8: To reduce traffic & improve sustainable transport choices	0		0	
9: To reduce air, noise & light pollution	+		++?	
10: To protect & conserve natural resources – soil, water, minerals & waste <sup>51</sup>	+	0	++?	0
11: To protect and enhance nature & biodiversity	+		++?	
12: To protect and enhance the historic environment, and its setting	0		0	
13: To protect and enhance the quality and character of townscapes & landscapes	+		++?	

- 4.85 **Vibrant Communities:** The provision and accessibility of GI can encourage safe social connectivity and help reduce social isolation. It could be considered that provision of GI in line with proposed national standards would meet with objectives and that higher standards would not necessarily significantly affect inclusivity. There are other factors, including for building design and locations, that are more likely to have effects on vibrant and inclusive neighbourhoods. Therefore, negligible effects for both options.
- 4.86 **Services & Facilities; Health & Active Living:** It is likely that implementation of the proposed national standards for GI will increase provision of, and accessibility to, green infrastructure – with positive effects, including for health and wellbeing. It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision and accessibility of GI with further positive effects – that are likely to be synergistic and cumulative, particularly in the longer term. The visible greening of the urban areas could further encourage people towards more active living with positive effects for health and wellbeing.
- 4.87 **Housing:** Provision of, and accessibility to, enhanced GI will improve the overall quality of residential development, supporting positive effects from housing provision for all. It is vital that the appropriate mix and tenure of housing, suitable for different housing needs of different people and at different times of their lives, is planned according to identified needs. Nonetheless, it is important to retain sufficient space to accommodate GI and in locations where it may better support nature and people. It is unclear at this stage what quantum of housing could be accommodated together with aspirational GI for nature, people and climate change. This is a particular

<sup>51</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

challenge for Coventry with its boundary and other constraints. It is difficult to predict the effects of increasing requirements for GI above national standards on housing as it depends upon quantum and location of development with uncertainties at this stage of assessment.

- 4.88 **Economy:** The economic valuation of urban natural capital demonstrates multiple social, environmental and economic benefits and the importance of urban green and blue spaces and blue-green infrastructure. Whilst improvements to GI will enhance the local environment for residents, workers and visitors, it is unclear how this will directly affect sustainable economic objectives and therefore, uncertainties.
- 4.89 **Climate Change – Carbon Emissions & Resilience:** The GI Standards aim to improve resilience to and mitigation of climate change, including increasing carbon capture, preventing flooding, and reducing temperatures during heatwaves - all with positive effects. It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision and accessibility of GI with further positive effects for resilience – that are likely to be synergistic and cumulative, particularly in the longer term. The more extensive greening of the urban environment would visually demonstrate a strong commitment to GI and progressing towards a dramatic reduction of carbon emissions that may further engage people in helping to achieve the Council's ambition. Uncertainties for significance at this stage of assessment.
- 4.90 **Transport & Movement:** Improving the sustainable transport network for cycling and walking can be integrated with the GI network for mutual benefits for nature and people. It is not clear how differences in GI standards will directly affect sustainable transport objectives – likely negligible effects for both options.
- 4.91 **Reduce Pollution:** Good quality GI has an important role to play in improving air quality in urban areas, including reducing particulate matter – and thus improving health/wellbeing – with positive effects. GI can reduce noise pollution – trees can act as sound barriers as they can either absorb or deflect noise (or both) and vegetation, including green roofs and wall systems act as sound insulation. It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision and accessibility of GI with further positive effects for reducing air and noise pollution – that are likely to be synergistic and cumulative, particularly in the longer term, but with some uncertainty at this stage.
- 4.92 **Natural Resources:** Provision of GI – both green and blue – will contribute to protecting & conserving the natural resources of soils and water with positive effects. It seems reasonable to assume that higher GI standards will achieve better protection of such natural resources but there is uncertainty for the significance of the further positive effects. It is not clear how differences in GI standards will directly affect sustainability objectives for waste and minerals – likely negligible effects for both options.
- 4.93 **Nature & Biodiversity:** Provision of GI – both green and blue – will contribute to protecting and enhancing nature and biodiversity with positive effects. It



seems reasonable to assume that higher GI standards will achieve better protection and enhancement of nature and biodiversity but there is uncertainty for the significance of the further positive effects.

- 4.94 **Historic Environment:** It is not clear how differences in GI standards will directly affect sustainability objectives for the historic environment, although for example, improvements in air quality through greening will reduce polluting effects on historic buildings – likely negligible effects for both options.
- 4.95 **Townscape & Landscape:** Provision of GI – both green and blue – will contribute to protecting and enhancing the quality and character of townscapes and landscapes with positive effects. It seems reasonable to assume that higher GI standards will achieve better protection and enhancement of townscapes and landscapes but there is uncertainty for the significance of the further positive effects.

### Reasons for Selection/Rejection of Options for Nature & Biodiversity Standards

- 4.96 **Table 4.5b: Outline Reasons for Selection/Rejection of Options for Nature & Biodiversity Standards**

Strategic Option		Outline Reasons for Selection/Rejection
1	National BNG & GI standards	<ul style="list-style-type: none"> <li>Coventry City Council has been applying 10% BNG for some time, the principle is already well established and is being delivered in tandem with a range of other initiatives which is felt to work well, especially as a proposed updated biodiversity SPD will help to provide flexibility of choice depending upon the local context</li> </ul> <p><b>Preferred Option</b></p>
2	Over and above national BNG & GI standards	<ul style="list-style-type: none"> <li>There is much other work ongoing across Coventry and beyond eg Local Nature Recovery Strategy and it is considered a flexible approach to this is needed to achieve the most effective impact rather than simply mandating an enhanced quantified approach</li> </ul>

### SA of Strategic Options: Development in the Green Belt

- 4.97 The summary findings of the high level SA of strategic options for development in the Green Belt are presented in Table 4.6a, as follows:

<b>Table 4.6a: Options for Development in the Green Belt</b>  <b>Sustainability Objective</b>	<b>1_ Development within the Green Belt</b>		<b>2_ No development in the Green Belt</b>	
1: To enable vibrant and inclusive communities	-?		0	
2: To provide accessible essential services and facilities for all residents	0		0	
3: To improve health & promote active living	+?		++?	
4: To provide decent and affordable housing for all	0		0	
5: To support sustainable inclusive economic growth	+?		-?	
6: To help achieve the Council's ambition to reach net zero carbon emissions	0		0	
7: To build resilience to climate change	0		0	
8: To reduce traffic & improve sustainable transport choices	0?		+?	
9: To reduce air, noise & light pollution	0		0	
10: To protect & conserve natural resources – soil, water, minerals & waste <sup>52</sup>	0	0	+	0
11: To protect and enhance nature & biodiversity	+?		+?	
12: To protect and enhance the historic environment, and its setting	0		+?	
13: To protect and enhance the quality and character of townscapes & landscapes	--		++	

<sup>52</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

- 4.98 **Vibrant Communities:** Other factors are more likely to have potential effects on objectives for inclusive communities than locations in or out of the Green Belt with negligible effects for both options. However, urban sprawl and encroachment of the countryside can affect the vibrancy of communities and some uncertainty of effects for potential development in the Green Belt. There is also the risk of unintended consequences of producing isolated communities – depends on location.
- 4.99 **Services & Facilities; Health & Active Living:** Other factors are more likely to have potential effects on objectives for accessibility to essential services and facilities than locations in or out of the Green Belt (GB). Provision of good quality housing will have positive effects on health and wellbeing regardless of whether it is in or out of the Green Belt. Protecting the openness of GB land, including for nature and recreation, is likely to have major positive effects for health and wellbeing with Option 2, although some uncertainty of the precise significance at this stage of assessment. Urban sprawl and encroachment of the countryside can affect residents' wellbeing and such development can evoke strong feelings – positive effects reduced for Option 1 with potential for some uncertainty of significance as depends on locational specificity.
- 4.100 **Housing:** The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence (NPPF). Coventry has two distinctive types of Green Belt – the open countryside of Ancient Arden to the west; and GB corridors of open land tracts that extend through the built-up area of the city, to and from the countryside beyond. Of greatest significance is the wider GB that encircles the city, helping prevent urban sprawl.
- 4.101 Existing LP Policy GB1 Green Belt & Local Green Space provides detailed explanation of the difficulties facing the Council, particularly with such a tight administrative boundary. For the adopted 2017 LP, the Council considered the Joint Green Belt Review<sup>53</sup>, together with other evidence to explore Coventry's exceptional circumstances regarding development pressures and release of some suitable land from the GB. Thus, at that time, the Council investigated any opportunities for GB land that would not be urban sprawl, retaining openness by avoiding/minimising any negative effects & optimising the positive effects for development land.
- 4.102 Coventry City Council has produced a Technical Update (July 2024)<sup>54</sup> to the Green Belt Review which informed its adopted Local Plan to assess whether the context to any of the assessed parcels of land have changed since the Plan was adopted. This has confirmed that the limited remaining GB land in the Coventry area continues to serve GB purposes. LP Policies GB1 Green Belt and GB2 Safeguarded Land in the Green Belt will be updated for the CLPR. Capacity (HELAA 2024) studies have determined that approx. 31,500 new dwellings can be accommodated within the urban areas to meet identified need and without needing to consider potential residential locations in the Green Belt. Therefore, neutral effects for both options.

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<sup>53</sup> Coventry & Warwickshire Joint Green Belt Review (2015)

<sup>54</sup> Coventry City Council (July 2024) Green Belt Technical Update Study

- 4.103 **Economy:** Supporting the right balance of employment growth is fundamental for the communities of Coventry and to ensure that jobs are accessible to local people. The Council has identified a shortfall of employment sites within its own administrative area, against its identified quantum of local need. A particular site in the Green Belt (Site North of A45 & West of Brick Hill Lane) is being promoted for employment purposes. Therefore, potential minor positive effects for limited employment land in the GB but with some uncertainty at this stage as impact significance and mitigation possibilities depend upon locational and development details. Minor negative effects for the economy if the Council cannot meet its employment land identified need through avoiding suitable land in the GB – some uncertainty of significance as depends on development type and jobs details.
- 4.104 **Climate Change – Carbon Emissions & Resilience:** The Council's Climate Change Strategy will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure. Direct greenhouse gas (GHG) emissions from buildings accounted for 17% of UK GHG emissions in 2019. It has been reported that the construction industry needs to decarbonise more urgently and building design needs to progress principles in the circular economy. All development will have to reduce GHG emissions and build resilience to climate change in line with updated planning policy – regardless of whether in or out of the GB – therefore, neutral effects for both options.
- 4.105 **Transport & Movement:** Transport produced 24% of the UK's total emissions in 2020 and remains the largest emitting sector in the UK, with the majority of emissions from road vehicles. Development in the Green Belt might not reduce traffic, whilst development focused on PDL might improve sustainable transport choices and therefore, neutral effects for Option 1 and minor positive effects for Option 2 – but uncertainty at this stage, as depends upon proposals and locations.
- 4.106 **Reduce Pollution:** Development in or out of the Green Belt will not affect this SA objective and no direct effects likely – neutral/not applicable.
- 4.107 **Natural Resources:** The review of the CLP will continue to build on previously developed land (PDL) where effectively located and thus contribute towards protecting agricultural land – and Green Belt land – with positive effects for Option 2, including by encouraging “*the recycling of derelict and other urban land*” and thus, supporting one of the five purposes of GB land. The recent Water Cycle Study Stage 1 (June 2024)<sup>55</sup> indicates that there is water capacity for the preferred residential quantum and therefore, likely neutral effects with regard to GB land for both options. The current CLP Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures – they will be updated and at least neutral effects indicated for both options.

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<sup>55</sup> JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

- 4.108 **Nature & Biodiversity:** The fragmentation and erosion of habitats remains a threat, and the need to secure biodiversity gain and improve the wider ecological network remain important objectives for plan making in the Coventry area. The current adopted Plan has policies to protect nature and biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These will be updated and should provide sufficient mitigation such that effects from new development will be at least neutral with regard to GB land for both options. All development will have to meet with the national requirements for BNG indicating positive effects.
- 4.109 **Historic Environment:** The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment – with neutral effects for GB land. However, avoiding development in the Green Belt supports one of the 5 purposes – “to preserve the setting and special character of historic towns” – therefore, potential positive effects for Option 2 and the historic environment; uncertainty of significance at this stage as depends upon location.
- 4.110 **Townscape & Landscape:** Green Belt serves five purposes (NPPF)<sup>56</sup>:
- (a) to check the unrestricted sprawl of large built-up areas;
  - (b) to prevent neighbouring towns merging into one another;
  - (c) to assist in safeguarding the countryside from encroachment;
  - (d) to preserve the setting and special character of historic towns; and
  - (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 4.111 It is for LPAs to define and maintain GB land in their local areas. Coventry has two distinctive types of Green Belt – the open countryside of Ancient Arden to the west and north west; and GB corridors of open land tracts that extend through the built-up area of the city, to and from the countryside beyond. Of greatest significance is the wider GB that encircles the city, helping prevent urban sprawl and coalescence.
- 4.112 The adopted Coventry LP was informed by a sub-regional GB study (2015), and since the CLP removed 16% of GB to accommodate identified development needs at that time, there is now limited GB land in the CLP area (Technical Review of GB, 2024). Existing LP Policy GB1 Green Belt & Local Green Space provides detailed explanation of the difficulties facing the Council, particularly with such a tight administrative boundary.
- 4.113 Coventry City Council has undertaken a technical update<sup>57</sup> to the original GB Review using the same methods that had been undertaken previously. The study has concluded that any potential releases of land from the GB for built

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<sup>56</sup> The new Labour Government has set out plans for delivering homes in the Green Belt and confirmed through recent proposals for reform of the NPPF (July 2024). However, the CLPR is being submitted under the extant NPPF that does not have any requirements regarding grey belt land.

<sup>57</sup> Coventry City Council (July 2024) Green Belt Technical Update Study

development will have visual or other impact, and that the GB areas continue to serve GB purposes. The study recommends the areas to remain as GB in their entirety; also in respect of safeguarded land in the GB with a note that further technical study is required regarding the extant allocations set out in the Warwick DC LP and the proposed Warwickshire JLP. LP Policies GB1 Green Belt and GB2 Safeguarded Land in the Green Belt will be updated for the CLPR.

- 4.114 Since there is strong updated evidence that the limited GB in the Coventry area continues to serve GB purposes, it is considered that any proposals for development in the GB could have major negative effects. Protecting the limited GB in the Coventry area is likely to have major positive effects for GB purposes and the SA objectives.

### Reasons for Selection/Rejection of Options for Development in the Green Belt

- 4.115 **Table 4.6b: Outline Reasons for Selection/Rejection of Options for Development in the Green Belt**

Strategic Option		Outline Reasons for Selection/Rejection
1	Development in Green Belt	<ul style="list-style-type: none"> <li>▪ Adverse effects on GB purposes</li> <li>▪ Adverse effects on landscape</li> <li>▪ Risk of isolated communities</li> </ul>
2	No development in Green Belt	<ul style="list-style-type: none"> <li>▪ Identified quantum need could be accommodated without GB land</li> <li>▪ Retains openness &amp; protects townscapes/landscapes</li> </ul> <p><b>Preferred Option</b></p>

### SA of Strategic Options: Quantum of Employment Land

- 4.116 The summary findings of the initial high level SA of strategic options for development in the Green Belt are presented in Table 4.7a, as follows:

<p><b>Table 4.7a: Options for Quantum of General Industrial Employment Land</b></p>			
<b>Sustainability Objective</b>	<b>1. 147.6 hectares</b>	<b>2. 60 hectares calculated that can be accommodated</b>	<b>3. 60 ha + 11.81 ha located in Green Belt</b>

1: To enable vibrant and inclusive communities	-?	+	+				
2: To provide accessible essential services and facilities for all residents	0	0	0				
3: To improve health & promote active living	-?	+	+				
4: To provide decent and affordable housing for all	-?	0	0				
5: To support sustainable inclusive economic growth	+	++	++				
6: To help achieve the Council's ambition to reach net zero carbon emissions	0	0	0				
7: To build resilience to climate change	0	0	0				
8: To reduce traffic & improve sustainable transport choices	0	0	0				
9: To reduce air, noise & light pollution	0	0	0				
10: To protect & conserve natural resources – soil, water, minerals & waste <sup>58</sup>	0?	0	+	0	+	-	0
11: To protect and enhance nature & biodiversity	+	+	+				
12: To protect and enhance the historic environment, and its setting	0?	0?	0?				
13: To protect and enhance the quality and character of townscapes & landscapes	-?	0	0	--			

4.117 **Vibrant Communities:** Provision of the identified need of 147.6 ha general industrial employment land in Option 1 as indicated by the HEDNA (2022)<sup>59</sup> would suggest that the role of employment contributing to vibrant communities would be satisfied with positive effects. However, capacity studies (HELAA 2024)<sup>60</sup> and review studies (ELR 2024)<sup>61</sup> indicate that this quantum of land may not be possible within the constrained nature of the Coventry area and therefore, negative effects but uncertainty of significance. Uncertainty of positive effects is indicated with Option 2 that is less than identified need but has been found that can be accommodated.

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

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

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

<sup>61</sup> DLP Planning Ltd for Coventry City Council (May 2024) Coventry Employment Land Review

Option 3 includes one additional site that is in the Green Belt. If potential negative effects on GB purposes can be mitigated, then with this additional site the quantum approaches the identified need and can be accommodated with more certainty of positive effects.

- 4.118 **Services & Facilities:** Other factors are more likely to have potential effects on objectives for accessibility to essential services and facilities than the quantum of employment land – neutral effects for all three options.
- 4.119 **Health & Active Living:** The relationship between fair employment, good work and health has been recognised for many years. Whilst employment rates have increased nationally since 2010, there has been an increase in poor quality work, including part-time, insecure employment (Marmot Review 10 years on, 2020)<sup>62</sup>. Since 2010 there have been profound shifts in many aspects of the labour market and employment practices in England. Rates of unemployment have decreased but increases in employment have often been in low-paid, unskilled, self-employed, short-term or zero hours contract jobs –which have seen a steady growth. Rates of pay have not increased and, notably, more people in poverty are now in work than out of work. The rise of automation in the labour market also has implications for health inequalities. Unemployment and poor quality work are major drivers of inequalities in physical and mental health.
- 4.120 Provision of the identified need of 147.6 ha general industrial employment land in Option 1 would suggest that employment needs would be met with concomitant positive effects for health. However, capacity and review studies indicate that this quantum of land may not be possible within the constrained nature of the Coventry area and therefore, some negative effects but uncertainty of significance. Uncertainty of positive effects is indicated with Option 2 that is less than identified need but has been found that can be accommodated. Option 3 includes one additional site that is in the Green Belt. If potential negative effects on GB purposes can be mitigated, then with this additional site the quantum approaches the identified need and can be accommodated with more certainty of effects.
- 4.121 **Housing:** Provision of good quality new homes will support the ambitions for sustainable economic growth and neutral effects suggested for Options 2 & 3. Studies have indicated that Option 1 cannot be accommodated. There is a risk that continuing to progress this option could compromise the availability of certain land for residential/mixed-use development and other uses, and limit the opportunities for ensuring that general industrial land is located in the most sustainable locations.
- 4.122 **Economy:** Coventry has seen strong economic growth over the past few years and is recognised as a national centre for a number of growing business sectors. These have all resulted in the creation of high-quality jobs for in growth sectors. However, there are a number of challenges, Coventry's economic growth and prosperity lags behind the England average and the city has fewer people in work compared to both regional and national

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<sup>62</sup> The Health Foundation (Feb 2020) Health Equity in England: The Marmot Review 10 Years On  
<https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>



figures. It is notable that many of Coventry's private sectors businesses are small or micro-businesses and the Council has an important priority to support such SMEs.

- 4.123 With regard to employment land needs, the HEDNA (Nov 2022) concluded that whilst the demand for B8 land use (storage/warehousing) is strong, there is a need for separate allocations for B1c/B2 (general industrial) where land is delineated from sites going for B8 in order to support the manufacturing sector. However, capacity studies (HELAA 2024) and land review studies (ELR 2024) indicate that this quantum of land may not be possible within the constrained nature of the Coventry area and therefore, uncertainty of significance for positive effects for Option 1.
- 4.124 Some uncertainty of positive effects is indicated with Option 2 that is less than identified need but has been found that can be accommodated. Option 3 includes one additional site that is in the Green Belt. If potential negative effects on GB purposes can be mitigated, then with this additional site the quantum approaches the identified need and can be accommodated with more certainty of effects. The Council is also reassessing whether the existing employment allocations are still suitable and deliverable and align with the overall strategy.
- 4.125 **Climate Change – Carbon Emissions & Resilience:** All development will have to reduce GHG emissions and build resilience to climate change in line with updated planning policy – regardless of quantum – therefore, neutral effects for all options.
- 4.126 **Transport & Movement:** The Council will seek to select employment development land that best supports objectives for sustainable transport – and it is indicated that Options 2 and 3 could be accommodated; Option 1 cannot be accommodated. CLP Policies AC1 Accessible Transport Network and AC2-AC6 will be updated to better support sustainable movement and active travel. Therefore, neutral effects for all three options.
- 4.127 **Reduce Pollution:** No direct effects likely – neutral/not applicable – as all development will be required to meet with EM Policies.
- 4.128 **Natural Resources:** Many of the existing sites are on PDL indicating positive effects for conserving soil but Option 1 does not use land as effectively as Options 2 and 3 such that the positive/negative effects indicate overall neutral with some uncertainty of significance of effects. Option 3 has most effectively used land but includes the additional site by the A45 and this is located in Grade 3 agricultural land indicating negative effects for loss of such land and the important soil resource. Therefore, both positive and negative effects for Option 3. CLP Policies EM1-EM6 and EM8-9 will be updated and thus provide sufficient mitigation for all development.
- 4.129 **Nature & Biodiversity:** The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide further mitigation measures such

that there will be no major significant negative effects. The Council will continue to allocate employment development sites to PDL and new development can create opportunities for enhancing GI and biodiversity with potential positive effects but uncertainty as depends upon locational specificity. All development will need to meet with the national requirements for BNG, indicating positive effects. .

- 4.130 **Historic Environment:** The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide sufficient mitigation measures to avoid significant negative effects on the historic environment – but some uncertainty as depends upon locational specificity. Overall, likely neutral/negligible effects for all options.
- 4.131 **Townscape & Landscape:** The current CLP includes policies to protect townscapes/landscapes, especially Policy DE1 Ensuring High Quality Design, and these will be updated in the CLP review. This indicates that sufficient mitigation measures will be provided through plan policies and thus, likely effect at least neutral for Options 2 and 3. However, Option 3 includes the site by the A45 and located within the Green Belt. This area of the Green Belt makes a significant contribution to the GB purposes and any development on the western extremity of the built up area would be extremely sensitive – indicating major negative effects. Therefore, both positive and negative effects for Option 3. The less than efficient use of land indicated by the quantum in Option 1 suggests that opportunities for enhancing the quality of townscape/landscape would not be progressed such that potential negative effects – uncertain as depends on locational specificity.

### Reasons for Selection/Rejection of Options for Quantum of General Industrial Employment Land

4.132 **Table 4.7b: Outline Reasons for Selection/Rejection of Options for Quantum of General Industrial Employment Land**

Strategic Option		Outline Reasons for Selection/Rejection
1	147.6 ha	<ul style="list-style-type: none"> <li>Rejected as this level of growth cannot be accommodated within Coventry's constrained boundaries</li> </ul>
2	60 ha – can be accommodated	<ul style="list-style-type: none"> <li>This amount can be accommodated with discussions across the FEMA with neighbouring authorities being explored to deliver the remainder which is consistent with the approach in the adopted Local Plan</li> <li>Potential to address shortfall with partner authorities without resorting to Green Belt release</li> </ul> <p><b>Preferred Option</b></p>

3	60 ha plus an additional 11.81 ha located in the Green Belt	▪ Rejected as option includes a site in the Green Belt
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## SA of Strategic Options: Quantum of Office Development

4.133 The summary findings of the initial high level SA of strategic options for quantum of office development are presented in Table 4.8a, as follows:

<b>Table 4.8a: Options for Quantum of Office Development</b>						
<b>Sustainability Objective</b>	<b>1. 8.5 ha</b>		<b>2. 5.8 ha</b>		<b>3. 4.12 ha</b>	
1: To enable vibrant and inclusive communities	-?		0?		+	
2: To provide accessible essential services and facilities for all residents	0		0		0	
3: To improve health & promote active living	-?		0?		+	
4: To provide decent and affordable housing for all	-?		-?		+	
5: To support sustainable inclusive economic growth	+?		++		++	
6: To help achieve the Council's ambition to reach net zero carbon emissions	0		0		0	
7: To build resilience to climate change	0		0		0	
8: To reduce traffic & improve sustainable transport choices	0		0		0	
9: To reduce air, noise & light pollution	0		0		0	
10: To protect & conserve natural resources – soil, water, minerals & waste <sup>63</sup>	0?	0	+	0	+	0
11: To protect and enhance nature & biodiversity	+?		+?		+?	
12: To protect and enhance the historic environment, and its setting	0		0		0?	

<sup>63</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

13: To protect and enhance the quality and character of townscapes & landscapes	-?	0	0
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- 4.134 **Vibrant Communities:** Other factors are more likely to have potential significant effects on objectives for inclusive communities than the quantum of land for office development. However, provision of sufficient land for office development will support the economy and a diversity of jobs will overall contribute to vibrant and inclusive communities.
- 4.135 Option 1 reflects an earlier office development need. Updated evidence indicates that this quantum would be an over-supply and thus, would restrict possibilities for repurposing surplus office development land with potential negative effects for less than efficient use of land – uncertainty as depends on precise locations.
- 4.136 Option 2 reflects the office development need updated to remove the oversupply. This indicates positive effects for the contribution that office land makes to vibrant communities but also some negative effects since use of land may not have been optimised – overall neutral effects. However, Option 3 reflects the updated office land needed and takes into account increased flexibility and hybrid working patterns – thus providing more certainty of significance of positive effects overall for communities
- 4.137 **Services & Facilities:** Other factors are more likely to have potential effects on objectives for accessibility to essential services and facilities than the quantum of office land – neutral/not applicable effects for all three options.
- 4.138 **Health & Active Living:** The relationship between fair employment, good work and health has been recognised for many years. Option 3 reflects the updated office land needed and takes into account increased flexibility and hybrid working patterns with positive effects for health & wellbeing. Options 1 and 2 reflect earlier evidence indicating a higher requirement for office development land than is needed. This would restrict possibilities for repurposing surplus office development land with potential negative effects for less than efficient use of land for Option 1; the lesser quantum in Option 2 suggests less negative effects and overall neutral – uncertainty for both as depends on precise locations.
- 4.139 **Housing:** The provision of good quality new homes will support the ambitions for sustainable economic growth. There is a risk that continuing to progress Options 1 and 2 is not the most efficient use of land and could compromise the availability of certain land for residential/mixed-use development and other uses. The opportunities for ensuring that office development land is located in the most sustainable locations could also be limited as other sites away from the centres may need to be sought – therefore, some potential negative effects indicated but uncertainty at this stage as depends on locational specificity. Positive effects for Option 3 as the repurposing of some previously allocated office land can release housing in suitable and sustainable locations.

- 4.140 **Economy:** Option 1 reflects an earlier office development need. Updated evidence indicates that this quantum would be an over-supply and thus, would restrict possibilities for repurposing surplus office development land with potential negative effects for less than efficient use of land – uncertainty as depends on precise locations. Option 2 reflects the office development need updated to remove the oversupply, thus indicating potential positive effects for the contribution that office land makes to sustainable economic growth.
- 4.141 However, Option 3 reflects the updated office land needed and takes into account increased flexibility and hybrid working patterns – thus providing more certainty of significance of effects. It also enables further positive effects for other SA objectives, such as for housing, by reducing the landtake for offices and releasing some land for repurposing. The Office Market Study (June 2024) confirmed the recommendations from the ELR (May 2024) that there is a need to reconsider the suitability and deliverability of existing allocations without permission. CLP Policies will be updated to reflect the needs for more flexible office spaces, including adaptable internal arrangements and shared facilities – especially relevant to support the needs of start-up businesses and SMEs that are so important to Coventry.
- 4.142 **Climate Change – Carbon Emissions & Resilience:** The All development will have to reduce GHG emissions and build resilience to climate change in line with updated planning policy – regardless of quantum – therefore, neutral effects for all options.
- 4.143 **Transport & Movement; Reduce Pollution:** The Council will seek to select development that best support objectives for sustainable transport – therefore, neutral effects overall for all three options. All development will be required to meet with EM Policies to reduce pollution – neutral for all options.
- 4.144 **Natural Resources:** Many of the existing sites are on PDL indicating positive effects for conserving soil but Option 1 does not use land as effectively as Options 2 and 3 such that the positive/negative effects indicate overall neutral. Some uncertainty of effects for Options 1 and 2 whilst for Option 3 that has most effectively used land, positive effects are more certain.
- 4.145 **Nature & Biodiversity:** Overall, likely minor positive effects for all options as all development will need to comply with plan policies on nature and biodiversity and national requirements for BNG.
- 4.146 **Historic Environment:** Overall, likely neutral/negligible effects for all options as all development will need to comply with plan policies on the historic environment but some uncertainty at this stage as depends upon locational specificity.
- 4.147 **Townscape & Landscape:** The current CLP includes policies to protect townscapes/landscapes, especially Policy DE1 Ensuring High Quality Design, and these will be updated in the CLP review. This indicates that sufficient mitigation measures will be provided through plan policies and thus, likely effect at least neutral for Options 2 and 3. The less than efficient use of land

indicated by the quantum in Option 1 suggests that opportunities for enhancing the quality of townscape/landscape would not be progressed such that potential negative effects – uncertain as depends on locational specificity.

### Reasons for Selection/Rejection of Options for Quantum of Office Development Land

4.148 **Table 4.8b: Outline Reasons for Selection/Rejection of Options for Quantum of Office Development Land**

Strategic Option		Outline Reasons for Selection/Rejection
1	8.5 ha	<ul style="list-style-type: none"> <li>Initial quantum proposed by the HEDNA has been superseded by the ELR Office Market addendum which demonstrates an oversupply</li> </ul>
2	5.8 ha	<ul style="list-style-type: none"> <li>Reduced HEDNA figure to take account of the oversupply, but still does not reflect optimisation of land usage as new patterns of working (hybrid / flexible) now use few sqm per person (10sqm rather than previous 14sqm as shown in the ELR office market addendum</li> </ul>
3	4.12 ha	<ul style="list-style-type: none"> <li>Most effective use of land, taking into account oversupply and reduced floorspace requirements of changed patterns of working</li> </ul> <p><b>Preferred Option</b></p>

### SA of Strategic Options: Distribution of Office Development

4.149 The summary findings of the initial high level SA of strategic options for distribution of office development are presented in Table 4.9a, as follows:

<b>Table 4.9a: Options for Distribution of Office Development</b>	<b>1. City Centre focus</b>	<b>2. More Dispersed Approach</b>	<b>3. City Centre focus (Friargate) &amp; rest to local centres</b>
<b>Sustainability Objective</b>			
1: To enable vibrant and inclusive communities	+?	+?	+
2: To provide accessible essential services and facilities for all residents	0	0	0

3: To improve health & promote active living	+?		+?		+	
4: To provide decent and affordable housing for all	0		0		0	
5: To support sustainable inclusive economic growth	+?		+?		++	
6: To help achieve the Council's ambition to reach net zero carbon emissions	0		0		0	
7: To build resilience to climate change	0		0		0	
8: To reduce traffic & improve sustainable transport choices	0		-?		0	
9: To reduce air, noise & light pollution	0		0		0	
10: To protect & conserve natural resources – soil, water, minerals & waste <sup>64</sup>	0	0	0	0	0	0
11: To protect and enhance nature & biodiversity	+?		+?		+?	
12: To protect and enhance the historic environment, and its setting	0?		0?		0?	
13: To protect and enhance the quality and character of townscapes & landscapes	0		0		0	

4.150 **Vibrant Communities:** Other factors are likely to have more significant effects on objectives for inclusive communities; however, distribution of sufficient land for offices to support the economy and a diversity of jobs will overall contribute to vibrant and inclusive communities. Option 1 and Option 2 have some uncertainty of positive effects whilst Option 3 that incorporates both city centre and distribution to the identified centres indicates more certainty as more likely to address future type & locational needs for office working – and throughout the CLP area.

4.151 **Services & Facilities:** Other factors are more likely to have potential effects on objectives for accessibility to essential services and facilities than the quantum of employment land – neutral effects for all three options.

4.152 **Health & Active Living:** Option 1 and Option 2 have uncertainty of positive effects whilst Option 3 that incorporates both city centre and distribution to the identified centres indicates more certainty as more likely to address future type & locational needs for office working.

<sup>64</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

- 4.153 **Housing:** The provision of good quality new homes will support the ambitions for sustainable economic growth. Neutral/not applicable effects for all three options.
- 4.154 **Economy:** Options 1 and 3 include opportunities for innovating with the multi-user development of Friargate, and better enabling the city to be cleaner and greener with GI and renewable energy since such developments are better able to incorporate enhanced levels of quality and energy efficiencies. Options 2 and 3 may better support smaller start-ups & SMEs for all through a dispersed approach but Option 2 does not necessarily align office land with strong accessibility to sustainable services/facilities and travel, such that some uncertainty of positive effects. Option 3 supports the needs for flexibility and adaptability, support for smaller start-ups and SMEs, and with both a city centre focus and dispersion to the local centres, provides office land throughout the CLP area and aligned with sustainable locations such that more positive effects are more certain.
- 4.155 **Climate Change – Carbon Emissions & Resilience:** All development will have to reduce GHG emissions and build resilience to climate change in line with updated planning policy – regardless of quantum – therefore, neutral effects for all options.
- 4.156 **Transport & Movement:** Options 1 and 3 comprise office land located in the city centre and local centres, thus confirming that workplaces will be allocated with sustainable travel; Option 2 dispersed throughout the CLP indicates the potential for some negative effects but uncertainty as depends on locational specificity.
- 4.157 **Reduce Pollution; Natural Resources; Nature & Biodiversity; Historic Environment; Townscape & Landscape:** All development will be required to meet with relevant updated Plan Policies indicating that any potential negative effects will be mitigated and overall, likely neutral effects for all three options; minor positive effects for biodiversity with some uncertainty of significance.

### Reasons for Selection/Rejection of Options for Distribution of Office Development Land

4.158 **Table 4.9b: Outline Reasons for Selection/Rejection of Options for Distribution of Office Development Land**

Strategic Option		Outline Reasons for Selection/Rejection
1	City Centre focus	<ul style="list-style-type: none"> <li>Whilst the city centre is a sustainable and key location for offices, a range of other options should also be available to suit the needs of different sectors of the economy including SMEs and start ups</li> </ul>
2	More Dispersed Approach	<ul style="list-style-type: none"> <li>Does not optimise updated opportunities for City Centre &amp; Friargate</li> <li>Potential for accessing through less sustainable travel choice</li> </ul>



3	City Centre including 27,000 sqm Friargate & rest to local centres	<ul style="list-style-type: none"> <li>▪ Most effective use of land which supports a range of needs including smaller businesses</li> </ul> <p><b>Preferred Option</b></p>
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## SA of Strategic Options: Purpose Built Student Accommodation (PBSA)

4.159 The summary findings of the initial high level SA of strategic options for distribution of office development are presented in Table 4.10a, as follows:

Table 4.10a: Options for Purpose Built Student Accommodation (PBSA)	1. Retain existing Policy H10	2. PBSA at campus, city university area
Sustainability Objective		
1: To enable vibrant and inclusive communities	-?	0
2: To provide accessible essential services and facilities for all residents	0	0
3: To improve health & promote active living	+?	+
4: To provide decent and affordable housing for all	-	+
5: To support sustainable inclusive economic growth	0?	0
6: To help achieve the Council's ambition to reach net zero carbon emissions	0	0
7: To build resilience to climate change	0	0
8: To reduce traffic & improve sustainable transport choices	0	+
9: To reduce air, noise & light pollution	0	0
10: To protect & conserve natural resources – soil, water, minerals & waste <sup>65</sup>	0   0	0   0

<sup>65</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

11: To protect and enhance nature & biodiversity	+?	+?
12: To protect and enhance the historic environment, and its setting	0?	0
13: To protect and enhance the quality and character of townscapes & landscapes	0	0

- 4.160 **Vibrant Communities; Services & Facilities:** A concentration of student accommodation in a particular neighbourhood could result in an imbalance that might adversely affect the vibrancy and inclusivity of communities, such that some negative effects indicated for Option 1 and retaining the existing policy H10. Significant concentrations in particular streets and neighbourhoods have already had negative impacts on local communities. The Council has prepared an HMO DPD<sup>66</sup> and this addresses issues such as effects on communities and the housing stock.
- 4.161 **Health & Active Living; Housing:** The HELAA (2024) recognised that a significant amount of the windfall delivery has been through the provision of PBSA. The PBSA Study (July 2024)<sup>67</sup> indicates that poorer quality student accommodation has been delivered and that this poorer quality stock is concentrated in the city centre. The overdevelopment of PBSA has implications for wider strategy in terms of development site availability, potential underoccupation of PBSA developments, and future change of use for alternative occupation. Over the longer term, this could be potentially damaging to the attractiveness of Coventry as a student destination and would stifle innovation.
- 4.162 Retaining the existing Policy H10 could result in HMOs/PBSA not being used most effectively and with negative effects for housing objectives as could take up land that is needed for other essential housing needs – Option 1. By limiting PBSA to the campus and city university area, the student population is more focused and very easily accessible to learning and other services in the city centre – positive effects for Option 2.
- 4.163 **Economy:** Likely neutral effects but some uncertainty for Option 1 as poorer quality student accommodation may adversely affect choice of university and thus, support for economic growth objectives.
- 4.164 **Climate Change – Carbon Emissions & Resilience:** All development will have to reduce GHG emissions and build resilience to climate change in line with updated planning policy – regardless of quantum – therefore, neutral effects for both options.
- 4.165 **Transport & Movement:** By focusing PBSA in the campus/city university area, sustainable transport will be more certain with positive effects for Option 2; neutral effects for Option 1.

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

<sup>67</sup> Cushman & Wakefield (July 2024) for Coventry CC Purpose Built Student Accommodation Market Study

4.166 **Reduce Pollution; Natural Resources; Nature & Biodiversity; Historic Environment; Townscape & Landscape:** All development will be required to meet with relevant updated Plan Policies indicating that any potential negative effects should be mitigated and overall, likely neutral effects for both options with some uncertainty for Option 1 and the historic and townscape objectives; minor positive effects for biodiversity with some uncertainty of significance for both options.

### Reasons for Selection/Rejection of Options for PBSA

4.167 **Table 4.10b: Outline Reasons for Selection/Rejection of Options for PBSA**

Strategic Option		Outline Reasons for Selection/Rejection
1	Retain existing Policy H10	<ul style="list-style-type: none"> <li>▪ Risks continuing with poorer quality accommodation</li> <li>▪ Potential underoccupation of PBSA &amp; limits future change of use for alternative occupation</li> </ul>
2	PBSA located at campus, city university area	<ul style="list-style-type: none"> <li>▪ Student population more focused in more sustainable locations</li> <li>▪ More effective use of land for other essential housing needs</li> </ul> <p><b>Preferred Option</b></p>

### SA Findings & Plan-Making

4.168 The findings of the SA of the strategic options identified a number of suggestions and recommendations for plan-making to consider – particularly at the Regulation 18 Issues & Options stage. These were taken into account during the refinement and further development of the plan, together with emerging evidence and the comments from the Regulation 18 consultation.

## 5.0 SA FINDINGS FOR THE SITE OPTIONS & PROPOSED ALLOCATIONS

### Context & Site Options

- 5.1 It should be remembered that the Coventry Local Plan to 2041 is a review of the adopted Local Plan (2017) which includes site options and allocations that were subject to SA, consultation and examination. This review of the Plan allows the Council to review, reassess and update the situation with regard to development needs, site options and proposed allocations. The particular characteristics of the Coventry Local Plan area must also be recognised – the administrative area is heavily built-up, comprising a city centre that is rich with cultural and historical assets, surrounded by an urban area which is then defined by the encircling Green Belt land that is so important to prevent urban sprawl and coalescence. These characteristics constrain the opportunities for new development.
- 5.2 The Coventry<sup>68</sup> Housing & Economic Land Availability Assessment (HELAA, 2024) identifies land which is suitable, available and achievable for housing and economic development over the Local Plan period. It includes consideration of sites submitted to the Council through various “Calls for Sites”, the most recent ending 20 September 2024. The HELAA builds upon the recommendations in the Housing & Economic Development Needs Assessment (HEDNA, 2023). The Council considered a site to be available for development if they were in one of the categories, as follows: Under construction; with outline/detailed planning permission; with permission in principle; identified on the brownfield register; submitted through the Call for Sites. Subsequently, viability studies were undertaken in line with national guidance to confirm achievability within the plan period by using a range of typologies to reflect likely development over the plan period.
- 5.3 The HELAA and viability studies confirmed that 25 of the existing housing site allocations and 7 of the employment land site allocations had not been built out, are still suitable and achievable, and should be carried forward into the CLP to 2041. Three of the existing allocations were found to be still suitable and achievable with some changes, and this included the Friargate Mixed Use Scheme in the City Centre. There were 12 new housing sites that were found to be suitable and achievable, and therefore, were taken forward as proposed site allocations in the CLPR.
- 5.4 The 25 plus 7 extant sites and the 12 comprise all the identified suitable and achievable site options for housing/mixed use. There were no other reasonable alternative site options that were identified and could be considered any further. Thus, all the site options that were found to be reasonable (suitable & achievable) have been taken forward as proposed site allocations in the CLPR. One employment site option was subject to SA.

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<sup>68</sup> <https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

## SA of Proposed Site Allocations

**Table 5.1: Summary of SA Findings for Proposed Site Allocations**

Proposed Site Allocations	Capacity (no. of dwellings)	1. Communities	2. Services & Facilities	3. Health & Active Living	4. Housing	5. Economic Growth	6. Net Zero Carbon	7. Resilience to Climate Change	8. Sustainable Transport	9. Reduce Pollution	10. Natural Resources <sup>69</sup>	11. Nature & Biodiversity	12. Historic Environment	13. Townscapes & Landscapes	
<b>New Housing Allocations</b> (proposed minimum density 250 dph)															
Central Police Station, Little Park Street	600	+	++	+	++	0	0	0	++	0	+	0	+?	0?	0?
New Union Street	170	+	++	+	++	0	0	0	++	0	+	0	+?	0?	+
Former Vintage House, St Nicholas Street/Leicester Row	100	+	++	+	++	0	0	0	++	0	+	0	+?	0?	+
Whitefriars Street Car Park	185	+	++	+	++	0	0	0	++	0	+	0	+?	0?	+
Paybody Building, Stoney Stanton Road	280	+	++	+	++	0	0	0	++	0	+	0	+?	0?	+
Dale Buildings, Tower Street	200	+	++	+	++	0	0	0	++	0	+	0	+?	0?	+
City Centre South	1,575	+++?	++	+	++	++	0	0	++	0	+	0	+?	0?	++

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

<b>New Housing Allocations</b> (proposed density at 45 dph)															
New Gate Court Business Park, Paradise Street	303	+	++	+	++	0	0	0	++	0	+	0	??	0?	+
Allesley Hotel, Birmingham Road	48	+	+	+	++	0	0	0	+	0	+	0	??	0?	+
Former Chace School, Willenhall	60	+	+	+	++	0	0	0	+	0	+	0	??	0	+
Former School Site, New Century Park	93	+	+	+	++	0	0	0	+	0	+	0	??	0	+
<b>New Housing Allocations</b> (proposed density at 125 dph)															
Land at Spon End	750	+++?	+	+	++	0	0	0	+	0	+	0	??	0?	++
<b>Existing Allocations with Changes</b>															
H2:3 Walsgrave Hill Farm	900	+++?	+	+	++	0	0	0	??	0	+	0	+++?	0	+
H2:15 Sandy Lane	250	+	+	+	++	0	0	0	+	0	+	0	??	0	+
JE2:1 Friargate Mixed Use Scheme, City Centre	1,350	+++?	++	+	++	++	0	0	++	0	+	0	??	0?	++
<b>New Employment Site Option</b>															
Land North of A45 at Pickford Green	4.72 hectares	??	??	+	0	++	0	0	+	0	-	0	??	0	--

- 5.5 The summary findings from the SA of the proposed site allocations are presented in the previous Table 5.1, and the details of the assessments are provided in Appendix V of this SA Report. There were no significant negative effects identified for any of the proposed new and changed housing site allocations. Such sites have been assessed and carefully selected to avoid significant negative effects and to optimise potential positive effects. The proposed site allocations will be subject to other plan policies, including updating, such that the cumulative effects of the proposed development (as guided by allocations and policies) are assessed and reported later in this SA Report in Section 7.
- 5.6 The one new site option being promoted for employment land was tested through SA and found to have major negative effects for development in the Green Belt; also, found to have minor negative effects for loss of Grade 3 agricultural land and the soil resource. Therefore, this site option was not taken forward because of negative effects on soils, agricultural land, and major negative effects on Green Belt purposes. This is especially with regard to avoiding urban sprawl and coalescence at the western edge of the urban area that has been shown to be very sensitive.

## Vibrant & Healthy Communities

- 1: To enable vibrant and inclusive communities**
- 2: To provide accessible essential services and facilities for all residents**
- 3: To improve health & promote active living**
- 4: To provide decent and affordable housing for all**
- 5: To support sustainable inclusive economic growth**

- 5.7 The provision and delivery of the identified needs for housing through the proposed site allocations will have major positive effects for housing objectives. Policies in the adopted Local Plan (Policies H1-H11) address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix and tenure of housing, with particular regard to affordable homes, for younger people and the potential for coliving. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups - poor, ageing, physical and mental disability, single parents, carers, and travellers. The Affordable Housing SPD (March 2022)<sup>70</sup> provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built. This SPD will be updated to reflect the new Local Plan.
- 5.8 Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by the specific housing policies. The extant policies do not explicitly mention ethnic or cultural housing needs but it is unclear how the Local Plan can help

<sup>70</sup> <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

specifically in this respect. Nonetheless, the intention with the review of housing policies is to provide a range of housing types aimed at meeting a variety of needs for all sections of the community. The Density Study (August 2024)<sup>71</sup> has found possibilities for densification of residential development in and around the vicinity of the city centre boundary. Taking into account local character and appropriate building forms, a city centre transition zone with 125 dph has been identified. Within the city centre boundary, densification to 250 dph is possible due to its urban character and the proximity of a wide range of city centre services and facilities. Within the urban area and on brownfield land, an increase from 35 to 45 dph has been found to be suitable.

- 5.9 High density places have been associated with sustainable outcomes but there is a risk of less interaction and building fewer relationships in such environments. However, for example, recent research<sup>72</sup> has investigated the delivery of award winning high density (250 dph) development in London and identified design factors that influence social interactions. Therefore, it is considered that there is evidence to support higher density residential developments, such that there can be positive effects to enable vibrant and inclusive communities for all the proposed site allocations.
- 5.10 The proposed sites in the city centre locations have easy, walking access to a wide range of services, including schools, nurseries, shops, community and faith centres, shops, diverse cultural and entertainment facilities. Also, a range of health centres, dentists, fitness centres and gyms, together with access to open/green spaces – all supportive of active living, health and wellbeing with positive effects.
- 5.11 Whilst provision of new homes is not directly attributable to economic growth, good quality homes in a city centre location will support working people. The amended Friargate Mixed Use Scheme offers vital employment land in the city centre that has major positive effects for both Coventry and the wider sub-regional area.
- 5.12 The four new allocations at 45 dph close to the urban areas have been carefully selected at existing local centres with essential services and facilities and proposed housing numbers that can be accommodated – all confirming positive effects for vibrant communities. The three existing allocations (H2:3, H2:15 & JE2:1) that have been amended to reflect updating and optimising opportunities for revised proposed numbers of dwellings – all with positive effects for housing, health and communities.
- 5.13 **SA Suggestions:**
- Creative building design to support inclusivity and social interactions – especially for the larger developments City Centre South & Friargate Mixed Use Scheme

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

<sup>72</sup> Mellan H & M Short (UCL, 30 January 2023) Designing for social interaction in high density housing; a multiple case analysis of recently completed design-led developments in London  
<https://www.frontiersin.org/articles/10.3389/frsc.2022.1043701/full>



- Creative design to encourage flexible and adaptable housing to support mix and tenure with changing needs - especially for the larger developments City Centre South & Friargate Mixed Use Scheme

## Sustainable Transport & Active Living

### **8: To reduce traffic & improve sustainable transport choices**

- 5.14 The urban environment for Coventry is well connected and with a good transport system. The proposed sites in the city centre locations have easy, walking access to a wide range of services, facilities, work and entertainment – all with major positive effects for sustainable transport objectives. There is nearby open/green space with city parks, the Coventry Canal Towpath for more distance walking, and a variety of walking around the urban areas, for example, A Coventry Way: 21 Circular Walks.<sup>73</sup> The four new allocations at 45 dph close to the urban areas have been carefully selected at existing local centres with essential services and facilities and good sustainable access into the city centre and various nearby green/open spaces.
- 5.15 The major mixed use site Friargate is in the city centre with major positive effects for working and sustainable transport. The new option for a possible employment site is in a good location on the strategic highway network A45 at Pickford and close to local services at Pickford and Allesley.
- 5.16 **SA Suggestions:**
- Walsgrave Hill Farm - Incorporate a safe walking/cycling network through the new development and linking to urban area to west and country area to east to encourage more active transport and active living locally
  - City Centre South and Friargate Mixed Use Scheme – creative design that encourages safe walking/cycling, linking to wider sustainable and green networks, and discourages private car ownership; consider possibilities for supporting shared vehicle uses

## Environmental Quality

- 6: To help achieve the Council's ambition to reach net zero carbon emissions**
- 7: To build resilience to climate change**
- 9: To reduce air, noise & light pollution**
- 10: To protect & conserve natural resources – soil, water, minerals & waste**
- 11: To protect and enhance nature & biodiversity**
- 12: To protect and enhance the historic environment, and its setting**
- 13: To protect and enhance the quality and character of townscapes & landscapes**

<sup>73</sup> <https://www.coventryrocks.co.uk/things-to-do/a-coventry-way-21-circular-walks>

- 5.17 All new development will need to meet updated plan policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions, build resilience to climate change, and avoid any significant negative effects. Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects for all the sites.
- 5.18 Development on previously developed land has positive effects for all proposed sites. The new option for a possible employment site is located in agricultural land classed Grade 3 good quality – and therefore, minor negative effects for this site through loss of best & most versatile land and the important soils resource. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)<sup>74</sup> indicates that there is water capacity for the identified development need – indicating neutral effects. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development to neutral. Thus, mitigation measures are in place to protect and conserve natural resources.
- 5.19 The current adopted Plan has policies to protect nature and biodiversity, including GB1 Green Belt and Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements<sup>75</sup> for Biodiversity Net Gain (BNG) – and Coventry has established practice through such an approach with its BNG SPD (2022)<sup>76</sup>. Therefore, positive effects but uncertainty of precise significance as this depends on detailed project design.
- 5.20 The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation and Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. Many of the proposed sites are within the Three Spires View Cone area of the Tall Buildings Design Guide SPD (2022)<sup>77</sup>, some are within archaeological constraint areas, and some are within or partly within Conservation Areas. These sites will be subject to the requirements of other plan policies and the SPDS such that negative effects should be mitigated to neutral/negligible but some uncertainty at this stage as this depends on design and project level studies.

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

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

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

<sup>77</sup> <https://www.coventry.gov.uk/downloads/download/7391/tall-buildings-design-guide-and-view-management-framework-spd>

- 5.21 The proposed site allocations are mostly in the city centre or within the urban areas such that if they are designed in accordance with the plan policies HE1, HE2, DE1 and GE1 (and to be updated), there should be effective mitigation measures in place to reduce any negative effects to neutral. Further positive effects are indicated through redevelopment of urban spaces, some vacant and some poor quality. Major positive effects on the townscape objectives were found for the major development proposals at City Centre South and the Friargate Mixed Use Scheme, as such regeneration of the city centre core will significantly improve the quality and character of the townscape with the potential to inspire wider enhancements beyond the sites themselves. Major positive effects for the site at Spon End as this is the regeneration of an area with dwellings not considered fit for habitation (currently vacant).
- 5.22 One new possible employment site Land North of A45 at Pickford Green has been put forward for consideration and was tested through SA - this is located within the Green Belt (GB) and thus, indicating negative effects. Green Belt is important to prevent urban sprawl and coalescence and the recent Technical Update (July 2024) by the Council confirmed that the GB parcels of land around Coventry continue to serve the five purposes of GB as set out in the NPPF<sup>78</sup>.
- 5.23 The site is located in Area 1 of the Green Belt – it is the largest area and considered to make a significant contribution to the GB purposes. It forms part of the wider Meriden Gap and Coundon wedge, and any built development on the western extremity of the built-up area would be extremely sensitive. Further development in this area would therefore have the effect of substantially reducing its open character leading to the appearance of urban sprawl and very significant encroachment of the open countryside in this strategically important area of Green Belt between Coventry and Birmingham. Therefore, likely major negative effects for landscape and Green Belt objectives. This site is also located on Grade 3 good quality agricultural land and thus, negative effects for loss of such land and the soil resource. This site option was not taken forward into the Proposed Submission CLPR due to negative effects on landscape and Green Belt objectives.

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<sup>78</sup> <https://www.gov.uk/guidance/national-planning-policy-framework/13-protecting-green-belt-land>

## 6 SA FINDINGS FOR THE DRAFT COVENTRY LOCAL PLAN: Regulation 19

### The Vision & Objectives for the Local Plan

6.1 The One Coventry Plan (2022-2030)<sup>79</sup> sets out the following Vision:

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

*We will create:*

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

6.2 The Vision includes three interconnected priorities:

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

6.3 The Local Plan has taken the key objectives from the One Coventry Plan list of commitments for each priority, where applicable to the planning system, and lists the planning policies that can help deliver the vision and priorities. Plan policies can be cross-cutting and, for example, Green & Blue Infrastructure Policies GE1-4 can contribute to all three priority objectives. In general, the Vision and the key objectives are likely to have positive effects for SA objectives, since they are aspirational and seek to address the future sustainable development of the Coventry area; there are no significant incompatibility issues between the two sets of objectives.

### Overall Development Needs

6.4 **Policy DS1: Overall Development Needs** sets out that over the Plan period 2021-2041 significant levels of housing and employment will be planned for and provided along with supporting infrastructure and environmental

<sup>79</sup> <https://www.coventry.gov.uk/onecoventryplan>

enhancements – a minimum of 29,100 additional homes and a minimum of 60 hectares of employment land within the city's administrative boundary. The identified need for employment land is 147 hectares but it is not possible to deliver all the additional employment land within the city boundary. The Council will continue to work proactively with neighbouring Councils through Duty to Cooperate to ensure that appropriate provision is made elsewhere within the Housing Market Area. Retail need for the plan period is considered to be met by existing provision and therefore, no new retail floorspace is allocated.

- 6.5 **Policy DS2: Duty to Cooperate & Partnership Working** and **Policy DS3: Sustainable Development** - both these policies are still relevant and have only had minor updating.  
**Policy DS4: General Masterplan Principles** – considered to be up to date and remains fit for purpose, particularly as this has been used to inform the development of key allocations some of which are underway at the time of the review.
- 6.6 These four strategic policies provide the overall approach to development needs. Policy DS1 reflects the review of development needs with the updating of predicted population change and associated needs for housing and employment land. The Council has investigated strategic options and selected a preferred approach for the quantum of development. This has been assessed as being able to be accommodated together with some buffer over the plan period. Therefore, overall, no significant negative effects indicated and major positive effects indicated for SA objectives for housing and economic growth, with further positive effects indicated for SA objectives for health and communities. Policy DS4 sets out key requirements relating to land use, densities, community facilities, transport, green/open spaces, phasing, local character, historic environment, energy and environmental management. Thus, this provides an overarching context for strategic mitigation measures to avoid or minimise potential negative effects from major new development.
- 6.7 **Policy HW1: Health & Health Impact Assessment (HIA)** – updating and broadening of scope to provide guidance for where the threshold has not been met for requiring a full HIA, for major applications of 10 dwellings or more, applicants will be required to demonstrate that they have taken health matters into account in line with the principles in the updated Health SPD. This broadening of the scope will extend the significance of the positive effects associated with provision of new development, including cumulative effects.

## Jobs & Economy

- 6.8 **Policies JE1 – JE8 Economy & Employment:** - Strategic Policies **JE1: Economy & Employment Strategy** and **JE2: provision of Employment Land & Premises** have been updated to reflect national changes and to align with the One Coventry Plan, including the need to support sustainable and green technology – with additional positive effects that could support SA objectives for net zero carbon and resilience to climate change. The Council reviewed the existing site allocations for employment and found that seven

employment sites were still suitable and should be retained in the Local Plan Review. These had been previously tested through the SA process. One new site was proposed for employment and this option was tested through SA but the site has not been progressed further by the Council as it is located in the Green Belt and with concern about negative effects. Details about the sites and SAs are presented in Section 5 and Appendix V of this SA Report.

- 6.9 The updating of Policies JE3-JE7 and the separation of research & development into a new policy JE8 confirms the location, type and access to employment. Overall with major positive effects for SA objectives on economic growth, including for supporting local centres and providing access to a range of employment opportunities. Provision of employment land supports health and communities with further positive effects.

## Housing

- 6.10 **Policies H1-H13 Housing** – significant updating to reflect changes in population and housing needs, and changes in national standards and legislation. The Council investigated strategic options and identified the preferred approach, as set out in Strategic Policy DS1, for a minimum of 29,100 additional dwellings between 2021 and 2041 that can be accommodated and as confirmed in **Strategic Policy H1: Housing Land Requirements**.
- 6.11 The Council reviewed the status of the existing site allocations (some built out, some being developed, some consented, some not started). It was identified that 25 housing and mixed use sites were still suitable and should be retained in the Local Plan Review to 2041. The Council assessed the site options that had been proposed through the calls for sites and found 12 new sites that were suitable and deliverable. All these sites were subject to SA and taken forward as proposed site allocations for housing and mixed use development in **Strategic Policy H2: Housing Allocations**. Details about the sites and SAs are presented in Section 5 and Appendix V of this SA Report. Overall, major positive effects for SA objectives for housing.
- 6.12 **Policy H3: Provision of New Housing** has significant updating to require all new dwellings to comply with Nationally Described Space Standards (NDSS), including increasing the supply of accessible and adaptable dwellings and wheelchair user dwellings with further positive effects for SA objectives for communities and health. The inclusion of policy wording for compliance with specific requirements for affordable housing, self/custom build and community led housing, build to rent, and co-living (set out in Policies H6, H12 & H13 will all have major positive effects for SA objectives for suitable mix and tenure, affordable, and ageing. The additional requirements regarding accessibility and sustainable/livable neighbourhoods indicate likely positive effects for SA objectives on services and facilities, and sustainable transport.
- 6.13 Requirements to avoid negative impacts on existing residential amenity and existing businesses provide mitigation measures. The additional policy text and cross-referencing to specific Environmental Management Policies provides further guidance and strengthens mitigation measures to help

ensure that there are no significant negative effects on SA objectives for environmental topics.

- 6.14 **Policy H4: Securing a Mix of Housing** has been updated to ensure that the required mix of housing that contributes to a balance of house types and sizes across the city is in accordance with the latest evidence, ensuring that positive effects will continue through the plan period.
- 6.15 **Policy H5: Managing Existing Housing Stock** has been updated in line with the Council's climate change strategy and as set out in the new Environmental Management Policies EM1, EM11, EM13 & EM14 – all with positive effects for SA objectives on net zero carbon and resilience to climate change.
- 6.16 **Policy H6: Affordable Housing, Policy H7: Gypsy & Traveller Accommodation, Policy H8: Specialist Housing, Older Persons Accommodation & Hostels, H10: Student Accommodation, and H11: Homes in Multiple Occupation** have been updated and strengthened. This confirms the major positive effects for SA objectives for affordable, younger people, travellers, and older people including adaptability and resilience. It will also confirm positive effects towards SA objectives for reducing health inequalities and having particular regard to potentially disadvantaged groups. The updating of Policy H10 focuses the student population at the universities and resolves an existing sustainability problem of poorer quality student housing in less sustainable locations. It also facilitates opportunities for release of housing for other people's needs in other parts of the city.
- 6.17 The Council has undertaken a Residential Density Study<sup>80</sup> in consideration of the constraints to new development by the tight boundary of the Coventry Local Plan area, and changing local circumstances. This has informed the updating of **Policy H9: Residential Density**. The study investigated the distinct local context, precedents of residential developments that have been delivered, and national examples of high quality developments at high densities. A range of character areas in the city were identified that reflect construction of homes in different time periods and planning contexts and establishing residential densities for each area. Higher densities for residential development with careful and creative design that enables social interactions can have strong sustainable outcomes including positive effects for sustainable transport, accessibility to services and facilities, communities, and health and wellbeing.
- 6.18 The study concluded that local character and context are more suitably reflected such that four densities were proposed – greenfield (30dph)<sup>81</sup>, brownfield (45 dph), City Centre transition zone (125dph), and the defined City Centre boundary (250 dph). This makes more effective use of available land and helps enable that the identified needs for new housing can be accommodated within the urban areas of the Coventry administrative area, all with positive effects.

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<sup>80</sup> Coventry City Council (2024) Residential Density Study

<sup>81</sup> Dph dwellings per hectare

- 6.19 **Policy H12: Build to Rent** and **Policy H13: Co-living** – two new policies that reflect changing needs. Build to rent developments will be expected to contribute towards meeting the city's identified need for affordable housing with positive effects. Co-living proposals will be supported in sustainable locations and of good quality and design – policy requirements provide mitigation measures to help ensure that there are no significant negative effects. The policy specifically requires that design should not contribute to car dependency with positive effects for SA objectives on sustainable travel. It also specifically requires adequate safety and security indicating positive effects for SA objectives on communities and health/wellbeing.

## Retail & Centres

- 6.20 **Policy R1: Delivering Retail Growth, Policy R2: City Centre, Policy R3: Network of Centres, Policy R4: Out of Centre Proposals, Policy R5: Retail Frontages & Ground Floor Units, and Policy R6: Restaurants, Bars & Hot Food Takeaways** – these policies are mostly still relevant and up to date. Therefore, minor updating and reflecting changes in shopping patterns with a reduced need for retail locations. Positive effects remain for supporting SA objectives for communities, services & facilities, health/wellbeing, and economic growth.

## Communities

- 6.21 **Policy CO1: New or Improved Social Community & Leisure Premises, Policy CO2: Re-Use of or Redevelopment of Facilities, and Policy CO3: Neighbourhood & Community Planning** – no changes and minor updating for Policy CO2. These policies continue to protect community facilities and support community planning with positive effects for SA objectives on communities and services & facilities. Particular positive effects are indicated for supporting community participation and democratic decision-making through Policy CO3, and this is likely to have potential further positive effects on health and wellbeing.

## Green Belt & Green Environment

- 6.22 Strategic Policy on the Green Belt and Local Green Space has been updated and split into two policies to better reflect that such land is covered by entirely different national policy. **Strategic Policy GB1: Green Belt** identifies the up to date boundaries for the Green Belt and retains that inappropriate development will not be permitted in the Coventry Green Belt unless very exceptional circumstances exist. The Council has prepared a Technical Update to the Green Belt Review (2024) and this has confirmed that all the Green Belt in the Coventry area still performs well against the five purposes of Green Belt.
- 6.23 The Council investigated strategic options and the preferred approach is for no development in the Green Belt as the Coventry area boundary is so constrained. Therefore, this policy continues to provide strong mitigation measures to avoid/minimise any negative effects for communities, health/wellbeing, previously developed land, biodiversity, the historic



environment, visual amenity and local character – all with positive effects for SA objectives. **Strategic Policy GB2: Safeguarded Land in the Green Belt** required only minor updating to align with the emerging South Warwickshire Local Plan – it was considered appropriate to retain the safeguarded status of the listed sites.

- 6.24 **Policy GB3: Local Green Space** – new policy separating text from previous GB1. The policy continues to provide strong mitigation measures to avoid and minimise any negative effects for communities, services/facilities, health/wellbeing, nature/biodiversity, and landscapes/townscapes – all with positive effects for SA objectives.
- 6.25 **Policy GE1: Green & Blue Infrastructure** has been updated, including the addition of “Blue”, making explicit the requirement to consider the water environment and its wider multifunctionality, and the requirement to “enhance” as well as protect. Policy wording has been refined to provide more guidance and clarification, and including references to relevant Strategies and Plans. This updating and clarification will strengthen the mitigation provided by the policy. It will also strengthen the positive effects for communities, services/facilities, health/wellbeing, nature/biodiversity, and landscapes/townscapes, as well as contributing to SA objectives for sustainable water management and building resilience to climate change.
- 6.26 **Policy GE2: Green Space** has been updated and to ensure resilience in meeting local need for playing field provision – confirming positive effects, including for health and wellbeing.
- 6.27 **Policy GE3: Biodiversity, Geological, Landscape & Archaeological Conservation** has been updated essentially to reflect the new national requirements for new development to provide a minimum of 10% net gain in biodiversity. The requirement from the Environment Act (2021) for at least 10% Biodiversity Net Gain (BNG) from all new development became mandatory on 12 February 2024<sup>82</sup> (BNG is required for small sites from 2 April 2024). In accordance with national guidance, the policy requires development proposals to ensure that they lead to a minimum 10% net gain of biodiversity and provides further guidance on ecologic assessments. Requirements regarding on-site and off-site BNG and compensatory measures involving biodiversity offsetting including purchasing of biodiversity credits must be agreed in line with the Coventry Biodiversity Net Gain SPD (December 2022)<sup>83</sup>. This provides more detailed information and guidance, thus helping ensure that there will be implementation of the policy requirements – all with major positive effects for SA objectives on biodiversity.
- 6.28 The updated policy includes a requirement to seek opportunities for contributing to the delivery of the Local Nature Recovery Strategy and the Green & Blue Infrastructure Strategy and Action Plan or its future equivalent. This strengthens the policy and the positive effects for nature and biodiversity, and indicates further associated positive effects for health/wellbeing and building resilience to climate change – and these positive effects may be

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

<sup>83</sup> <https://www.coventry.gov.uk/downloads/download/7393/biodiversity-net-gain-spd>

synergistic and cumulative in the longer term as they contribute to the wider networks.

6.29 **Habitats Regulations Assessment (HRA) Screening:** An HRA screening (August, 2024) was undertaken for the emerging draft CLPR and carried out in accordance with Government guidance<sup>84</sup>. The previous HRA (2015) had been carried out with extant guidance and methods applicable at that time. It was considered that the European/internationally designated sites<sup>85</sup> for nature conservation that needed to be scoped into the screening of the draft CLPR for Likely Significant Effects (LSEs) and any requirement for subsequent appropriate assessment (AA), were as follows:

- The Ensor's Pool SAC is located about 6km to the north of the CLPR area boundary
- The Severn Estuary SAC/SPA/Ramsar is located some 86km to the south west of the CLPR area boundary

6.30 The HRA screening considered the potential for LSEs on habitats' conservation objectives from: atmospheric pollution (nitrogen deposition); loss or damage to habitats and functionally linked land; disturbance from noise, vibration or light to sensitive species; and recreational pressures. The screening found that there were no impact pathways identified due to the distances from the CLPR area boundary. The screening also considered LSEs associated with changes to water quality and water quantity/levels/flow and there were no impact pathways identified. The draft Coventry & Warwickshire Sub-Regional Water Cycle Study (WCS) Stage 1 (June 2024)<sup>86</sup> indicates that there is the capacity for the proposed development in the CPLR. Therefore, this further confirms that the habitats sites are screened out for appropriate assessment with regard to water quality and quantity/flow/levels – in consideration of the capacities for proposed development and the distances of the proposed development from the habitats sites.

6.31 The HRA screening has found that there are no impact pathways and therefore, it is concluded that there are no adverse effects alone from the Coventry Local Plan Review on the integrity of the SAC, SPA and Ramsar sites that have been investigated as potentially relevant to the plan and its proposed development. In the absence of any adverse effects alone, there will be no adverse effects in combination with other plans and projects. This confirms the findings of the previous HRA and that there is no requirement for the Coventry Local Plan to include any policy regarding European/internationally designated sites for nature conservation.

6.32 **Policy GE4: Tree Protection** has been updated to provide additional clarification and a link to the Coventry Trees & Development Guidelines SPD

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

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

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

(October 2020)<sup>87</sup>. This strengthening of the policy strengthens the mitigation measures with more certainty of avoidance of any potential negative effects for trees.

## Design

- 6.33 **Policy DE1: Ensuring High Quality Design** – major revision requiring that all development proposals should follow a design-led approach to deliver sustainable high quality place-making. Development is required to contribute positively to the wellbeing of existing and new communities, and the quality of the surrounding built and natural environment. This all indicates positive effects for SA objectives on communities, health, reducing pollution, protecting natural resources, nature, and townscapes/landscapes. [The setting, integrity and character of heritage assets is already protected in accordance with Policy HE2.] All development must accord with Coventry's emerging City Wide Design Codes, demonstrating compliance with its key design principles. This provides further mitigation for any negative effects and strengthens the significance of positive effects.
- 6.34 New development is required to be planned and designed with reference to climate change mitigation and adaptation. This indicates further positive effects for SA objectives on net zero carbon and resilience to climate change. The policy also now includes reference to the Coventry Tall Buildings SPD, and specific reference to views of the city's three spires with regard to development in and around the city centre. A new policy clause (h) requires new development to consider that safety and security of new and existing users, indicating strengthening of mitigation measures and further positive effects for SA objectives on health and communities.
- 6.35 Additional requirements for car parking to be integrated, convenient and safe without detriment strengthens the policy and provides strengthened mitigation of any potential negative effects. Additional specific requirements for safe, secure, convenient and accessible cycle parking and storage and waste management facilities to be appropriately integrated within the overall development also provides strengthening of the policy with strong mitigation against any negative effects for amenity and health SA objectives.
- 6.36 **DE2: Delivering High Quality Places** – a new policy that includes specific requirements for public realm, public art, lighting, designing for healthy communities, and the City Centre and the City Centre Transition areas. This new policy retains elements from the City Centre AAP, notably with regard to public realm, public art, and lighting – and all with positive effects for communities and health/wellbeing across the CLP area. The requirement in designing for healthy communities to fully consider how physical and mental health and wellbeing for people of all abilities and ages has been considered and catered for provides strong mitigation for potential negative effects on SA objectives for inclusivity. The requirement to consider the local contexts within the City Centre and the City Centre Transition area strengthen the

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[https://www.coventry.gov.uk/downloads/download/5198/trees\\_and\\_development\\_guidance\\_draft\\_supplementary\\_planning\\_document\\_spd](https://www.coventry.gov.uk/downloads/download/5198/trees_and_development_guidance_draft_supplementary_planning_document_spd)

mitigation measures against any potential negative effects; requirements to demonstrate how proposals contribute to the vision for the City Centre will strengthen the opportunities for enhancement with positive effects.

## Heritage

- 6.37 **Policy HE1: Conservation Areas, Policy HE2: Conservation & Heritage Assets, Policy HE3: Heritage Park Charterhouse** – updating, including requirement in Policy HE2 to demonstrate how the relevant Historic England good practice guidance has been taken into account, and clarification regarding the consideration of exceptional cases, where harm cannot be outweighed by public benefit. **Policy HE4: Archaeology** – new policy created by extracting the relevant parts of the previous Policy HE2 for clarity and to provide some more detail. With such strengthening, these policies will continue to conserve the historic environment providing mitigation measures to avoid or limit potential negative effects.

## Accessibility

- 6.38 **Policy AC1: Accessible Transport Network** – significant updating of this policy to reflect latest policy and guidance and the Council's emphasis on prioritising sustainable travel. Additional policy text requires sustainable transport modes to be fully integrated into the design and place-making. This requires an improvement in the proportion of trips made by walking, cycling and public transport, and a reduction in car dominance – all with positive effects for SA objectives on sustainable transport. The specific requirements for streets and the public realm for improvement in quality and resilience will have positive effects for health and wellbeing, together with the improvements for air quality, green and blue infrastructure – with further positive effects for SA objectives for communities, biodiversity and townscapes/landscapes. This requirement could include consideration of noise too. The Policy also allows for emerging and future intelligent mobility infrastructure.
- 6.39 **Policy AC2: Road Network** – updating, including requiring development to actively support intelligent mobility infrastructure and positively integrate with the sustainable transport network. Proposals should not negatively impact road safety, thus providing mitigation measures for SA objectives on health.
- 6.40 **Policy AC3: Demand Management** – updated and including a requirement for proposals to encourage and incentivise sustainable travel, such as through the provision of Mobility Credits – with further positive effects indicated for SA objectives on health and sustainable transport. Parking standards have been reviewed and updated with the details in Appendix 5 of the Local Plan seeking to reduce car dependency and make any parking need more relevant to local characteristics, development type and distance from the services and facilities of the City Centre.
- 6.41 CLP Appendix 5 recognises three distinct zones – City Centre, Transition Zone, Outer City – acknowledging the variances in car usage and accessibility across the city. Details and guidance are provided for cars, including electric

vehicles, goods vehicles, drop-off and loading areas, and for people with disabilities. Details and guidance are also provided with regard to cycle parking. The detailed guidance will help ensure implementation of policy requirements indicating more certainty of significance of effects. Overall, this will contribute towards a modal shift, further enhancing positive effects for health, resilience to climate change, and sustainable transport.

- 6.42 **Policy AC4: Active Transport Provision including Walking, Cycling & Micro Mobility** – updating includes new policy text for access to walking and cycling routes to be appropriate for all abilities and needs, including wheelchairs, indicating positive effects for SA objectives on accessibility and inclusivity. Further details are set out regrading cycling facilities, and the Council will promote walking and cycling by delivering a wide range of walking and cycling schemes – all with positive effects for SA objectives for communities, health and sustainable transport.
- 6.43 **Policy AC5: Bus, Demand Response Transit & Rapid Transit** – updating and to reflect the Council's emphasis on prioritising bus use and support for demand response transit – all promoting positive effects for SA objectives on health and sustainable transport. **Policy AC6: Rail** - updated to include support for electrification of rail lines and improved routes to the East Midlands. **Policy AC7: Freight** – updated requiring applicants to have more consideration of HGV movements and facilities on site, particularly regarding big warehouse and distribution centres – providing stronger mitigation measures to limit potential negative effects on health and amenity.

## Environmental Management, Minerals & Waste

- 6.44 **Policy EM1: Planning for Climate Change Adaptation** – significant updating to strengthen the strategic approach, including addressing overheating in new buildings, achieving a water efficiency target of 100l/person/day, and considering making connections available to the Coventry Heat Network. All development must meet net zero (regulated operational carbon) for residential and non-domestic development, including embodied carbon and waste – all with major positive effects towards SA objectives for reaching net zero carbon emissions. All development must consider water neutrality in regard to improving resilience to climate change and enabling waterbodies to be brought up to Good status – indicating positive effects for SA objectives for climate change and water resources (quantity and quality). Policies EM2-3 deleted and replaced by Policies EM11-EM14 (and please see later in this section).
- 6.45 **Policy EM4: Flood Risk Management** – updating to reflect changes in national legislation and policy. Additional policy text seeking to restore natural river form and remove culverting where possible with positive effects for SA objectives on green/blue infrastructure. Additional text concerning the safety of those sleeping in any ground floor accommodation in areas at risk of flooding provides stronger mitigation measures to reduce potential negative effects on health and wellbeing. **Policy EM5: Sustainable Drainage Systems SuDS** - updating with national legislation and policy. Separate guidance will detail how SuDS schemes will be designed, adopted and maintained in

accordance with technical standards – and this will support the implementation of the mitigation measures ensuring certainty of effects.

**Policy EM6: Redevelopment of Previously Developed Land** – updating and in line with the Water Cycle Study (2024) for relevant standards on water efficiencies.

- 6.46 **Policy EM7: Air Quality** – minor updating to confirm that requirements should be in line with the Air Quality SPD. **Policy EM8: Waste Management; Policy EM9: Safeguarding Mineral Resources; Policy EM10: Non Mineral Development in Mineral Safeguarding Areas** – no changes to these policies and they continue to support SA objectives for protection of natural resources, waste and minerals.
- 6.47 **Policy EM11: Energy Infrastructure and Policy EM12: Net Zero (regulated operational carbon) New Build Non-Domestic Development** – new policies addressing operational carbon to ensure that buildings are fit for the future through the updated national Building Regulations and local requirements with major positive effects for SA objectives on net zero carbon and building resilience to climate change. Information is provided on energy metrics and guidance for no fossil fuels, on and off site renewable energy, offsetting, smart energy systems, and post occupancy evaluation – all supporting the implementation of the policies. The policies have considered the potential adverse effects on viability, land values and developers' investment and mitigation measures are provided with flexibility of application. These policies extend beyond national standards in Building Regulations that aim for net zero carbon in 2050 throughout the UK. Thus, these policies with their wider approach will better enable progress towards the Council's ambitions for net zero carbon locally in 2030 with positive effects sooner.
- 6.48 **Policy EM13: Overheating in New Buildings** – new policy recognising that meeting ambitious space heating demands in new buildings will be at increased risk of overheating due to the ability of the building to retain heat well. The policy provides mitigation measures to avoid potential negative effects on health and wellbeing. Such overheating mitigation measures align well with green and blue infrastructure policies since measures such as green roofs, walls and trees are effective for cooling/shading and improving nature and biodiversity.
- 6.49 **Policy EM14: Embodied Carbon & Waste** – new policy that addresses the shift in proportion from operational carbon to embodied carbon over a building's lifetime carbon emissions and ensures that embodied carbon is considered in working towards a wholly net zero carbon building. Positive effects for SA objectives on net zero carbon and resilience to climate change. The policy provides guidance on reporting, limiting embodied carbon, building end of life, and demolition audits.
- 6.50 **Policy EM15: Noise** – new policy since noise issues associated with new development had not been addressed in the adopted Local Plan (2017). Noise pollution is an acknowledged issue for human health and wellbeing, and can also affect sensitive animal, bird or insect species. The policy applies to noise pollution and/or disturbance on amenity and biodiversity/surrounding

environment and thus, provides mitigation measures to support Sa objectives to reduce noise pollution.

- 6.51 **Policy IM1: Developer Contributions for Infrastructure** – minor updating, including the addition of “blue” to green infrastructure. This policy continues to support the overall development in the Plan and helps ensure that the likely effects from new development on infrastructure is mitigated, and including consideration of cumulative effects.

## City Centre

- 6.52 **Policy CC1: Coventry City Centre – Part A Development Strategy** remains relevant with updating and provides an overarching framework for development in the City Centre. Policy wording aligns with the Tall Buildings Design Guide & View Management Framework SPD (2022)<sup>88</sup> prepared and adopted since the extant Local Plan (2017). The retained and updated policy aims for the city centre to continue to be developed and regenerated to ensure a truly world class city centre. The policy clauses align with many of the SA objectives indicating positive effects, especially significant for supporting inclusive economic growth and enhancing the quality and character of townscapes. Positive effects are predicted for SA objectives on communities, services and facilities, health, housing, sustainable transport, soils, and protecting the historic environment.
- 6.53 Previous Policy CC2 on heritage has been deleted and incorporated into Core Policies HE2 and HE4. Previous Policy CC3 on building design has been deleted as it is covered within Core Policy DE1. Previous Policies CC5-7 have been deleted as they are now addressed within Core Policy DE2 as such matters are applicable city wide, not just the city centre. Previous Policy CC7 on tall buildings has been deleted as this matter is now addressed within Core Policy DE1. Plan Policies – DE1, DE2, HE2 & HE4 are now applicable to the whole Coventry area, not just the city centre – and thus, with wider positive effects.
- 6.54 Previous Policy CC8 on blue and green infrastructure is now Policy CCI Part B. Previous Policy CC9 on drainage and flood risk is now Policy CC1 Part C. Previous Policy CC10 on environmental management is now Policy CC1 Part D. Previous Policy CC11 on accessibility is incorporated into other AC CLP policies and referenced in Policy CC1 Part E. Previous Policies CC12 to CC26 now all incorporated into Policy CC1 Part E Character Areas.
- 6.56 **Policy CC1: Coventry City Centre – Part B Green and Blue Infrastructure** sets out requirements specific to the City Centre and requires consideration of the emerging Green and Blue Infrastructure Strategy that will provide further details and guidance. Thus, the policy provides strong mitigation measures to protect blue and green infrastructure. Opportunities to add greenery to areas adjacent to the Ring Road will be encouraged, together with new accessible green spaces – indicating further mitigation and possibilities for positive

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<sup>88</sup> <https://www.coventry.gov.uk/downloads/download/7391/tall-buildings-design-guide-and-view-management-framework-spd>

effects that may be synergistic and cumulative, especially in the longer term and linking to the wider nature networks.

- 6.57 **Policy CC1: Coventry City Centre – Part C Drainage & Flood Risk** sets out requirements to be in line with requirements of Policy EM4. This recognises that there could be higher levels of impermeable areas within the city centre and by retaining specific policy, mitigation measures are strengthened.
- 6.58 **Policy CC1: Coventry City Centre – Part D Environmental Management** is retained with such mitigation measures strengthened since clause (g) requires proposals to have regard to all other relevant policies within the Local Plan (and not just within the city centre).
- 6.59 **Policy CC1: Part E City Centre Character Areas** – new policy that requires all development in the City Centre to reference the relevant character area of its location and to deliver high quality contextually responsive proposals. The policy identifies eleven character areas as follows: Friargate Area; Cathedral & Cultural Area; Civic Area; Far Gosford Street Area; Stoney Stanton Road Area; Corporation Street Area; Mixed Use Retail Core; Parkside Area; University & Enterprise Area; Northern Regeneration Area; and Warwick Row Area. This updated identification of character areas better describes the receiving communities and environments such that the design of new development may better mitigate potential negative effects and enhance potential positive effects. No significant negative effects and overall positive effects for many SA objectives, especially significant for supporting sustainable inclusive economic growth, housing for all, inclusive communities, and sustainable transport.
- 6.60 The policy requires all development to preserve and enhance the historic environment of the area and in accordance with Conservation Area Appraisals and Plan. This ensures that there are adequate mitigation measures in place for SA objectives on the historic environment. High quality development guided by the local character areas will help ensure further positive effects for SA objectives on townscape character, sense of place, and visual amenity. It will also help resolve existing sustainability problems by continuing to encourage high quality regeneration that will not only have positive effects on townscape but also other interrelated SA objectives on the economy and people's health and wellbeing.
- 6.61 The summary findings of the SA are presented in the Table 6.1, as follows:



## SA of CLPR Policies

Table 6.1: Summary of SA Findings for CLPR Policies

SA Objectives Local Plan Policies	1. Communities	2. Services & Facilities	3. Health & Active Living	4. Housing	5. Economic Growth	6. Net Zero Carbon	7. Resilience to Climate Change	8. Sustainable Transport	9. Reduce Pollution	10. Natural Resources <sup>89</sup>	11. Nature & Biodiversity	12. Historic Environment	13. Townscapes & Landscapes
DS1-DS4 Overall Development Needs & Sustainable Development	+	++	+	++	++	+	+	0	0	0	+	0?	+
HW1 Health & Health Impact Assessment	+	+	++	+	+	0	0	0	0	0	0	0	0
JE1-JE8 Economy & Employment	+	0	+	0	++	+	+	0	0	0	0	0	0
H1-H13 Housing	++	++	++	++	0	+	+	+	0	0	0	0	0
R1-R6 Retail	+	++	+	0	++	0	0	0	0	0	0	0	0
CO1-CO3 Communities	++	++	+	0	0	0	0	0	0	0	0	0	0
GB1-GB2 Green Belt	+	0	+	0	0	0	0	0	0	+	0	+	++
LGS1 LGS, GE1 Green Infrastructure, GE2 Green Space, GE3 Biodiversity, GE4 Trees	+	+	++	0	0	0	+	0	0	+	0	++	++

<sup>89</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

DE1 Ensuring High Quality Design DE2 Delivering High Quality Places	++	0	++	0	0	0	0	0	0	0	0	0	0	++
HE1 Conservation Areas, HE2 Assets, HE3 Charterhouse, HE4 Archaeology	+	0	+	0	0	0	0	0	0	0	0	0	++	+
AC1-AC7 Transport	+	0	+	0	0	0	+	++	+	0	0	0	0	+
EM1-EM15 Environmental Management	+	0	++	0	0	++	++	0	++	+	+	+	0	+
CC1 (Parts A-E) City Centre	++	+	+	++	++	0	0	++	0	+	0	+	++	++

## 7.0 SA FINDINGS FOR THE IMPLEMENTATION OF THE COVENTRY LOCAL PLAN REVIEW TO 2041 AS A WHOLE

### Introduction

- 7.1 This section presents an assessment of the likely significant effects of the pre-submission draft Coventry Local Plan (to 2041) as a whole. It considers the plan objectives, strategic approach, policies and site allocations - and the likely cumulative effects on each of the SA objectives. Many of the likely effects of the draft plan as a whole are interconnected. The Local Plan recognises the interconnectedness of sustainable development topics. The key objectives of the One Coventry Plan that are relevant to development planning are aligned with the Local Plan policies to show how the plan can help deliver its vision and priorities – increasing economic prosperity; improving outcomes and tackling inequalities within communities; and tackling causes and consequences of climate change.

### To enable vibrant & inclusive communities

- 7.2 Significant positive effects are predicted through the housing policies H1-H13 that will overall provide the identified needs for housing, thus supporting communities. Policy H3 reflects updated standards and requires adaptable and accessible buildings, indicating positive effects. Policy H4 seeks to secure a mix of housing and Policy H6 addresses specific requirements for affordable housing, resulting overall in dwellings of varying tenures, sizes and types being delivered over the plan period. Policies DE1 and DE2 seek to promote diverse, viable places with high quality design, good environmental quality and healthy communities – all contributing to positive effects for vibrant communities. Policy AC4 requires safe, comfortable and convenient access to cycling and walking routes – appropriate for all abilities and needs, including wheelchair accessible routes – further positive effects for inclusivity.
- 7.3 Policy H7 addresses the needs of gypsy and traveller communities. Policy H8 supports those needing care, nursing, or for older persons and Policy H10 addresses the specific needs of students. Policy H9 requires that proposed development density should relate to local character and context, thus with likely positive effects for social connectivity. In order to promote social inclusivity it will be important that residents can benefit from good access to a range of services and facilities. Policies CO1-3 consider social, community and leisure facilities, together with neighbourhood and community planning. Overall, cumulative minor positive effects for inclusivity and communities.

### To provide accessible essential services & facilities for all residents

- 7.4 Policy DS4 sets out general masterplan principles that includes consideration of social and community facilities. Policies CO1-2 address social, community and leisure facilities. Policy GE1 promotes protection and enhancement of green and blue infrastructure. Overall, minor positive effects.

### To improve health & promote active living

- 7.5 Overall, most of the Local Plan policies are expected to contribute to improving health as provision of good quality housing, support for employment and communities, together with good environmental quality will contribute to health and wellbeing. The importance of promoting health improvements is evidenced specifically through policy HW1 that requires all major developments to undertake a Health Impact Assessment in line with the HIA SPD. Other policy requirements for good quality housing and accessibility to open/green space will contribute to health and wellbeing.
- 7.6 The proposed site allocations are close to healthcare facilities, and also open space, green and blue infrastructure, recreation and leisure facilities, and sustainable transport modes. Policies LGS1 and GE14 protect and enhance nature and green space with its importance for health. This will be cumulative in the longer term as networks are enhanced and recovery strategies implemented. Policy AC4 presents the Council's emphasis on prioritising walking and cycling and includes a requirement for accessibility for all abilities and needs, supporting active transport with positive effects for health. This is all supported by environmental management policies to reduce pollution and improve quality – Policies EM1-EM15. Over time, this should result in cumulative effects that may be synergistic and will help towards reducing an existing sustainability problem of health inequalities in the Coventry area.

### To provide decent and affordable housing for all

- 7.7 The Local Plan makes provision to deliver at least 29,100 new dwellings during the period up to 2041 and supports delivering a mix of homes through a range of policies H1-H13 with major positive effects for SA objectives. Policy H4 seeks to secure a mix of housing and Policies H6, H7, H8, and H10 address the needs of specific people, including the young, affordable needs, and gypsy/travellers. Policy H8 addresses the needs for older people and supported housing/care. Policy H11, H12 and H13 consider the specific requirements for homes in multiple occupation, build to rent, and co-living housing.
- 7.8 The residential site allocations will contribute to the provision of housing within the Coventry area, including significant proposals such as City Centre South and the Friargate mixed use scheme in the City Centre. Policy H5 helps ensure that the best use is made of existing housing stock, including an emphasis on re-use and support for retrofitting – with further positive effects. Overall, major positive effects for SA housing objectives and that will be cumulative, particularly in the longer term.

### To support sustainable inclusive economic growth

- 7.9 Strategic Policy JE1 sets out the overall strategy for economy and employment and Policy JE2 has reviewed and updated the provision of employment land and premises. Policies JE3-8 provide further details and information for different types of employment use, with particular significant positive effects indicated for the differentiation between industrial

storage/distribution and R&D uses into two policies JE5&JE8. The review of the plan has updated employment land need particularly taking into account the changes for office requirements. Policy JE4 includes a new requirement for flexibility and adaptability to changing needs with positive effects for SA objectives.

- 7.10 Site allocations are retained from the adopted plan and one new site option was considered but found to be unsuitable. The Council is able to find suitable land for employment within the Coventry area approaching its identified need, and it will continue to discuss and cooperate with neighbouring Councils as well as considering any sites that may be proposed in the future. Overall, the Plan will have significant positive effects for SA objectives to support inclusive economic growth; further positive effects are indicated for health and wellbeing and communities.

### **To help achieve the Council's ambition to reach net zero carbon emissions**

- 7.11 A key emphasis of the new Coventry Local Plan is to support the One Coventry Plan priority regarding climate change and to support the draft Climate Change Strategy<sup>90</sup>. The new Policies EM11-EM14 address operational carbon to ensure that buildings are fit for purpose with regard to reduced energy consumption and integration of design to address climate change adaptation through the revised national Building Regulations and local requirements. Overall, likely to be significant positive effects for SA objectives to reach net zero carbon emissions – especially in the longer term as new methods in the construction industry become established.

### **To build resilience to climate change**

- 7.12 Policy EM1 Planning for Climate Change Adaptation has been updated to address overheating in new buildings, enhance water efficiencies, consider water neutrality and greywater recycling, and all development must meet net zero (regulated operational carbon). Together with the retained details for sustainable water management in Policies EM4-5, significant positive effects are indicated, particularly in the longer term as the effects become cumulative.

### **To reduce traffic and improve sustainable transport choices**

- 7.13 The Council has assessed possibilities for allocating suitable sites for new development and carefully selected and retained those sites that are close to services and facilities. The City is well connected with accessible options such that this approach indicates positive effects for SA objectives on improving sustainable transport and reducing car travel. Policies AC1-AC4 have had considerable updating to reflect latest national policy and guidance, and support the Council's emphasis on prioritising sustainable travel. Overall, the approach to site allocations and transport policies will have likely positive effects for SA objectives on sustainable transport. These

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<sup>90</sup> <https://www.coventry.gov.uk/draftclimatechangepolicy>

may become synergistic and cumulative in the medium to longer term as the modal shift becomes established – and with further positive effects for health and wellbeing, nature, and climate change.

### **To reduce air, noise and light pollution**

- 7.14 Policy EM7 is retained for air quality and the Plan includes the new Policy EM15 on noise; light pollution is addressed in Policy H3 Housing and Policy DE2 Delivering High Quality Places. Therefore, overall, there are sufficient mitigation measures to ensure no significant negative effects on SA objectives for air, noise or light pollution.

### **To protect and conserve natural resources – soil, water, minerals and waste**

- 7.15 Policy EM6 on redevelopment of previously developed land is retained and updated to align with water efficiency targets. This will continue to provide sufficient mitigation to support sustainable water management. Policies EM 8&9 continue to guide waste and minerals planning such that SA objectives are supported with no significant negative effects overall.

### **To protect and enhance nature and biodiversity**

- 7.16 A Habitats Regulations Assessment (HRA) Screening (August 2024) concluded that there is no requirement for the Coventry Local Plan to include any policy regarding European and internationally designated sites for nature conservation. Policy GE3 continues to protect national and locally important biodiversity and has been updated to incorporate the new national minimum requirement for 10% net gain in biodiversity for all new development. Policies GE2-3 with minor updating continue to provide information and guidance such that the green/blue infrastructure network in the plan area should be enhanced, particularly in the longer term and networks are linked, widened and become more established with overall positive effects for SA objectives for nature and biodiversity.

### **To protect and enhance the historic environment, and its setting**

- 7.17 Policies HE1-4 continue to provide strong mitigation measures to protect the historic environment such that there should be no significant negative effects and there are possibilities for enhancement, for example, through the refinement of character areas in the City Centre and support for high quality regeneration.

### **To protect and enhance the quality and character of townscapes and landscapes**

- 7.18 Policy GB1 Green Belt has been strengthened through confirmation of the quality and importance of the Green Belt for Coventry (Technical update, 2024) and by differentiating between Green Belt and Local Green Space. This

updated evidence and policy has guided other policies, including site allocations, in the Plan such that positive effects are indicated for SA objectives for the Green Belt and to retain its five purposes.

- 7.19 The updating of Policies on design and high quality places DE1-2, together with Policies LGS1 and GE1-4 will overall interact and indicate positive effects for SA objectives on protecting and enhancing local character, visual amenity, and restoration of degraded townscapes/landscapes – likely to be cumulative, especially in the longer term.

## 8.0 MONITORING

- 8.1 The SEA Directive and Regulations require that the significant effects (positive and negative) of implementing the plan should be monitored in order to identify at an early stage any unforeseen effects and to be able to take appropriate remedial action. Government guidance<sup>91</sup> on SA/SEA advises that existing monitoring arrangements should be used where possible in order to avoid duplication. Details of monitoring arrangements may be included in the sustainability appraisal report, the post-adoption statement or in the local plan itself. Government requires local planning authorities to produce Monitoring Reports (AMRs), and the Coventry Authority Monitoring Report (AMR)<sup>92</sup> (produced annually) is considered sufficient to ensure appropriate monitoring takes place.

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

<sup>92</sup> [https://www.coventry.gov.uk/downloads/download/2678/annual\\_monitoring\\_reports](https://www.coventry.gov.uk/downloads/download/2678/annual_monitoring_reports)



## 9.0 CONSULTATION & NEXT STEPS

- 9.1 This SA Report is being published alongside the Proposed Submission draft Coventry Local Plan Review for Regulation 19 consultation during autumn 2024. Any comments on the SA will be taken into consideration at the next stage when the Council will submit the draft Coventry Local Plan for examination by an independent planning inspector.

**APPENDICES:**  
**Available as a separate document**

- I Statement of Compliance** (August 2024)
- II SA Scoping Report** (March 2023, available on Council's website)
- III SA of Strategic Options** (May 2023 & August 2024)
- IV Consultation Representations on the Initial SA Report** (May 2023)
- V SA of Proposed Site Allocations** (August 2024)