



Coventry City Council

**Coventry Local Plan Review
2021-2041:**

**Proposed Submission
Regulation 19 Consultation**

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

**SA Report:
APPENDICES**

September 2024

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APPENDICES:

- I Statement of Compliance**
- II SA Scoping Report** (March 2023, available separately 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)

Appendix I: Statement on Compliance with SEA Directive & Regulations

The EU SEA Directive¹ (Annex 1) requires certain information to be provided in the Environmental Report. This requirement is implemented into UK legislation through the SEA Regulations (2004)². This is Appendix 1 of the Sustainability Appraisal Report that constitutes the Environmental Report as required by the SEA Directive and the UK SEA Regulations.

This Appendix 1 sets out how the requirements for SEA have been met and signposts where this information is found in the Sustainability Appraisal Report (August 2024) – and in accordance with paragraph 32 of the National Planning Policy Framework (updated, 2023)³.

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
<i>An outline of the contents, main objectives of the plan and relationship with other relevant plans</i>	Section 1 Introduction	Sets out the Vision and main Objectives of the Coventry Local Plan Review
	Section 3 Context & Baseline	Summarises the relationship with other plans and references the detailed review provided in the SA Scoping Report (2023)
<i>The relevant aspects of the current state of the environment and the likely evolution thereof without the implementation of the plan</i>	Section 3 Context & Baseline	Summarises the relevant baseline conditions for sustainability (including the state of relevant environmental aspects) in the Coventry LP area. The information is set out in more detail in the SA Scoping Report (2023) that also indicates the likely evolution of current conditions and trends where available
<i>The environmental characteristics of the area likely to be affected</i>	Section 3 Context & Baseline	Summarised in Section 3 of Main SA Report; where relevant and available this information is detailed in the SA Scoping Report
<i>Any existing environmental problems which are relevant to the plan including, in particular, those relation to any areas</i>	Section 3 Context & Baseline	Summarises existing sustainability (including environmental problems) for the Coventry LP area. This section also summarises information for

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

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

³ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
<i>of a particular environmental importance</i>		Natura 2000 sites in line with Habitats Regulations Assessment requirements (HRA Screening Report available separately, July 2024).
<i>The environmental protection objectives relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation</i>	Section 2 SA Methods Section 3 Context & Baseline	Provides the summary of objectives for sustainability in the Coventry LP area (including environmental objectives) and the implications of these objectives for the CLPR (refers to details in the SA Scoping Report 2023); explains how the environmental considerations have been taken into account.
<i>The likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects</i>	Section 2 SA Methods Table 2.1	Presents the SA Framework of objectives that shows which of the issues listed by the SEA Regulations are progressed by which SA objectives. This ensures that all the issues are considered during the assessment of each element of the emerging CLPR since each policy & proposal is assessed against each SA objective.
	Sections 4, 5, 6 & 7 Appendices III & V	Summarises the likely significant effects of implementing the CLPR (including environmental effects) with details provided in the appendices. Where possible, an indication is given of whether the effect is likely to be cumulative, short, medium and long term
<i>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan</i>	Sections 4, 5, 6 & 7 Appendices III & V	Where potential significant negative effects are predicted the SA has sought to provide suggestions for mitigation possibilities. These are summarised in the main report, and detailed in the appraisal matrices that comprise the appendices.
<i>An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information</i>	Sections 4 & 5 Tables 4.2b – 4.10b	Strategic Options for Quantum of Housing, Residential Density, Building Regulations Standards, & Biodiversity Net Gain were appraised through initial SA (March 2023). Subsequently, additional options & refinements of options were appraised – explained & findings reported in Section 4. Options for site allocations are discussed in Section 5. The reasons for progressing options and not taking others forward is set out in Tables 4.2b to 4.10b.

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
	Sections 2 & 3 Methods & Context, Baseline	Outlines how the assessment was undertaken – the appraisal methodology and difficulties encountered in compiling information are noted.
<i>A description of the measures envisaged concerning monitoring</i>	Section 8	Provides measures proposed for monitoring the sustainability (and environmental) effects of the implementation of the Coventry LP.
<i>A non-technical summary of the information provided under the above headings</i>	Report preface (available separately)	Provides a non-technical summary.

Coventry Local Plan Review: Sustainability Appraisal (SA) Appendix III: SA of Strategic Options

IIIa: Options for Quantum of Housing Needs 2022-2041	
1	63,760 dwellings (3,188 per annum) – Government standard method ⁴ (with ONS population projections from 2014) ⁵
2	39,280 dwellings (1,964 per annum) – HEDNA method ⁶ (with census population data from 2021)
3	29,100 dwellings (1,455 per annum) – HEDNA method as per Option 2 but minus 35% uplift for largest urban authorities ⁷
4	Approx. 31,500 dwellings (1, 575 per annum) – calculated as quantum that can be accommodated based on supply figures
5	30,500 dwellings (1, 527 per annum) – calculated through proposed new standard method for assessing housing needs (July 2024) ⁸

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

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

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

⁵ The ONS population data for Coventry has been found to be erroneous & overestimated. For example, please see: <https://osr.statisticsauthority.gov.uk/correspondence/sir-andrew-watson-to-ed-humpherson-and-sir-david-norgrove-population-projections-and-mid-year-population-estimates-for-coventry/> and <https://osr.statisticsauthority.gov.uk/wp-content/uploads/2021/05/Review-of-population-estimates-and-projections-produced-by-the-Office-for-National-Statistics.pdf>

⁶ Housing & Economic Development Needs Assessment (HEDNA, November 2022) Iceni Projects Ltd on behalf of Coventry & Warwickshire Local Authorities <https://www.coventry.gov.uk/downloads/download/7374/coventry-and-warwickshire-housing-and-economic-development-needs-assessment-hedna>

⁷ Government changes (rev December 2020) to the planning system include a 35% uplift to the housing number generated by the standard method for the 20 most populated cities & urban centres in England – and Coventry is on the list of 20 <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

⁸ <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system#chapter-4--a-new-standard-method-for-assessing-housing-needs>

⁹ Dwellings per hectare

¹⁰ Coventry's draft Climate Change Strategy 2023-2030 <https://www.coventry.gov.uk/downloads/download/7434/coventry-s-draft-climate-change-strategy-that-aims-for-“The-dramatic-reduction-of-carbon-emissions-to-achieve-carbon-neutrality-with-a-100%reduction-to-1990-levels-by-2050-at-the-very-latest”>

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

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

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

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

IIIIf: Options for Quantum of Employment Land	
1	147.6 ha general industrial (excluding strategic B8) – HEDNA (2024)
2	60 ha general industrial calculated as quantum that can be accommodated
3	60 ha plus an additional 11.81 ha being promoted & located in the Green Belt (Site North of A45 & West of Brick Hill Lane)

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

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

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

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

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

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

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

IIIa: Options for Quantum of Housing Needs 2022-2041	
1	63,760 dwellings (3,188 per annum) – Government standard method (with ONS population projections from 2014)
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3	29,100 dwellings (1,455 per annum) – HEDNA method as per Option 2 but minus 35% uplift for largest urban authorities
4	Approx. 31,500 dwellings (1, 575 per annum) – calculated as can be accommodated based on supply figures
5	30,500 dwellings (1, 527 per annum) – calculated through proposed new standard method for assessing housing needs (July 2024) ¹⁶

		Options for Quantum of Housing				
Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	1. Standard Method (2014)	2. Standard Method (HEDNA 2022) –	3. Standard Method less 35% Uplift (2022) –	4. Quantum that can be accommodated –	5. Proposed Standard Method (2024) –
		63,760 dwellings	39,280 dwellings	29,100 dwellings	approx. 31,500 dwellings	30, 540 dwellings
1: To enable vibrant and inclusive communities	There is a need to plan for a growing, changing, ageing and increasingly diverse population that will need increasing participation and involvement to help maintain social cohesion and reduce risks for radicalisation and social exclusion. The total population of Coventry City Council ¹⁷ administrative area was 345,300 with an 8.9% growth in population from 2011 to 2021 – and this is higher than the rate in the West Midlands 6.2% and England 6.6% - and with a high	+	+	+	+	+

¹⁶ <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system#chapter-4--a-new-standard-method-for-assessing-housing-needs>

¹⁷ <https://www.coventry.gov.uk/facts-coventry/population-demographics>

	<p>number of young people aged 20-24. It is predicted to increase to 422,919 by the year 2031 and to 454,534 by the year 2042. In line with the rest of England, this is an ageing population.</p> <p>The provision of new good quality homes will have positive effects for people. It could be asserted that higher figures of new homes, as in Option 1, could have more positive effects as more new homes could be available to more people – but the higher quantum of new development could overload the capacity of existing communities to absorb new people.</p> <p>Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies, rather than the overall quantum of housing. For example, extant Policy H7 covers Gypsy & Travellers, Policy H8 covers the needs of an ageing population, and Policy H10 covers student accommodation. Policy H4 secures a mix of housing and Policy H6 covers affordable housing – the encouragement of mixing should support a wider range of social connectivity and community interaction – all with positive effects for all five options.</p> <p>The Housing Topic Paper & the HEDNA discuss the possibilities for a new Policy on Co-Living – and this is likely to encourage safe social connectivity and could encourage community participation – all particularly for the younger people who would be interested in this form of housing – positive effects for all five options.</p> <p>Thus extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period.</p> <p>The extant policies do not explicitly mention ethnic or cultural housing needs. The majority (66.6%) of Coventry's total population is White British, such that Coventry has a notably higher percentage of ethnic</p>					
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	<p>minority groups compared to the regional and national averages¹⁸. However, over the past decade, the city has become increasingly ethnically diverse with just under half of its school-aged population from an ethnic minority background in 2021. There are many factors that may be contributing to the changing ethnic composition, such as differing patterns of ageing, fertility, mortality, and migration – and it is not clear how policies for new homes can support inclusivity for such groups in communities.</p> <p>SA Suggestion at Regulation 18: Is there any scope for considering any particular housing needs from cultural, ethnic or migrants/refugees groups and can the new development plan contribute to encouraging more social inclusivity for these groups?</p>					
<p>2: To provide accessible essential services and facilities for all residents</p>	<p>As communities grow and change, the provision of, and access to, community and social facilities and services, needs to be maintained and improved for social and health wellbeing. This includes access for all to Green Infrastructure [and this is discussed further in SA No 11 Nature & Biodiversity].</p> <p>It could be asserted that the higher figures of new homes, as in Option 1, could have more negative effects as the higher quantum of new development could overload the capacity of services & facilities for residents. However, larger scale developments may be better able to support provision of new services & facilities. It is likely that the lower quantum of new housing in Options 3, 4 & 5 are less likely to overload the capacity of services & facilities with less negative effects and overall more likely positive effects.</p> <p>The location of new development is guided by specific policies – and these consider accessibility to physical, social & green infrastructure – including sufficient mitigation measures to ensure that services & facilities are sufficient, for example, Policy IM1 Developer Contributions. Policy H2 lists housing allocations that have been</p>	+	+	++	++	++

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

	<p>assessed & identified to be in suitable locations, including for provision of, and accessible, services & facilities, including sustainable/active transport, social & community facilities, education & training, and green infrastructure. The review will update these policies. Policies C1-3 specifically address communities.</p> <p>SA Suggestion at Regulation 18: Policy review could consider encouraging facilities that are adaptable to future changes in population demographics and technology. It could encourage & support people to lead healthy & active lives, and ensure that facilities are accessible to all groups, including those with physical or mental disabilities.</p>					
<p>3: To improve health & promote active living</p>	<p>As life expectancy is below average and health outcomes are worse in the more deprived areas of Coventry, a targeted approach has been identified by the JSNA¹⁹ to give appropriate support to each group to improve health and wellbeing for all rates. There is also a shift to focus on to prevention that will need a community-informed and culturally competent approach. The Index of Multiple Deprivation (IMD) data (2019)²⁰ for Coventry City indicates a range of deprivation (from least to most deprived) throughout the wards with the most deprived tending to be found in the city centre and radiating out towards the north/north-east, to the south-east and with a grouping of wards located near the boundary to the south-west. Inequalities in health arise out of inequalities in society.</p> <p>Coventry became a Marmot City²¹ in 2013 and is committed to reducing inequality and improving health outcomes for all. In 2019, the key focus is on children and young people, and following the impact of Covid19 on the city, also prioritising the effect on ethnic minority group communities. Healthy ageing is a challenge throughout England. There are complexities of planning for health due to the multiple determinants and the need for cross-sectoral understanding and collaboration with linkages between the global</p>	+?	+?	+	+	+

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

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

²¹ <https://www.coventry.gov.uk/policy-1/coventry-marmot-city>

	<p>ecosystem, the natural and built environments, the local economy with communities, people, and their lifestyles.</p> <p>Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental²². These factors are covered by the following SA Nos 4 & 5.</p> <p>Overcrowding is more likely to be experienced by minority ethnic groups²³ – and this might occur as a result of multiple generations of a family living in one home. There can be reduced isolation but there are health risks associated with overcrowding. Provision of identified need through appropriate density & quality can help resolve such an existing sustainability problem.</p> <p>It could be asserted that higher figures of new homes could have more positive effects as more new homes could be available to more people. However, the effectiveness of reducing health inequalities is likely to be associated with the location of new development. In consideration of the land constraints in Coventry, the higher quanta of housing are likely to be difficult to accommodate - homes may need to be small, more densely located and thus less able to meet the variety and adaptability of needs. Such quanta would also place pressures on the capacities of the open/green spaces in the city – and thus, limit the health and wellbeing associated with such spaces. Overall, some uncertainties of significance of effects for Options 1 & 2; positive effects more certain for development that can be accommodated – Options 3, 4 & 5.</p> <p>The extant Local Plan includes site allocations (H2 Housing; JE2 Employment Land) and other policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have</p>					
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²² For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

²³ The Marmot Review 10 Years On (February 2020) <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

	<p>negative effects for health and wellbeing. The review will update policies.</p> <p>Through Policy HW1 of the current Plan, applicants are required to mitigate against potentially negative health impacts. The Health Impact Assessment SPD²⁴ provides information and guidance on completing the relevant health toolkit and HIA. This is a proactive approach in plan-making and provides mitigation to ensure that there are no negative effects on health from new development.</p> <p>SA Suggestions at Regulation 18: Can the Plan consider reducing deprivation with particular regard to deprivation pockets in Coventry, thus supporting the targeted approach identified by the JSNA? Policies addressing the ageing population could consider adaptability & improving resilience (both physical & cognitive) for housing the elderly. Can design principles or requirements create safer neighbourhoods & help reduce crime, including violence – especially against women and girls? Are there particular issues for health & overcrowding, perhaps associated with ethnic minority groups?</p>					
<p>4: To provide decent and affordable housing for all</p>	<p>New demographic projections have been modelled (HEDNA 2022)²⁵ to estimate the amount and type of housing that will be needed over the period to 2041. The older person population is projected to increase notably in the future and an ageing population means that the number of people with disabilities is likely to increase substantially. Self-build and custom housebuilding²⁶ is a growing sector of the housing market, and one which has potential to contribute to housing delivery. There is also the potential for co-living²⁷ to be considered. It is understood that there is a sizeable amount of student</p>	<p>+?</p>	<p>++?</p>	<p>++</p>	<p>++</p>	<p>++</p>

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

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

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

²⁷ For example, please see <https://coliving.com/what-is-coliving>

	<p>accommodation in Coventry and, if delivered, provides the potential to reduce the number of students in the wider housing market.</p> <p>It may be asserted that opportunities to provide decent and affordable housing for all is more likely with the higher quanta of housing in Options 1 & 2 – if such numbers of homes could be accommodated within the constraints of the city area. Homes may need to be small, more densely located and thus less able to meet the variety and adaptability of needs – and therefore, uncertainties for significance of effects for Options 1 & 2.</p> <p>However, capacity (HELAA 2024²⁸) and viability studies have indicated that Options 3, 4 & 5 could deliver the identified need for housing indicating major positive effects for housing objectives. Therefore, positive effects likely for all five options but uncertainties of significance for the higher quanta of housing numbers.</p> <p>Whilst delivery has not been an issue for the Council²⁹, there must be some uncertainty about availability of suitable land in sustainable locations to accommodate the higher quanta of housing in Options 1 & 2, and to meet with other objectives, particularly for climate change & biodiversity. The city has tight boundaries and constrained opportunities to grow within them, such that the Council will continue to work closely with its neighbouring authorities for shared opportunities. Therefore, uncertainty of significance of positive effects for Options 1 & 2.</p> <p>In 2020/21³⁰ the delivery of affordable housing was below the annualised need (although an increase in percentage from 7 to 13 % on 2019/20), and the updated policies will need to take this into account. As PBSA schemes are built, Homes in Multiple Occupation (HMOs) will become available for the wider housing market. It is</p>					
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²⁸ Coventry City Council (2024) Housing & Economic Land Availability <https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

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

³⁰ <https://www.coventry.gov.uk/downloads/file/37391/authority-monitoring-report-2020-2021>

	<p>important to address any imbalance in the distribution of affordable housing.</p> <p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups.</p> <p>The Affordable Housing SPD (March 2022)³¹ provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built – all with likely major positive effects.</p> <p>The need to improve the quality of the existing housing stock remains, especially with regard to damp and poorly insulated homes. Climate change commitments will require, amongst other things, retrofitting existing homes to ensure that they are up to modern insulation standards (and see later SA No 6 Net Zero Carbon & SA No 7 Resilience to Climate change).</p> <p>SA Suggestion at Regulation 18:</p> <ul style="list-style-type: none"> ■ Is there any scope for considering any particular housing needs from cultural, ethnic or migrants/refugees groups? 					
<p>5: To support sustainable</p>	<p>Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people. The</p>	<p>--?</p>	<p>-?</p>	<p>+?</p>	<p>+?</p>	<p>+</p>

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

<p>inclusive economic growth</p>	<p>initial evidence indicated that employment need could be met from renewal of existing sites and redevelopment³².</p> <p>The HEDNA (Nov 2022) considered population, housing growth and the economy in tandem based on the 2021 census figures. Capacity (HELAA 2024) and viability studies have indicated that Options 3, 4 & 5 may be able to be accommodated, indicating minor positive effects for employment objectives but with some uncertainty of significance at this stage until more studies are undertaken. It is unlikely that the higher quanta of housing in Options 1 & 2 could be accommodated due to the constraints within the Coventry boundary. The higher quanta in Options 1 & 2 could require re-allocation of some employment land and/or result in increased commuting for work (with further implications for other SA objectives, such as transport). It remains uncertain how the effects of Covid-19 on changing patterns of working, such as home working, co-working & hybrid working, will affect requirements for employment land during the plan period.</p>					
<p>6: To help achieve the Council's ambition to reach net zero carbon emissions</p>	<p>The Council recognises the climate crisis and is currently reviewing its Strategy³³. This will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure.</p> <p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions. Following consultation in 2023, Government intended to publish the Future Homes & Buildings Standards (FHBS) in 2024³⁴ and then bring it into force in 2025. All new homes will then be 'zero carbon-ready', meaning that they will be zero carbon - once the electricity grid has</p>	<p>+?</p>	<p>+?</p>	<p>+</p>	<p>+</p>	<p>+</p>

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

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

³⁴ <https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation/the-future-homes-and-buildings-standards-2023-consultation>

	<p>been decarbonised^{35,36}. The UK has committed to decarbonise the electricity system by 2035³⁷ and the updated policies in the CLPR will reflect this commitment in consideration of the plan period to 2041.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, as well as those that encourage active travel through location of new development in sustainable locations with sustainable transport – Policy AC1 Accessible Transport & Policy H1 Allocations, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan)</p> <p>Since all new development will need to meet requirements from updated policies, it is likely that there will be no significant negative effects for all five housing options – in the longer term, after 2035. Assuming that the required zero carbon trajectory can be achieved, positive effects for climate change objectives are indicated in the longer term. However, there is some uncertainty that the higher quanta of housing in Options 1 & 2 would be able to meet with the enhanced requirements to meet with net zero carbon – particularly in the shorter term. Viability/costs may also be an issue in the shorter term as the construction industry develops new methods.</p> <p>The Council's Energy SPD³⁸ currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements. The Council is also investigating how it could establish challenging new targets/standards, including consideration of standards higher than Building Regulations, in order to support Coventry's aspirations for addressing the climate change crisis.</p>					
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³⁵ <https://www.futurehomes.org.uk/delivery-at-scale>

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

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

³⁸Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) <https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

	<p>There is a perception that new building reduces carbon emissions when operational compared to an existing building. However, new buildings incur high carbon emissions from embodied carbon associated with the extraction of raw materials, transport & construction. The VAT levy on new builds at 0-5% compared to 20% for refurbishment is a disincentive for refurbishment. However, refurbishment of buildings is likely to be delivered in a shorter time than new build. High quality refurbishments can inspire as much as new buildings with appropriate design and reuse of buildings can include historic assets – a particular issue for Coventry and with positive effects.</p> <p>SA Suggestion at Regulation 18: Circular economy principles³⁹ for buildings should be considered for inclusion in the updating of policies so that embodied carbon and whole life assessment are requirements for development proposals.</p>					
<p>7: To build resilience to climate change</p>	<p>There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK.⁴⁰ Therefore, it is vital to build resilience, including reducing risks from overheating, flooding and the resultant detriment to wellbeing, the economy and the environment.</p> <p>All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. Relevant current policies in the adopted Local Plan include, Policy EM1 Planning for Climate Change Adaptation, Policy EM2 Building Standards, Policy GE1 Green Infrastructure, Policy EM4 Flood Risk Management, and Policy EM5 Sustainable Drainage Systems – and all these will be reviewed & updated.</p> <p>There is some uncertainty that the higher quanta of housing in Options 1 & 2 would be able to meet with the enhanced</p>	<p>-?</p>	<p>-?</p>	<p>+</p>	<p>+</p>	<p>+</p>

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

⁴⁰ For example, see <https://earth.org/climate-change-in-the-uk/>

	<p>requirements to build resilience from overheating, flood risk, and extreme weather effects due to the constraints – suitable land & viability (and particularly in the shorter term until technology catches up with requirements & the construction sector can meet with increased needs). Overall, provision of green spaces and sustainable drainage are key elements to progress objectives for climate change. The higher quanta of housing is likely to place greater pressures on these resources with negative effects – therefore, minor negative effects for Options 1 & 2 that will be cumulative in the longer term, but uncertainties of significance at this stage of assessment.</p>					
<p>8: To reduce traffic & improve sustainable transport choices</p>	<p>A key objective remains for the review of the CLP - to improve the sustainability of the transport system in Coventry, improving integration with walking and cycling routes and green infrastructure networks, and promoting more active travel. The Council has aimed to locate new development in sustainable locations – identified through their proximity and accessibility to sustainable transport choices – and reflected in the site allocations in the adopted Plan.</p> <p>This principle will be retained in the review of the policies and will apply to all new development. Due to the predicted increase in population, transport policies need to both encourage sustainable modes and also to discourage car use – for example, through restricted parking, zero emission zones, and reallocation of some road space to sustainable movement options.</p> <p>The Environment Improvement Plan⁴¹ for England includes an aim for half of all journeys in cities to be cycled or walked by 2030 and Coventry's Transport Strategy⁴² aims to significantly improve conditions to encourage more people to walk and cycle.</p>	<p>--?</p>	<p>-?</p>	<p>0?</p>	<p>0?</p>	<p>0?</p>

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

⁴² <https://www.coventry.gov.uk/transport-strategy-2/transport-strategy>

	<p>It is uncertain whether such approaches could mitigate sufficiently for the higher quantum of housing in Option 1. There is considerable uncertainty about the delivery of the higher quantum of housing in Option 1 due to the boundary constraints and limited amount of sustainable transport locations, albeit that the urban parts of Coventry are generally well connected. Therefore, potential for major negative effects with Option 1. The quantum of housing in Option 2 indicates a reduction in potential negative effects on transport objectives but with uncertainty at this stage as significance will vary with locations. The lower quanta of housing in Options 3, 4 & 5 are less likely to be associated with significant cumulative negative effects and therefore, negligible or neutral effects are indicated.</p> <p>Where there is a deficiency in public & sustainable transport, it is generally considered that larger developments, particularly in rural areas, are able to provide & encourage sustainable transport choices as part of an overall package of masterplanning & developer contributions. Coventry is constrained by boundaries and various other factors, including Green Belt (and see SA No 13); however, the urban environment is well connected and with a good transport system. Nonetheless, it is considered that the higher quanta of housing with such overall development pressures could challenge the capacity of public & sustainable transport, and open/green spaces, with potential negative effects. The lower quantum of housing that has been calculated (HELAA, 2024) with urban capacity may facilitate a shift in transport mode to more sustainable options with negligible or neutral effects. There may be some positive effects – especially in the longer term as walking/cycling/GI networks become better linked & more extensive. However, uncertainties of significance at this stage of assessment.</p> <p>It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).</p>					
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	<p>There may also be an issue from transport and air quality for nitrogen deposition and negative effects on biodiversity and nature sites (see SA No 11) and HRA Report (August 2024).</p> <p>SA Suggestions at Regulation 18: Consider revision of policy to include restricted parking & zero emission zones Consider whether more areas of road space would be safe & appropriate for reallocation to cycling & walking – particularly in areas that would link/extend sustainable transport networks. Reuse/refurbishment of existing buildings, including historic assets (and see SA No 12) Consider higher densities in key sustainable locations that meet other Plan objectives</p>					
<p>9: To reduce air, noise & light pollution</p>	<p>In the UK, air pollution has been recently reported (2022) as being the largest environmental risk to public health⁴³. Reducing vehicle emissions will continue to improve air quality. Indoor air pollution is becoming an increasing proportion of the problem⁴⁴.</p> <p>Noise pollution is an acknowledged issue for human health & wellbeing – physical & mental - (see SA No 3 and also certain biodiversity see SA No 11), and particularly road traffic noise (see also SA No 8) remains a major problem in Europe⁴⁵ & the UK⁴⁶. Significant health impacts are likely to be underestimated, and exposure to environmental noise does not affect everyone equally. Socially deprived groups & groups with increased susceptibility to noise may suffer more pronounced health related impacts of noise. Future urban growth and increased demand for mobility is likely to increase the numbers of people exposed to high levels of noise.</p>	0?	0?	0?	0?	0?

⁴³ OHID (updated Feb 2022) Air Pollution: applying All Our Health <https://www.gov.uk/government/publications/air-pollution-applying-all-our-health/air-pollution-applying-all-our-health>

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

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

⁴⁶ For example, please see Karen Bakker (January 2023) Noise Pollution is a menace to humanity <https://www.theguardian.com/commentisfree/2023/jan/03/noise-pollution-is-a-menace-to-humanity-and-a-deadly-threat-to-animals>

	<p>Light pollution disturbance can adversely affect health & wellbeing, including fatigue, insomnia, stress & anxiety⁴⁷ (and also certain biodiversity – see SA No 11).</p> <p>Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects. Some uncertainty at this stage of assessment about the effectiveness of mitigation for potential cumulative effects.</p> <p>SA Suggestions at Regulation 18: Continue to focus on reducing vehicle use to help reduce air pollution Consider the implications of environmental noise Consider the implications of light pollution explicitly in building design & including the indoor environment Consider cumulative effects Consider the implications of air, noise & light pollution for nature & biodiversity</p>										
<p>10: To protect & conserve natural resources – soil, water, minerals & waste⁴⁸</p>	<p>The vast majority of development completions (90%) in 2021/22⁴⁹ were on former brownfield or previously developed land, with just 10% built on greenfield sites. The review of the CLP will recommend that priority is given to continuing to build on PDL where effectively located. Policy EM6 Redevelopment of Previously Developed Land provides mitigation to conserve natural resources indicating negligible effects for all five options. However, with the updating of policies to meet with new requirements, especially those for climate change & sustainable movement, there may be insufficient suitable PDL to meet with the higher quanta in Options 1 & 2 – indicating</p>	-	0?	-?	0	0	0	0	0	0	0

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

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

⁴⁹ <https://www.coventry.gov.uk/downloads/file/39439/authority-monitoring-report-2021-22>

	<p>potential minor negative effects for Option 1 and for Option 2, although with some uncertainty at this stage. The best agricultural land must be conserved and effects of climate change may affect food security.</p> <p>Climate change, particularly incidences of hotter, drier, summers may exacerbate water supply issues; wetter and more flooding may overload wastewater systems. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The cumulative effects of the higher quanta of housing may incur minor negative effects but with some uncertainty at this stage. The recent Water Cycle Study Stage 1 (June 2024)⁵⁰ indicates that there is water capacity for the quanta in Options 3, 4 & 5 – with potential neutral effects.</p> <p>Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development. It is assumed that they will be updated to address any capacity issues such that neutral effects would be indicated. However, there may be some uncertainty associated with the higher quantum of housing in Option 1.</p> <p>SA Suggestions at Regulation 18: The effective use of land could consider whether an uplift in minimum housing density requirements might be possible where sufficient infrastructure is in place Are there sufficient allotments for any increasing need? Are there sufficient facilities that recycle and recover value from waste?</p>					
<p>11: To protect and enhance</p>	<p>It will be necessary to consider the new requirements from the Environment Act and including emerging metrics for calculating</p>	<p>--?</p>	<p>-?</p>	<p>+</p>	<p>+</p>	<p>+</p>

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

<p>nature & biodiversity</p>	<p>biodiversity net gain (BNG)⁵¹. Unequal distribution, and access to, green infrastructure across the city can exacerbate health inequalities. There are priority areas that would benefit particularly from greening. Off-site areas for biodiversity net gain may be needed. Increased recreational pressures and water quality impacts (such as road run-off) as a result of new development can put pressure on GI and biodiversity. Climate change is likely to affect changes to habitats and species distribution.</p> <p>The fragmentation and erosion of habitats remains a threat, and the need to secure biodiversity gain and improve the wider ecological network remain objectives for plan making in the Coventry area. The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide further mitigation measures aiming for no major significant negative effects. However, the higher quanta of housing in Options 1 & 2 will challenge mitigation possibilities for Coventry – even with new development being required to provide biodiversity net gain as land constraints will limit availability for provision of such biodiversity mitigation measures – and therefore, negative effects indicated. The HELAA (2024) studies have found that the quanta in Options 3, 4 & 5 could be accommodated and therefore, likely minor positive effects as all development will need to meet with 10% BNG. Overall, some uncertainties of significance of effects as depend upon locations, densities and any possibilities for sufficient offsite measures.</p> <p>SA Suggestions at Regulation 18: Need to consider any issues from transport & air quality for nitrogen deposition on nature sites Increasing density of housing in suitable locations could take the loading off land availability</p>					
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⁵¹ Biodiversity Metric 4.0 (JP039) 2021 <https://publications.naturalengland.org.uk/publication/6049804846366720>

	Need to consider wider water network for quality, flows and any functionally linked watercourses with a longer term aspiration to restore connectivity by removing barriers					
12: To protect and enhance the historic environment, and its setting	<p>Coventry has a range of unique historic assets that give the area its distinctive characters and cultural identity. Development pressures may continue to have potential negative effects on historic assets and their setting, especially through cumulative effects. As the population changes, local communities may change with different understandings of heritage value and importance. Mitigation of, and adaptation to, the effects of climate change are a particular challenge for heritage assets and their setting.</p> <p>The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. However, the quantum of housing in Options 1 & 2 is likely to have cumulative effects overall that will be difficult to mitigate due to the constraints within the City – therefore, minor negative effects but with some uncertainty at this stage. The lower quanta of housing in Options 3, 4 & 5 indicate that there is more capacity in the City to accommodate the change and with strong policies in place, likely effects will be reduced to neutral/negligible – but still some uncertainty as depends on precise details & location.</p> <p>The historic environment is closely interwoven with townscape & good design (SA No 13). It may also be noted that new development can resolve existing sustainability problems with the historic environment, for example, by removing extant unsightliness of the setting of an asset, improving accessibility, and enhancing the asset with its context/setting.</p> <p>Historic England recognises the need for urgent action & is committed to achieving net zero carbon; HE suggests that reusing</p>	-?	-?	0?	0?	0?

	<p>the current homes built before 1919 (about 20% in England) with appropriate energy improvement solutions is key to cutting carbon emissions⁵².</p> <p>SA Suggestions at Regulation 18: Increasing density of housing in suitable locations could take the loading off land availability & risks of negative effects for historic environment Reuse/refurbishment of older buildings is indicated as being more likely to progress to net zero carbon – but energy efficiency during operation may be an issue Are there areas of the city that have changed significantly with changing population such that the local value & importance has changed? Are there opportunities with the review to focus on protecting heritage assets at risk? Are there opportunities to resolve existing problems with the historic environment & enhancing access/context/setting? Consider proactive support for reuse of buildings pre 1919 with suitable energy improvements</p>					
<p>13: To protect and enhance the quality and character of townscapes & landscapes</p>	<p>It is important to promote good sustainable urban design and this should reflect the special characteristics and needs of different parts of the city. Good design should focus on people within the spaces, how they move, interact and socialise, and should ensure feelings of safety and security. Green and open spaces should be woven into the urban design, and consideration given to opportunities to enhance the blue infrastructure assets for Coventry. The Coventry Green Belt⁵³ remains an important mechanism to prevent urban sprawl, safeguard countryside, and preserve the setting and special character of historic towns – such as Coventry. The administrative boundary of Coventry is tightly defined with many parts of the existing urban area abutting the Green Belt. This was a significant issue during preparation of the current Plan & Coventry's exceptional</p>	<p>--?</p>	<p>-?</p>	<p>+</p>	<p>+</p>	<p>+</p>

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

⁵³ <https://www.coventry.gov.uk/directory-record/45418/green-belt-land> and see also: https://www.coventry.gov.uk/downloads/download/4073/evidence_base_-_coventry_and_warwickshire_joint_green_belt_review_2015

	<p>circumstances were acknowledged. Policy GB1 Green Belt will be updated but the issue of constraints to high levels of new development remain and with particular adverse effects on Green Belt and the quality and character of town and countryside areas, including the closely woven historic environment.</p> <p>The recent technical update to the GB Study (July 2024)⁵⁴ has confirmed that Coventry's GB continues to serve GB purposes and it will continue to do so, noting that there remain some significant areas of PDL in the urban areas of Coventry.</p> <p>Climate change and population growth are exacerbating environmental issues in urban areas. The economic valuation of urban natural capital demonstrates multiple social, environmental and economic benefits and the importance of urban green and blue spaces and blue-green infrastructure⁵⁵. Therefore, it is vital that space for green & blue infrastructure is retained & enhanced, including improvements to linkages & networks that will further benefit people & nature.</p> <p>Significant negative effects are likely for Options 1 & 2, and particularly for cumulative effects, as such high quanta of development are likely to compromise the possibilities for embedded & other mitigation measures in the design process.</p> <p>Mitigation measures, such as for design, location and offsetting, are likely to be effective for the lowest quanta of housing as capacity has been indicated in Options 3, 4 & 5. New development that is high quality, creative & proportional to the receiving townscape & local environment can have very positive effects, and also act as a catalyst for further enhancement of quality and human wellbeing to the built environment. Therefore, positive effects are likely for Options 3, 4 & 5 as it has been indicated by the HELAA studies that such housing numbers can be accommodated within the urban area.</p>					
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⁵⁴ Coventry city Council (July 2024) Green Belt Technical Update Study

⁵⁵ Environment Agency 2021 The State of the Environment: the urban environment <https://www.gov.uk/government/publications/state-of-the-environment/the-state-of-the-environment-the-urban-environment>

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

		Options for Density		
Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	1. Greenfield 30 dph; Outside ring road min 35 dph; inside min 200dph	2. As Option 1 but Outside ring road >35 dph in certain locations	3. Greenfield 35 dph; Brownfield 45 dph; Transition Zone 125 dph; City Centre 250 dph
1: To enable vibrant and inclusive communities	The current CLP approach set out in Policy H9 provides mitigation measures to avoid or minimise likely potential negative effects by defining standards for residential densities according to the characteristics and capacity of the different receiving environments within the Coventry area. The need to protect greenfield land from development pressures and recognise the more rural context is recognised with a lower density of 30 dph. The opportunities for effective use of previously developed land, particularly in a central urban context, is understood and policy allows for a minimum density of 200 dph inside the ring road, which defines a separation between inside and outside. A slightly higher density of 35 dph is permissible outside the ring road on non-greenfield land.	0?	+	++

⁵⁶ Dwellings per hectare

	<p>The Council is investigating possibilities for increasing residential density outside the ring road in certain locations – to help meet with the increased need identified for housing development. It may be noted that there has been both praise and criticism for the ring road and its role in facilitating traffic movement, its complexity and being difficult to navigate, and forming a barrier between the city centre and its suburbs⁵⁷. However, a series of poetry films⁵⁸ was used as part of Coventry’s successful bid for status as UK city of Culture 2021. Thus, there are particular functions and characteristics associated with the ring road and these may influence nearby communities.</p> <p>High density places have been associated with sustainable outcomes but there is a risk of less interaction and building fewer relationships in such environments. However, for example, recent research⁵⁹ has investigated the delivery of award winning high density (250 dph) development in London and identified design factors that influence social interactions. Therefore, it is considered that there is evidence to support higher density residential developments, taking into account housing needs type and mix with local character and appropriate building forms such that there could be positive effects to enable vibrant and inclusive communities in certain locations outside the ring road.</p> <p>There could be synergistic and cumulative effects with other SA objectives, such as those for active travel (SA No 3), enabling provision of identified housing need (SA No 4), & promoting higher densities will better protect & conserve natural resources (SA No 10 soils).</p> <p>There is some uncertainty about whether the extant density arrangements will be able to accommodate the increased housing requirements. The density study⁶⁰ has identified development opportunities in the vicinity of the city centre boundary, thus defining a city centre transition zone where 125 dph is considered appropriate. This</p>			
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⁵⁷ For example, please see Beanland, Christopher (The Guardian, 4 March 2017) <https://www.theguardian.com/cities/2017/mar/14/brutal-inspiration-why-poets-are-writing-about-coventrys-ring-road>, and Jenny Scott (BBC News, 5 April 2014) Are these the worst ring roads in England? <https://www.bbc.co.uk/news/uk-england-26036572> and (BBC News, 16 March 2017) Coventry ring road inspires verse amid city of culture bid <https://www.bbc.co.uk/news/av/uk-england-birmingham-39298399>

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

⁵⁹ Mellan H & M Short (UCL, 30 January 2023) Designing for social interaction in high density housing; a multiple case analysis of recently completed design-led developments in London <https://www.frontiersin.org/articles/10.3389/frsc.2022.1043701/full>

⁶⁰ Coventry City Council (July 2024) <https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

	<p>study has also found that there could be intensification of density within the city centre boundary due to its urban character and the proximity of city centre services and facilities. Capacity and viability studies have indicated that approx. 31,500 dwellings can be accommodated using this refinement of density thresholds that better consider the social & environmental characters and capacities – with major positive effects.</p> <p>SA suggestions at Regulation 18: Identify locations outside ring road where connectivity to the city centre could be optimised Consider recent experiences & research in England on the social implications of higher density development to inform potentially suitable dph & likely building design that would be appropriate for Coventry. Is there scope to consider 250 dph inside the ring road and as has been implemented through planning policy in London & where sustainable deliverables have been reported⁶¹?</p>			
<p>2: To provide accessible essential services and facilities for all residents</p>	<p>It is unclear whether the current approach to residential densities would actually be able to accommodate the identified housing needs. Capacity studies will inform the implications for provision of services & facilities - and mitigation measures will be proposed through updating of relevant policies (current CLP Policies AC1-7) such that there should be no significant adverse effects.</p> <p>If locations are identified outside the ring road where accessible essential services & facilities are available & with capacity, there will be negligible or neutral effects for Option 2. Some uncertainties as effects will depend on overall quantum of housing confirmed and locations.</p> <p>The refinement of densities to more specifically acknowledge the character & ability to accommodate different types of development as set out in Option 3 makes best use of accessibility to services & facilities with positive effects.</p>	0?	0?	+

⁶¹ For example, please see Lessons from Higher Density Development https://www.london.gov.uk/sites/default/files/project_2_3_lessons_from_higher_density_development.pdf and LSE (2020) Living in a Denser London <https://www.lse.ac.uk/geography-and-environment/research/lse-london/documents/Reports/2020-LSE-Density-Report-digital.pdf>

<p>3: To improve health & promote active living</p>	<p>Overcrowding, poor housing conditions, and affordability problems have increased in recent years, as well as health inequalities⁶².</p> <p>It is unclear whether the current approach to residential densities would be able to accommodate the identified housing needs. However, capacity studies and mitigation measures provided through other policies, including in particular CLP Policy HW1 Health Impact Assessments (HIAs) that requires major development to ensure that it has no adverse effects on health and wellbeing, indicate that there will be no significant negative effects through the current approach to densities.</p> <p>Since the provision of good quality housing is known to have positive effects on health & wellbeing, then ensuring that needs can be met through appropriate increases in density in certain locations is likely to have positive effects. These effects are more certain for Option 3 where different densities have been identified according to the characteristics of the receiving communities & environment.</p> <p>SA Suggestions: Identify the relevant & appropriate densities for Coventry, seeking to reduce health inequalities by aligning housing with regard to areas of deprivation Ensure that proposed densities have taken into account building design requirements that create safety & help reduce crime; promote active living Higher densities may be suitable for the ageing population & design requirements will need to consider physical health & mental wellbeing to improve resilience Higher densities may be suitable for coliving</p>	<p>0?</p>	<p>+</p>	<p>+</p>
<p>4: To provide decent and affordable housing for all</p>	<p>Overcrowding, poor housing conditions, and affordability problems have increased in recent years⁶³. Taking into account the current approach to residential densities, it would not be possible to accommodate all the identified housing needs on brownfield (necessitating going to the Green Belt with associated likely negative</p>	<p>+</p>	<p>++</p>	<p>++</p>

⁶² For example, see Tinson A & A Clair December 2020 Better Housing is crucial for our health & the Covid-19 recovery <https://www.health.org.uk/publications/long-reads/better-housing-is-crucial-for-our-health-and-the-covid-19-recovery> and The Marmot Review 10 Years On (February 2020) <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

⁶³ For example, see Tinson A & A Clair December 2020 Better Housing is crucial for our health & the Covid-19 recovery <https://www.health.org.uk/publications/long-reads/better-housing-is-crucial-for-our-health-and-the-covid-19-recovery> and The Marmot Review 10 Years On (February 2020) <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

	<p>effects), but it would progress some provision such that some positive effects are indicated for Option 1, with uncertainty of significance.</p> <p>If ensuring that needs, including suitable mix & tenure for all identified groups, can be met through appropriate increases in density in certain locations, there are likely to be major positive effects for Option 2. These effects are more certain for Option 3 where different densities have been identified according to the characteristics of the receiving communities & environment.</p>			
5: To support sustainable inclusive economic growth	Options for housing densities will not directly affect objectives for economic growth and therefore, at least neutral effects for SA No 5.	0	0	0
6: To help achieve the Council's ambition to reach net zero carbon emissions	All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve dramatic reduction of carbon emissions. Therefore, at least neutral effects for SA No 6.	0	0	0
7: To build resilience to climate change	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. Therefore, at least neutral effects for SA No 7.	0	0	0
8: To reduce traffic & improve sustainable transport choices	<p>The Coventry urban area is well connected with sustainable transport modes. Increasing housing densities in certain locations outside the ring road & where there is good accessibility & capacity to encourage sustainable and active travel will mitigate any potential negative effects. There may be possibilities to enhance sustainable travel through new development; proactive mechanisms to discourage car travel may be needed.</p> <p>The intensification of densities in the city centre & the transition zone could better discourage car travel & improve sustainable transport choices with positive effects, although some uncertainty as might depend on specific developments.</p>	0	0	+
9: To reduce air, noise & light pollution		0	0	0

	<p>In the UK, air pollution has been recently reported as being the largest environmental risk to public health⁶⁴. Reducing vehicle emissions will continue to improve air quality. Indoor air pollution is becoming an increasing proportion of the problem⁶⁵. The Coventry Air Quality Action Plan⁶⁶ includes commitments to improve air quality that involve improvements for pedestrians and cyclists to and from the city centre – and this will improve sustainable connectivity through the ring road. For example, this might help identify those locations near the ring road where a higher residential density could be appropriate and help facilitate further connectivity between the city centre and suburban communities – with positive effects – and helping to resolve an existing sustainability problem.</p> <p>Noise pollution is an acknowledged issue for human health & wellbeing – physical & mental - (and also certain biodiversity see SA No 11), and particularly road traffic noise remains a major problem in Europe⁶⁷. Significant health impacts are likely to be underestimated, and exposure to environmental noise does not affect everyone equally. As housing density increases, potential risks to health and wellbeing by noise from neighbouring activities and the wider environment (especially road traffic) is likely to increase. However, building design requirements⁶⁸ with acoustic separation & sound insulation can ensure that mitigation measures are implemented to acceptable levels/effects.</p> <p>Similarly, good quality design of buildings & their location can reduce the implications for light pollution on health & wellbeing. Light pollution disturbance can adversely affect health & wellbeing, including fatigue, insomnia stress & anxiety⁶⁹ (and also certain biodiversity – see SA No 11).</p> <p>Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan and these policies will be updated and improved in the review, including taking account of advances in building design & materials</p>			
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⁶⁴ OHID (updated Feb 2022) Air Pollution: applying All Our Health <https://www.gov.uk/government/publications/air-pollution-applying-all-our-health/air-pollution-applying-all-our-health>

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

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

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

⁶⁸ For example, please see <https://www.bregroup.com/bretrust/wp-content/uploads/sites/12/2019/02/Acoustic-design-and-testing-Trust-report-online-version-1.pdf>

⁶⁹ For example, please see <https://www.darksky.org/light-pollution/human-health/>

	<p>resources uses such that mitigation measures could be ensured to enable promotion of appropriately increased residential densities in certain locations. Therefore, likely negligible effects for all three options.</p> <p>SA Suggestions at Regulation 18: Ensure that updating of environmental management policies considers highest design requirements to reduce potential air, noise & light pollution Continue to reduce the need to travel by vehicles & discourage car use</p>						
<p>10: To protect & conserve natural resources – soil, water, minerals & waste⁷⁰</p>	<p>Some uncertainty of effectiveness of policy mitigation measures to protect natural resources from the scale of development; therefore potential minor negative effects for Option 1.</p> <p>Consideration of higher density residential developments will have positive effects for more effective use of land, particularly in the Coventry area that is so constrained, with possibilities for major significance but uncertain at this stage of assessment as depends on extent of quantum of housing, extent of densification & location.</p> <p>These effects are more certain for Option 3 where different densities have been identified according to the characteristics of the receiving communities & environment.</p>	-	0	++?	0	++	0
<p>11: To protect and enhance nature & biodiversity</p>	<p>The scale of new development needed is likely to have strong pressures on green infrastructure (GI) & biodiversity with likely significant negative effects, even with the new requirements for biodiversity net gain.</p> <p>Consideration of higher density residential developments will have positive effects for more effective use of land, particularly in the Coventry area that is so constrained & with such importance for protecting spaces for GI & biodiversity. Possibilities for major significance but uncertain at this stage of assessment as depends on extent of quantum of housing, extent of densification & location.</p>	-?		++?	++		

⁷⁰ First cell refers to land/soil & water resources; second cell refers to minerals & waste

	These effects are more certain for Option 3 where different densities have been identified according to the characteristics of the receiving communities & environment.			
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment – regardless of residential densities.	0	0	0
13: To protect and enhance the quality and character of townscapes & landscapes	<p>It is important to promote good sustainable urban design and this should reflect the special characteristics and needs of different parts of the city. The approach to residential densities already recognises the different characteristics & different possibilities for accommodating changes through increased development.</p> <p>High quality & proportionate new development can enhance the townscape & local character. By focusing the housing needs in certain locations with appropriate densification, pressures may be taken from other places; with high quality design, positive effects could be indicated but with uncertainty at this stage of assessment.</p> <p>These effects are more certain for Option 3 where different densities have been identified according to the characteristics of the receiving communities & environment.</p> <p>SA Suggestions at Regulation 18: Consider highest design possibilities & including for reuse/refurbishment to resolve existing sustainability/townscape issues</p>	0?	+	+

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

		Options for Climate Change	
Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	1. In line with FHS & FBS	2. Over & above Building Regulations
1: To enable vibrant and inclusive communities	Other factors are more likely to have potential effects on objectives for inclusive communities than requirements in line or above Building Regulations.	0	0

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

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

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

2: To provide accessible essential services and facilities for all residents	Other factors are more likely to have potential effects on objectives for accessibility to essential services & facilities than requirements in line or above Building Regulations.	0	0
3: To improve health & promote active living	<p>An approach that progresses aspirations for adapting to climate change more promptly by requiring standards above national Building Regulations is likely to have positive effects for health & wellbeing by better reducing the risks to health.</p> <p>Climate change affects the social & environmental determinants of health - clean air, safe drinking water, sufficient food & secure shelter⁷⁴. Reducing emissions of greenhouse gases through better transport, food and energy-use choices can result in improved health, particularly through reduced air pollution. There is some interpretation of data suggesting that achieving net zero emissions by 2050 <i>will not be enough to ensure a safe future for humanity</i>⁷⁵. Any consequence of climate change that can bring physical ill health can also have mental health implications & climate change can negatively impact on mental health, including depression and anxiety. These factors may need more consideration in the future, but clear actions to mitigate climate change can positively influence mental health⁷⁶.</p> <p>Aligning with Government requirements may be considered to have negligible but uncertain effects for health & wellbeing. However, by requiring standards over & above Building Regulations, aspirations for reducing carbon emissions will be achieved sooner & will better support the aspirations for Coventry City with regard to building resilience to climate change effects, including those for health. By making a clear proactive commitment, such action could influence both physical & mental health with potential major positive effects. As climate change effects are global, considerable uncertainties indicated.</p>	0?	++?
SA No 4: To provide decent	There is a perceived concern from the construction industry in being able to meet national net zero carbon targets because of various issues – and most notably with the embedded carbon in materials ⁷⁷ .	0?	?

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

⁷⁵ For example, please see CCAG as reported by IEMA (August 2021) <https://www.iema.net/articles/net-zero-by-2050-too-little-too-late-scientists-warn>

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

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

<p>and affordable housing for all</p>	<p>Therefore, there is a risk that requiring higher standards than national Building Regulations will pose greater challenges for new development design & building – and particularly construction – such that costs & viability for house building may be compromised with potential negative effects, especially in the shorter term. However, the development sector has embraced sustainability with the need to achieve net zero carbon & implementation of the circular economy with design for durability, reuse, remanufacturing, and recycling.⁷⁸ With commitment & creativity in design, higher standards may be more readily achievable; however, the effects on the delivery of the required housing is uncertain & unknown at this stage.</p>		
<p>5: To support sustainable inclusive economic growth</p>	<p>Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people.</p> <p>It is unclear whether any requirement for higher standards through Building Regulations would have any significant effects on economic growth. It could be asserted that higher standards might equate to higher costs & thus limit growth. However, Government has advised that the transition to net zero carbon is the growth opportunity of the 21st century⁷⁹, and the recently published Net Zero Growth Plan (March, 2023)⁸⁰ continues to claim new opportunities to grow green jobs. Coventry has strong commitments for innovation, research & development in new technology such that higher standards could be a catalyst to promote progress in the green economy and support the city's aspirations.</p> <p>Some research has indicated that it is cheaper to reduce greenhouse gas emissions than it is to deal with climate change impacts⁸¹ - and thus, this would support progressing higher standards sooner with some positive effects indicated for the economy.</p>	<p>0?</p>	<p>++?</p>
<p>6: To help achieve the</p>		<p>0?</p>	<p>+++</p>

⁷⁸ For example, please see RIBA https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy_9781859469545

and BRE <https://bregroup.com/products/breeam/breeam-solutions/breeam-circularity-and-resilience/>

⁷⁹ <https://www.gov.uk/government/news/net-zero-review-uk-could-do-more-to-reap-economic-benefits-of-green-growth>

⁸⁰ DESNZ (March, 2023) <https://www.gov.uk/government/publications/powering-up-britain>

⁸¹ <https://www.ucl.ac.uk/news/2021/sep/economic-cost-climate-change-could-be-six-times-higher-previously-thought>

<p>Council's ambition to reach net zero carbon emissions</p>	<p>The Council recognises the climate crisis and is currently reviewing its Strategy⁸². This will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure.</p> <p>Direct greenhouse gas (GHG) emissions from buildings accounted for 17% of UK GHG emissions in 2019⁸³. It has been reported that the construction industry needs to decarbonise more urgently⁸⁴ and building design needs to progress principles in the circular economy. There is some interpretation of data suggesting that achieving net zero emissions by 2050 “<i>will not be enough to ensure a safe future for humanity</i>”⁸⁵.</p> <p>Implementation of planning policy requiring higher standards to reduce GHG emissions sooner than national requirements will have major positive effects towards helping the Council achieve its ambition for dramatic reduction of carbon emissions, as set out in the Coventry draft Climate Change Strategy but with uncertainties of significance at this stage.</p>		
<p>7: To build resilience to climate change</p>	<p>There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK.⁸⁶ Therefore, it is vital to build resilience, including reducing risks from overheating, flooding and the resultant detriment to health & wellbeing, the economy, and the environment. All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change.</p> <p>Implementation of planning policy requiring higher standards, including reducing GHG emissions sooner than national requirements, will contribute to building resilience to climate change sooner with likely positive effects but some uncertainty of significance.</p>	<p>0?</p>	<p>+?</p>
<p>8: To reduce traffic & improve</p>	<p>Transport produced 24% of the UK's total emissions in 2020 & remains the largest emitting sector in the UK, with the majority of emissions from road vehicles⁸⁷.</p>	<p>0</p>	<p>0</p>

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

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

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

⁸⁵ For example, please see CCAG as reported by IEMA (August 2021) <https://www.iema.net/articles/net-zero-by-2050-too-little-too-late-scientists-warn>

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

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

sustainable transport choices	Changes to Building Regulations will not affect this SA objective and therefore, neutral/not applicable effects.				
9: To reduce air, noise & light pollution	No direct effects likely – neutral/not applicable	0		0	
10: To protect & conserve natural resources – soil, water, minerals & waste⁸⁸	<p>With climate change, temperate soils are forecast to experience a high degree of variability in moisture conditions; restoring lost carbon through conventional approaches may take decades; and food security is an increasing issue. Soil has been recognised as an essential national asset & government has indicated that managing soil carbon could form a part of net zero plans⁸⁹. The review of the CLP will continue to build on previously developed land (PDL) where effectively located & thus contribute towards protecting agricultural land.</p> <p>Climate change, particularly incidences of hotter, drier, summers may exacerbate water supply issues; wetter weather and more flooding may overload wastewater systems. The cumulative effects of increased development on soil & water resources is uncertain, particularly in the shorter-medium term before the effects of net zero carbon actions are implemented & become effective. Therefore, uncertain negative effects for Option 1. Planning policy requirements that are over & above national building regulations requirements are likely to reduce carbon emissions earlier, thus mitigating negative effects on soils & water sooner, and thus indicating at least neutral effects – but uncertainty of significance at this stage of assessment.</p> <p>The current CLP Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development. It is assumed that they will be updated to address any capacity issues such that at least neutral effects would be indicated for both options.</p> <p>Progressions with the circular economy, driven by the need to reduce carbon emissions & encouraged through higher standards as in Option 2, will conserve minerals & reduce/minimise/reuse waste with some potential further positive effects in the longer term but with uncertainty of significance.</p>	-?	0	0?	+?

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

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

<p>11: To protect and enhance nature & biodiversity</p>	<p>The need for addressing biodiversity loss & climate change issues together is being increasingly recognised⁹⁰. Climate change can contribute to biodiversity loss & biodiversity loss can make climate change and its effects worse. Government has recently reiterated that we cannot mitigate & adapt to climate change without Nature-Based Solutions⁹¹. It could be considered that meeting the proposed national standards for building regulations & reducing GHG emissions could approach negligible effects – but uncertainty as depends upon quantum of new development. All development will have to meet with new requirements for Biodiversity Net Gain & therefore, positive effects indicated for all options. It could be assumed that progressing more rigorous standards would reduce GHG emissions & sooner such that mitigation measures are earlier & more effective such that there could be some positive effects for nature & biodiversity – but uncertainty as depends upon quantum of new development & extent of associated biodiversity gain.</p>	<p>+</p>	<p>++</p>
<p>12: To protect and enhance the historic environment, and its setting</p>	<p>Historic England recognises the need for urgent action & is committed to achieving net zero carbon; HE suggests that reusing the current homes built before 1919 (about 20% in England) with appropriate energy improvement solutions is key to cutting carbon emissions⁹².</p> <p>The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. It could be assumed that progressing more rigorous standards would reduce GHG emissions & sooner such that mitigation measures are earlier & more effective such that there could be less risk of negative effects on the historic environment – but uncertainty as depends upon extent of development & location.</p>	<p>0</p>	<p>+</p>
<p>13: To protect and enhance the</p>	<p>The national design guide (2019)⁹³ sets out the characteristics of well-designed places & includes consideration of minimising carbon emissions. Circular economy principles in building design⁹⁴ will</p>	<p>0</p>	<p>0?</p>

⁹⁰ For example, please see UK Parliament Post (Feb 2020) <https://researchbriefings.files.parliament.uk/documents/POST-PN-0617/POST-PN-0617.pdf> and NE (April 2020) Climate Change Adaptation Manual (NE751) <https://publications.naturalengland.org.uk/publication/5679197848862720>

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

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

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

⁹⁴ For example, please see RIBA https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy_9781859469545 and BRE <https://bregroup.com/products/breem/breem-solutions/breem-circularity-and-resilience/>

<p>quality and character of townscapes & landscapes</p>	<p>contribute towards mitigating effects of climate change. It is also acknowledged that new proportional & high quality development can enhance the townscape.</p> <p>The current CLP includes policies to protect townscapes/landscapes, especially Policy DE1 Ensuring High Quality Design, including consideration of climate change. These will be updated in the CLP review, and therefore, likely negligible effects with regard to the proposed changes to Building Regulations. There may be challenges to design & construction, particularly in the shorter term, if requirements over & above such standards are proposed and thus with some uncertainty of significance.</p>		
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IIIId: Options for Nature & Biodiversity	
1	Planning policy requirements in line with national requirements & standards, including 10% Biodiversity Net Gain (BNG) ⁹⁵ , and Green Infrastructure (GI) ⁹⁶ standards ⁹⁷
2	Planning policy requirements that are over and above national requirements for BNG & GI standards
<p>The recent Environmental Improvement Plan (January, 2023)⁹⁸ for England includes a commitment that the public should be able to access green space or water, such as woodlands, wetlands, parks and rivers, within a 15-minute walk from their home. The Green Infrastructure Framework (GIF, Feb 2023)⁹⁹ provides a structure to analyse where greenspace in urban environments is needed most. It aims to support equitable access to greenspace across England. The framework integrates green infrastructure tools, principles, standards and design guidance. It is structured by five key standards:</p> <ul style="list-style-type: none"> ▪ Urban Nature Recovery Standard – including trees & wildflowers to increase carbon capture, prevent flooding, & reduce temperatures during heatwaves ▪ Urban Greening Factor (UGF) – approximately 40% of residential developments to have green & blue spaces, green roofs or green walls ▪ Urban Tree Canopy Cover Standard – increase tree canopy cover in urban environments ▪ Accessible Greenspace Standards - promote access to good quality green and blue space within 15 minutes' walk from home ▪ Green Infrastructure Strategy - delivery plans to support creation and enhancement of new and existing greenspace 	

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

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

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

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

⁹⁹ Natural England, Feb 2023 <https://www.gov.uk/government/news/natural-england-unveils-new-green-infrastructure-framework>

		Options for Nature & Biodiversity	
Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	1. In line with national requirements & standards for BNG & GI	2. Over & above national requirements for BNG & GI
		1: To enable vibrant and inclusive communities	The provision & accessibility of GI can encourage safe social connectivity & help reduce social isolation. It could be considered that provision of GI in line with proposed national standards would meet with objectives & that higher standards would not necessarily significantly affect inclusivity. There are other factors, including for building design and locations, that are more likely to have effects on vibrant and inclusive neighbourhoods. Therefore, negligible effects for both options.
2: To provide accessible essential services and facilities for all residents	It is likely that implementation of the proposed national standards for GI will increase provision of, and accessibility to, green infrastructure – with positive effects. It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision & accessibility of GI with further positive effects – that are likely to be synergistic & cumulative, particularly in the longer term.	+	++
3: To improve health & promote active living	It is likely that implementation of the proposed national standards for GI will increase provision of, and accessibility to, green infrastructure – with positive effects for health & wellbeing, both physical & mental. It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision & accessibility of GI with further positive effects for health & wellbeing – that are likely to be synergistic & cumulative, particularly in the longer term.	+	++

	<p>Coventry has been a Marmot City¹⁰⁰ since 2013 & there has been progress in outcomes across health & society. The Marmot Review¹⁰¹ in 2020 on health equity in England highlighted that the health gap has grown between wealthy & deprived areas, people can expect to spend more of their lives in poor health, improvements to life expectancy have stalled, and that place matters. Enhancing GI is only one factor that contributes to improving health & wellbeing. However, a requirement to meet standards for GI over & above national proposals would demonstrate further strong commitment to Marmot principles & support for the multisectoral & partnership approach in the city. The visible greening of the urban areas could further encourage people in active living with positive effects for health & wellbeing.</p> <p>SA Suggestions: Align opportunities for enhancing GI network in most deprived areas & where health inequity could be most reduced</p>		
<p>4: To provide decent and affordable housing for all</p>	<p>Provision of, and accessibility to, enhanced GI will improve the overall quality of residential development, supporting positive effects from housing provision for all.</p> <p>It is vital that the appropriate mix & tenure of housing, suitable for different housing needs of different people & at different times of their lives, is planned according to identified needs. Nonetheless, it is important to retain sufficient space to accommodate GI & in locations where it may better support nature & people. It is unclear at this stage what quantum of housing could be accommodated together with aspirational GI for nature, people & climate change. This is a particular challenge for Coventry with its boundary & other constraints.</p> <p>It is difficult to predict the effects of increasing requirements for GI above national standards on housing as it depends upon quantum & location of development with uncertainties at this stage of assessment.</p>	<p>+?</p>	<p>+?</p>
<p>5: To support sustainable inclusive economic growth</p>	<p>Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people.</p> <p>The economic valuation of urban natural capital demonstrates multiple social, environmental and economic benefits and the importance of urban green and blue spaces and blue-green</p>	<p>0?</p>	<p>0?</p>

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

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

	infrastructure ¹⁰² . Whilst improvements to GI will enhance the local environment for residents, workers & visitors, it is unclear how this will directly affect sustainable economic objectives and therefore, uncertainties.		
6: To help achieve the Council's ambition to reach net zero carbon emissions	The GI Standards aim to improve resilience to & mitigation of climate change, including increasing carbon capture, and with positive effects towards reaching dramatic reduction of carbon emissions, as set out in Coventry's draft Climate Change Strategy.	+	++?
	It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision & accessibility of GI with further positive effects for reducing GHG emissions – that are likely to be synergistic & cumulative, particularly in the longer term. The more extensive greening of the urban environment would visually demonstrate a strong commitment to GI & progressing towards a dramatic reduction of carbon emissions that may further engage people in helping to achieve the Council's ambition. Uncertainties for significance at this stage of assessment.		
7: To build resilience to climate change	The GI Standards aim to improve resilience to & mitigation of climate change, including preventing flooding, and reducing temperatures during heatwaves, and with positive effects towards building resilience to climate change.	+	++?
	It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision & accessibility of GI with further positive effects for resilience – that are likely to be synergistic & cumulative, particularly in the longer term. The more extensive greening of the urban environment would visually demonstrate a strong commitment to GI & progressing towards a dramatic reduction of carbon emissions that may further engage people in helping to achieve the Council's ambition. Uncertainties for significance at this stage of assessment.		
8: To reduce traffic & improve sustainable transport choices	Improving the sustainable transport network for cycling & walking can be integrated with the GI network for mutual benefits for nature & people. It is not clear how differences in GI standards will directly affect sustainable transport objectives – likely negligible effects for both options.	0	0
9: To reduce air, noise & light pollution	Good quality GI has an important role to play in improving air quality in urban areas, including reducing particulate matter – and thus improving health/wellbeing – with positive effects. GI can	+	++?

¹⁰² Environment Agency 2021 The State of the Environment: the urban environment <https://www.gov.uk/government/publications/state-of-the-environment/the-state-of-the-environment-the-urban-environment>

	<p>reduce noise pollution – trees can act as sound barriers as they can either absorb or deflect noise (or both) & vegetation, including green roofs & wall systems act as sound insulation.</p> <p>It is reasonable to assume that requiring higher GI standards would enable a concomitant increase in provision & accessibility of GI with further positive effects for reducing air & noise pollution – that are likely to be synergistic & cumulative, particularly in the longer term. Uncertainties for significance at this stage of assessment.</p>				
10: To protect & conserve natural resources – soil, water, minerals & waste¹⁰³	<p>Provision of GI – both green & blue – will contribute to protecting & conserving the natural resources of soils & water with positive effects. It seems reasonable to assume that higher GI standards will achieve better protection of such natural resources but there is uncertainty for the significance of the further positive effects.</p> <p>It is not clear how differences in GI standards will directly affect sustainability objectives for waste & minerals – likely negligible effects for both options.</p>	+	0	++	0
11: To protect and enhance nature & biodiversity	<p>Provision of GI – both green & blue – will contribute to protecting & enhancing nature & biodiversity with positive effects. It seems reasonable to assume that higher GI standards will achieve better protection & enhancement of nature & biodiversity but there is uncertainty for the significance of the further positive effects.</p>	+		++?	
12: To protect and enhance the historic environment, and its setting	<p>It is not clear how differences in GI standards will directly affect sustainability objectives for the historic environment, although for example, improvements in air quality through greening will reduce polluting effects on historic buildings – likely negligible effects for both options.</p>	0		0	
13: To protect and enhance the quality and character of townscapes & landscapes	<p>Provision of GI – both green & blue – will contribute to protecting & enhancing the quality & character of townscapes & landscapes with positive effects. It seems reasonable to assume that higher GI standards will achieve better protection & enhancement of townscapes & landscapes but there is uncertainty for the significance of the further positive effects.</p>	+		++?	

¹⁰³ First cell refers to land/soil & water resources; second cell refers to minerals & waste

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

		Options for Green Belt	
Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	1. Development in Green Belt	2. No Development within the Green Belt
		1: To enable vibrant and inclusive communities	Other factors are more likely to have potential effects on objectives for inclusive communities than locations in or out of the Green Belt. However, urban sprawl & encroachment of the countryside can affect the vibrancy of communities & some uncertainty of effects for Option 1; and development in the GB could have the unintended consequences of producing isolated communities ¹⁰⁴ .
2: To provide accessible essential services and facilities for all residents	Other factors are more likely to have potential effects on objectives for accessibility to essential services & facilities than locations in or out of the Green Belt.	0	0

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

<p>3: To improve health & promote active living</p>	<p>Provision of good quality housing will have positive effects on health & wellbeing regardless of whether it is in or out of the Green Belt. Protecting the openness of GB land, including for nature & recreation, is likely to have major positive effects for health & wellbeing with Option 2, although some uncertainty of the precise significance at this stage of assessment. Urban sprawl & encroachment of the countryside can affect residents' wellbeing & such development can evoke strong feelings – minor positive effects for Option 1 with potential for some uncertainty of significance as depends on locational specificity.</p>	<p>+</p>	<p>++</p>
<p>SA No 4: To provide decent and affordable housing for all</p>	<p>The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence (NPPF). Protecting the Green Belt is useful for urban regeneration as it encourages the use of brownfield rather than greenfield land, and is an efficient use of land. The GB prevents urban sprawl – limiting air pollution, loss of open/green spaces, & pressures on services/facilities; and preserves the countryside for nature, farming, recreation & related open uses, including protection of historic settlements & landscapes. In some areas for GB, it may be asserted that as urban areas become restricted to new housing, there is a lack of developable land with concomitant increases in house prices¹⁰⁵, and it can also lead to leapfrog development on the outer edge of the GB; consideration of the GB can be controversial¹⁰⁶.</p> <p>In some areas, the actual land designated by such planning policy may not have any ecological value & has not been based on its natural beauty. These poor quality GB areas have been identified as grey belt areas by the Labour Government & likely definitions are set out in the proposed revisions to the NPPF (July 2024)¹⁰⁷. However, the Coventry Local Plan to 2041 will be submitted under the current NPPF which does not mention any requirements regarding grey belt land.</p> <p>Coventry has two distinctive types of Green Belt – the open countryside of Ancient Arden to the west; and GB corridors of open land tracts that extend through the built-up area of the city, to and from the countryside beyond. Of greatest significance is the wider GB that encircles the city, helping prevent urban sprawl. Existing LP Policy GB1 Green Belt & Local Green Space provides detailed</p>	<p>0</p>	<p>0</p>

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

¹⁰⁶ For example, please see <https://www.cbre.co.uk/insights/articles/should-we-build-more-homes-on-the-green-belt>
<https://www.centreforcities.org/reader/benefits-challenges-green-belt/>
<https://theweek.com/arts-life/property/960970/pros-and-cons-of-building-on-the-green-belt>
<https://www.theguardian.com/society/2023/nov/24/building-on-the-green-belt-is-no-solution-to-the-housing-crisis>
<https://www.cpre.org.uk/explainer/all-you-need-to-know-about-the-green-belt/>

¹⁰⁷ <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system#chapter-5--brownfield-grey-belt-and-the-green-belt>

	<p>explanation of the difficulties facing the Council, particularly with such a tight administrative boundary. For the adopted 2017 LP, the Council considered the Joint Green Belt Review¹⁰⁸, together with other evidence to explore Coventry's exceptional circumstances regarding development pressures and release of some suitable land from the GB. Thus, at that time, the Council investigated any opportunities for GB land that would not be urban sprawl, retaining openness by avoiding/minimising any negative effects & optimising the positive effects for development land.</p> <p>Coventry City Council has updated its technical review¹⁰⁹ of the GB and this has confirmed that the limited remaining GB land in the Coventry area continues to serve GB purposes. LP Policies GB1 Green Belt and GB2 Safeguarded Land in the Green Belt will be updated for the CLPR.</p> <p>Capacity (HELAA 2024)¹¹⁰ & the viability study have determined that identified needs of approx. 31,500 new dwellings can be accommodated within the urban areas and without needing to consider residential locations in the Green Belt. Therefore, neutral effects for both options.</p>		
<p>5: To support sustainable inclusive economic growth</p>	<p>Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people.</p> <p>The Council has identified a shortfall of employment sites within its own administrative area, against its identified quantum of local need. A particular site in the Green Belt (Site North of A45 & West of Brick Hill Lane) is being promoted for employment purposes. Therefore, potential minor positive effects for limited employment land in the GB but with some uncertainty at this stage as impact significance & mitigation possibilities depend upon locational & development details. Minor negative effects for the economy if the Council cannot meet its employment land identified need through avoiding suitable land in the GB – some uncertainty of significance as depends on development type & jobs details.</p>	+?	-?
<p>6: To help achieve the Council's ambition to reach net zero carbon emissions</p>	<p>The Council recognises the climate crisis and is currently reviewing its Strategy¹¹¹. This will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure.</p>	0	0

¹⁰⁸ Coventry & Warwickshire Joint Green Belt Review (2015)

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

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

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

	Direct greenhouse gas (GHG) emissions from buildings accounted for 17% of UK GHG emissions in 2019 ¹¹² . It has been reported that the construction industry needs to decarbonise more urgently ¹¹³ and building design needs to progress principles in the circular economy. All development will have to reduce GHG emissions in line with updated planning policy – regardless of whether in or out of the GB – therefore, neutral effects.				
7: To build resilience to climate change	There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK. ¹¹⁴ Therefore, it is vital to build resilience, including reducing risks from overheating, flooding and the resultant detriment to health & wellbeing, the economy, and the environment. All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change – regardless of whether in or out of the GB – therefore, neutral effects.	0	0		
8: To reduce traffic & improve sustainable transport choices	Transport produced 24% of the UK's total emissions in 2020 & remains the largest emitting sector in the UK, with the majority of emissions from road vehicles ¹¹⁵ . Development in the Green Belt might not reduce traffic, whilst development focused on PDL might improve sustainable transport choices and therefore, neutral effects for Option 1 and minor positive effects for Option 2 – but uncertainty at this stage, as depends upon proposals and locations.	0?	+		
9: To reduce air, noise & light pollution	Development in or out of the Green Belt will not affect this SA objective and no direct effects likely – neutral/not applicable	0	0		
10: To protect & conserve natural resources – soil, water, minerals & waste¹¹⁶	The review of the CLP will continue to build on previously developed land (PDL) where effectively located & thus contribute towards protecting agricultural land – and Green Belt land – with positive effects for Option 2, including by encouraging <i>the recycling of derelict and other urban land</i> & thus, supporting one of the five purposes of GB land. The recent Water Cycle Study Stage 1 (June 2024) ¹¹⁷ indicates that there is water capacity for the preferred residential quantum and therefore, likely neutral effects with regard to GB land for both options.	0	0	+	0

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

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

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

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

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

¹¹⁷ JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

	The current CLP Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development. It is assumed that they will be updated to address any capacity issues such that at least neutral effects would be indicated for both options.		
11: To protect and enhance nature & biodiversity	Grey belt land ¹¹⁸ may be visually unsatisfactory but could be supporting valuable biodiversity. The fragmentation and erosion of habitats remains a threat, and the need to secure biodiversity gain and improve the wider ecological network remain objectives for plan making in the Coventry area. The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These will be updated & should provide sufficient mitigation such that effects will be at least neutral with regard to GB land – all development will be required to meet with new requirements for Biodiversity Net Gain indicating positive effects for both options but some uncertainty of significance at this stage.	+	+
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment – with neutral effects for GB land. However, avoiding development in the Green Belt supports one of the 5 purposes – to preserve the setting & special character of historic towns – therefore, potential positive effects for Option 2 and the historic environment; uncertainty at this stage as depends upon location.	0	+
13: To protect and enhance the quality and character of townscapes & landscapes	The NPPF ¹¹⁹ sets out the importance of Green Belts. <i>The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Green Belt serves five purposes:</i> a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	--	++

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

¹¹⁹ <https://www.gov.uk/guidance/national-planning-policy-framework/13-protecting-green-belt-land>

	<p>The new Labour Government has set out plans for delivering homes in the Green Belt¹²⁰ and confirmed through recent proposals for reform of the NPPF (July 2024)¹²¹. The consultation draft advises that “We want this approach to protect land which makes a strong contribution to any Green Belt purposes, while allowing authorities to consider a range of Green Belt land based on its merits for potential development”. However, the review of the CLP to 2041 will be submitted under the current NPPF which does not make any requirements in respect of grey belt land.</p> <p>It is for LPAs to define and maintain GB land in their local areas. Coventry has two distinctive types of Green Belt – the open countryside of Ancient Arden to the west and north west; and GB corridors of open land tracts that extend through the built-up area of the city, to and from the countryside beyond. Of greatest significance is the wider GB that encircles the city, helping prevent urban sprawl and coalescence.</p> <p>The adopted Coventry LP was informed by a sub-regional GB study (2015), and since the CLP removed 16% of GB to accommodate identified development needs at that time, there is now limited GB land in the CLP area. Existing LP Policy GB1 Green Belt & Local Green Space provides detailed explanation of the difficulties facing the Council, particularly with such a tight administrative boundary.</p> <p>Coventry City Council has undertaken a technical update¹²² to the original GB Review & using the same methods. The study has concluded that any potential releases of land from the GB for built development will have visual or other impact, and that the GB areas continue to serve GB purposes. The study recommends the areas to remain as GB in their entirety; also in respect of safeguarded land in the GB with a note that further technical study is required regarding the extant allocations set out in the Warwick DC LP and the proposed Warwickshire JLP.</p> <p>LP Policies GB1 Green Belt and GB2 Safeguarded Land in the Green Belt will be updated for the CLPR.</p> <p>Since there is strong updated evidence that the limited GB in the Coventry area continues to serve GB purposes (and thus is not likely to be defined as greybelt land), it is considered that any proposals for development in the GB could have major negative effects. Protecting the limited GB in the Coventry area is likely to have major positive effects for GB purposes & the SA objectives.</p>		
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¹²⁰ <https://labour.org.uk/updates/stories/labours-housing-plan-how-well-protect-our-natural-spaces-and-free-up-grey-belt-land-for-building/>

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

¹²² Coventry City Council (July 2024) Green Belt Technical Update Study

III f: Options for Quantum of General Industrial Employment Land	
1	147.6 ha general industrial (excluding strategic B8) – HEDNA (2022)
2	60 ha general industrial calculated as quantum that can be accommodated
3	60 ha plus an additional 11.81 ha being promoted & located in the Green Belt (Site North of A45 & West of Brick Hill Lane)

		Options for Quantum of General Industrial Employment Land		
Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	1. 147.6 hectares	2. 60 hectares calculated that can be accommodated	3. 60 ha + 11.81 ha located in Green Belt
1: To enable vibrant and inclusive communities	<p>Other factors are more likely to have potential significant effects on objectives for inclusive communities than the quantum of employment land. However, provision of sufficient employment land to support the economy and a diversity of jobs will overall contribute to vibrant & inclusive communities.</p> <p>The HEDNA (Nov 2022)¹²³ considered employment land requirements across Coventry and Warwickshire looking to 2041 and 2050. For Coventry, the employment land needs were calculated to be 147.6 general industrial – and please see SA No 5 Economic</p>	-?	+	+

¹²³ Housing & Economic Development Needs Assessment (HEDNA, November 2022) Icen Projects Ltd on behalf of Coventry & Warwickshire Local Authorities
<https://www.coventry.gov.uk/downloads/download/7374/coventry-and-warwickshire-housing-and-economic-development-needs-assessment-hedna>

	<p>Growth for more details. Recent studies (ELR, May 2024)¹²⁴ have considered the changes & trends in the employment market since the current Local Plan was adopted, and investigated suitability of existing employment sites for continued use.</p> <p>Provision of the identified need of 147.6 ha general industrial employment land in Option 1 would suggest that the role of employment contributing to vibrant communities would be satisfied with positive effects. However, capacity studies (HELAA 2024)¹²⁵ & review studies (ELR 2024) indicate that this quantum of land may not be possible within the constrained nature of the Coventry area & therefore, negative effects but uncertainty of significance.</p> <p>Uncertainty of positive effects is indicated with Option 2 that is less than identified need but has been found that can be accommodated. Option 3 includes one additional site that is in the Green Belt. If potential negative effects on GB purposes can be mitigated, then with this additional site the quantum approaches the identified need and can be accommodated with more certainty of positive effects.</p>			
<p>2: To provide accessible essential services and facilities for all residents</p>	<p>Other factors are more likely to have potential effects on objectives for accessibility to essential services & facilities than the quantum of employment land – neutral effects for all three options.</p>	0	0	0
<p>3: To improve health & promote active living</p>	<p>The relationship between fair employment, good work and health has been recognised for many years. Whilst employment rates have increased nationally since 2010, there has been an increase in poor quality work, including part-time, insecure employment (Marmot Review 10 years on, 2020)¹²⁶. Since 2010 there have been profound shifts in many aspects of the labour market and employment practices in England. Rates of unemployment have decreased but increases in employment have often been in low-paid, unskilled, self-employed, short-term or zero hours contract jobs –which have seen a steady growth. Rates of pay have not increased and, notably, more people in poverty are now in work than out of work. The rise of automation in the labour market also has</p>	-?	+?	+

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

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

¹²⁶ The Health Foundation (Feb 2020) Health Equity in England: The Marmot Review 10 Years On <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

	<p>implications for health inequalities. Unemployment and poor quality work are major drivers of inequalities in physical and mental health.</p> <p>Provision of the identified need of 147.6 ha general industrial employment land in Option 1 would suggest that employment needs would be met with concomitant positive effects for health. However, capacity & review studies indicate that this quantum of land may not be possible within the constrained nature of the Coventry area & therefore, some negative effects but uncertainty of significance.</p> <p>Uncertainty of positive effects is indicated with Option 2 that is less than identified need but has been found that can be accommodated. Option 3 includes one additional site that is in the Green Belt. If potential negative effects on GB purposes can be mitigated, then with this additional site the quantum approaches the identified need and can be accommodated with more certainty of effects.</p>			
<p>SA No 4: To provide decent and affordable housing for all</p>	<p>The provision of good quality new homes will support the ambitions for sustainable economic growth & neutral effects suggested for Options 2 & 3. Studies have indicated that Option 1 cannot be accommodated. There is a risk that continuing to progress this option could compromise the availability of certain land for residential/mixed-use development & other uses, and limit the opportunities for ensuring that general industrial land is located in the most sustainable locations.</p>	<p>-?</p>	<p>0</p>	<p>0</p>
<p>5: To support sustainable inclusive economic growth</p>	<p>Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people. Coventry has seen strong economic growth over the past few years and is recognised as a national centre for a number of growing business sectors, including advanced manufacturing and engineering; energy and low carbon; connected autonomous vehicles; business, professional & financial services; digital, creative, and gaming. These have all resulted in the creation of high-quality jobs for in growth sectors. However, there are a number of challenges, Coventry's economic growth and prosperity lags behind the England average and the city has fewer people in work compared to both regional and national figures¹²⁷.</p>	<p>+</p>	<p>++?</p>	<p>++</p>

¹²⁷ One Coventry Plan 2022-2030 <https://www.coventry.gov.uk/downloads/download/7162/one-coventry-plan-2022-2030>

	<p>It is notable that many of Coventry's private sector businesses are small or micro-businesses & the Council has an important priority to support SMEs¹²⁸. Further priorities for creating the infrastructure to enable sustainable economic growth include innovating with multi-user developments (such as Friargate & City Centre South), and enabling the city to be cleaner & greener with GI & renewable energy.</p> <p>With regard to employment land needs, the HEDNA (Nov 2022)¹²⁹ concluded that whilst the demand for B8 land use (storage/warehousing)¹³⁰ is strong, there is a need for separate allocations for B1c/B2 (general industrial) where land is delineated from sites going for B8 in order to support the manufacturing sector. Taking into account various sub-regional factors & an adjustment for flexibility, the HEDNA concludes on 147.6 general industrial land need for the Coventry LP area to 2041.</p> <p>Provision of the identified need of 147.6 ha general industrial employment land in Option 1 would suggest that the contribution to sustainable economic growth objectives would be achieved with positive effects. However, capacity studies (HELAA 2024) & land review studies (ELR 2024)¹³¹ indicate that this quantum of land may not be possible within the constrained nature of the Coventry area & therefore, uncertainty of significance.</p> <p>Some uncertainty of positive effects is indicated with Option 2 that is less than identified need but has been found that can be accommodated. Option 3 includes one additional site that is in the Green Belt. If potential negative effects on GB purposes can be mitigated, then with this additional site the quantum approaches the identified need and can be accommodated with more certainty of effects.</p> <p>Existing CLP Policies JE1-JE7 on employment will be updated & revised, including a new policy that addresses R&D employment, differentiating this from industrial & storage/distribution development. The Council is also reassessing whether the existing employment allocations are still suitable & deliverable & align with the overall strategy.</p>			
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¹²⁸ Coventry City Council Economic Development Strategy 2022-2027 <https://www.coventry.gov.uk/council-democracy/economic-development-strategy-2022-2027/3>

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

¹³⁰ Discussions are ongoing on how to meet the separately identified strategic B8 needs to serve the wider Coventry & Warwickshire functional economic market area – and this is not considered further within this SA of the Coventry Local Plan Review

¹³¹

	<p>There may be other opportunities with employment sites to enhance objectives for GI, clean energy & net zero carbon that would extend positive effects beyond SA No 5 - depends on locational & industrial specificities.</p> <p>SA Suggestions:</p> <ul style="list-style-type: none"> ■ Is there scope to increase density of job numbers through creative building design that optimises footprinting? ■ Maximising use of green roofs & other GI to encourage greening of sustainable economic development ■ Maximising use of renewable energy modes – to include neighbourhood provision? 			
<p>6: To help achieve the Council's ambition to reach net zero carbon emissions</p>	<p>The Council recognises the climate crisis and is currently reviewing its Strategy¹³². This will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure.</p> <p>Direct greenhouse gas (GHG) emissions from buildings accounted for 17% of UK GHG emissions in 2019¹³³. It has been reported that the construction industry needs to decarbonise more urgently¹³⁴ and building design needs to progress principles in the circular economy.</p> <p>A major element of the review of the CLP is to address the Council's ambitions to reach net zero carbon emissions, including updates to Policy EM1 and replacement of Policies EM2 & EM3 with EM11-EM14 incorporating building standard requirements for different typologies. All development will be required to meet with new policy – therefore, neutral effects for all three options.</p>	0	0	0
	<p>There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK.¹³⁵ Therefore, it is vital to</p>	0	0	0

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

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

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

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

<p>7: To build resilience to climate change</p>	<p>build resilience, including reducing risks from overheating, flooding and the resultant detriment to health & wellbeing, the economy, and the environment.</p> <p>A major element of the review of the CLP is to build resilience to climate change effects and all development will be required to meet with new and updated policies – therefore, neutral effects for all three options.</p>						
<p>8: To reduce traffic & improve sustainable transport choices</p>	<p>Transport produced 24% of the UK's total emissions in 2020 & remains the largest emitting sector in the UK, with the majority of emissions from road vehicles¹³⁶.</p> <p>The Council will seek to select employment development land that best supports objectives for sustainable transport – and it is indicated that Options 2 & 3 could be accommodated; Option 1 cannot be accommodated. CLP Policies AC1 Accessible Transport Network and AC2-AC6 will be updated to better support sustainable movement & active travel. Therefore, neutral effects for all three options.</p>	0	0	0			
<p>9: To reduce air, noise & light pollution</p>	<p>No direct effects likely – neutral/not applicable. All development will be required to meet with EM Policies.</p>	0	0	0			
<p>10: To protect & conserve natural resources – soil, water, minerals & waste¹³⁷</p>	<p>With climate change, temperate soils are forecast to experience a high degree of variability in moisture conditions; restoring lost carbon through conventional approaches may take decades; and food security is an increasing issue. Soil has been recognised as an essential national asset & government has indicated that managing soil carbon could form a part of net zero plans¹³⁸. The review of the CLP will continue to build on previously developed land (PDL) where effectively located & thus contribute towards protecting agricultural land.</p> <p>Many of the existing sites are on PDL indicating positive effects for conserving soil but Option 1 does not use land as effectively as Options 2 & 3 such that the positive/negative effects indicate overall neutral. Some uncertainty of effects for Options 1 & 2 whilst for Option 3 that has most effectively used land, positive effects are more certain.</p>	0?	0	+?	0	+	0

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

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

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

	<p>CLP Policies EM1-EM6 will be updated & thus provide sufficient mitigation for all development.</p> <p>The current CLP Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development. It is assumed that they will be updated to address any capacity issues such that at least neutral effects would be indicated for all three options. Progressions with the circular economy, driven by the need to reduce carbon emissions & encouraged through higher standards, will conserve minerals & reduce/minimise/reuse waste with some potential further positive effects in the longer term but with uncertainty of significance.</p>			
<p>11: To protect and enhance nature & biodiversity</p>	<p>It will be necessary to consider the new requirements from the Environment Act and including emerging metrics for calculating biodiversity net gain¹³⁹. Unequal distribution, and access to, green infrastructure across the city can exacerbate health inequalities. There are priority areas that would benefit particularly from greening. Off-site areas for biodiversity net gain may be needed. Increased recreational pressures and water quality impacts (such as road run-off) as a result of new development can put pressure on GI and biodiversity. Climate change is likely to affect changes to habitats and species distribution.</p> <p>The fragmentation and erosion of habitats remains a threat, and the need to secure biodiversity gain and improve the wider ecological network remain objectives for plan making in the Coventry area. The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide further mitigation measures such that there will be no major significant negative effects. All development will have to meet with new requirements for Biodiversity Net Gain & therefore, positive effects indicated for all options but some uncertainty of significance at this stage.</p> <p>The Council will continue to allocate employment development sites to PDL & new development can create opportunities for enhancing GI and biodiversity with potential positive effects but uncertainty at this stage as depends upon locational specificity.</p>	<p>+</p>	<p>+</p>	<p>+</p>

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

12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide sufficient mitigation measures to avoid significant negative effects on the historic environment – but some uncertainty at this stage as depends upon locational specificity.	0?	0?	0?
13: To protect and enhance the quality and character of townscapes & landscapes	<p>The national design guide (2019)¹⁴⁰ sets out the characteristics of well-designed places & circular economy principles in building design¹⁴¹ will contribute towards mitigating effects of climate change. It is also acknowledged that new proportional & high quality development can enhance the townscape.</p> <p>The current CLP includes policies to protect townscapes/landscapes, especially Policy DE1 Ensuring High Quality Design, and these will be updated in the CLP review. This indicates that sufficient mitigation measures will be provided through plan policies and thus, likely effect at least neutral for Options 2 & 3. The less than efficient use of land indicated by the quantum in Option 1 suggests that opportunities for enhancing the quality of townscape/landscape would not be progressed such that potential negative effects – uncertain as depends on locational specificity.</p>	-?	0	0

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

¹⁴¹ For example, please see RIBA https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy_9781859469545 and BRE <https://bregroup.com/products/breem/breem-solutions/breem-circularity-and-resilience/>

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

		Options for Quantum of Office Development		
Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	1. 8.5 ha	2. 5.8 ha	3. 4.12 ha
		1: To enable vibrant and inclusive communities	<p>Other factors are more likely to have potential significant effects on objectives for inclusive communities than the quantum of land for office development. However, provision of sufficient land for office development will support the economy and a diversity of jobs will overall contribute to vibrant & inclusive communities.</p> <p>The HEDNA (Nov 2022)¹⁴² has considered employment land requirements across Coventry and Warwickshire looking to 2041 and 2050. For Coventry, the office land needs were calculated to be 8.5 ha to 2041 – and please see SA No 5 Economic Growth for more details. The ELR (May 2024)¹⁴³ further studied existing employment land & needs. A recent Office Market Study (June 2024)¹⁴⁴ focuses on the changes & trends in the office market since the HEDNA & ELR and to identify if the conclusions & recommendations are still valid. The Study raises issues for suitability & deliverability of existing allocations, potential over-supply, growing demands for flexible leases &</p>	-?

¹⁴² Housing & Economic Development Needs Assessment (HEDNA, November 2022) Icenl Projects Ltd on behalf of Coventry & Warwickshire Local Authorities
<https://www.coventry.gov.uk/downloads/download/7374/coventry-and-warwickshire-housing-and-economic-development-needs-assessment-hedna>

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

¹⁴⁴ DLP Planning Ltd for Coventry City Council (June 2024) Coventry Office Market Study: An Addendum to the Coventry Employment Land Review

	<p>workspaces, together with on-site parking, and continuing flexible & hybrid working patterns.</p> <p>Option 1 reflects an earlier office development need. Updated evidence indicates that this quantum would be an over-supply & thus, would restrict possibilities for repurposing surplus office development land with potential negative effects for less than efficient use of land – uncertainty as depends on precise locations.</p> <p>Option 2 reflects the office development need updated to remove the oversupply. This indicates positive effects for the contribution that office land makes to vibrant communities but also some negative effects since use of land may not have been optimised – overall neutral effects. However, Option 3 reflects the updated office land needed & takes into account increased flexibility & hybrid working patterns – thus providing more certainty of significance of positive effects overall for communities.</p>			
<p>2: To provide accessible essential services and facilities for all residents</p>	<p>Other factors are more likely to have potential effects on objectives for accessibility to essential services & facilities than the quantum of office land – neutral/not applicable effects for all three options.</p>	0	0	0
<p>SA No 4: To provide decent and affordable housing for all</p>	<p>The provision of good quality new homes will support the ambitions for sustainable economic growth.</p> <p>There is a risk that continuing to progress Options 1 & 2 is not the most efficient use of land & could compromise the availability of certain land for residential/mixed-use development & other uses. The opportunities for ensuring that office development land is located in the most sustainable locations could also be limited (other sites away from centres might need to be sought) – therefore, some potential negative effects indicated but uncertainty at this stage as depends on locational specificity. Positive effects for Option 3 as the repurposing of some previously allocated office land can release housing in suitable & sustainable locations.</p>	-?	-?	+

<p>5: To support sustainable inclusive economic growth</p>	<p>Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people. Coventry has seen strong economic growth over the past few years and is recognised as a national centre for a number of growing business sectors, including advanced manufacturing and engineering; energy and low carbon; connected autonomous vehicles; business, professional & financial services; digital, creative, and gaming. These have all resulted in the creation of high-quality jobs for in growth sectors. However, there are a number of challenges, Coventry's economic growth and prosperity lags behind the England average and the city has fewer people in work compared to both regional and national figures¹⁴⁵.</p> <p>It is notable that many of Coventry's private sector businesses are small or micro-businesses & the Council has an important priority to support SMEs¹⁴⁶. Further priorities for creating the infrastructure to enable sustainable economic growth include innovating with multi-user developments (such as Friargate & City Centre South), and enabling the city to be cleaner & greener with GI & renewable energy.</p> <p>Option 1 reflects an earlier office development need. Updated evidence indicates that this quantum would be an over-supply & thus, would restrict possibilities for repurposing surplus office development land with potential negative effects for less than efficient use of land – uncertainty as depends on precise locations.</p> <p>Option 2 reflects the office development need updated to remove the oversupply, thus indicating potential positive effects for the contribution that office land makes to sustainable economic growth.</p> <p>However, Option 3 reflects the updated office land needed and takes into account increased flexibility & hybrid working patterns – thus providing more certainty of significance of effects. It also enables further positive effects for other SA objectives, such as for housing, by reducing the landtake for offices & releasing some land for repurposing.</p> <p>The Office Market Study (June 2024) confirmed the recommendations from the ELR (May 2024) that there is a need to reconsider the suitability & deliverability of existing</p>	<p>+</p>	<p>++</p>	<p>++</p>
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¹⁴⁵ One Coventry Plan 2022-2030 <https://www.coventry.gov.uk/downloads/download/7162/one-coventry-plan-2022-2030>

¹⁴⁶ Coventry City Council Economic Development Strategy 2022-2027 <https://www.coventry.gov.uk/council-democracy/economic-development-strategy-2022-2027/3>

	allocations without permission. CLP Policies will be updated to reflect the needs for more flexible office spaces, including adaptable internal arrangements & shared facilities – especially relevant to support the needs of start-up businesses & SMEs that are so important to Coventry.			
6: To help achieve the Council's ambition to reach net zero carbon emissions	The Council recognises the climate crisis and is currently reviewing its Strategy ¹⁴⁷ . This will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure.	0	0	0
	Direct greenhouse gas (GHG) emissions from buildings accounted for 17% of UK GHG emissions in 2019 ¹⁴⁸ . It has been reported that the construction industry needs to decarbonise more urgently ¹⁴⁹ and building design needs to progress principles in the circular economy. A major element of the review of the CLP is to address the Council's ambitions to reach net zero carbon emissions and all development will be required to meet with new policies – therefore, neutral effects for all three options.			
7: To build resilience to climate change	There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK. ¹⁵⁰ Therefore, it is vital to build resilience, including reducing risks from overheating, flooding and the resultant detriment to health & wellbeing, the economy, and the environment.	0	0	0
	A major element of the review of the CLP is to build resilience to climate change effects and all development will be required to meet with new and updated policies – therefore, neutral effects for all three options.			
8: To reduce traffic & improve	Transport produced 24% of the UK's total emissions in 2020 & remains the largest emitting sector in the UK, with the majority of emissions from road vehicles ¹⁵¹ .	0	0	0

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

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

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

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

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

sustainable transport choices	The Council will seek to select development that best support objectives for sustainable transport – therefore, neutral effects overall for all three options.						
9: To reduce air, noise & light pollution	No direct effects likely – neutral/not applicable. All development will be required to meet with EM Policies.	0		0		0	
10: To protect & conserve natural resources – soil, water, minerals & waste¹⁵²	<p>With climate change, temperate soils are forecast to experience a high degree of variability in moisture conditions; restoring lost carbon through conventional approaches may take decades; and food security is an increasing issue. Soil has been recognised as an essential national asset & government has indicated that managing soil carbon could form a part of net zero plans¹⁵³. The review of the CLP will continue to build on previously developed land (PDL) where effectively located & thus contribute towards protecting agricultural land.</p> <p>Many of the existing sites are on PDL indicating positive effects for conserving soil but Option 1 does not use land as effectively as Options 2 & 3 such that the positive/negative effects indicate overall neutral. Some uncertainty of effects for Options 1 & 2 whilst for Option 3 that has most effectively used land, positive effects are more certain.</p> <p>Climate change, particularly incidences of hotter, drier, summers may exacerbate water supply issues; wetter weather and more flooding may overload wastewater systems. The cumulative effects of increased development on soil & water resources is uncertain, particularly in the shorter-medium term before the effects of net zero carbon actions are implemented & become effective.</p> <p>CLP Policies EM1-EM6 will be updated & thus provide sufficient mitigation for all development – therefore, likely effects are neutral for all three options.</p> <p>The current CLP Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development. It is assumed that they will be updated to address any capacity issues such that at least neutral effects would be indicated for all three options.</p>	0?	0	+?	0	+	0

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

¹⁵³ UK Horizon scanning (April 2021) <https://post.parliament.uk/soil-as-an-essential-national-asset/>

	Progressions with the circular economy, driven by the need to reduce carbon emissions & encouraged through higher standards, will conserve minerals & reduce/minimise/reuse waste with some potential further positive effects in the longer term but with uncertainty of significance.			
11: To protect and enhance nature & biodiversity	<p>It will be necessary to consider the new requirements from the Environment Act and including emerging metrics for calculating biodiversity net gain¹⁵⁴. Unequal distribution, and access to, green infrastructure across the city can exacerbate health inequalities. There are priority areas that would benefit particularly from greening. Off-site areas for biodiversity net gain may be needed. Increased recreational pressures and water quality impacts (such as road run-off) as a result of new development can put pressure on GI and biodiversity. Climate change is likely to affect changes to habitats and species distribution.</p> <p>The fragmentation and erosion of habitats remains a threat, and the need to secure biodiversity gain and improve the wider ecological network remain objectives for plan making in the Coventry area. The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide further mitigation measures such that there will be no major significant negative effects. All development will have to meet with new requirements for Biodiversity Net Gain & therefore, positive effects indicated for all options but some uncertainty of significance at this stage.</p> <p>The Council will continue to aim to allocate employment sites to PDL & new development can create opportunities for enhancing GI and biodiversity with potential positive effects but uncertainty at this stage as depends upon locational specificity.</p>	+	+	+
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide sufficient mitigation measures to avoid significant negative effects on the historic environment – but some uncertainty at this stage as depends upon locational specificity.	0?	0?	0?

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

<p>13: To protect and enhance the quality and character of townscapes & landscapes</p>	<p>The national design guide (2019)¹⁵⁵ sets out the characteristics of well-designed places & circular economy principles in building design¹⁵⁶ will contribute towards mitigating effects of climate change. It is also acknowledged that new proportional & high quality development can enhance the townscape.</p> <p>The current CLP includes policies to protect townscapes/landscapes, especially Policy DE1 Ensuring High Quality Design, and these will be updated in the CLP review. This indicates that sufficient mitigation measures will be provided through plan policies and thus, likely effect at least neutral for Options 2 & 3. The less than efficient use of land indicated by the quantum in Option 1 suggests that opportunities for enhancing the quality of townscape/landscape would not be progressed such that potential negative effects – uncertain as depends on locational specificity.</p>	<p>-?</p>	<p>0</p>	<p>0</p>

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

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

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

		Options for Distribution of Office Development		
Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	1. City Centre focus	2. More Dispersed Approach	3. City Centre focus (Friargate) & rest to other defined centres
1: To enable vibrant and inclusive communities	<p>Other factors are likely to have more significant effects on objectives for inclusive communities; however, distribution of sufficient land for offices to support the economy and a diversity of jobs will overall contribute to vibrant & inclusive communities.</p> <p>Many of Coventry's businesses are small or micro-businesses & the Council has an important priority to support such SMEs¹⁵⁷. The Coventry Office Market Study (June 2024)¹⁵⁸ confirmed the need for flexibility & adaptability for office spaces.</p>	+ ?	+ ?	+

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

¹⁵⁸ DLP Planning Ltd for Coventry City council (June 2024) Coventry Office Market Study: An Addendum to the Coventry Employment Land Review

	Option 1 and Option 2 have some uncertainty of positive effects whilst Option 3 that incorporates both city centre & distribution to the identified centres indicates more certainty as more likely to address future type & locational needs for office working – and throughout the CLP area.			
2: To provide accessible essential services and facilities for all residents	Other factors are more likely to have potential effects on objectives for accessibility to essential services & facilities than the quantum of employment land – neutral effects for all three options.	0	0	0
3: To improve health & promote active living	The relationship between fair employment, good work and health has been recognised for many years. Whilst employment rates have increased nationally since 2010, there has been an increase in poor quality work, including part-time, insecure employment (Marmot Review 10 years on, 2020) ¹⁵⁹ . Unemployment and poor quality work are major drivers of inequalities in physical and mental health. Option 1 and Option 2 have uncertainty of positive effects whilst Option 3 that incorporates both city centre and distribution to the identified centres indicates more certainty as more likely to address future type & locational needs for office working.	+	+	+
SA No 4: To provide decent and affordable housing for all	The provision of good quality new homes will support the ambitions for sustainable economic growth. Neutral/not applicable effects for all three options.	0	0	0
5: To support sustainable inclusive economic growth	It is notable that many of Coventry's private sector businesses are small or micro-businesses & the Council has an important priority to support such SMEs ¹⁶⁰ . Options 1 & 3 include opportunities for innovating with the multi-user development of Friargate, and better enabling the city to be cleaner & greener with GI & renewable energy since such developments are better able to incorporate enhanced levels of quality & energy efficiencies. Options 2 & 3 may better support smaller start-ups & SMEs for all through a dispersed approach but Option 2 does not necessarily align office land	+	+	++

¹⁵⁹ The Health Foundation (Feb 2020) Health Equity in England: The Marmot Review 10 Years On <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

¹⁶⁰ Coventry City Council Economic Development Strategy 2022-2027 <https://www.coventry.gov.uk/council-democracy/economic-development-strategy-2022-2027/3>

	with strong accessibility to sustainable services/facilities & travel, such that some uncertainty of positive effects. Option 3 supports the needs for flexibility & adaptability, support for smaller start-ups & SMEs, and with both a city centre focus & dispersion to the other defined centres, provides office land throughout the CLP area and aligned with sustainable locations such that more positive effects are more certain.			
6: To help achieve the Council's ambition to reach net zero carbon emissions	The Council recognises the climate crisis and is currently reviewing its Strategy ¹⁶¹ . This will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure.	0	0	0
	A major element of the review of the CLP is to address the Council's ambitions to reach net zero carbon emissions and all development will be required to meet with new policy – therefore, neutral effects for all three options.			
7: To build resilience to climate change	There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK. ¹⁶² Therefore, it is vital to build resilience, including reducing risks from overheating, flooding and the resultant detriment to health & wellbeing, the economy, and the environment.	0	0	0
	A major element of the review of the CLP is to build resilience to climate change effects and all development will be required to meet with new and updated policies – therefore, neutral effects for all three options.			
8: To reduce traffic & improve sustainable transport choices	Transport produced 24% of the UK's total emissions in 2020 & remains the largest emitting sector in the UK, with the majority of emissions from road vehicles ¹⁶³ .	0	-?	0
	Options 1 & 3 comprise office land located in the city centre & other defined centres, thus confirming that workplaces will be allocated with sustainable travel; Option 2 dispersed throughout the CLP indicates the potential for some negative effects but uncertainty as depends on locational specificity.			

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

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

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

9: To reduce air, noise & light pollution	No direct effects likely – neutral/not applicable. All development will be required to meet with EM Policies.	0		0		0	
10: To protect & conserve natural resources – soil, water, minerals & waste¹⁶⁴	CLP Policies EM1-EM6 will be updated & thus provide sufficient mitigation for all development – therefore, likely effects are neutral for all three options.	0	0	0	0	0	0
	The current CLP Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.						
11: To protect and enhance nature & biodiversity	The fragmentation and erosion of habitats remains a threat, and the need to secure biodiversity gain and improve the wider ecological network remain objectives for plan making in the Coventry area. The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide further mitigation measures aiming for no major significant negative effects. All development will have to meet with new requirements for Biodiversity Net Gain & therefore, positive effects indicated for all options but some uncertainty of significance at this stage.	+?		+?		+?	
	The Council will continue to aim to allocate office sites to PDL & new development can create opportunities for enhancing GI and biodiversity with potential positive effects but uncertainty at this stage as depends upon locational specificity.						
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide sufficient mitigation measures to avoid significant negative effects on the historic environment – but some uncertainty at this stage as depends upon locational specificity.	0?		0?		0?	
13: To protect and enhance the	The national design guide (2019) ¹⁶⁵ sets out the characteristics of well-designed places & circular economy principles in building design ¹⁶⁶ will contribute towards mitigating	0		0		0	

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

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

¹⁶⁶ For example, please see RIBA https://ribabooks.com/The-Handbook-to-Building-a-Circular-Economy_9781859469545 and BRE <https://bregroup.com/products/breem/breem-solutions/breem-circularity-and-resilience/>

quality and character of townscapes & landscapes	effects of climate change. It is also acknowledged that new proportional & high quality development can enhance the townscape. The current CLP includes policies to protect townscapes/landscapes, especially Policy DE1 Ensuring High Quality Design, and these will be updated in the CLP review. This indicates that sufficient mitigation measures will be provided through plan policies and thus, likely effect at least neutral for all options.			
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IIIi: Options for Purpose Built Student Accommodation (PBSA)	
1	Retain Policy H10 Student Accommodation as adopted Plan (2017)
2	PBSA to be located at campus/city university area unless evidence demonstrates otherwise on a case by case basis

		Options for PBSA	
Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	1. Retain existing Policy H10	2. PBSA located at campus, city university area
1: To enable vibrant and inclusive communities	<p>Other factors are more likely to have potential effects on objectives for inclusive communities than locations for PBSA. However, a concentration of PBSA in a particular neighbourhood could result in an imbalance that might adversely affect the vibrancy and inclusivity of communities, such that some negative effects indicated for Option – uncertain as depends on location.</p> <p>The level of student population in the city is also a factor affecting the amount and distribution of Homes in Multiple Occupation (HMO)s. The residential areas that tend to have high concentrations of student populations are the areas that surround or are accessible easily to the city's two universities. Significant concentrations in particular streets and neighbourhoods have already had negative impacts on local communities. The Council has prepared an HMO DPD¹⁶⁷ and this addresses issues such as effects on communities and the housing stock (please see SA No 4 later).</p>	-?	0

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

<p>2: To provide accessible essential services and facilities for all residents</p>	<p>Existing Policy H10 requires that there should be no disadvantages to local services – neutral effects for both options.</p>	<p>0</p>	<p>0</p>
<p>3: To improve health & promote active living</p>	<p>Provision of good quality housing will have positive effects on health & wellbeing regardless of location. There is the potential for some uncertainty of significance for Option 1 as continued provision of PBSA throughout the LP area could result in concentrations of students in some areas that then could affect the wellbeing of local residents with different lifestyles. The PBSA Study (July 2024)¹⁶⁸ indicates that poorer quality student accommodation has been delivered and that this poorer quality stock is concentrated in the City Centre – therefore, some uncertainty about the significance of positive effects from continuing with H10 as set out in Option 1.</p> <p>SA Suggestion:</p> <ul style="list-style-type: none"> ■ Require sufficient standards of building quality and design in PBSA to ensure decent homes & associated health & wellbeing 	<p>+?</p>	<p>+</p>
<p>SA No 4: To provide decent and affordable housing for all</p>	<p>As the fastest growing higher education institution in the UK, Coventry University now teaches one in every seven higher education students in the West Midlands & has more than 30,000 students across its UK campuses¹⁶⁹. Coventry is the larger of the two universities located in the city; it is a public research university with two campuses – one in the centre of Coventry with the majority of operations and another in central London. The University of Warwick is a campus university (720 acres) on the outskirts of Coventry.</p> <p>Capacity (HELAA 2024)¹⁷⁰ studies have determined that identified needs of approx. 31,500 new dwellings can be accommodated within the urban areas - and including the needs of students. In these studies, it was recognised that a significant amount of the windfall delivery has been through the provision of PBSA. As such, the windfall expectation has been tempered to 200 dwellings pa to take account of the reduced expectation of further PBSA schemes to come forward.</p>	<p>-</p>	<p>+</p>

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

¹⁶⁹ <https://www.coventry.ac.uk/>

¹⁷⁰ Coventry City Council (2024) Housing & Economic Land Availability Assessment <https://www.coventry.gov.uk/planning-policy/local-plan-review/3>

	<p>The PBSA Study (July 2024)¹⁷¹ found that the student to bed ratio in the City has now fallen to an unhealthy level which is impacting occupancy and arguably the long-term sustainability of some developments. Too many beds (and beds of the wrong type) are being delivered to the market. The overdevelopment of PBSA has implications for wider strategy in terms of development site availability, potential underoccupation of PBSA developments, and future change of use for alternative occupation. Over the longer term, this could be potentially damaging to the attractiveness of Coventry as a student destination and would stifle innovation. It also found that poorer quality student accommodation has been delivered and that this poorer quality stock is concentrated in the City Centre – therefore, negative effects indicated for Option 1 that could become significant cumulative effects.</p> <p>By limiting PBSA to the campus & city university area, the student population is more focused and very easily accessible to learning & other services in the city centre – with positive effects. Retaining the existing Policy H10 could result in HMOs/PBSA not being used most effectively and with negative effects for housing objectives as could take up land that is needed for other essential housing needs.</p> <p>SA Suggestion:</p> <ul style="list-style-type: none"> ■ Require sufficient standards of building quality and design in PBSA to ensure decent homes 		
<p>5: To support sustainable inclusive economic growth</p>	<p>Ensuring the right balance of employment growth, with appropriate education and skills training, is fundamental for the communities of Coventry, to ensure that jobs are accessible to local people. The university is one of the city's biggest employers bringing skills and education to the region and helping to continue the growth of staff and student spending, job creation and graduate success. Provision of PBSA will support the economy of the university but regardless of options for PBSA – neutral effects for both options but some uncertainty for Option 1 as poorer quality student accommodation may adversely affect choice of university and thus, support for economic growth objectives in this sector.</p>	0?	0
<p>6: To help achieve the Council's ambition to reach net zero carbon emissions</p>	<p>The Council recognises the climate crisis and is currently reviewing its Strategy¹⁷². This will need significant shifts in energy efficiency of new and existing buildings, transport trends, and the further deployment of a range of renewables infrastructure.</p>	0	0

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

¹⁷² A Green Future for a Changing City(2022 – 2030) <https://www.coventry.gov.uk/draftclimatechangestrategy>

	Direct greenhouse gas (GHG) emissions from buildings accounted for 17% of UK GHG emissions in 2019 ¹⁷³ . It has been reported that the construction industry needs to decarbonise more urgently ¹⁷⁴ and building design needs to progress principles in the circular economy. All development will have to reduce GHG emissions in line with updated planning policy – therefore, neutral effects.		
7: To build resilience to climate change	There is increasing evidence that extreme weather events such as heatwaves and flooding are becoming more frequent and severe in the UK. ¹⁷⁵ Therefore, it is vital to build resilience, including reducing risks from overheating, flooding and the resultant detriment to health & wellbeing, the economy, and the environment. All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change – therefore, neutral effects.	0	0
8: To reduce traffic & improve sustainable transport choices	Transport produced 24% of the UK's total emissions in 2020 & remains the largest emitting sector in the UK, with the majority of emissions from road vehicles ¹⁷⁶ . The current Policy H10 requires that PBSA should be “directly accessible” from the universities; however, by focusing PBSA in the campus/city university area, sustainable transport will be more certain with positive effects for Option 2.	0	+
9: To reduce air, noise & light pollution	The current Policy H10 requires that any PBSA will not materially harm the amenities of occupiers of nearby properties & therefore, neutral effects for both options.	0	0
10: To protect & conserve natural resources – soil, water, minerals & waste¹⁷⁷	The review of the CLP will continue to build on previously developed land (PDL) where effectively located & thus contribute towards protecting agricultural land. The recent Water Cycle Study Stage 1 (June 2024) ¹⁷⁸ indicates that there is water capacity for the preferred residential quantum and therefore, likely neutral effects for both options. The current CLP Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development. It is assumed that they will be updated to address any capacity issues such that at least neutral effects would be indicated for both options.	0	0

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

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

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

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

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

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

<p>11: To protect and enhance nature & biodiversity</p>	<p>The fragmentation and erosion of habitats remains a threat, and the need to secure biodiversity gain and improve the wider ecological network remain objectives for plan making in the Coventry area. The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These will be updated & should provide sufficient mitigation measures - all development will have to meet with new requirements for Biodiversity Net Gain & therefore, positive effects indicated for all options but some uncertainty of significance at this stage.</p>	<p>+</p>	<p>+</p>
<p>12: To protect and enhance the historic environment, and its setting</p>	<p>The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment – with likely neutral effects for both options but more certainty of mitigation measures for Option 2 as PBSA focused on campus/university area.</p>	<p>0?</p>	<p>0</p>
<p>13: To protect and enhance the quality and character of townscapes & landscapes</p>	<p>The current Policy H10 requires that any PBSA will not materially harm the amenities of occupiers of nearby properties & therefore, likely neutral effects for both options but more certainty of mitigation measures for Option 2 as PBSA focused on campus/university area.</p>	<p>0?</p>	<p>0</p>

Appendix IV: SA Consultation Representations & Responses Consultation Representations to SA Initial Report (May 2023) at Regulation 18 Stage Issues & Options

Section of SA Report	Consultee & Comments	Enfution Responses & Action Taken
Environment Agency		
	No specific comments on the SA at this stage	Noted
Historic England		
	Broadly welcome the changes proposed, however, in regard to options 2 and 3 for quantum of housing development these should be changed to show there is the potential for harm to the historic environment, dependent upon the location of development sites. When specific allocations are being considered, the methodology and its findings are set out within an updated Heritage topic paper. In regard to 'Options for Residential Density', this is uncertain at this stage of the local plan review and the SA should reflect this, not sat there are negligible effects.	Agreed, with thanks
Natural England		
	<p>An appropriate evidence base should be used to support the selection of sites and inform the policies for their delivery. This should include:</p> <ul style="list-style-type: none"> • Landscape and Visual Impact Assessments, Landscape Sensitivity Assessments and Landscape Character Assessments. • Soil surveys and mapping (Agricultural Land Classification available on Magic maps) ecological surveys, green infrastructure and biodiversity opportunity mapping <p>The Plan should contain policies to protect Best and Most Versatile (BMV) agricultural land (Grades 1, 2, 3a). Polices should avoid the loss of BMV land. Any development proposed on BMV land should be informed by a detailed soil survey.</p>	Noted & agreed.

Section of SA Report	Consultee & Comments	Enfusion Responses & Action Taken
	<p>(NPPF paragraph 174(b)) Site selection must also be informed by the relevant environmental assessments.</p> <p>These are:</p> <ul style="list-style-type: none"> • Sustainability Appraisal incorporating Strategic Environmental Assessment with recommendations used to inform mitigation measures and design principles for the allocated sites. • Habitats Regulations Assessment: mitigation and avoidance measures identified through the HRA should be secured through policies in the Plan. Where mitigation or avoidance is not possible the site should not be allocated. 	
William Davis Homes		
	<p>It is clear that the “exceptional local circumstances” required by the NPPF in order to depart from the use of Standard Method (SM) have not been established and the SM should therefore provide the basis of calculating the Local Housing Need (LHN). The Issues and Options consultation proposes to ignore the 35% uplift to the LHN required without any reasoned justification. The housing requirement in the Local Plan should be identified based on the SM being “a minimum starting point in determining the number of homes needed in an area” as set out in the PPG, increase growth could be necessary as part of major infrastructure projects such as the NUCKLE rail improvements and A45 and A46 improvements; and that the city is part of the WMCA which has a growth agenda. Failure to do so will exacerbate the housing crisis and perpetrate its acute socio-economic consequences in the area.</p> <p>These matters do not appear to have been adequately assessed in the initial SA and WDH’s concerns in this respect are exacerbated by the overstated land supply position set out in the Issues and Options Consultation, which would suggest that the housing land supply strategy should include sustainable sites in the greenbelt around the city. It is clear that “exceptional circumstances” exist to justify the release of land from the Green Belt for development as set out in the NPPF.</p>	<p>Noted with thanks.</p> <p>Identification & refinement of strategic options is an iterative process between the plan-making & SA teams. Taking into account consultation responses and further evidence, additional strategic options for the CPLR were developed that required testing through SA – and this includes:</p> <ul style="list-style-type: none"> ▪ Potential for development in the Green Belt ▪ No potential development in the Green Belt

Section of SA Report	Consultee & Comments	Enfusion Responses & Action Taken
	<p>The SA Report (May 2023) only considers a very limited number of Strategic Options relating to the Quantum of Housing Needs, Residential Density, Climate Change and BNG. It completely fails to consider any spatial strategy options, the opportunity to allocate additional residential development sites, including sites that are currently within the designated Green Belt, or the implications of not fully addressing the identified housing needs in the City. This all indicates CCC's apparent willingness to forgo meeting the City's market and affordable housing needs and exacerbate the socio-economic consequences of the housing crisis in favour of protecting sites in the Green Belt that would otherwise be entirely appropriate for sustainable residential development.</p> <p>CCC must continue to plan on the basis of the current NPPF position, not the Governments proposed changes. The Labour Party have already said if they come to power they support the review of Green Belt land to facilitate housing delivery.</p>	<p>The SA Report (August 2024) has been able to take into account Government's proposals for revision to the NPPF, including for grey belt land in the Green Belt.</p>

Coventry Local Plan Review: Sustainability Appraisal (SA) Appendix V: SA of Proposed New & Amended Site Allocations & Potential New Employment Site

Proposed Site Allocations					
Site Ref	Name & Location	Area (hectare)	Capacity (number of homes)		
			Existing density at 200dph	Proposed minimum 250 dph	Assessed capacity
	New Allocations				
STM009-24	Coventry Central Police Station, Little Park Street	1.19	238	298	600
STM011-24	New Union Street	0.35	70	88	170
R003-23	Former Vintage House, St Nicholas Street/Leicester Row CV1 4BN	0.23	46	57	100
STM012-24	Whitefriars Street Car Park	0.6	120	150	185
F008-24	Paybody Building, Stoney Stanton Road	0.73	146	182	280
STM013-24	Dale Buildings, Tower Street	0.37	74	92	200
STM18-24	City Centre South, Coventry	6.91	1,382	1,727	1,575
			At 35 dph	At 45 dph	Assessed capacity
STM001-23	New Gate Court Business Park, Paradise Street, CV1 2RU	0.57	20	26	303
BAB001-23	The Allesley Hotel, Birmingham Road	2.0	70	90	48
BW001-23	Former Chace School, Chace Avenue, Willenhall	1.4	49	63	60
LS001-23	Former School Site, New Century Park – Land to the south of Isadora Lea	2.58	90	116	93
			At 35 dph	At 125 dph	Assessed capacity
SH004-24	Land at Spon End	7.2	252	1,116	750
	Existing Allocations with Changes				
HE002-24	H2:3 Walsgrave Hill Farm	59			900
R004-24	H2:15 Sandy Lane	2.7			250
STM014-24	JE2:1 Friargate Mixed Use Scheme, City Centre	10.0			1,350
	Employment				
BAB016-24	Land North of A45 at Pickford Green	11.81			11.81 ha

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

STM009-24	Coventry Central Police Station, Little Park Street Area: 1.19 hectares Capacity: 600 dwellings	
Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
1: To enable vibrant and inclusive communities	<p>The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site in the city centre.</p> <p>The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.</p>	+
2: To provide accessible essential services and facilities for all residents	<p>Major positive effects indicated for this city centre location close to a wide range of services & facilities, including schools, nurseries, shops, community & faith centres, and diverse cultural & entertainment facilities. There is a range of open/green space nearby¹⁷⁹ such as Greyfriars Green & St Michael's Fields, and within a mile, wider spaces such as Spencer Park & Charterhouse Field.</p>	++
3: To improve health & promote active living	<p>Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental¹⁸⁰. These factors are covered by the following SA Nos 4 & 5. There are some 9 health centres/general practices and 9 dental practices within about a mile radius of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. Such a city centre location provides a potential variety of health services and within walking distances.</p> <p>With a city centre location, there is easy access to a range of health facilities, such as gyms, pools - the Wave Waterpark, and dance, yoga studios. There is also easy access to a wide range of food shopping with associated positive effects for health.</p>	+

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

¹⁸⁰ For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

	The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD ¹⁸¹ provides information and guidance on completing the relevant health toolkit and HIA.	
4: To provide decent and affordable housing for all	<p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The indicative capacity & city centre location are suitable for a flatted/high rise format & should be able to offer a range of adaptable and affordable tenures– all with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)¹⁸² provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	++
5: To support sustainable inclusive economic growth	Whilst provision of new homes is not directly attributable to economic growth, good quality homes in a city centre location will support working people. Overall – neutral/not applicable effects.	0
6: To help achieve the Council's ambition to reach net zero carbon emissions	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD¹⁸³ currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.</p>	0
7: To build resilience to	All new housing development will need to meet updated policy requirements that seek to help the Council build	0

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

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

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

climate change	resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	
8: To reduce traffic & improve sustainable transport choices	<p>The urban environment is well connected and with a good transport system; the location in the city centre will enable active travel & should discourage car travel as most services & facilities will be accessible by walking or public transport. The main railway station is less than 15 minutes' walk to the south-west of the site.</p> <p>It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).</p> <p>SA Suggestion: Limit parking & provide secure cycle storage/sharing</p>	++
9: To reduce air, noise & light pollution	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	0
10: To protect & conserve natural resources – soil, water, minerals & waste¹⁸⁴	<p>Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)¹⁸⁵ indicates that there is water capacity for the identified development need – indicating neutral effects.</p> <p>Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.</p>	+ 0
11: To protect and enhance nature & biodiversity	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	+?
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to	0?

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

¹⁸⁵ JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

	<p>avoid significant negative effects on the historic environment.</p> <p>The site is within the city centre & within the Three Spires View Cone - The Tall Buildings Design Guide & Three Spires View Framework SPD (2022)¹⁸⁶ provides further guidance to mitigate potential effects. It is also within an archaeological constraint area but other plan policies provide mitigation measures. Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies.</p>	
13: To protect and enhance the quality and character of townscapes & landscapes	<p>A tall building is suitable for such a city centre location and designed according to policies and guides as described for SA No 12 will ensure that potential negative effects are mitigated. Likely neutral effects but uncertain as depends upon project level studies.</p>	0?

STM011-24	<p>New Union Street Area: 0.35 hectares dwelling</p> <p style="text-align: right;">Capacity: 170</p>	
Sustainability Objective	Assessment of Effects	
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
1: To enable vibrant and inclusive communities	<p>The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site in the city centre.</p> <p>The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.</p>	+
2: To provide accessible essential	<p>Major positive effects indicated for this city centre location close to a wide range of services & facilities, including schools, nurseries, shops, community & faith</p>	++

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

services and facilities for all residents	centres, and diverse cultural & entertainment facilities. There is a range of open/green space nearby such as Greyfriars Green & St Michael's Fields, and within a mile, wider spaces such as Spencer Park & Charterhouse Field.	
3: To improve health & promote active living	<p>Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental¹⁸⁷. These factors are covered by the following SA Nos 4 & 5.</p> <p>There are some 9 health centres/general practices and 9 dental practices within about a mile radius of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. Such a city centre location provides a potential variety of health services and within walking distances.</p> <p>With a city centre location, there is easy access to a range of health facilities, such as gyms, pools - the Wave Waterpark, and dance, yoga studios. There is also easy access to a wide range of food shopping with associated positive effects for health.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD¹⁸⁸ provides information and guidance on completing the relevant health toolkit and HIA.</p>	+
4: To provide decent and affordable housing for all	<p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The indicative capacity & city centre location should be able to offer a range of adaptable and affordable tenures – all with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)¹⁸⁹ provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	++
5: To support sustainable inclusive	Whilst provision of new homes is not directly attributable to economic growth, good quality homes in a city centre	0

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

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

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

economic growth	location will support working people. Overall – neutral/not applicable effects.	
6: To help achieve the Council's ambition to reach net zero carbon emissions	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD¹⁹⁰ currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.</p>	0
7: To build resilience to climate change	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	0
8: To reduce traffic & improve sustainable transport choices	<p>The urban environment is well connected and with a good transport system; the location in the city centre will enable active travel & should discourage car travel as most services & facilities will be accessible by walking or public transport. The main railway station is less than 15 minutes' walk to the south-west of the site.</p> <p>It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).</p>	++
9: To reduce air, noise & light pollution	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	0
10: To protect & conserve natural resources – soil, water, minerals & waste¹⁹¹	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024) ¹⁹² indicates that there is water capacity for the identified development need – indicating neutral effects.	+ 0

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

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

¹⁹² JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratfor on Avon DC, & Warwick DC

	Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	
11: To protect and enhance nature & biodiversity	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	+
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. The site is within the city centre & within the Three Spires View Cone - The Tall Buildings Design Guide & Three Spires View Framework SPD (2022) ¹⁹³ provides further guidance to mitigate potential effects. It is also within an archaeological constraint area but other plan policies provide mitigation. Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies.	0?
13: To protect and enhance the quality and character of townscapes & landscapes	A city centre location and designed according to policies and guides as described above for SA No 12 will ensure that potential negative effects are mitigated. Likely positive effects as the regeneration of vacant multistorey and surface car parks will improve the quality and character of the townscape.	+

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

R003-23	Former Vintage House, St Nicholas Street/Leicester Row Area: 0.23 hectares Capacity: 100 dwellings	
Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
1: To enable vibrant and inclusive communities	<p>The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site in the city centre.</p> <p>The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.</p>	+
2: To provide accessible essential services and facilities for all residents	Major positive effects indicated for this location in the city centre and a wide range of services & facilities, including schools, nurseries, shops, community & faith centres, and diverse cultural & entertainment facilities. There is a range of open/green space nearby such as Lady Herbert's Gardens, Swanswell Park & Pool, and Naul's Mill Park – and within 5 minutes' walk of the historic Coventry Canal Basin with warehousing, barges, boat rides, shops & café.	++
3: To improve health & promote active living	<p>Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental¹⁹⁴. These factors are covered by the following SA Nos 4 & 5. There are some 9 health centres/general practices and 9 dental practices within about a mile radius of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. Such a city centre location provides a potential variety of health services and within walking distances.</p> <p>With a location in the city centre, there is easy access to a range of health facilities, such as gyms, pools - the Wave Waterpark, and dance, yoga studios - and the longer distance walking with the towpath. There is also easy access to a wide range of food shopping with associated positive effects for health.</p>	+

¹⁹⁴ For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

	The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD ¹⁹⁵ provides information and guidance on completing the relevant health toolkit and HIA.	
4: To provide decent and affordable housing for all	<p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is so close to the city centre & with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)¹⁹⁶ provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	++
5: To support sustainable inclusive economic growth	Whilst provision of new homes is not directly attributable to economic growth, good quality homes in the city centre will support working people. Overall – neutral/not applicable effects.	0
6: To help achieve the Council's ambition to reach net zero carbon emissions	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD¹⁹⁷ currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.</p>	0
7: To build resilience to climate change	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	0

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

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

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

<p>8: To reduce traffic & improve sustainable transport choices</p>	<p>The urban environment is well connected and with a good transport system; the location in the city centre will enable active travel & should discourage car travel as most services & facilities will be accessible by walking or public transport. The main railway station is some 25 minutes' walk to the south of the site.</p> <p>It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).</p>	<p>++</p>
<p>9: To reduce air, noise & light pollution</p>	<p>Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.</p>	<p>0</p>
<p>10: To protect & conserve natural resources – soil, water, minerals & waste¹⁹⁸</p>	<p>Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)¹⁹⁹ indicates that there is water capacity for the identified development need – indicating neutral effects.</p> <p>Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.</p>	<p>+ 0</p>
<p>11: To protect and enhance nature & biodiversity</p>	<p>The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.</p>	<p>+?</p>
<p>12: To protect and enhance the historic environment, and its setting</p>	<p>The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment.</p> <p>The site is not within the Three Spires View Cone nor an archaeological constraint area; it is within the Coventry Canal Conservation Area & will need sensitive design - other plan policies should provide mitigation measures.</p>	<p>0?</p>

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

¹⁹⁹ JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

	Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies & creative detailed design.	
13: To protect and enhance the quality and character of townscapes & landscapes	A location in the city centre and designed according to other policy requirements as described above for SA No 12 should ensure that potential negative effects are mitigated.	+
	Likely positive effects as the regeneration of a vacant and cleared site will improve the quality and character of the townscape.	

STM012-24	Whitefriars Street Car Park Area: 0.6 hectares Capacity: 185 dwelling	
	Assessment of Effects	
Sustainability Objective	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
1: To enable vibrant and inclusive communities	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site in the city centre. The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.	+
2: To provide accessible essential services and facilities for all residents	Major positive effects indicated for this location in the city centre and a wide range of services & facilities, including schools, nurseries, shops, community & faith centres, and diverse cultural & entertainment facilities. There is a range of open/green space nearby such as Lady Herbert's Gardens, Swanswell Park & Pool, and Charterhouse Field.	++
3: To improve health & promote active living	Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental ²⁰⁰ . These factors are covered by the following SA Nos 4 & 5. There are some 9 health centres/general practices and 9	+

²⁰⁰ For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

	<p>dental practices within about a mile radius of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. Such a city centre location provides a potential variety of health services and within walking distances.</p> <p>With a location in the city centre, there is easy access to a range of health facilities, such as gyms, pools - the Wave Waterpark, and dance, yoga studios - and the longer distance walking with the towpath. There is also easy access to a wide range of food shopping with associated positive effects for health.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD²⁰¹ provides information and guidance on completing the relevant health toolkit and HIA.</p>	
<p>4: To provide decent and affordable housing for all</p>	<p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is so close to the city centre & with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)²⁰² provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	<p>++</p>
<p>5: To support sustainable inclusive economic growth</p>	<p>Whilst provision of new homes is not directly attributable to economic growth, good quality homes in the city centre will support working people. Overall – neutral/not applicable effects.</p>	<p>0</p>
<p>6: To help achieve the Council's ambition to reach net zero carbon emissions</p>	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality</p>	<p>0</p>

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

²⁰² <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

	Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD ²⁰³ currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.	
7: To build resilience to climate change	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	0
8: To reduce traffic & improve sustainable transport choices	The urban environment is well connected and with a good transport system; the location in the city centre will enable active travel & should discourage car travel as most services & facilities will be accessible by walking or public transport. The main railway station is some 17 minutes' walk to the south-west of the site. It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	++
9: To reduce air, noise & light pollution	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	0
10: To protect & conserve natural resources – soil, water, minerals & waste²⁰⁴	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024) ²⁰⁵ indicates that there is water capacity for the identified development need – indicating neutral effects. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	+ 0
11: To protect and enhance nature & biodiversity	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects	+?

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

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

²⁰⁵ JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratfor on Avon DC, & Warwick DC

	but uncertainty of significance as depends on detailed project design.	
12: To protect and enhance the historic environment, and its setting	<p>The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment.</p> <p>The site is within the city centre & within the Three Spires View Cone and an archaeological constraint area - The Tall Buildings Design Guide & Three Spires View Framework SPD (2022)²⁰⁶ provides further guidance to mitigate potential effects - other plan policies should provide mitigation measures. Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies & creative detailed design.</p>	0?
13: To protect and enhance the quality and character of townscapes & landscapes	<p>A location in the city centre and designed according to policies as described above for SA No 12 should ensure that potential negative effects are mitigated.</p> <p>Likely positive effects as the regeneration of a car park site will improve the quality and character of the townscape.</p>	+

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

F008-24	Paybody Building, Stoney Stanton Road Area: 0.73 hectares Capacity: 280 dwellings	
Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
1: To enable vibrant and inclusive communities	<p>The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site in the city centre.</p> <p>The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.</p>	+
2: To provide accessible essential services and facilities for all residents	<p>Major positive effects indicated for this location in the city centre and a wide range of services & facilities, including schools, nurseries, shops, community & faith centres, and diverse cultural & entertainment facilities. There is a range of open/green space nearby such as Lady Herbert's Gardens, Swanswell Park & Pool, Radford Recreation Ground, and Naul's Mill Park – and the Coventry Canal towpath for wider walking is nearby within 5 mins walk.</p>	++
3: To improve health & promote active living	<p>Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental²⁰⁷. These factors are covered by the following SA Nos 4 & 5. There are some 7 health centres/general practices and 5 dental practices within about a mile radius of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. Such a city centre location provides a potential variety of health services and within walking distances.</p> <p>With a location in the city centre, there is easy access to a range of health facilities, such as gyms, pools - the Wave Waterpark, and dance, yoga studios - and the longer distance walking with the towpath. There is also easy access to a wide range of food shopping with associated positive effects for health.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1</p>	+

²⁰⁷ For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

	High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD ²⁰⁸ provides information and guidance on completing the relevant health toolkit and HIA.	
4: To provide decent and affordable housing for all	<p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is so close to the city centre & with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)²⁰⁹ provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	++
5: To support sustainable inclusive economic growth	Whilst provision of new homes is not directly attributable to economic growth, good quality homes in the city centre will support working people. Overall – neutral/not applicable effects.	0
6: To help achieve the Council's ambition to reach net zero carbon emissions	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD²¹⁰ currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.</p>	0
7: To build resilience to climate change	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	0

²⁰⁸ Health Impact Assessment (HIA) Supplementary Planning Document

(SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

²⁰⁹ <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

²¹⁰ Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) <https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

<p>8: To reduce traffic & improve sustainable transport choices</p>	<p>The urban environment is well connected and with a good transport system; the location in the city centre will enable active travel & should discourage car travel as most services & facilities will be accessible by walking or public transport. The main railway station is some 27 minutes' walk to the south of the site.</p> <p>It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).</p>	<p>++</p>
<p>9: To reduce air, noise & light pollution</p>	<p>Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.</p>	<p>0</p>
<p>10: To protect & conserve natural resources – soil, water, minerals & waste²¹¹</p>	<p>Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)²¹² indicates that there is water capacity for the identified development need – indicating neutral effects.</p> <p>Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.</p>	<p>+ 0</p>
<p>11: To protect and enhance nature & biodiversity</p>	<p>The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.</p>	<p>+?</p>
<p>12: To protect and enhance the historic environment, and its setting</p>	<p>The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment.</p> <p>The site is within the city centre & within an archaeological constraint area - other plan policies should provide mitigation measures. Therefore, likely neutral effects on the historic environment but some</p>	<p>0?</p>

²¹¹ First cell refers to land/soil & water resources; second cell refers to minerals & waste

²¹² JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

	uncertainty as depends on project level studies & creative detailed design.	
13: To protect and enhance the quality and character of townscapes & landscapes	A location in the city centre and designed according to policies as described above for SA No 12 should ensure that potential negative effects are mitigated.	+
	Likely positive effects as the regeneration of an existing NHS facility with large car park is likely to improve the quality and character of the townscape.	

STM013-24	Dale Buildings, Tower Street Area: 0.37 hectares Capacity: 200 dwellings	
	Assessment of Effects	
Sustainability Objective	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
1: To enable vibrant and inclusive communities	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site in the city centre. The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.	+
2: To provide accessible essential services and facilities for all residents	Major positive effects indicated for this location in the city centre and a wide range of services & facilities, including schools, nurseries, shops, community & faith centres, and diverse cultural & entertainment facilities. There is a range of open/green space nearby such as Lady Herbert's Gardens, Swanswell Park & Pool, and Naul's Mill Park – and less than 10 minutes' walk of the historic Coventry Canal Basin with warehousing, barges, boat rides, shops & cafés.	++
3: To improve health &	Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental ²¹³ . There are	+

²¹³ For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

<p>promote active living</p>	<p>some 9 health centres/general practices and 10 dental practices within about a mile radius of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. Such a city centre location provides a potential variety of health services and within walking distances.</p> <p>These factors are covered by the following SA Nos 4 & 5. With a location so close to the city centre, there is easy access to a range of health facilities, such as gyms, pools - the Wave Waterpark, and dance, yoga studios - and the longer distance walking with the canal towpath. There is also easy access to a wide range of food shopping with associated positive effects for health.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD²¹⁴ provides information and guidance on completing the relevant health toolkit and HIA.</p>	
<p>4: To provide decent and affordable housing for all</p>	<p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is so close to the city centre & with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)²¹⁵ provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	<p>++</p>
<p>5: To support sustainable inclusive economic growth</p>	<p>Whilst provision of new homes is not directly attributable to economic growth, good quality homes in the city centre will support working people. Overall – neutral/not applicable effects.</p>	<p>0</p>
<p>6: To help achieve the Council's ambition to reach net zero carbon emissions</p>	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall.</p>	<p>0</p>

²¹⁴ Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

²¹⁵ <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

	Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD ²¹⁶ currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.	
7: To build resilience to climate change	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	0
8: To reduce traffic & improve sustainable transport choices	The urban environment is well connected and with a good transport system; the location in the city centre will enable active travel & should discourage car travel as most services & facilities will be accessible by walking or public transport. The main railway station is some 20 minutes' walk to the south of the site. It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	++
9: To reduce air, noise & light pollution	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	0
10: To protect & conserve natural resources – soil, water, minerals & waste²¹⁷	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024) ²¹⁸ indicates that there is water capacity for the identified development need – indicating neutral effects. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	+ 0
11: To protect and enhance	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity.	+?

²¹⁶Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

²¹⁷ First cell refers to land/soil & water resources; second cell refers to minerals & waste

²¹⁸ JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

nature & biodiversity	These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	
12: To protect and enhance the historic environment, and its setting	<p>The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment.</p> <p>The site is within the Three Spires View Cone & an archaeological constraint area; it is near to the Lady Herbert's Garden & Burgess Conservation Area & will need sensitive design - other plan policies provide mitigation. Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies & creative detailed design.</p>	0?
13: To protect and enhance the quality and character of townscapes & landscapes	<p>A location in the city centre and designed according to other policy requirements as described above for SA No 12 should ensure that potential negative effects are mitigated.</p> <p>Likely positive effects as the regeneration of older style offices & industrial/warehouse type units in poor condition will improve the quality and character of the townscape.</p>	+

STM18-24	City Centre South Area: 6.91 hectares Capacity: 1,575 dwellings
Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty
1: To enable vibrant and inclusive communities	<p>The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by</p>

	<p>specific housing policies. Major positive effects indicated with such a capacity & opportunities for inclusive communities for this site in the city centre. A range of public realm works are proposed & these will contribute to social interactions.</p> <p>The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.</p> <p>SA Suggestion:</p> <ul style="list-style-type: none"> ■ Creative design for inclusivity & to encourage support social interaction 	
<p>2: To provide accessible essential services and facilities for all residents</p>	<p>Major positive effects indicated for this location in the city centre and a wide range of services & facilities, including schools, nurseries, shops, community & faith centres, and diverse cultural & entertainment facilities. There is a range of open/green space nearby such as Lady Herbert's Gardens, Swanswell Park & Pool, Greyfriars Green, Spencer Park, and Charterhouse Field.</p>	<p style="text-align: center;">++</p>
<p>3: To improve health & promote active living</p>	<p>Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental²¹⁹. These factors are covered by the following SA Nos 4 & 5. There are some 10 health centres/general practices and 11 dental practices within about a mile radius of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. Such a city centre location provides a potential variety of health services and within walking distances.</p> <p>With a location in the city centre, there is easy access to a range of health facilities, such as gyms, pools - the Wave Waterpark, and dance, yoga studios - and the longer distance walking with the towpath. There is also easy access to a wide range of food shopping with associated positive effects for health. A range of public realm works are proposed & these will contribute to health & wellbeing.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD²²⁰ provides information</p>	<p style="text-align: center;">+</p>

²¹⁹ For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

²²⁰ Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

	and guidance on completing the relevant health toolkit and HIA.	
4: To provide decent and affordable housing for all	<p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is in the city centre & with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)²²¹ provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p> <p>SA Suggestion:</p> <ul style="list-style-type: none"> ■ Creative design to encourage flexible & adaptable housing to support mix & tenure with changing needs 	++
5: To support sustainable inclusive economic growth	<p>Whilst provision of new homes is not directly attributable to economic growth, good quality homes in the city centre will support working people. Redevelopment for mixed uses proposed – residential, class E, learning & community uses, sui generis uses including drinking establishments – regeneration of the urban city centre core will have major positive effects for economic growth objectives – and could inspire enhancement beyond the site itself.</p>	++
6: To help achieve the Council's ambition to reach net zero carbon emissions	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD²²² currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.</p>	0
7: To build resilience to	All new housing development will need to meet updated policy requirements that seek to help the Council build	0

²²¹ <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

²²² Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

climate change	resilience to climate change. The site is within Flood Zone 1 & partly within FZ2 indicating low risk of flooding.	
8: To reduce traffic & improve sustainable transport choices	The urban environment is well connected and with a good transport system; the location in the city centre will enable active travel & should discourage car travel as most services & facilities will be accessible by walking or public transport. The main railway station is some 17 minutes' walk to the south-west of the site. It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	++
9: To reduce air, noise & light pollution	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	0
10: To protect & conserve natural resources – soil, water, minerals & waste²²³	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024) ²²⁴ indicates that there is water capacity for the identified development need – indicating neutral effects. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	+ 0
11: To protect and enhance nature & biodiversity	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	+?
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment.	0?

²²³ First cell refers to land/soil & water resources; second cell refers to minerals & waste

²²⁴ JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

	The site is within the city centre & within the Three Spires View Cone and partly within an archaeological constraint area - The Tall Buildings Design Guide & Three Spires View Framework SPD (2022) ²²⁵ provides further guidance to mitigate potential effects - other plan policies should provide mitigation measures. Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies & creative detailed design.	
13: To protect and enhance the quality and character of townscapes & landscapes	A location in the city centre and designed according to policies as described above for SA No 12 should ensure that potential negative effects are mitigated.	++
	Likely major positive effects as the regeneration of the existing urban city centre core will significantly improve the quality and character of the townscape with the potential to inspire wider enhancements beyond the site itself.	

STM001-23	New Gate Court Business Park, Paradise Street Area: 0.57 hectares Capacity: 303 dwelling	
	Assessment of Effects	
Sustainability Objective	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
1: To enable vibrant and inclusive communities	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site very close to the city centre.	+
	The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental	

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

	disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.	
2: To provide accessible essential services and facilities for all residents	Major positive effects indicated for this location close to the city centre and a wide range of services & facilities, including schools, nurseries, shops, community & faith centres, and diverse cultural & entertainment facilities. There is a range of open/green space nearby including Charterhouse Field less than 10 minutes' walk to the south-east.	++
3: To improve health & promote active living	<p>Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental²²⁶. There are some 6 health centres/general practices and 6 dental practices within about a mile radius of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. Such a location near the city centre provides a potential variety of health services and within walking distances.</p> <p>These factors are covered by the following SA Nos 4 & 5. With a location so close to the city centre, there is easy access to a range of health facilities, such as gyms, pools - the Wave Waterpark, and dance, yoga studios - and the longer distance walking with the canal towpath. There is also easy access to a wide range of food shopping with associated positive effects for health.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD²²⁷ provides information and guidance on completing the relevant health toolkit and HIA.</p>	+
4: To provide decent and affordable housing for all	Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is so close to the city centre & with likely major positive effects.	++

²²⁶ For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

²²⁷ Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

	The Affordable Housing SPD (March 2022) ²²⁸ provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.	
5: To support sustainable inclusive economic growth	Whilst provision of new homes is not directly attributable to economic growth, good quality homes near to the city centre will support working people. Overall – neutral/not applicable effects.	0
6: To help achieve the Council's ambition to reach net zero carbon emissions	All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall. Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD ²²⁹ currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.	0
7: To build resilience to climate change	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	0
8: To reduce traffic & improve sustainable transport choices	The urban environment is well connected and with a good transport system; the location so close to the city centre will enable active travel & should discourage car travel as most services & facilities will be accessible by walking or public transport. The main railway station is only 15 minutes' walk to the south-west of the site. It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	++
9: To reduce air, noise & light pollution	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	0
10: To protect & conserve	Development on previously developed land is positive effects. Water resources and quality are protected	+ 0

²²⁸ <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

²²⁹ Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

<p>natural resources – soil, water, minerals & waste²³⁰</p>	<p>through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)²³¹ indicates that there is water capacity for the identified development need – indicating neutral effects.</p> <p>Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.</p>	
<p>11: To protect and enhance nature & biodiversity</p>	<p>The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.</p>	<p style="text-align: center;">+?</p>
<p>12: To protect and enhance the historic environment, and its setting</p>	<p>The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment.</p> <p>The site is partly within an archaeological constraint area & the Old City Wall Scheduled Monument²³² is within the site boundary – therefore, development will need sensitive design - other plan policies provide mitigation. Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies & creative detailed design.</p>	<p style="text-align: center;">0?</p>
<p>13: To protect and enhance the quality and character of townscapes & landscapes</p>	<p>A location so near to the city centre and designed according to other policy requirements as described above for SA No 12 should ensure that potential negative effects are mitigated.</p> <p>Likely positive effects as the regeneration of the existing underused commercial park will improve the quality and character of the townscape.</p>	<p style="text-align: center;">+</p>

²³⁰ First cell refers to land/soil & water resources; second cell refers to minerals & waste

²³¹ JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

²³² <https://historicengland.org.uk/listing/the-list/list-entry/1002979> and <https://magic.defra.gov.uk/MagicMap.aspx>

BAB01-23	The Allesley Hotel, Birmingham Road Area: 2.0 hectares Capacity: 48 dwellings	
Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
1: To enable vibrant and inclusive communities	<p>The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site close to the city centre.</p> <p>The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.</p>	<div style="background-color: #92d050; padding: 5px; width: 20px; margin: 0 auto;">+</div>
2: To provide accessible essential services and facilities for all residents	<p>Positive effects indicated for this location in Allesley and a range of essential services & facilities, including schools, a convenience shop, a village hall, a community centre, and pubs/restaurant. There is a range of open/green space around the village, particularly to the north and west. City centre facilities are within about 2.5 miles to the south-east</p>	<div style="background-color: #92d050; padding: 5px; width: 20px; margin: 0 auto;">+</div>
3: To improve health & promote active living	<p>Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental²³³. There are 2 health centres and a dental practice within about a mile of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services.</p> <p>These factors are covered by the following SA Nos 4 & 5. There is a fitness centre within 15 min walk to the north and others within about 2.5 miles towards the city centre.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD²³⁴ provides information</p>	<div style="background-color: #92d050; padding: 5px; width: 20px; margin: 0 auto;">+</div>

²³³ For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

²³⁴ Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

	and guidance on completing the relevant health toolkit and HIA.	
4: To provide decent and affordable housing for all	<p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is accessible to the city centre & with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)²³⁵ provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	++
5: To support sustainable inclusive economic growth	Whilst provision of new homes is not directly attributable to economic growth, good quality homes will support working people. Overall – neutral/not applicable effects.	0
6: To help achieve the Council's ambition to reach net zero carbon emissions	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD²³⁶ currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.</p>	0
7: To build resilience to climate change	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	0
8: To reduce traffic & improve sustainable transport choices	<p>The urban environment is well connected and with a good transport system; the location is some 2.5 miles from the city centre.</p> <p>It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).</p>	+

²³⁵ <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

²³⁶ Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

<p>9: To reduce air, noise & light pollution</p>	<p>Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.</p>	<p>0</p>	
<p>10: To protect & conserve natural resources – soil, water, minerals & waste²³⁷</p>	<p>Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)²³⁸ indicates that there is water capacity for the identified development need – indicating neutral effects.</p> <p>Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.</p>	<p>+</p>	<p>0</p>
<p>11: To protect and enhance nature & biodiversity</p>	<p>The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.</p>	<p>+</p>	
<p>12: To protect and enhance the historic environment, and its setting</p>	<p>The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment.</p> <p>The site is within the Allesley Village conservation Area & within an archaeological constraint area – therefore, development will need sensitive design - other plan policies provide mitigation. Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies & creative detailed design.</p>	<p>0?</p>	
<p>13: To protect and enhance the quality</p>	<p>A location accessible to the city centre & designed according to other policy requirements as described</p>	<p>+</p>	

²³⁷ First cell refers to land/soil & water resources; second cell refers to minerals & waste

²³⁸ JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

and character of townscapes & landscapes	<p>above for SA No 12 should ensure that potential negative effects are mitigated.</p> <p>Likely positive effects as the regeneration of the existing former hotel and associated hardstanding car park will improve the quality and character of the townscape.</p>	
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BW001-23	<p>Former Chace School, Chace Avenue, Willenhall Area: 1.4 hectares Capacity: 60 dwellings</p>	
Sustainability Objective	<p style="text-align: center;">Assessment of Effects</p> <p style="text-align: center;">Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</p>	
1: To enable vibrant and inclusive communities	<p>The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site close to the city centre.</p> <p>The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.</p>	+
2: To provide accessible essential services and facilities for all residents	<p>Positive effects indicated for this location in Willenhall and a range of essential services & facilities, including schools, convenience shops/supermarket, a community centre, and cafes. There is a range of open/green space including the River Sowe with footpaths to the west and Binley Recreation Park about a mile to the east. City centre facilities are within about 2.5 miles to the north-west.</p>	+
3: To improve health & promote active living	<p>Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental²³⁹. There are 3 health centres and a dental practice within about 0.5 mile of the site. It is not known at this stage of assessment whether these practices are taking new patients but</p>	+

²³⁹ For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

	<p>other LP policies should ensure that there is capacity for such essential services.</p> <p>These factors are covered by the following SA Nos 4 & 5. There is a fitness centre within 15 min walk to the north and others within about 2.5 miles towards the city centre.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD²⁴⁰ provides information and guidance on completing the relevant health toolkit and HIA.</p>	
4: To provide decent and affordable housing for all	<p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is accessible to the city centre & with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)²⁴¹ provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	++
5: To support sustainable inclusive economic growth	<p>Whilst provision of new homes is not directly attributable to economic growth, good quality homes will support working people. Overall – neutral/not applicable effects.</p>	0
6: To help achieve the Council's ambition to reach net zero carbon emissions	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD²⁴² currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.</p>	0

²⁴⁰ Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

²⁴¹ <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

²⁴² Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) <https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

7: To build resilience to climate change	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	0
8: To reduce traffic & improve sustainable transport choices	The urban environment is well connected and with a good transport system; the location is some 2.5 miles from the city centre. It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	+
9: To reduce air, noise & light pollution	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	0
10: To protect & conserve natural resources – soil, water, minerals & waste²⁴³	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024) ²⁴⁴ indicates that there is water capacity for the identified development need – indicating neutral effects. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	+ 0
11: To protect and enhance nature & biodiversity	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	+?
12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic	0

²⁴³ First cell refers to land/soil & water resources; second cell refers to minerals & waste

²⁴⁴ JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

	environment. Likely neutral effects on the historic environment.	
13: To protect and enhance the quality and character of townscapes & landscapes	A location accessible to the city centre and designed according to other policy requirements as described above for SA No 12 should ensure that potential negative effects are mitigated.	+
	Likely positive effects as the development of a cleared and vacant site will improve the quality and character of the townscape.	
LS001-23	Former School Site, New Century Park, Land to the south of Isadora Lea Area: 2.58 hectares Capacity: 93 dwellings	
Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
1: To enable vibrant and inclusive communities	<p>The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site easily accessible to the city centre.</p> <p>The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.</p>	+
2: To provide accessible essential services and facilities for all residents	Positive effects indicated for this location in the urban area with a range of essential services & facilities, including schools, several convenience shops/supermarkets, a community centres, pubs/restaurants and cafes. There is a range of open/green space including the River Sowe with footpaths to the east and it is adjacent to the Coventry Sphinx sports club to the west. City centre facilities are within about 2 miles to the west.	+

<p>3: To improve health & promote active living</p>	<p>Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental²⁴⁵. There are 4 health centres and 5 dental practices within about a mile of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services.</p> <p>These factors are covered by the following SA Nos 4 & 5. There are 3 fitness centres/gyms within a mile of the site and others within about 2.5 miles towards the city centre.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD²⁴⁶ provides information and guidance on completing the relevant health toolkit and HIA.</p>	<p style="text-align: center;">+</p>
<p>4: To provide decent and affordable housing for all</p>	<p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is accessible to the city centre & with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)²⁴⁷ provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	<p style="text-align: center;">++</p>
<p>5: To support sustainable inclusive economic growth</p>	<p>Whilst provision of new homes is not directly attributable to economic growth, good quality homes will support working people. Overall – neutral/not applicable effects.</p>	<p style="text-align: center;">0</p>
<p>6: To help achieve the Council's ambition to reach net zero carbon emissions</p>	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management</p>	<p style="text-align: center;">0</p>

²⁴⁵ For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

²⁴⁶ Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

²⁴⁷ <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

	Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD ²⁴⁸ currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.	
7: To build resilience to climate change	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.	0
8: To reduce traffic & improve sustainable transport choices	The urban environment is well connected and with a good transport system; the location is some 2 miles from the city centre. It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	+
9: To reduce air, noise & light pollution	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	0
10: To protect & conserve natural resources – soil, water, minerals & waste²⁴⁹	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024) ²⁵⁰ indicates that there is water capacity for the identified development need – indicating neutral effects. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	+ 0
11: To protect and enhance nature & biodiversity	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	+?

²⁴⁸Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

²⁴⁹ First cell refers to land/soil & water resources; second cell refers to minerals & waste

²⁵⁰ JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

12: To protect and enhance the historic environment, and its setting	The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. Likely neutral effects on the historic environment.	0
13: To protect and enhance the quality and character of townscapes & landscapes	A location accessible to the city centre and designed according to other policy requirements as described above for SA No 12 should ensure that potential negative effects are mitigated. Likely positive effects as the development of a cleared and vacant site will improve the quality and character of the townscape.	+

SH004-24	Land at Spon End Area: 7.2 hectares Capacity: 750 dwellings	
Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
1: To enable vibrant and inclusive communities	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects for this site close to the city centre. The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs. The site is part of the Citizen Housing ²⁵¹ portfolio, a social housing provider, & the organisation has relocated occupants of the site where the existing homes are not considered fit for habitation. Therefore, potentially major positive effects for redeveloping a new inclusive community.	++?

²⁵¹ <https://www.citizenhousing.org.uk/about-us/what-we-do/#row1>

<p>2: To provide accessible essential services and facilities for all residents</p>	<p>Positive effects indicated for this location in the urban area with a range of essential local services & facilities, including schools, several convenience shops/supermarkets, 3 community centres, pubs/restaurants and cafes. City centre facilities are within about 0.5 miles to the east.</p>	<p style="text-align: center;">+</p>
<p>3: To improve health & promote active living</p>	<p>Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental²⁵². There are 6 health centres and 9 dental practices within about a mile of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services.</p> <p>These factors are covered by the following SA Nos 4 & 5. There are fitness centres/gyms within about 0.5 miles towards the city centre.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD²⁵³ provides information and guidance on completing the relevant health toolkit and HIA.</p>	<p style="text-align: center;">+</p>
<p>4: To provide decent and affordable housing for all</p>	<p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is accessible to the city centre & with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)²⁵⁴ provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	<p style="text-align: center;">++</p>
<p>5: To support sustainable inclusive economic growth</p>	<p>Whilst provision of new homes is not directly attributable to economic growth, good quality homes will support working people. Overall – neutral/not applicable effects.</p>	<p style="text-align: center;">0</p>

²⁵² For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

²⁵³ Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

²⁵⁴ <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

<p>6: To help achieve the Council's ambition to reach net zero carbon emissions</p>	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD²⁵⁵ currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.</p>	<p>0</p>	
<p>7: To build resilience to climate change</p>	<p>All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 2 & partly in FZ3 indicating risk of flooding.</p>	<p>0</p>	
<p>8: To reduce traffic & improve sustainable transport choices</p>	<p>The urban environment is well connected and with a good transport system; the location is some 0.5 miles from the city centre & 1 mile from the railway station.</p> <p>It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).</p>	<p>+</p>	
<p>9: To reduce air, noise & light pollution</p>	<p>Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.</p>	<p>0</p>	
<p>10: To protect & conserve natural resources – soil, water, minerals & waste²⁵⁶</p>	<p>Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)²⁵⁷ indicates that there is water capacity for the identified development need – indicating neutral effects.</p> <p>Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.</p>	<p>+</p>	<p>0</p>
<p>11: To protect and enhance</p>	<p>The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity.</p>	<p>+</p>	

²⁵⁵Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

²⁵⁶ First cell refers to land/soil & water resources; second cell refers to minerals & waste

²⁵⁷ JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

nature & biodiversity	These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	
12: To protect and enhance the historic environment, and its setting	<p>The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. Likely neutral effects on the historic environment.</p> <p>The site is partly within the Spon End Conservation Area & partly within an archaeological constraint area – therefore, development will need sensitive design - other plan policies provide mitigation. Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies & creative detailed design.</p>	0?
13: To protect and enhance the quality and character of townscapes & landscapes	<p>A location close to the city centre and designed according to other policy requirements as described above for SA No 12 should ensure that potential negative effects are mitigated.</p> <p>Likely positive effects as the regeneration of an area with dwellings not considered fit for habitation (currently vacant) will improve the quality and character of the townscape.</p>	++
H2:3	<p>Walsgrave Hill Farm Area: 59 hectares Capacity: 900 dwellings A long standing Local Plan Allocation – retained for the Local Plan Review; challenges to delivery relate to access & the A46 but this may be improved in due course.</p>	
Sustainability Objective	Assessment of Effects	
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
1: To enable vibrant and	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement	++?

<p>inclusive communities</p>	<p>of community participation is likely to be guided by specific housing policies. Major positive effects indicated for this site with capacity to design inclusive communities for a range of people – uncertainty as depends on detailed design.</p> <p>The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.</p> <p>SA Suggestion:</p> <ul style="list-style-type: none"> ■ Creative design for inclusivity & to encourage support social interaction 	<p style="background-color: #4F7942; color: white; text-align: center;">+</p>
<p>2: To provide accessible essential services and facilities for all residents</p>	<p>Positive effects indicated for this location at the edge of the city urban area with a variety of accessible services & facilities. City centre facilities are within about 3.5 miles to the south-west.</p> <p>The current site allocation recognises the need for expansion of schools to accommodate the increased need.</p>	<p style="background-color: #709A47; color: white; text-align: center;">+</p>
<p>3: To improve health & promote active living</p>	<p>Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental²⁵⁸. There are 2 health centres (but dental practices some 1.5 mile distance) within about 1 mile of the site. The current site allocation recognises the need to expand health services at Walsgrave Hill Farm to accommodate the increased population</p> <p>These factors are covered by the following SA Nos 4 & 5. There are various fitness centres within a mile of the site & access to wider green spaces, including the Sowe Valley footpath & Coombe Abbey Country Park.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD²⁵⁹ provides information and guidance on completing the relevant health toolkit and HIA.</p>	<p style="background-color: #709A47; color: white; text-align: center;">+</p>
<p>4: To provide decent and</p>	<p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper</p>	<p style="background-color: #4F7942; color: white; text-align: center;">++</p>

²⁵⁸ For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

²⁵⁹ Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

affordable housing for all	<p>recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is accessible to the city centre & with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)²⁶⁰ provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	
5: To support sustainable inclusive economic growth	<p>Whilst provision of new homes is not directly attributable to economic growth, good quality homes will support working people. Overall – neutral/not applicable effects.</p>	0
6: To help achieve the Council's ambition to reach net zero carbon emissions	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD²⁶¹ currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.</p>	0
7: To build resilience to climate change	<p>All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 & partly within FZ2 & 3 indicating a range of risk of flooding. Capacity studies have confirmed that the assessed number of homes can be delivered safely – neutral effects overall.</p>	0
8: To reduce traffic & improve sustainable transport choices	<p>The urban environment is well connected and with a good transport system; the location is some 3.5 miles from the city centre.</p> <p>The current site allocation recognises that proposals for revised junction works to the A46 at Clifford Bridge may impact on the delivery of dwellings and therefore some uncertainty for timings.</p> <p>It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).</p>	+?

²⁶⁰ <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

²⁶¹ Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

	<p>SA Suggestion:</p> <ul style="list-style-type: none"> ■ Incorporate a safe walking/cycling network through the new development & linking to urban area to west & country area to east to encourage more active transport/living locally 	
9: To reduce air, noise & light pollution	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	0
10: To protect & conserve natural resources – soil, water, minerals & waste²⁶²	<p>Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)²⁶³ indicates that there is water capacity for the identified development need – indicating neutral effects.</p> <p>Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.</p>	+ 0
11: To protect and enhance nature & biodiversity	<p>The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects.</p> <p>All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects more certain as the site is near to the River Sowe & the wider countryside to the east providing creative opportunities for linking into green & blue infrastructure; uncertainty as depends on detailed design.</p>	++?
12: To protect and enhance the historic environment, and its setting	<p>The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. Likely neutral effects on the historic environment.</p> <p>The current site allocation recognises risk to heritage and includes a requirement for retention and enhanced</p>	0

²⁶² First cell refers to land/soil & water resources; second cell refers to minerals & waste

²⁶³ JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

	setting of listed buildings at Hungerley Hall Farm, thus providing mitigation measures.	
13: To protect and enhance the quality and character of townscapes & landscapes	A location accessible to the city centre and designed according to other policy requirements as described above for SA No 12 should ensure that potential negative effects are mitigated.	+
	Likely positive effects as the location between the urban area to the west & the countryside to the east offers opportunities for creative design.	

H2:15	Sandy Lane Area: 2.7 hectares Capacity: 250 dwellingings A current Local Plan Allocation – retained with increased density for the Local Plan Review	
Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
1: To enable vibrant and inclusive communities	The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Positive effects indicated for this site easily accessible to the city centre The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.	+
2: To provide accessible essential services and facilities for all residents	Positive effects indicated for this site in the city urban area with a variety of accessible services & facilities. with a range of essential local services & facilities, including schools, several convenience shops/supermarkets, pubs/restaurants and cafes, including close to the Canal Basin & its services/facilities. City centre facilities are less than about one mile to the south.	+
3: To improve health &	Provision of good quality housing & access to employment is well established as contributing to better	+

<p>promote active living</p>	<p>health and wellbeing – physical & mental²⁶⁴. There are several health centres & dentists within about 1 mile of the site.</p> <p>These factors are covered by the following SA Nos 4 & 5. There are several fitness centres within a mile of the site & green/open spaces nearby, such as Radford Recreation Ground, Naul's Mill Park, and the Coventry Canal towpath.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD²⁶⁵ provides information and guidance on completing the relevant health toolkit and HIA.</p>	<p></p>
<p>4: To provide decent and affordable housing for all</p>	<p>Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is very accessible to the city centre & with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)²⁶⁶ provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p>	<p>++</p>
<p>5: To support sustainable inclusive economic growth</p>	<p>Whilst provision of new homes is not directly attributable to economic growth, good quality homes will support working people. Overall – neutral/not applicable effects.</p>	<p>0</p>
<p>6: To help achieve the Council's ambition to reach net zero carbon emissions</p>	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy</p>	<p>0</p>

²⁶⁴ For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

²⁶⁵ Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

²⁶⁶ <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

	SPD ²⁶⁷ currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.	
7: To build resilience to climate change	All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating a low of risk of flooding. Capacity studies have confirmed that the assessed number of homes can be delivered safely – neutral effects overall.	0
8: To reduce traffic & improve sustainable transport choices	The urban environment is well connected and with a good transport system, some 0.5 miles from the city centre. It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).	+
9: To reduce air, noise & light pollution	Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.	0
10: To protect & conserve natural resources – soil, water, minerals & waste²⁶⁸	Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024) ²⁶⁹ indicates that there is water capacity for the identified development need – indicating neutral effects. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.	+ 0
11: To protect and enhance nature & biodiversity	The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.	+?

²⁶⁷Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

²⁶⁸ First cell refers to land/soil & water resources; second cell refers to minerals & waste

²⁶⁹ JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

<p>12: To protect and enhance the historic environment, and its setting</p>	<p>The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment. Likely neutral effects on the historic environment.</p> <p>The current site allocation recognises that the site contains a locally listed building and is adjacent to the Canal Conservation Area - thus providing mitigation measures.</p>	<p style="text-align: center;">0</p>
<p>13: To protect and enhance the quality and character of townscapes & landscapes</p>	<p>A location accessible to the city centre and designed according to other policy requirements as described above for SA No 12 should ensure that potential negative effects are mitigated.</p> <p>Likely positive effects as the regeneration of this site will offer positive effects for townscape objectives.</p>	<p style="text-align: center;">+</p>

<p>STM014-24</p>	<p>JE2:1 Friargate Mixed Use Scheme, City Centre Area: 10.0 hectares Capacity: 1,350 dwellings Current allocation within the City Centre Area Action Plan CC12 for 400 new homes – partially implemented with the construction of 2 office blocks, a hotel, & public realm improvements. Changes to development types & capacities proposed.</p>	
<p>Sustainability Objective</p>	<p style="text-align: center;">Assessment of Effects</p> <p style="text-align: center;">Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty</p>	
<p>1: To enable vibrant and inclusive communities</p>	<p>The provision of new good quality homes will have positive effects for people. Safe social connectivity, regard for disadvantaged groups, and encouragement of community participation is likely to be guided by specific housing policies. Major positive effects indicated with such a capacity & opportunities for inclusive communities for this site in the city centre. The mix of uses, public realm improvements, and proposed enhanced housing capacity will contribute to social interactions.</p>	<p style="text-align: center;">++?</p>

	<p>The extant policies address many of the potentially disadvantaged groups – poor, ageing, physical & mental disability, single parents, carers, travellers – and the review will update these to be relevant for the plan period. The extant policies do not explicitly mention ethnic or cultural housing needs.</p> <p>SA Suggestion:</p> <ul style="list-style-type: none"> ■ Creative design for inclusivity & to encourage, support social interaction 	
2: To provide accessible essential services and facilities for all residents	Major positive effects indicated for this location in the city centre and a wide range of services & facilities, including schools, nurseries, shops, community & faith centres, and diverse cultural & entertainment facilities. There is a range of open/green space nearby such as Lady Herbert's Gardens, Swanswell Park & Pool, Greyfriars Green, Spencer Park, and Charterhouse Field.	++
3: To improve health & promote active living	<p>Provision of good quality housing & access to employment is well established as contributing to better health and wellbeing – physical & mental²⁷⁰. These factors are covered by the following SA Nos 4 & 5. There are many health centres/general practices and dental practices within about a mile radius of the site. It is not known at this stage of assessment whether these practices are taking new patients but other LP policies should ensure that there is capacity for such essential services. Such a city centre location provides a potential variety of health services and within walking distances.</p> <p>With a location in the city centre, there is easy access to a range of health/fitness facilities, such as gyms, pools - the Wave Waterpark, and dance, yoga studios - and the longer distance walking with the canal towpath. There is also easy access to a wide range of food shopping with associated positive effects for health.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD²⁷¹ provides information and guidance on completing the relevant health toolkit and HIA.</p>	+
4: To provide decent and affordable housing for all	Policies in the adopted Local Plan address specific housing requirements and these will be updated through the review process. The HEDNA and the Housing Paper recognise the importance of providing a suitable mix & tenure of housing, with particular regard to affordable	++

²⁷⁰ For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

²⁷¹ Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

	<p>homes and for younger people. The need for appropriate housing for the ageing population is also understood, as well as needs for potentially disadvantaged groups. The location is in the city centre & with likely major positive effects.</p> <p>The Affordable Housing SPD (March 2022)²⁷² provides more detailed guidance on the CLP Policy H6 Affordable Housing and aims to make it easier for affordable homes to be built.</p> <p>SA Suggestion:</p> <ul style="list-style-type: none"> ■ Creative design to encourage flexible & adaptable housing to support mix & tenure with changing needs 	
5: To support sustainable inclusive economic growth	<p>Whilst provision of new homes is not directly attributable to economic growth, good quality homes in the city centre will support working people. Redevelopment for mixed uses proposed – residential, class E, learning & community uses, sui generis uses including drinking establishments – regeneration of the urban city centre core will have major positive effects for economic growth objectives – and could inspire enhancement beyond the site itself with sportive implications for the sub-regional economy.</p>	++
6: To help achieve the Council's ambition to reach net zero carbon emissions	<p>All new housing development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD²⁷³ currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.</p>	0
7: To build resilience to climate change	<p>All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1 indicating low risk of flooding.</p>	0
8: To reduce traffic & improve	<p>The urban environment is well connected and with a good transport system; the location in the city centre will enable active travel & should discourage car travel as</p>	++

²⁷² <https://www.coventry.gov.uk/downloads/file/37970/affordable-housing-spd>

²⁷³ Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022)
<https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

<p>sustainable transport choices</p>	<p>most services & facilities will be accessible by walking or public transport. The main railway station is adjacent to the south of the site.</p> <p>It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).</p>	
<p>9: To reduce air, noise & light pollution</p>	<p>Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.</p>	<p>0</p>
<p>10: To protect & conserve natural resources – soil, water, minerals & waste²⁷⁴</p>	<p>Development on previously developed land is positive effects. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)²⁷⁵ indicates that there is water capacity for the identified development need – indicating neutral effects.</p> <p>Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.</p>	<p>+ 0</p>
<p>11: To protect and enhance nature & biodiversity</p>	<p>The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.</p>	<p>+?</p>
<p>12: To protect and enhance the historic environment, and its setting</p>	<p>The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment.</p> <p>The site is within the city centre & within the Three Spires View Cone and but not within an archaeological constraint area - The Tall Buildings Design Guide & Three</p>	<p>0?</p>

²⁷⁴ First cell refers to land/soil & water resources; second cell refers to minerals & waste

²⁷⁵ JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

	Spires View Framework SPD (2022) ²⁷⁶ provides further guidance to mitigate potential effects - other plan policies should provide mitigation measures. Therefore, likely neutral effects on the historic environment but some uncertainty as depends on project level studies & creative detailed design.	
13: To protect and enhance the quality and character of townscapes & landscapes	A location in the city centre and designed according to policies as described above for SA No 12 should ensure that potential negative effects are mitigated.	++
	Likely major positive effects as the regeneration of the existing urban city centre core will significantly improve the quality and character of the townscape with the potential to inspire wider enhancements beyond the site itself.	

BAB016-24	Land North of A45 Developable Area: 11.81 hectares Employment	
Sustainability Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years), long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
1: To enable vibrant and inclusive communities	The provision of good quality accessible employment will support vibrant communities.	+?
2: To provide accessible essential services and facilities for all residents	Positive effects indicated for this employment location adjacent to the A45 with local facilities within a mile in Allesley & Eastern Green; city centre facilities are within about 4 miles to the south-east.	+?

²⁷⁶

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

<p>3: To improve health & promote active living</p>	<p>Provision of & access to employment is well established as contributing to better health and wellbeing – physical & mental²⁷⁷.</p> <p>The extant Local Plan includes policies that facilitate active travel and encourage healthy lifestyles. Policy DE1 High Quality Design addresses matters such as crime and fear of crime that have negative effects for health and wellbeing. The review will update these policies. The Health Impact Assessment SPD²⁷⁸ provides information and guidance on completing the relevant health toolkit and HIA.</p>	<p style="text-align: center;">+</p>
<p>4: To provide decent and affordable housing for all</p>	<p>Employment site – neutral effects on housing.</p>	<p style="text-align: center;">0</p>
<p>5: To support sustainable inclusive economic growth</p>	<p>The Council cannot find sufficient employment land within its own administrative area in order to meet identified needs. Therefore, the identification of this site for employment, close to the urban environment & readily accessible via the adjacent A45 to the city and the wider strategic transport network suggests likely major positive effects for economic growth objectives.</p>	<p style="text-align: center;">++</p>
<p>6: To help achieve the Council's ambition to reach net zero carbon emissions</p>	<p>All new development will need to meet updated policy requirements that seek to help the Council achieve its ambition to achieve a dramatic reduction in carbon emissions & avoid any significant negative effects – neutral effects overall.</p> <p>Relevant Policies in the current Local Plan include DS3 Sustainable Development and DE1 Ensuring High Quality Design, together with the Environmental Management Policies (EM1-EM8) in the adopted Plan) will be updated to meet with new requirements. The Council's Energy SPD²⁷⁹ currently aims to support the implementation of CLP Policy EM2 Building Standards by providing technical guidance. This Policy EM2 will be reviewed and updated at least in line with national requirements.</p>	<p style="text-align: center;">0</p>
<p>7: To build resilience to climate change</p>	<p>All new housing development will need to meet updated policy requirements that seek to help the Council build resilience to climate change. The site is within Flood Zone 1, 2 & 3 indicating some risk of flooding but this will be mitigated through national requirements to ensure safety for employment uses.</p>	<p style="text-align: center;">0</p>

²⁷⁷ For example: <https://commonslibrary.parliament.uk/research-briefings/cbp-9414/>

²⁷⁸ Health Impact Assessment (HIA) Supplementary Planning Document (SPD) <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/2>

²⁷⁹ Coventry City Council Energy Supplementary Planning Document (SPD) (March 2022) <https://www.coventry.gov.uk/downloads/file/37976/energy-spd>

<p>8: To reduce traffic & improve sustainable transport choices</p>	<p>The site is some 0.5 miles north-west of the urban environment adjacent to the A45 - well connected and with a good transport system; the location is some 4 miles from the city centre.</p> <p>It may be noted that facilitating active travel has further positive effects for air quality & noise (SA No 9), health & wellbeing (SA No 3) and GI (SA No 11).</p>	+	
<p>9: To reduce air, noise & light pollution</p>	<p>Environmental management and mitigation for pollution is guided by specific policies in the adopted Plan, including Policy EM7 Air Quality, Policy H1 for nuisance noise, and the City Centre Area Action Plan for light. These policies will be updated providing mitigation measures such that there will be no significant negative effects and thus indicating neutral or negligible effects.</p>	0	
<p>10: To protect & conserve natural resources – soil, water, minerals & waste²⁸⁰</p>	<p>The land is classed as Grade 3 moderate to good agricultural land & therefore, negative effects for loss of best & most versatile agricultural land & the important soils resource. Water resources and quality are protected through policies in the adopted Plan, including Policy EM4 Flood Risk Management, Policy EM6 PDL, and Policy GE1 GI. The recent Water Cycle Study Stage 1 (June 2024)²⁸¹ indicates that there is water capacity for the identified development need – indicating neutral effects. Policy EM9 Safeguarding Minerals and Policy EM8 Waste Management provide mitigation measures to reduce potential negative effects from new development.</p>	-	0
<p>11: To protect and enhance nature & biodiversity</p>	<p>The current adopted Plan has policies to protect nature & biodiversity, including GB1 Green Belt & Local Green Space, GE1 GI, GE2 Green Space, and GE3 Biodiversity. These policies will be updated to reflect the new requirements and this will provide mitigation measures indicating no major significant negative effects. All development will have to meet with the national requirements for Biodiversity Net Gain – positive effects but uncertainty of significance as depends on detailed project design.</p>	+?	
<p>12: To protect and enhance the historic environment, and its setting</p>	<p>The adopted Plan includes policies to protect the historic environment, including Policy HE1 Conservation Areas, HE2 Conservation & Heritage Assets, Policy DE1 High Quality Design, and Policy GE1 GI. These policies will be updated and should provide mitigation measures to avoid significant negative effects on the historic environment.</p> <p>Likely neutral effects on the historic environment as site not located in any sensitive areas.</p>	0	

²⁸⁰ First cell refers to land/soil & water resources; second cell refers to minerals & waste

²⁸¹ JBA Consulting (June 2024) for Coventry CC, North Warwickshire BC, Nuneaton & Bedworth BC, Rugby BC, Stratford on Avon DC, & Warwick DC

<p>13: To protect and enhance the quality and character of townscapes & landscapes</p>	<p>The site is located within the Green Belt with potential negative effects. There are some other established employment sites in Pickford Green indicating that such new development could be accommodated locally. However, the site is located in Area 1 of the Green Belt – it is the largest area & considered to make a significant contribution to the GB purposes. It forms part of the wider Meriden Gap and Coundon wedge, any built development on the western extremity of the built-up area would be extremely sensitive. Further development in this area would therefore have the effect of substantially reducing its open character leading to the appearance of urban sprawl and very significant encroachment of the open countryside in this strategically important area of Green Belt between Coventry and Birmingham²⁸².</p> <p>Therefore, likely major negative effects for landscape and Green Belt objectives.</p>	<p>--</p>
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²⁸² Coventry City Council Green Belt Technical Review Update (July 2024)