

Sustainability Appraisal/ Strategic Environmental Assessment Report

Coventry Local Plan: Proposed Submission

January 2016



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1. NON-TECHNICAL SUMMARY

Introduction

- 1.1** The Sustainability Appraisal/Strategic Environmental Assessment report has been produced alongside the Local Plan for Coventry. It is a statutory requirement to prepare such reports alongside the development of all plans and proposals through UK and European Legislation. The Local Plan will set out the strategic policy framework for enabling and guiding development in Coventry up to 2031. Specifically, it will set out:
- What the city should be like in 2031 (Vision);
 - What needs to be changed and managed to realise the vision (Objectives);
 - How these objectives can be achieved (Policies); and
 - Targets to measure achievement (Monitoring).
- 1.2** The Sustainability Appraisal aims to promote sustainable development through the integration of economic, environmental and social considerations into the preparation of plans and proposals. A key function of the Sustainability Appraisal is to illustrate the positives and identify and allowable negatives when appraising alternative site and policy options, thus informing a transparent decision making process.

Methodology

- 1.3** The preparation of the Sustainability Appraisal of the submission Local Plan, has involved two stages:
- Stage A: the production of a Scoping Report¹, which sets out the scope of the Sustainability Appraisal for the Coventry Local Development Plan and
 - Stage B: the production of the Sustainability Appraisal Report, 2015.
- 1.4** The first stage of the Sustainability Appraisal involved reviewing relevant plans programmes and strategies, collecting information to develop an understanding of the social, environmental and economic health of the city to help understand the impact the Local Plan may have coupled with the identification of key sustainability issues. The Sustainability Appraisal Framework was also developed to assess the Local Plan in a systematic and logical way. This information was set out in a Scoping Report and a targeted consultation was undertaken in 2014 to update baseline data and the assessment of all relevant plans and programmes.
- 1.5** A range of options were put forward to address the key planning issues facing the city up to 2031. These were appraised against each of the Sustainability Objectives thus showing how the options compared in sustainability terms. This has aided the development and refinement of the identified options. The next stage was to predict and evaluate the effects of the Local Plan. This is in terms of their magnitude, geographical scale, and time period over which they will occur. Other factors are also taken into account for example whether the effect is temporary or permanent, positive or negative, frequency or secondary effects. Mitigation measures are also proposed to prevent, reduce or offset significant effects or to maximise beneficial impacts.

Baseline information and current state of the environment

- 1.6** As part of the 2015 Scoping Report, a Sustainability Appraisal Framework has been developed and this framework has been used to appraise the Local Plan. Twenty sustainability objectives were identified, covering a range of aspects from environmental, economic and social issues such as: poverty, housing provision, biodiversity, waste generation, energy conservation,

¹ This report is available for download on the City Council's website: www.coventry.gov.uk/cldp

climate change, economic growth, education, transport and nature conservation (please refer to table 3 in this report).

- 1.7** In order to measure the performance against sustainability principles and to establish baseline data relevant to Coventry, over 100 indicators that provide data on current conditions, historical trends and relationships of the current situation in relation to targets of environmental, social and economic aspects of Coventry have been identified. These are set out in appendix C of the Scoping Report, 2015. A summary of the headline findings for Coventry are set out below in Figure 1.

Reasonable alternative options

- 1.8** The Local Plan has been developed through the consideration of a number of potential reasonable alternative options in terms of meeting the development needs of the city. These alternative options were expressly considered and tested through previous versions of the Local Plan, and as recently as 2014 but going back to 2005 when the Council began preparing a replacement plan for the existing 2001 Coventry Development Plan.
- 1.9** All reasonable alternative options have been consistently appraised against the sustainability appraisal framework throughout the Local Plan preparation process to help identify the most sustainable policies and proposals. Tables 6 - 8 in the main body of this report provides a summary of the comparison of all reasonable options and the full results of the options appraisal are in set out in Appendix 1 (a), (b), (c) and (d).

Figure 1: Coventry headline statistics

Statistic	Coventry Headline Statistics		West Midlands Region	England	Period
	Count	Rate	Rate	Rate	
Population by age (% of total population)					
<u>Total population</u>	337,400		5,713,300	54,316,600	2014
<u>Average age of all residents</u>		34	40 ↓	40 ↓	2014
<u>Residents aged 0 - 15</u>	66,600	19.7%	19.5% ↔	19.0% ↑	2014
<u>Residents aged 16 - 64 (working age)</u>	222,100	65.8%	62.5% ↑	63.5% ↑	2014
<u>Residents aged 65+</u>	48,700	14.4%	18.0% ↓	17.6% ↓	2014
Selected ages (% of total population)					
<u>Residents aged 0 - 4</u>	23,800	7.1%	6.4% ↑	6.3% ↑	2014
<u>Residents aged 18 - 24</u>	47,500	14.1%	9.4% ↑	9.1% ↑	2014
<u>Residents aged 85+</u>	7,000	2.1%	2.4% ↓	2.3% ↓	2014
Population by ethnic group (% of total population)					
<u>White: English/Welsh/Scottish/Northern Irish/British ethnicity</u>	211,188	66.6%	79.2% ↓	79.8% ↓	2011
<u>White: Other ethnicity</u>	22,841	7.2%	3.6% ↑	5.7% ↑	2011
<u>Mixed ethnicity</u>	8,230	2.6%	2.4% ↑	2.3% ↑	2011
<u>Asian/Asian British ethnicity</u>	51,598	16.3%	10.8% ↑	7.8% ↑	2011
<u>Black/African/Caribbean/Black British ethnicity</u>	17,764	5.6%	3.3% ↑	3.5% ↑	2011
<u>Other ethnicity</u>	5,339	1.7%	0.9% ↑	1.0% ↑	2011
Births					
<u>Annual number of births (General Fertility Rate - births per 1,000 females aged 15-44)</u>	4,495	61.8	64.9 ↓	62.4 ↔	Jan.-Dec. 2013
Mortality rates (age standardised rates per 100,000 people, all ages):					
Annual number of deaths	2,713				Jan.-Dec. 2013
<u>Mortality rate from all causes (3 years) (rate per 100,000 residents)</u>	7,957	1033.4	1001.2 ↑	977.8 ↑	Jan. 2011 - Dec. 2013
<u>Premature deaths - deaths of people aged under 75 (3 years) (rate per 100,000 residents)</u>	2,791	404.3	358.7 ↑	342.4 ↑	Jan. 2011 - Dec. 2013
Health					
<u>Life expectancy at birth for males (years)</u>		78.2	78.8 ↓	79.4 ↓	2011-13
<u>Life expectancy at birth for females (years)</u>		82.4	82.8 ↔	83.1 ↓	2011-13
<u>Infant mortality rate per 1,000 live births</u>		4.8	5.6 ↔	4.1 ↔	Jan. 2011 - Dec. 2013
<u>People with a limiting long term health problem or disability (% of all residents)</u>	56,247	17.7%	19.0% ↓	17.6% ↔	2011
Deprivation					
Children in low-income families (% of all dependent children)	17,205	23.1%	21.1% ↑	18.6% ↑	2012
<u>Households in fuel poverty (% of all households)</u>	20,579	15.9%	13.9% ↑	10.4% ↑	2013
<u>Multiple deprivation (% of residents living in neighbourhoods amongst the 10% most deprived in England)</u>		18.3%	16.1% ↑	9.8% ↑	2010

Statistic	Coventry Headline Statistics		West Midlands Region	England	Period
	Count	Rate	Rate	Rate	
Local Economy Income					
Average annual income per head amongst residents (£s per year)		£13,747	£15,551 ↓	£17,842 ↓	2013
Employment & Unemployment (% of working age residents)					
Employment rate	138,200	64%	70% ↓	73% ↓	Jan.-Dec. 2014
Unemployment rate (% of economically active 16+ residents)	11,400	7.5%	6.8% ↑	6.2% ↑	Jan.-Dec. 2014
Economic Inactivity rate	66,800	31%	25% ↑	23% ↑	Jan.-Dec. 2014
Workless households - none in employment (% of households with any working age residents)	23,200	22%	19% ↑	17% ↑	Jan.-Dec. 2013
<u>Jobseeker's Allowance claimants</u>	4,673	2.1%	2.4% ↓	1.8% ↑	Apr-15
<u>Total out-of-work benefit claimants</u>	24,900	11.2%	11.1% ↔	9.7% ↑	Jan.-Dec. 2014
Qualifications (% of working age residents)					
<u>Working age residents with no qualifications</u>	31,600	15%	13% ↔	9% ↑	Jan.-Dec. 2014
<u>Working age residents qualified to higher education level (NVQ level 4+)</u>	68,800	32%	29% ↔	36% ↓	Jan.-Dec. 2014
Businesses (rates per 10,000 adult residents)					
Number of active businesses	7,940	293.2	386.8 ↓	443.1 ↓	2014
Annual business start-ups	1,490	55.0	56.0 ↔	70.2 ↓	2013
Annual business closures	980	36.2	40.0 ↓	47.6 ↓	2013
Recorded crime (rates per 1,000 residents)					
<u>All recorded crime</u>	21,556	63.9	56.3 ↑	61.1 ↔	Jan.-Dec. 2014
Violence against the person	4,154	12.3	12.1 ↔	12.8 ↔	Jan.-Dec. 2014
Children and young people					
<u>Children looked after by the Local Authority (rate per 10,000 u18s)</u>	630	87	73 ↑	60 ↑	Mar-14
<u>Children aged 10-11 measured as being 'obese' (% of 10-11 year olds measured)</u>	769	21.3%	21.1% ↔	19.1% ↑	2013-14 ac. yr
<u>Teenage (u18) conceptions (rate per 1,000 girls aged 15-17)</u>	235	40.8	28.7 ↑	23.9 ↑	Apr 2013 - Mar 2014
<u>Achievement of 5 GCSEs A*-C inc. English & Maths (% of Key Stage 4 pupils)</u>		52.3%	54.9% ↓	56.8% ↓	2013-14 ac. yr
<u>Young people not in education, employment or training (NEET) (% of all 16-18s)</u>	770	6.8%	5.4% ↑	4.7% ↑	2014
Students studying at local universities	50,880				2013-14
Housing					
Total number of dwellings in the city (% of dwellings privately owned)	135,870	81.8%	80.9% ↔	82.3% ↔	Apr-14
Vacant dwellings (% of all dwellings)	3,300	2.4%	2.7% ↓	2.6% ↓	Oct-14
Homelessness - households accepted as homeless & in priority need (rate per 1,000 households)	629	4.7	3.4 ↑	2.3 ↑	Jan.-Dec. 2014
Average house price		£135,000	£155,000 ↓	£195,000 ↓	Apr. - June. 2014
Car ownership					
<u>% of households with at least 1 car or van available</u>	87,231	67.8%	75.3% ↓	74.2% ↓	2011

Key

Reading the tables

↑	indicates the Coventry rate is notably higher than comparator place
↓	indicates the Coventry rate is notably lower than comparator place
↔	indicates the Coventry rate is not significantly different to comparator place
Green	indicates Coventry's performance is better than comparator place
Red	indicates Coventry's performance is worse than comparator place
Black	indicates the difference is neither positive nor negative

Source: Coventry City Council, Insight Team, June 2015

Significant effects on the environment

1.10 The Local Plan objectives and draft policies have been rigorously tested against the sustainability objectives in appraisal matrices to identify likely positive effects and negative impacts that may arise. Appendix 5 illustrates the strategic key social and environmental constraints in areas of the city that are likely to be significantly affected. For example, areas that are susceptible to flood risk (including surface level flooding), ecologically rich sites (flora and fauna), libraries, doctors' surgeries and schools. Headline findings of this appraisal conclude the Local Plan is likely to have an overall positive effect, mainly on the economic, but also on the social and environmental aspects of sustainability. Amongst the positive effects that are likely to be realised through the Local Plan include:

- Provision of new employment and training opportunities, specifically in areas of highest deprivation;
- Encouraging greater use of public transport and more sustainable modes of travel;
- Reduction in social exclusion and poverty by providing accessibility and affordability to housing and employment needs, where they are needed most across all tenures;
- Promotion of improved access to health facilities and assets, including parks and green spaces;
- Opportunities for high quality urban design within new development to contribute to local distinctiveness, including considering local standards such as Ancient Arden;
- Reduction in the level of personal travel through carefully planned development coupled with increased awareness of more sustainable modes of transport; and
- Enhanced and improved green and blue environment in the city centre and across the wider urban areas.

1.11 The most significant possible negative effect that has been identified would be if the Local Plan policies lead to the wholesale release of Greenfield and Green Belt land to meet additional development pressures beyond the identified capacity within the administrative boundary of Coventry. For example, accommodating all of Coventry's objectively assessed housing need (42,400) would lead to an unsustainable loss of Greenfield land, including huge tracts of Green Belt. However, sites allocated for development are likely to be positive for improving some people's access to a home and supporting economic activity necessary for regeneration. However, the negative would mean increased resource consumption, traffic generation and domestic waste. Appropriate mitigation and compensatory measures would need to be developed to offset these identified allowable weaknesses. These are explored further in section 7 of this report.

Mitigation measures

1.12 The SA concluded that the overall impact of the Local Plan on the 20 sustainability objectives is likely to be positive. However, it suggests that policy drafting could improve its performance even further. The overarching mitigation measures that could be incorporated into policy include:

- Identifying, and incorporating in the Local Plan measures to increase the self-sufficiency and enabling development to have a positive effect on the health and well-being of all residents in the city.
- Carefully planning any higher density developments and ensuring that the provision of housing is not in excess of local requirements and at the expense of valuable employment land.
- Achieving high design standards in new developments to protect historic environments within city centre and create local distinctiveness, particularly in sensitive areas where the majority of new development is expected to take place.

Monitoring

- 1.13** A single monitoring framework is being developed to encompass the various documents that are being prepared as part of the Coventry Local Development Plan. This will ensure that the significant sustainability effects of implementing the plan are monitored to identify any unforeseen adverse effects and enable remedial action to be taken. Sustainability Appraisal monitoring will be incorporated into the existing monitoring arrangements.

2. INTRODUCTION

- 2.1** This report sets out the process and findings of the Sustainability Appraisal (SA) of the Local Plan, Proposed Submission, which forms part of the Coventry Local Development Plan (or CLDP for short). Local Planning Authorities are required to undertake a SA/SEA for all local planning documents.
- 2.2** Government guidelines recommend that SA should be undertaken in a staged approach. Table 1 shows an outline of the stages and the relationship to other documents. The SA has been carried out in compliance with the European SEA Directive requirements.
- 2.3** The Proposed Submission Local Plan explains the mechanism for the delivery of the Councils vision for Coventry to be a proud city that works for jobs and growth for better pavements, streets and roads, to support and celebrate its young people and to protect their most vulnerable residents. The Local Plan encourages a balanced approach to meeting the development needs of the city particularly in relation to housing. It also identifies key regeneration projects that will also enable the delivery of this growth strategy.
- 2.4** The 2015 Local Plan builds upon previous stages and iterations of the replacement Development Plan. This expressly includes the Issues and Options (2006), the Options (2007), the Emerging Strategy (2008), the Proposed Submission (2009), the revised Issues and Options (2011) the proposed submission Core Strategy (2012) and the Preferred Emerging Strategy (2014). This iteration of the Local Plan presents the Councils preferred policy approach for accommodating and enabling a proposed level of growth within the city boundary (no overspill).

Table 1: Stages in the sustainability appraisal process

Stage	Description	Where is it published?
Stage A	Setting the context and objectives, establishing the baseline and deciding on the scope	Scoping Report - 2015
Stage B	Developing and refining options and assessing effects	This report
Stage C	Preparing the SA Report	This report
Stage D	Consulting on the draft Local Plan and SA Report	September 2014
Stage E	Monitoring the significant effects of implementing the Local Plan	To be done on an annual basis

- 2.5** The appraisal process has identified and recommended some additions that could improve policy development and its potential impacts. The changes suggested are expected to be included in the Local Plan Proposed Submission document.

Engagement

- 2.6** This report accompanies the Local Plan Proposed Submission document. The Council welcomes your views on any aspects of this report. In particular the following questions are asked:
- Are there any significant effects that were not identified?
 - Has the sustainability appraisal process identified all reasonable alternatives and reasons given for the preferred one?
 - Have alternatives been correctly evaluated and suitable mitigation proposed?
- 2.7** Following the period of representations, responses will be dispatched along with the suite of documents to be submitted to the Planning Inspectorate for independent examination.

SEA Requirements

- 2.8** The SA Report must show that the SEA Directive's requirements have been met. This is achieved through signposting the information required by the Directive in table 2. The information is spread between this SA Report, the Proposed Submission Local Plan and the 2015 Scoping Report. These documents are available to view and download at: www.coventry.gov.uk/cldp

Table 2: Signposting of SEA Directives

SEA Directive Requirements	Where can it be found
Preparation of an environmental report: in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I)	This report.
a) an outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	This report, section 2. Scoping Report, 2015 page 34-38 and Appendix B
b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Scoping Report, 2015 page 40-41 and Appendix C and this report.
c) the environmental characteristics of areas likely to be significantly affected;	Scoping Report, 2015 page 40-41 and Appendix C
d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Scoping Report, 2015 (appendix C) and this report (appendix 3, page 2014)
e) the environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	Scoping Report page 34-38 and Appendix B and this report, page 13
f) 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);	This report, section 6.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	This report, section 7.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	This report, sections 3, 5 and table 7.
i) A description of the measures envisaged concerning monitoring in accordance with Art. 10;	This report, section 7.
j) A non-technical summary of the information provided	Non-technical summary in this

under the above headings.	report.
The report must include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2).	Information contained in this report.
Consultation: Authorities with environmental responsibilities, when deciding on the scope and level of detail of the information which must be included in the environmental report (Art. 5.4).	Scoping Report, 2015
Authorities with environmental responsibilities and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2).	Consultation on the Local Plan emerging preferred strategy and this report.
Other EU Member States where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7).	Not applicable.
Taking the environmental report and the results of the consultations into account in decision-making (Art. 8).	On-going process.
Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted should be informed and the following items are made available to those so informed: <ul style="list-style-type: none"> • the plan or programme as adopted; • a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Art. 5, the opinions expressed pursuant to Art. 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and • the measures decided concerning monitoring (Art. 9) 	To be addressed later.
Monitoring: of the significant environmental effects of the plan or programme's implementation (Art. 10).	This report, section 7.

3. BACKGROUND

Purpose of SA Report

- 3.1** The Sustainability Appraisal aims at promoting sustainable development through the integration of economic, environmental and social considerations into the preparation of planning policy documents. One of the key functions of the sustainability appraisal is to illustrate the benefits and risks of different development options and policy choices to enable a transparent decision making process.

Method of carrying out the assessment

- 3.2** The Sustainability Appraisal of the Local Plan was carried out by Council officers in workshops. Guidance was provided and care was taken to ensure high levels of consistency.
- 3.3** A mix of expertise was sought when selecting members of the appraisal group, which included experience in property development, climate change, regeneration, planning, urban design, conservation and archaeology and housing strategy. It should be noted that the group had a wide range of specialist technical knowledge to rigorously assess potential impacts against the sustainability objectives. The appraisal has therefore been carried out in line with national guidance. This has ensured a mix of expertise and opinion throughout the appraisal process.

Sustainability Appraisal Framework

- 3.4** The approach adopted in undertaking the SA is based on guidance set out in “Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks”, Department for Communities and Local Government 2005. This has now been withdrawn, but the Practical Guide to the SEA Directive, Department for Communities and Local Government 2005, remains current. This describes the same process in more generic terms, so the withdrawal of the more specific guide does not require any changes. It also considers more up-to-date guidance from the Government’s Planning Practice Guidance Note coupled with good practice from other SA/SEA delivery organisations.
- 3.5** The Sustainability Appraisal Framework developed in the Scoping Report is used to appraise all Local Planning Documents. The framework was developed as part of Stage A (refer to Table 1) in the Sustainability Appraisal process, and as part of the preparation, involved the following tasks:
- Identification and review of relevant policies, plans, programmes, and sustainability objectives;
 - Collation of environmental, social and economic baseline information;
 - Identification and discussion of sustainability issues and problems relevant to Coventry;
 - Developing the SA framework: this task involved the following: formulate sustainability indicators and targets, which give structure and show the priorities of the SA and develop a list of 20 Sustainability Objectives (shown in Table 3); and
 - Consulting on the scope of the SA: the consultation period finished on 20 July 2014, and changes suggested to the framework during the consultation period were taken into account in the preparation of this SA process.
- 3.6** Table 3 shows the 20 Sustainability Objectives that were developed as part of the 2015 Scoping Report, and which have been used throughout this document to assess the appraisal of the Local Plan’s policies and proposals.

Table 3: Sustainability Objectives for Coventry

1	Improve accessibility to and use of basic services and amenities to all residents.
2	Enable vibrant and inclusive communities that participate in decision-making.
3	Reduce social exclusion and poverty.
4	Improve health, reduce health inequalities and promote active living.
5	Provide decent and affordable housing for all, of the right quantity, type, tenure and affordability for local needs.
6	To reduce crime, disorder and fear of crime.
7	To encourage increased cultural and recreational activities across all sectors of the community.
8	To protect and enhance landscapes, local countryside, open spaces and the historic environment.
9	To protect and enhance biodiversity.
10	Promote a high quality built environment by improving design and layout and encourage local distinctiveness and stewardship of local environments.
11	Enhance quality and minimise air, soil, water, light and noise pollution levels.
12	Minimise and manage the risk of flooding and impacts of climate change.
13	To minimise greenhouse gas emissions and energy use and increase energy efficiency and the proportion of energy generated from renewable resources.
14	To minimise use of water, minerals and other natural resources.
15	To reduce travel by car and air.
16	To reduce pollution and waste generation and increase levels of reuse and recycling.
17	To meet local needs locally.
18	To improve Coventry's economy through developing a successful and diverse modern economy.
19	To ensure access to good quality employment opportunities for all.
20	Good education and training opportunities for all.

Table 4: Local Plan Proposed Submission objectives

Local Plan Objectives	Sub objectives
<ul style="list-style-type: none"> Supporting businesses to grow 	<ul style="list-style-type: none"> Maintaining a local economy, maximise employment opportunities and skill levels, and ensure that businesses have a range and choice of sites and premises. Attracting inward investment and helping business to expand. Improve Coventry economy through developing a successful and diverse modern economy.
<ul style="list-style-type: none"> Enabling the right infrastructure for the city to grow and thrive. 	<ul style="list-style-type: none"> Providing leadership to stimulate the Friargate business district; and Making the city more accessible for business, visitors and local people through better road, rail and digital connections.
<ul style="list-style-type: none"> Developing the city centre for a 21st century dynamic urban hub. 	<ul style="list-style-type: none"> Enhancing the quality of public space. Focus on the office, retail and leisure employment generating developments within the City Centre ; and Direct large scale storage and distribution (B8) uses towards Regional Logistics Sites.
<ul style="list-style-type: none"> Raising the profile of Coventry. 	<ul style="list-style-type: none"> Encouraging businesses to relocate to the city; Developing economic, business and trade links with other cities; and Promoting Coventry as a visitor destination and centre of arts & culture; sports & leisure; music & events.

<ul style="list-style-type: none"> • Creating an attractive, cleaner and greener city. 	<ul style="list-style-type: none"> • Reduce the unemployment level. • Protect and conserve the irregular pattern of the public footpath network and characteristic feature of roads and lanes. • To achieve a significant improvement in the quality of design, maintenance and accessibility of buildings and spaces in all parts of the City in order to provide a cleaner , sustainable and attractive built, historic and green environment.
<ul style="list-style-type: none"> • Creating an Accessible Transport Network. 	<ul style="list-style-type: none"> • Providing a transport network that gives the City better levels of accessibility, efficiency, safety and sustainability. • Providing better links with the City Centre and better connection to Green Spaces within Coventry. • Increasing the range of opportunities for people to access arts & culture; sports & leisure; music & events; and other activities.
<ul style="list-style-type: none"> • Housing that meets the needs of all people 	<ul style="list-style-type: none"> • Improve the provision of the right quality of housing to meet the needs of population. • Increase number of larger family homes in Coventry. • Promoting a high quality built environment by improving design and layout.
<ul style="list-style-type: none"> • Improve the health and wellbeing of local residents. 	<ul style="list-style-type: none"> • Create a smoke free Coventry. • Improve equitable access to high quality health areas most affected. • Encourage health and active lifestyle. • Encouraging walking and cycling.
<ul style="list-style-type: none"> • Make communities safer. 	<ul style="list-style-type: none"> • Ensuring that new developments, open spaces, residential and business areas are designed in ways that reduce the opportunities for crime.

4. TASK B1: TESTING THE LOCAL PLAN OBJECTIVES AGAINST THE SA FRAMEWORK

Purpose

- 4.1** The objectives of the proposed submission Local Plan have been tested against the sustainability objectives to identify both potential synergies and inconsistencies. This information may help in developing alternatives for the development of the Local Plan and may also help to refine the objectives.

Method

- 4.2** The Sustainability Appraisal of the Local Plan was carried out by Council officers in workshops. Guidance was provided and care was taken to ensure high levels of consistency. A mix of expertise was sought when selecting members of the appraisal group, which included experience in property development, climate change, regeneration, planning, urban design, conservation and archaeology and housing strategy. It should be noted that the group had a wide range of specialist technical knowledge to rigorously assess potential impacts against the sustainability objectives. The appraisal has therefore been carried out in line with national guidance. This has ensured a mix of expertise and opinion throughout the appraisal process.
- 4.3** In many ways the compatibility of the Local Plan objectives with the SA objectives will depend on how they are implemented through the policies. Therefore the approach to the appraisal was undertaken on the basis of the following assumptions:
- Any development should have due regard to the need to protect and enhance biodiversity and the natural, built and historic environment;
 - Development should take place in a way that limits the potential for pollution and greenhouse gas emissions and uses resources efficiently to limit waste production; and
 - Acceptance that the wider population would naturally increase over time based on past trends and population projections.

Findings

- 4.4** There are several potential conflicts that have been identified. These principally stem from Sustainability Objectives 8, 11, 15 and 16, which relate to the environment. It is therefore considered that there may be possible conflicts between the Local Plan objectives and the sustainability objectives. An increase in housing numbers is likely to result in an overall increase in energy and water requirements and in the amount of waste produced.

Table 5: Local Plan and SA Objectives Matrix

		Sustainability Objectives																			
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
Local Plan Objectives	1	✓	✓	✓	✓	✓	✓	✓	0	0	✓	✓	0	0	0	✓	✓	✓	✓	✓	✓
	2	✓	✓	✓	✓	✓	✓	✓	x	x	✓	✓	0	0	0	✓	✓	✓	✓	✓	✓
	3	✓	✓	✓	0	✓	✓	0	0	x	✓	0	0	0	0	✓	0	✓	✓	✓	✓
	4	✓	✓	✓	✓	✓	✓	✓	x	x	x	x	✓	✓	✓	✓	✓	✓	✓	✓	✓
	5	✓	✓	✓	✓	✓	✓	✓	✓	0	x	x	0	0	0	✓	✓	✓	✓	✓	✓
	6	✓	✓	✓	✓	0	✓	✓	✓	0	✓	0	0	0	0	✓	✓	✓	0	0	✓
	7	✓	✓	✓	✓	0	0	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	0	0
	8	✓	✓	✓	✓	0	0	✓	x	x	✓	x	x	x	0	✓	✓	✓	0	0	0
	9	✓	✓	✓	✓	✓	✓	0	✓	0	✓	0	0	0	0	0	0	✓	0	0	0
✓	Compatible			x	possible conflict										0	neutral					

General Comments:

- A. The table shows that the main aspects of neutrality are between pollution and economic growth and reducing travel by car and air and economic growth and improved transportation and consequent accessibility.
- B. There are potential conflicts that have been shown through the environmental objectives in relation to air quality, green space, biodiversity and the natural environment.

5. TASK B2: DEVELOPING AND APPRAISING THE ALTERNATIVE OPTIONS

Purpose

- 5.1 The SEA Directive requires the environmental report **consider “reasonable alternatives taking into account the objectives and geographical scale of the plan or programme”** and give **“an outline of the reasons for selecting the alternatives dealt with”** (Article 5.1 and Annex I (h)). The aim of developing and appraising different options is to compare the sustainability impacts of alternative ways of addressing and achieving the same objectives. The options should be sufficiently distinct to highlight the different sustainability implications of each in order to allow for meaningful comparisons.

Developing Reasonable Alternative Options for the 2016 Local Plan

- 5.2 The range of reasonable alternative options that have been developed are clearly different ways of addressing key planning issues facing the city up to 2031 (Local Plan period). All options that have been appraised, past and present, were developed through an analysis of technical studies carried out as part of Coventry's evidence base and workshop discussions with key stakeholders and the wider community. The options have been tested against the Sustainability Appraisal Framework to assess their performance in sustainability terms, with reference to social, environmental and economic factors. The performance of the options against the Sustainability Appraisal Framework are set out in an appraisal schedule (Appendix 1). This showed how the options compared in relation to the SA/SEA framework. Para 155 of the NPPF is expressly clear in that:

“Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate”.

- 5.3 The Local Plan has been through a number of iterations and changes since the Issues and Options paper was published for consultation in 2005. Each iteration or version of the Core Strategy/Local Plan, prepared at the earlier stages can be considered an alternative in its own right to the Local Plan as it now stands. Each of those earlier versions of the Core Strategy was subjected to SA/SEA and an historical overview of all reasonable alternative options is set out below to provide a thorough overview of how options have been considered and appraised over the past ten years.

Developing Alternative Options – 2010 Core Strategy

- 5.4 The evolution of the 2010 Core Strategy established a set of six spatial options for the future development of the city. These are shown in table 6 below. It must be recognised that these were developed at a time when the West Midlands Regional Strategy formed part of the development plan for Coventry and Planning Policy Statements informed the plan preparation process. The range of options that were developed formed different ways of addressing key planning issues facing the city up to 2026. The options were developed through an analysis of technical studies carried out as part of developing the evidence base and LDF workshop discussions with key stakeholders and the wider community. The options were tested against the Sustainability Appraisal Framework to assess their performance in sustainability terms, with reference to social, environmental and economic factors. The full appraisal results are set out in Appendix 1(d).

Table 6: Alternative Options for the 2010 Core Strategy

Spatial Options Considered
OPTION A - Continuation of current policies: site led approach to encourage the regeneration of the existing built-up area
OPTION B - Focus development on the city centre and other centres
OPTION C - Allow development on existing green spaces within the city and maximise densities in the existing built up area and maximise the use of existing resources
Option D - Outward expansion of the city within the boundary
Option E - Outward expansion of the city
Option F – Submission document key diagram and proposals map

Developing Alternative Options – 2012 Core Strategy

- 5.5** The evolution of the 2012 Core Strategy established a set of three local options for the future development of the city. The detailed assessment findings of these options can be shown in Appendix 1(c). It must be emphasised that these options must be considered in the context of option B in table 7. For example, building within the Coventry boundary only.

Table 7: Options for the 2012 Core Strategy

Core Strategy Options
<p>Option A – Hub and Spokes</p> <p>Spokes of growth stemming from the city centre which acts as the hub, which is the focus for major private and public sector investment both in terms of ongoing regeneration and cohesive major developments.</p>
<p>Option B – Expanded Centres</p> <p>Develop and focus growth in the city centre, major district centres, district centres and some local centres. This would involve those centres expanding to accommodate future development demands.</p>
<p>Option C – Transport Corridors</p> <p>Focus growth and development along the major arterial routes across the city. These corridors encompass road, rail and cycle and pedestrian routes.</p>

Developing Alternative Options – 2016 Local Plan

- 5.6** The options identified in table 8 below are those developed and considered as part of the initial Local Plan options consultation in 2014, but have also been developed and informed by previous consultations and options going as far back as 2005. Inevitably, this has meant that the plan preparation process has not been straightforward, because it has had to respond to changes in planning legislation, Government policy, new and frequently updated evidence and

case law. These options are mechanisms to deliver Coventry's development needs during the plan period. A comprehensive analysis of the spatial options is offered in table 8 which details the outcomes of the appraisal process against the sustainability framework objectives. The detailed assessment findings of these options can be shown in Appendix 1(a).

Table 8: Options for the 2016 Local Plan

Option Scenarios
<p>Scenario A: Protecting the Coventry Green Belt</p> <p>Initial analysis of possible housing land through the SHLAA suggests around 17,000 new homes can be delivered within the existing urban area, with around 80% of this on brownfield land. This would mean no amendment of Green belt boundaries within Coventry. Instead it would mean the remaining homes required to meet Coventry's housing need would be accommodated on non-Green Belt land in Warwickshire (the wider housing market area), subject to the duty to cooperate process and acceptance by neighbouring authorities.</p>
<p>Scenario B: Building within the boundary</p> <p>Initial analysis of possible housing land through the SHLAA suggests around 17,000 new homes can be delivered within the existing urban area, with around 80% of this on brownfield land. This option would therefore mean changes to the city's Green Belt boundaries to accommodate the remaining homes required to meet Coventry's housing need. It is likely however that this would include loss of land considered high in environmental quality or rich in historic character. It would not however mean the loss of all Green Belt land.</p>
<p>Scenario C: Protecting the Green Belt and building within the boundary</p> <p>Initial analysis of possible housing land through the SHLAA suggests around 17,000 new homes can be delivered within the existing urban area, with around 80% of this on brownfield land. This option would therefore mean changes to the city's Green Belt boundaries to accommodate homes required to meet Coventry's housing need. It is unlikely however that all of these homes could be provided in Coventry once regard is given to sustainable development, historical landscapes and environmental quality, meaning a relatively small proportion would need to be provided within Warwickshire. Although other land options technically exist within Coventry these have constraints and are unlikely to be deliverable in this plan period. Initial evidence therefore suggests more sustainable options may exist adjacent to the city's boundary instead of within it.</p>
<p>Scenario D: Do Nothing</p> <p>This would effectively involve relying on saved policies in the Coventry Development Plan 2001. However, this Plan is considered out-of-date given it is not likely to be NPPF compliant. Furthermore, it would expose the Council to planning by appeal as the policy basis for challenges would be greater given that it would not address the future development needs within Coventry.</p>

Evolution of Alternative Growth Options – 2015 Growth Projections

- 5.7** The appraisal of all reasonable alternative growth number options are set out in Appendix 1(b) which considers different housing growth options as identified in the Councils 2015 SHMA. It is evident from the appraisal results that the most sustainable ranges for growth are between 13 and 27 thousand new dwellings. Conversely, it is also evident that the appraisal results show that growth scenarios below and above the 13 and 27 thousand ranges begin to show significant impacts on the SA framework. For example, they perform significantly more negatively against many of the environmental objectives relating to drainage, air quality, sustainable travel, protecting bio diverse habitats and reducing waste.
- 5.8** A clear conclusion as a result of these findings is there are clear tensions and incompatibilities focusing specifically at growth projections outside of the 13 and 27 thousand ranges. They are

therefore considered to be the least sustainable to form a reasonable and sustainable alternative in establishing a sound and robust basis for Coventry's future development ambitions.

Influence of the SA in developing the Local Plan Options

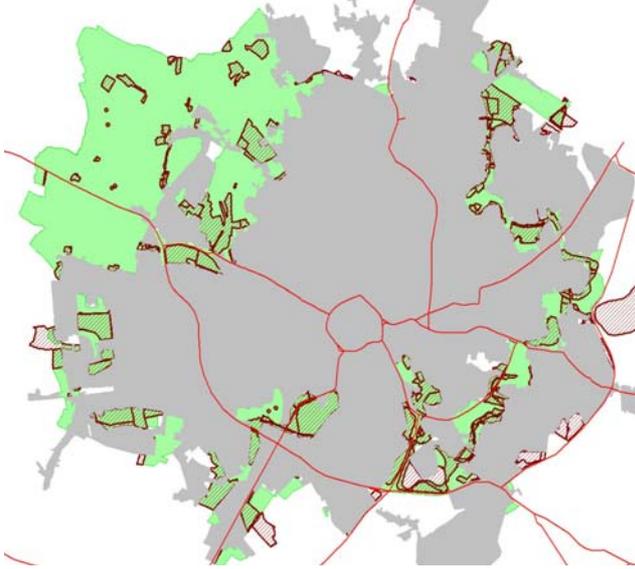
- 5.9** It can be seen from the above account of the evolution of the preparation of the Coventry Local Plan that it has been a long and challenging process, not least because it has straddled major changes in Government administrations and planning legislation and policy. For example, at the start of the process, there was a suite of national planning guidance documents and an emerging regional plan for the West Midlands. By the end of the process, the suite of national planning guidance had been swept away to be replaced by a single streamlined NPPF, and the West Midlands Plan had been revoked.
- 5.10** At the same time, the Council has been collecting evidence and commissioning studies to inform the preparation of the Local Plan. The views of Council members, stakeholders, and the general public have also been taken on board. Throughout, however, there has been the consistent theme of SA/SEA, which has been applied rigorously at each iteration in the preparation of the Local Plan. The findings and recommendations of the SA work played a significant role in determining the preferred strategy in 2014, and the SA has continued to influence the development of the overall spatial strategy, choice of major locations for growth, and criteria-based policies.
- 5.11** It is therefore difficult to distinguish the influence of the SA relative to other influencing factors, but the key message is that the Council, informed by the SA, national policy and evidence, has sought to select the most sustainable options available to them for accommodating the growth identified as being needed by the city.

Reasons for Rejecting Alternative Options

- 5.12** It is important to recognise that each Local Planning Authority in Warwickshire has the legal and statutory right to examine their respective spatial options, distribution and quantum of growth through their development plans and SA/SEA process. For this very reason, it is considered not appropriate for Coventry to test options outside of its administrative boundary.
- 5.13** It is evident from the alternative options considered and appraised above, that Coventry did consider an approach that involved planning for the city's development needs by not designating Green Belt land for potential development which was expressed as a series of options as part of the 2012 Core Strategy. However, it was evident from the work in developing the 2016 Local Plan that to constrain development in that way would mean the Council would fail the Duty to Cooperate and its strategic development needs. Therefore, in order to have a sound and legally compliant development plan, this was not a realistic alternative option.
- 5.14** Equally, it is evident from the growth projections options analysis that the ranges between 27 and 42 thousand would involve significant environmental impacts. It is also evident from the appraisal that such impacts become greater towards the higher end of the growth projections.
- 5.15** The Council has considered testing mid-point growth projections. However, in terms of the 2015 SHMA requirements, anything between 27 and 34 thousand was considered unnecessary given the Councils most-up-to date capacity requirements stand at 17 thousand.
- 5.16** One of the overriding strategic issues that has become apparent throughout the SA/SEA process is the spatial pattern of growth and reasonable alternative options are massively constrained in Coventry by the city's tight administrative boundary. In terms of appraising the options and how areas of land are considered for potential future development, it is clear from the Local Plan, that the environmental constraints have been considered and applied.
- 5.17** The Council's suite of evidence base reports provide a clear understanding of many areas that are constrained by several environmental assets including, Flood Zones 3 and 2, SSSIs, LNRs and ancient woodlands which have placed further restrictions on how much land could be

considered. The maps below provide a graphical illustration of the environmental constraints in Coventry, through a staged sequential process that has been employed in identifying areas least constrained.

Figure 2: Environmental Designations:
SSSI, LNR and ancient woodlands



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Figure 3: Flood Zones 1 and 2

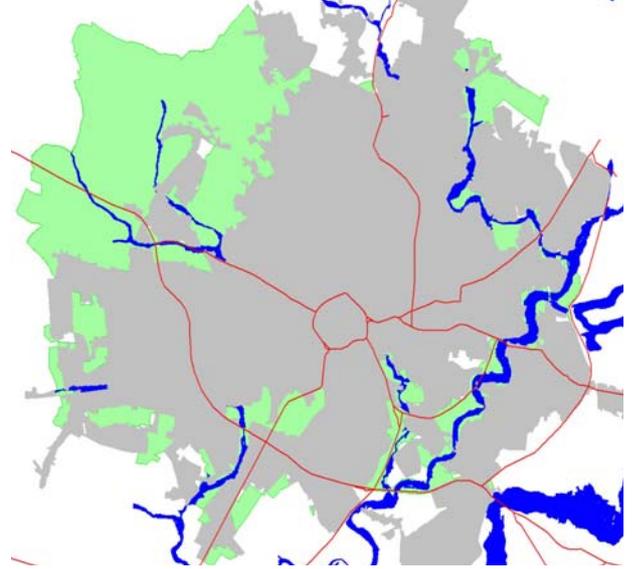
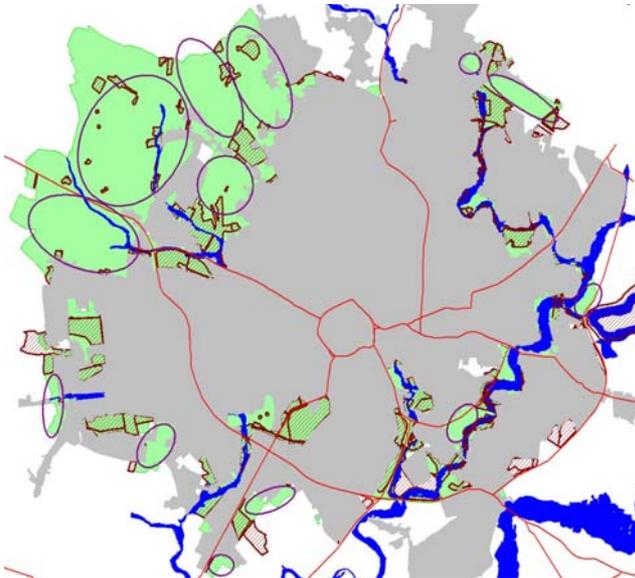


Figure 4: Combining Constraints



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Figure 5: Land availability

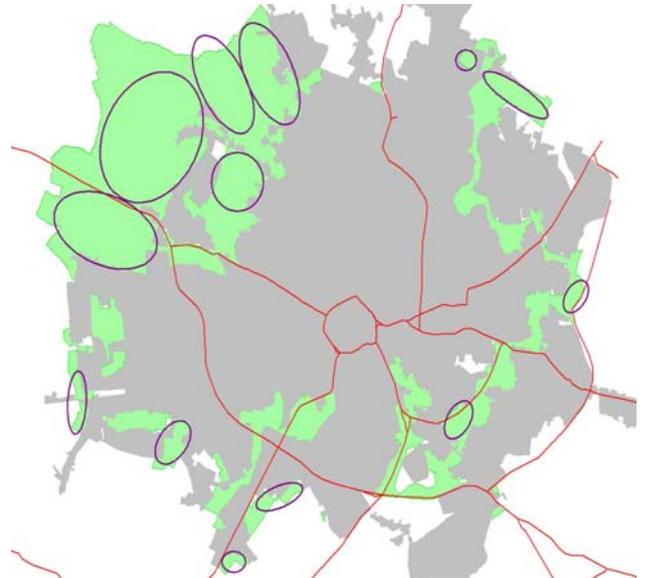
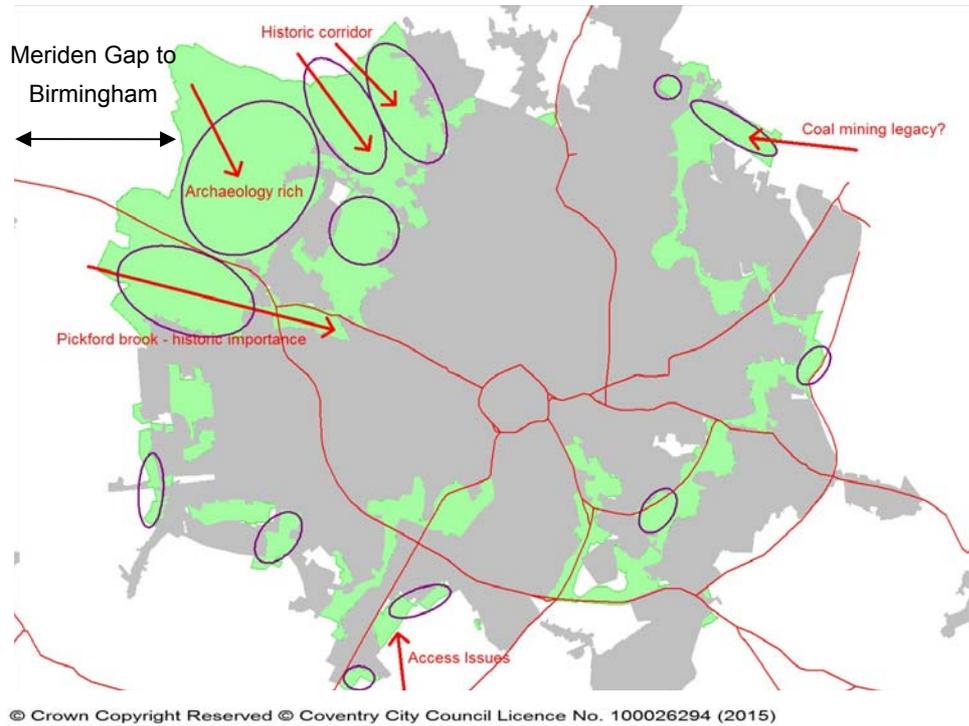


Figure 6: Further constraints



- 5.18 The Council's suite of evidence has also combined many of the environmental constraints to form a Green Belt matrix assessment which includes an assessment of all Green Belt parcels currently designated in Coventry. This evidence base focuses on four key areas which include;
1. Historic Environment Record and Characterisation Study;
 2. Sustainability Appraisal/Strategic Environment Assessment;
 3. Joint Green Belt Review; and
 4. Coventry Green Belt Ecological Report.

They all form the basis of the Council's intelligence and are available to view on the website: www.coventry.gov.uk/localplan

Appraising the Effects of the Options

- 5.19 Table 9 provides a comparison of the social, environmental and economic issues considered in determining the strategic direction of planned growth and alternative options considered and rejected.

Table 9: Assessment of effects of the 2016 Local Plan Options

Scenarios	Analysis	Implication for Local Plan and Recommendation
Scenario A – Protecting the Green Belt		
A1	<p>16 overall positives, with 4 negative scorings which meant this scenario scored lower than scenarios B and C. This was coupled with only 3 uncertain which related to crime and natural resources.</p> <p>The approach would have a positive impact on promoting urban regeneration and improving social inclusion. This would improve the way people live, work and interact throughout the city by promoting a high quality built environment.</p> <p>The approach would bring about sustainable development, by promoting reuse of previously developed land and protecting the Coventry Green Belt and other green spaces.</p> <p>The impact of the approach on natural resources and water however is uncertain, as this element of the appraisal process is site specific and dependent on individual developments.</p> <p>With regards the economic objectives the overall outcome was a mixture of positive and negatives although there was concern raised that increased out-migration could result in an increase in the need to travel, especially for employment purposes.</p>	<p>This scenario had a number of negative feedback and the least positive outcomes so can be considered the least sustainable approach to meeting future housing needs. This scenario highlights the weakness of focusing a planning strategy purely on brownfield land availability and means any prospective developments already identified through the development plan system are being brought forward on a market basis, i.e. with limited public sector intervention.</p> <p>This approach is lower than current demographic projections. This could lead to higher levels of outmigration than those estimated by the ONS. This could result in a 'real' decline in the city's population. Increased out-migration could also result in an increase in the need to travel, especially for employment purposes.</p>
Scenario B – Building within the boundary		
B1	<p>17 positive scorings were identified overall, but this was offset by 8 negative scorings. Two objectives were considered to be neutral.</p> <p>The strongest aspects of this approach focused on accessibility to services, amenities and public transport, with objectives 2, 18, 19 and 20 being considered very positive.</p> <p>There were some positive scorings in respect of the economic objectives relating to this scenario in relation to increased job opportunities and new investment linked to housing growth. Linking housing development closer to services then in turn it would be easier to access by foot,</p>	<p>This scenario scored several negatives so can be considered a less than sustainable approach to future development. The approach scores strongly for economic and social sustainability, but does not have such a positive effect on the environment.</p> <p>The approach does raise some concerns over flooding and climate change, which means strong policies would be needed should it be the chosen approach. Existing vacant and derelict land within the urban area will be regenerated and brought back into active use, subject to a robust phasing policy.</p> <p>There is also some concern regarding indirect impacts of this approach on suburban and peripheral areas of the city. These concerns would need to be monitored through the AMR should it be selected as the chosen mechanism for</p>

cycle or public transport. This would inevitably reduce the reliance on the car, help reduce greenhouse gas emissions and improve air quality. Depending on the extent to which this occurred objective 13 may well be upgraded to positive in the longer term.

Focus on the centres also creates a more positive environment for green spaces and prevents the release of Green Belt land. This explains the positive response for the environmentally focused objectives.

There was a general consensus that waste generation should not be an issue with development focused in existing high density development. With regards climate change it was generally acknowledged that higher density developments might bring about greater economies of scale in terms of sustainable construction and reduced greenhouse gas emissions by lower car usage. Until such time as specific schemes are brought forward and their impacts are monitored, this is still an uncertain conclusion.

A reduced need to travel will promote increased levels of walking, cycling and use of public transport. This will contribute towards reduced carbon emissions and improve the urban environment. This will have a positive effect on public health and wellbeing.

delivering Coventry's housing need.

The Local Plan will need to attempt to mitigate the potential negative impacts that have been identified if this option is chosen. A requirement at this level could risk over allocation of land during a period of market uncertainty, which may compromise urban regeneration. This is a significant risk in the first 5 years of the plan period in particular.

Scenario C – Protecting the Green Belt and building within the boundary

C1 24 overall positives were scored together with 3 negatives. 10 objectives were very positive whilst only two were considered to be uncertain and neutral. The negative impacts of the approach largely focused on the potential impacts this would have on landscapes, historic environment and biodiversity. These concerns were also reflected in the 2 uncertain and neutral impacts which considered biodiversity, flooding and climate change. The uncertain decision however was due to the site-specific nature that would inevitably arise through the wider development framework of this approach given sites could be beyond the city's administrative boundary. The majority of positive impacts focused on accessibility to services, jobs, affordable homes and public transport, which

This scenario is clearly the most sustainable approach. However, this option is one which advocates a primary focus on urban regeneration and focuses development along key transport routes but would inevitably mean that green spaces would be threatened by the need to provide the level of housing this option requires given that it could exceed the minimum figure identified in the SHMA (23,600) for new homes in and adjacent to the boundary as a result of further work through the DtC.

are all expected to benefit from the way the approach prioritises housing growth. There were also positive impacts highlighted for the health and recreation objectives and the approach aims to protect urban green space and provide new and suitable public open spaces.

Scenario D – Do Nothing

D1	No change. This is not a realistic or sustainable option. Cities do not attract future investment if land is not made readily available for development or if development is not planned in accordance with robust and sustainable policies.	Reduced growth is likely to be better for most environmental objectives. However, the social and economic benefits of, or imperatives for, growth may override these.
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6. TASK B3 AND B4: PREDICTING AND EVALUATING THE EFFECTS OF THE LOCAL PLAN

Purpose

- 6.1 The purpose of this task is to predict the social, environmental and economic effects of the emerging core strategy, as well as the sustainability implications of the Local Plan in general. **The SEA Directive requires that the environmental report provides information on the likely significant effects, including secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects on the environment.** It should also set out the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.

Method

- 6.2 The effects of the submission document have been predicted and evaluated. A qualitative approach has been adopted and in line with current practice the following scale is used:

++
+
?
0
-
--

very positive

positive

uncertain

neutral/no impact

negative

very negative

prediction and evaluation of different spatial effects options including their implications, the recommend

Predicting effects of the Local Plan (Task B3)

- 6.3 The Proposed Submission Local Plan includes site specific allocations and the appraised options relate to ways in which any level of growth can be accommodated within the city's administrative boundary and the wider housing market area. The appraisal in Table 9 indicates the Proposed Submission Local Plan is likely to be more effective in promoting sustainable development if the following policy approaches are taken forward:

- New housing growth in the city centre.
- New housing growth at higher densities within the existing built up.
- Depending on the type and nature of employment proposed, provision of new employment opportunities within the city centre and major regeneration areas.
- Consider limits on types of houses in order to ensure local needs are met and empty units are not created. Ensure there is sufficient housing for elderly people to enable larger housing to be freed up for families. This relates to more family housing provision within those areas where need is currently not met.
- Prioritise improvements to the city centre in terms of the environment, shops, offices, residential, culture and leisure. Avoid the provision of additional long stay parking facilities, but there may be scope for additional short stay parking.
- Implement transport infrastructure improvements in terms of more park and ride, better enforced travel plans, improved access for all and greater provision of sustainable modes of travel. For example, cycling and walking facilities.
- Avoid out-of-centre and out-of-town retail and leisure development wherever possible.
- Protection of the most important Green Belt parcels, green field and any other green space from residential estate development.
- Avoid developing urban green space.
- Investigate whether the provision of new recycling facilities should be shared with a wider sub-national area (Coventry, Solihull and Warwickshire).
- Potential to provide new recycling facilities on employment sites or along transport routes.

- 6.4** Table 11 indicates that the impact of the DPD on the 20 Sustainability Objectives is likely to be positive. The DPD may however lead to a Net loss of urban green spaces, and local countryside, which in turn reduces recreational opportunities; an increase in the risk of flooding though increased hardstanding. There may also be potential conflicts between the compatibility of higher density development and the protection of local environments and local distinctiveness, and the ability to meet local needs ensuring that people live where they work. These negative impacts may prevent developments required to achieve Coventry’s social and economic objectives.
- 6.5** The policy areas identified in the document relating to the growth of the city could potentially have negative impacts on local biodiversity, and therefore mitigation measures considering the needs of the local habitats should be included to protect and enhance the assets.

Environmental Characteristics of areas likely to be significantly affected

- 6.6** Part 4 of the 2015 Scoping Report sets out the baseline information and the environmental portrait of the current state of the environment together with a clear picture of the likely evolution of the environment without the plan. The table below details the environmental characteristics of the areas in the city likely to be significantly affected.

Table 10: Areas likely to be significantly affected and their environmental characteristics

Area(s) likely to be significantly affected	Environmental Characteristics
Keresley Sustainable Urban Extension	<ul style="list-style-type: none"> The most important habitats in terms of biodiversity are the semi-natural woodlands including Bunsons Wood, Pikehorne Wood and Hall Yard Wood all are LWS and ancient woodlands. Species rich hedgerows include the Thompson’s Lane hedges and the ponds scattered across the area. Some ponds are noted as deteriorating through scrub encroachment and drying out. There are many records of amphibians in the Keresley area, namely great crested newts, smooth newts, common toad and common frog. In addition, other protected and important fauna species recorded in the area include bats, brown hare, badger and notable birds, as well as rare beetles, moths, butterflies and bees. There are several important veteran trees in the north of the area, in Bunsons Wood. This area is underlain substantially by red sandstones and clays of Upper Carboniferous age, with a patchy fringing cover of unconsolidated Quaternary deposits; chiefly Boulder Clay. Excavations into natural bedrock or Quaternary deposits would be of interest for purposes of geological recording and/or collection of representative specimens.
Eastern Green Sustainable Urban Extension	<ul style="list-style-type: none"> Protected and important fauna records of great crested newt, smooth newt, common frog, badger, bats, white clawed crayfish, water vole and brown hare plus a notable invertebrate, have been observed in the area. County rare flora records in the area include water violet, orange foxtail, blunt-leaved pondweed, sharp-flowered rush and shepherd’s downy rose in addition to native black poplars and veteran trees. The invasive plants Himalayan balsam and Japanese knotweed, listed under Schedule 9 of the Wildlife and Countryside Act 1981, have been recorded. This largely rural area is underlain substantially by sandstone-dominated bedrock of Upper Carboniferous age, with a localised cover of unconsolidated Quaternary deposits, principally Boulder Clay and some alluvium.

Sutton Stop/Lentons Lane	<ul style="list-style-type: none"> The LWS is situated within a loop of the Oxford Canal, which forms the boundary on the north and east sides, while the Hawkesbury Locks Conservation Area at Sutton Stop (a popular canal hamlet) borders the site to the north-west. To the west the boundary is marked by a former colliery railway (long dismantled) which is overgrown with dense scrub, while beyond is a small area of arable fields. There are many records of amphibians in the Lenton's Lane area, namely great crested newts, smooth newts, common toad and common frog. In addition, other protected and important fauna species recorded in the area include bats, a number of rare butterflies and moths and several birds of conservation concern.
Land west of Cromwell Lane	<ul style="list-style-type: none"> The most important wildlife area is the Rough Close and adjoining meadows LWS described as a valuable 25 hectares of ancient, semi-natural woodland and semi-improved grassland with hedges and pond. Almost 250 species of plant have been recorded from within the site. This area is underlain largely by red clay and sandstone bedrock of latest Carboniferous and/or earliest Permian age, with a localised cover of unconsolidated Quaternary alluvium. There are many records of amphibians in the Tile Hill and wider area, namely great crested newts, smooth newts, common toad and common frog. Other protected and important fauna species recorded in the area include bats, badger and rare invertebrates.
Whitley	<ul style="list-style-type: none"> Protected and important fauna records of bats, otter, smooth newt, common frog, common toad, badger and hedgehog as well as a number of notable birds, butterflies, bees, moths and beetles have been observed in the area. Several county rare plants have been recorded; including treacle mustard and bird's foot, as well as important native black poplars and veteran trees. This area is one of very poor geological exposure, dominated by clay and sandstone bedrock of latest Carboniferous and to a lesser extent mid-Triassic age, with variable cover of unconsolidated Quaternary deposits.
Urban regeneration area - Canley	<ul style="list-style-type: none"> The Woodlands Green Wedge area is a stronghold for amphibians, including great crested newts. In addition, protected and important fauna records of bats, water vole, and a number of notable moths, beetles and a rare bee species have been observed in the area. This area is dominated by a cover of brown pebbly clay, identified as glacial till. This overlies red mudstone and sandstone bedrock of latest Carboniferous and/or early Permian age, which outcrops from beneath the younger till in the southern part of the area.

Evaluating effects of the DPD (Task B4)

- 6.7** Having identified and described the likely effects of the Proposed Submission Local Plan, it is necessary to carry out an evaluation of their significance. This includes assessing: probability, duration, frequency and reversibility of the effects, including secondary, cumulative and synergistic effects. Table 8 details the likely significant effects against the sustainability appraisal framework.

Housing

- 6.8** Overall, the Local Plan is considered to have the potential for major short to long-term positive cumulative effects on housing through the provision of 42,400 new homes to meet the objectively assessed need of the city during the life of the Plan. Housing will be distributed across the city in urban, urban fringe and semi-rural areas and Local Plan policies will ensure that a suitable mix of homes are provided to meet the needs of all people in the future. The increased supply of housing as a result of the policies and allocations could also have the effect of increasing the availability of different tenures in the area, particularly larger family housing, which was identified as a key sustainability in the Scoping Report. The Local Plan also seeks to

provide affordable housing that will also help to address this issue. Local Plan policies seek to protect the existing built environment and also require any new development to be well designed and be high quality.

- 6.9** Buildings account for a large proportion of primary energy use in the UK and according to Defra, buildings contribute to about 46% of the UK's carbon emissions. Therefore, existing and new buildings can have a strong influence on how climatic changes occur over time. If new developments brought about through the implementation of Local Plan policies and implement energy efficiency measures and on site renewable energy production as advised in the Council's Climate Change Strategy and Delivering a More Sustainable City Supplementary Planning Document, Coventry could contribute to a substantial saving in energy use and also in CO₂ emissions, which would otherwise may not have occurred.

Accessibility

- 6.10** Local Plan policies seek to address the impacts of proposed development on the road network and ensure that appropriate infrastructure is provided. The IDP sets out a range of highways and sustainable transport infrastructure that will need to be delivered during the life of the Plan to support proposed development. Local Plan policies also seek to improve public transport and pedestrian routes and encourage the use of sustainable transport modes. These measure as along with the delivery of housing, employment and community facilities/ services has the potential for a long-term positive cumulative effect on transport and accessibility.
- 6.11** The transport of goods and people are responsible for significant levels of greenhouse gas emissions, which can influence natural climatic changes and contribute to increased risks of flooding. This can also have implications for air quality. New buildings will inevitably create new demand for transport, but the Local Plan will encourage developers to include measures that promote walking and cycling and the use of public transport as well as promote mixed-use developments, perhaps reducing the need for commuting to work. This will help to achieve a reduction in health inequalities as demonstrated in the Health Impact Assessment.

Climate Change and Natural Environment

- 6.12** The level of growth proposed through the Local Plan has the potential for major long-term negative effects on the natural environment. To address this, the Local Plan seeks to direct development away from the most sensitive and important useable areas of green space and also protect, enhance and restore the natural environment. The mitigation provided by Plan policies should address negative effects to ensure they are not significant for the landscape or biodiversity; however, the overall cumulative effects of the Local Plan remain.
- 6.13** Some of the impacts discussed above are irreversible:
- Loss of biodiversity, landscape and habitats cannot always be restored;
 - Global warming due to the accumulation of existing greenhouse gases, and the challenges of climatic changes.
- Other impacts are likely to have a cumulative effect:
- The loss of certain habitats may result in loss of some species which were dependent upon that particular habitat;
 - Increased waste production could result in larger areas of land being used as landfill if recycling targets are not met.
- 6.14** It is however recognised that there is a need for new homes, more jobs and the construction of related infrastructure in order to accommodate future levels of growth. Any future development must be in locations that are, or can be made sustainable, together with mitigation measures to limit the potential effects that have been identified.

Water Resources and Water Quality

- 6.15** Overall, the Local Plan is considered to have the potential for minor negative cumulative effects on this topic through the provision of 42,400 homes and 52 ha of continuous employment land during the life of the Plan. Local Plan policies protect the water environment and encourage the inclusion of water efficiency measures and sustainable drainage systems as well as the provision of necessary infrastructure. Mitigation measures should ensure that negative cumulative effects are not significant.

Cultural Heritage

- 6.16** Overall, the Local Plan seeks to protect and enhance heritage as well as avoid development that would have an impact on the significance of heritage assets. It seeks to direct development to the available and suitable areas with the least constraint. Whilst it is recognised that development has the potential for negative effects on heritage it is also considered that there is the opportunity for positive effects by enhancing assets and promoting improved access. There is suitable mitigation available to address negative effects to ensure that they are not significant; however, the overall cumulative effect of the Local Plan on heritage remains uncertain.

Waste Management and Recycling

- 6.17** Overall, the Local Plan is considered to have the potential for minor negative cumulative effects on this topic through the provision of 42,400 homes and 52 ha of continuous employment land during the life of the Plan. Local Plan policies expect development proposals to make sufficient provision for sustainable waste management and they also allow for sufficient flexibility to address increased future demand for waste facilities as a result of proposed development.

Jobs and Economy

- 6.18** Overall, the Local Plan is considered to have the potential for major short to long-term positive cumulative effects on the jobs and the economy through the provision of 200ha of employment land during the life of the Plan. Major allocations for employment have been distributed across the city, including at the proposed Eastern Green SUE and the sub-regional employment area in the north east of the city at Ansty. The Local Plan protects existing employment as well as supports economic growth through both the regeneration of previously developed land as well as development of suitable Greenfield sites. It also seeks to maintain the shopping function of the city centre and associated district and local centres to support proposals that enhance their roles.

Air Quality

- 6.19** It is considered that major negative effects on air quality are unlikely as a result of the Local Plan. Policies seek to address the impacts of proposed development on the road network and improve public transport and pedestrian routes as well as encourage the use of sustainable transport modes. While there may be some localised impacts in the short-term as a result of proposed development, the mitigation proposed through Local Plan policies and predicted trends in air quality will ensure that these are not significant.
- 6.20** Table 12 is an appraisal of the draft policies outlined in the submission Local Plan. As noted earlier, the appraisal was carried out through a series of in-house workshops and results in recommendations for taking the policies forward. The following table summarises the likely positive and negative effects by predicting the impacts against the sustainability appraisal. Detailed appraisal matrices are set out at appendix 4.

Table 11: Predicting and evaluating the effects

++	very positive
+	positive
o	neutral/no impact
-	negative
--	very negative

Guidance:

Consider short, medium and long term effects/impacts of the DPD

		DPD	No DPD	Likely <i>Positive</i> effects of DPD on sustainability objectives	Possible <i>Negative</i> impacts of DPD on sustainability objectives
Sustainability Objectives	1	+	-	1) The DPD makes attempts to encourage public transport use potentially making services and amenities more accessible. 2) Locating services near to housing could have a positive impact on accessibility. However, people will not necessarily live near where they work or use the most local services and amenities, so positive impacts depend on personal decisions.	
	2	o	o	DPD may help a little in making things more accessible, but largely a personal decision as to whether someone wishes to take part in decision-making.	
	3	+	o	Long term positive impact potential: provision of new homes, many being affordable and new employment opportunities may provide for those who are currently excluded. Bringing land which was previously used for anti-social behaviour back into productive use should also help reduce such behaviour.	

4	+	-	The DPD has a long term potential to improve health - through the promotion of more sustainable modes of transport and provision of more recreational facilities. Also through the protection of the countryside/green belts through careful directing of development.	1) Possible negative impacts of DPD such as some development encroaching on the countryside, areas of greenbelt or existing urban spaces may reduce recreational opportunities. 2) Higher density buildings could result in smaller garden sizes having negative impact for promoting health and active living, though provision of attractive high quality shared and public spaces could counter this.
5	++	--	The DPD directly attempts to provide new housing which seeks to fulfil housing needs, including affordable housing. Short, medium and long term positive impact on sustainability objective	
6	0	0	Some potential for crime reduction to be built into new developments. May however be more influenced by other SPD rather than as a direct effect of this DPD.	
7	+	0	Protecting countryside and greenbelt will enable recreation to continue there.	Loss of some urban green spaces, open countryside or green belt may reduce recreational opportunities.
8	+	0	DPD provides the potential to contain growth in areas and protect other areas - such as some areas of green belt, open countryside and green spaces.	Loss of green belt, open countryside and urban spaces to development - significant short and long term negative impact on environment.
9	0	0	Scale of development necessary to meet housing need will put pressure on biodiversity. DPD seeks to minimise this.	Scale of development necessary to meet housing need will put pressure on biodiversity. DPD seeks to minimise this
10	+	-	Long term possibility to create high quality built environment through new development of improving design and could lead to distinctiveness.	No real negative impact identified.
11	0	0	DPD will encourage reduction in pollution levels through tighter EU controls, but greatest impact would be through other SPDs focusing on more detailed aspects of design and pollution reduction.	DPD will encourage reduction in pollution levels, but really greatest impact would be through other SPDs focusing on more detailed aspects of design and pollution reduction.

12	-	0	No real positive impact identified between the DPD and this Sustainability Objective.	Growth proposed in DPD will create additional hard standing, likely to result in the removal of vegetation and is unlikely to protect people from flooding and the impacts of climate change
13	0	0	DPD will encourage reduction in pollution levels, but really greatest impact would be through other SPDs focusing on more detailed aspects of design and pollution reduction. DPD does encourage recycling through establishment of waste management facilities.	DPD will encourage reduction in pollution levels, but really greatest impact would be through other SPDs focusing on more detailed aspects of design and pollution reduction.
14	0	0	No real negative impact identified between the DPD and this Sustainability Objective.	
15	++	-	This DPD has real potential to achieve medium and long term positive impacts to reduce car travel (little influence on air travel) by encouraging sustainable modes of transport, and developing houses, employment and services in close proximity to the areas likely to experience growth and regeneration.	
16	0	0	Establishment of some large scale recycling facilities could have positive long term environmental benefits. Provision of small scale recycling facilities could also result in some short term environmental gains and encourage reduction waste generation. The location of the new facilities, both large and small scale would have to be carefully considered.	No real negative impact identified between the DPD and this Sustainability Objective provided the new facilities are carefully located - appropriate to whether the facility is large or small scale
17	++	-	The DPD encourages the growth of Coventry to provide for employment, housing and service needs. Potential to create both medium and long term benefits on economy and housing needs of Coventry.	Concern that the provision of employment and housing in close proximity will not necessarily mean that people will live where they work - some people choose not to
18	++	-	The DPD would have a significant direct effect on improving Coventry's employment opportunities and create a diverse modern economy.	

	19	+	-	The DPD has a positive potential to provide access to good quality employment for all through the establishment of new employment opportunities.	
	20	+	-	This DPD may open up training and education opportunities through vocational training as new firms and businesses invest in the cities available land opportunities alongside the establishment of new employment premises.	May not provide training and education for <i>all</i>

Table 12 – Sustainability Appraisal (critical analysis) of submission draft Local Plan policies

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
Policy DS1 Overall Development Needs		
<p>1. Over the Plan period significant levels of housing, employment and retail development will be planned for and provided along with supporting infrastructure and environmental enhancements:-</p> <ul style="list-style-type: none"> a) 24,600 additional homes. b) 128ha of employment land within the city's administrative boundary, including: <ul style="list-style-type: none"> i. at least 176,000sq.m of office floor space at Friargate and the wider city centre, ii. the continued expansion of Whitley Business Park; and iii. 15ha strategic allocation adjoining the A45 as part of the Eastern Green sustainable urban extension c) 84,000sq.m gross comparison retail floor space and 21,900sq.m gross convenience floor space by 2031, of which at least 70,000sq.m is to be allocated to Coventry city centre. <p>2. Notwithstanding the above, Coventry's objectively assessed housing need for the period 2011 to 2031 is 42,400 additional homes and 369ha of employment land (including qualitative replacements). It is not possible to deliver all of this additional development land within the city boundary. As such, the Council will continue to work actively with neighbouring Councils through the Duty to Cooperate to ensure that appropriate provision is made elsewhere within the Housing Market Area.</p>	<p>The planned and future regeneration of the city has a strong relationship with all of the 20 sustainability objectives. They aim to improve each facet of the objectives in a major and significant way by signalling how developments should be delivered.</p> <p>No detail as to how communities could participate in decision making – e.g. community ownership of resources & strategies i.e. 'grass-roots empowerment as opposed to top-down management'.</p> <p>The intrinsic and vital link between regeneration and skills, education, participation needs to be defined more closely.</p> <p>The policy is a general enabling policy and that the detailed comments will be picked up in detailed 'daughter' plans such as the City Centre AAP and SUE Masterplans</p>	<p>Policy will have to be carefully considered in terms of implementation as it could affect other related sustainability objectives, but otherwise, the policy is largely factually based and is more a statement of intent rather than a proactive approach to development.</p> <p>No change.</p>
Policy DS2 Duty to Cooperate		
<p>Coventry City Council will work with neighbouring authorities within it's Housing Market Area to support the delivery of the development needs identified in Policy DS1 that originate from the city.</p> <p>In order to ensure the affordable housing needs of the city are met, the Council will work with its neighbouring authorities to secure opportunities for Coventry citizens to access affordable homes within Warwickshire where they</p>	<p>This policy is relevant to all LPAs in that they are facing similar challenges. The policy appears to reconcile the potential conflict between meeting individual objectively assessed housing need but also meeting the overall housing need across the wider housing area.</p>	<p>No change to p[olicy].</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>are delivered as part of the city's wider housing needs being met.</p> <p>The Council will support the preparation of joint strategic evidence which will enable the successful delivery of regeneration and economic growth across the sub-region. The Council will continue to be proactive in this regard and will seek to cooperate with all partners on an on-going basis across all topic areas including housing, infrastructure, economy and jobs, transport, health and the environment.</p> <p>Should the need arise and should it be considered appropriate the Council is committed to working with partners on preparing joint development plan documents, supplementary planning documents and design guides to help deliver new sustainable development that may straddle or adjoin the city's administrative boundary.</p> <p>Where sites cross or are adjacent to administrative boundaries and are not subject to joint development plan documents, the Council will continue to work proactively and on an on-going basis with all relevant partners to enable the delivery of new development on these sites.</p> <p>The Council is committed to supporting the economic growth objectives of the sub-region and, in partnership with the CWLEP will continue to work proactively will all partners to deliver economic growth and prosperity across Coventry and Warwickshire.</p>		
Policy DS3 Sustainable Development		
<p>When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work proactively with applicants to find solutions to enable proposals to be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area, including:</p> <ul style="list-style-type: none"> a) access to a variety of high quality green and blue spaces; b) access to job opportunities; c) low and, wherever possible, zero carbon homes; d) use of low carbon, renewable and energy efficient technologies; e) the creation of mixed sustainable communities through a variety of 	<p>In terms of assessing the policy objectives, it is very much dependant on the housing mix and age ranges of the end users for any given development site. In respect of objective 8, there is a need to protect the historic environment such as the cathedral quarter. Also, there needs to a focus on quality intensive developments rather than 'garden grabbing'. For objective 12, each site will differ depending on its location but the strategic flood risk assessment will help to identify areas that are prone to flooding within</p>	<p>Recommend that the policy specify what sustainable living is in the Coventry context. Define what would be classed as mixed use communities, and what would be detrimental, and how this could be measured. Recommend inserting additional bullet points to</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>dwelling types, sizes, tenures and range of community facilities</p> <p>f) increased health, wellbeing and quality of life;</p> <p>g) measures to adapt to the impacts of climate change;</p> <p>h) access to sustainable modes of transport;</p> <p>i) preservation and enhancement of the historic environment; and</p> <p>j) sustainable waste management.</p> <p>2. Planning applications that accord with the policies in the Coventry Local Plan (and, where relevant, with policies in supporting plans) will be approved without delay, unless material considerations indicate otherwise.</p> <p>3. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise.</p> <p>4. This will take into account:</p> <p>a) Any adverse impacts of granting permission that would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or</p> <p>b) Specific policies in that Framework that indicate that development should be restricted.</p>	<p>specified periods.</p> <p>If employment sites do become defunct, then it may be appropriate to use these for housing development. The scale and mix of developments is very important and therefore, the thrust should be to encourage mixed communities and not risk creating ghettos of affordable housing.</p> <p>If the proposed growth point into the Green Belt at Upper Eastern Green and Keresley are then made accessible to the M6 and A45, they could have a further detrimental impact on the environment by encouraging/enabling outward migration to Birmingham/Solihull and beyond rather than meeting the city's employment-led objective. Such developments could thereby encourage longer journey times/trips and encourage more residential development on other Green Belt sites to meet the city's own needs.</p> <p>Other point was the importance of protecting green spaces within the city's deprived neighbourhoods to provide opportunities for new facilities for local youth to discourage anti-social behaviour/fear of crime.</p> <p>The importance of mixed development should be emphasised. If spaces are to be truly sustainable then they must be living, vibrant places that everybody has a stake in and not left to rot on the periphery.</p>	<p>consider health and well-being of Coventry residents.</p>
<p>Policy HWB1: Health Impact Assessments</p>		

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>All major development proposals will be required to demonstrate that they would have an acceptable impact on health and wellbeing. This should be demonstrated through a: HIA where significant impacts on health and wellbeing would arise from that proposal; or HIA Screening Report which demonstrates that the proposed development would not overall give rise to negative impacts in respect of health and wellbeing.</p> <p>All HIAs shall be undertaken in accordance with the Council's HIA Supplementary Planning Document.</p> <p>Where a development has significant negative or positive impacts on health and wellbeing the Council may require applicants to provide for the mitigation or provision of such impacts through planning conditions and/or financial/other contributions secured via planning obligations and/or the Council's CIL Charging Schedule.</p>		No change.
Policy JE1 Overall Economy and employment strategy		
<p>1. The Council will work positively and proactively with the business community in the city, inward investors, the city's two Universities, key public sector employers, the CWLEP and neighbouring local authorities to support sustainable economic growth and job creation. In this regard the Council will:</p> <ul style="list-style-type: none"> a) Promote continued diversification of the city's economic base, particularly through supporting the expansion of companies operating in growth sectors and partnership working with the city's Universities to promote innovation; b) Ensure that job opportunities arising from employment development are accessible to all of the city's working age residents, particularly priority groups and those in the most deprived areas of the city; c) Provide for a readily available range and choice of employment sites and premises to meet projected need over the Plan period related to growth of the city's population and the pivotal role of the city in the CWLEP's ambitious growth agenda for the sub-region; 	<p>It's positive in that it recognises that job opportunities arising from employment development must be accessible to residents; but other than transport solutions and developing sites in close proximity to areas of deprivation, it only gives a couple of possible examples about how this might be done. Policy may wish to add that there may be sites which are not currently considered to be strategic may become strategic in the future. Policy cannot ensure employment opportunities to local communities but will promote access to employment, education and training opportunities from which the whole community can benefit.</p>	<p>Recommend policy aspects be included such as apprenticeships, job-sharing, supported internships, accessible recruitment through local providers (such as the Job Shop).</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation																									
<p>d) Safeguard existing employment sites and premises from being lost to non-employment uses unless certain exceptional circumstances are demonstrated;</p> <p>e) Support companies in retaining, expanding and/or relocating their headquarters operations within the city.</p> <p>f) Seek to direct office development to locations in the city centre and other defined centres with new large scale office development focused on the city centre's Friargate Business District;</p> <p>g) Ensure that new research and development, light industrial, general industrial and storage/distribution developments are appropriately sited and designed to maximise their accessibility by a choice of means of transport, have an acceptable impact on the highway network and to minimise the potential for environmental conflict with nearby sensitive land uses;</p> <p>h) Support tourism/visitor related development in respect of Coventry city centre, the Ricoh Arena and the Coventry and Warwick University Campuses.</p>																											
Policy JE2: Employment Allocations																											
<p>1. A total of 101ha of land are allocated for employment development within the city's administrative area. The allocations are as specified below together with details of the type of employment development that will be promoted on each of these sites.</p> <table border="1" data-bbox="181 1029 1093 1398"> <thead> <tr> <th>Site Ref</th> <th>Site</th> <th>Ward/LPA</th> <th>Area Ha (Hectares)</th> <th>Employment Type</th> </tr> </thead> <tbody> <tr> <td>JE2:1</td> <td>Friargate (part of mixed use site)</td> <td>St. Michael's</td> <td>7</td> <td>Primarily B1a</td> </tr> <tr> <td>JE2:2</td> <td>Lyons Park</td> <td>Bablake</td> <td>16.5</td> <td>B1, B2 & B8</td> </tr> <tr> <td>JE2:3</td> <td>Whitley Business Park</td> <td>Cheylesmore</td> <td>26.5</td> <td>B1b&c, B2 & B8</td> </tr> <tr> <td>JE2:4</td> <td>Land at Baginton Fields and South East of Whitley</td> <td>Cheylesmore</td> <td>25</td> <td>B1b&c, B2 & B8</td> </tr> </tbody> </table>	Site Ref	Site	Ward/LPA	Area Ha (Hectares)	Employment Type	JE2:1	Friargate (part of mixed use site)	St. Michael's	7	Primarily B1a	JE2:2	Lyons Park	Bablake	16.5	B1, B2 & B8	JE2:3	Whitley Business Park	Cheylesmore	26.5	B1b&c, B2 & B8	JE2:4	Land at Baginton Fields and South East of Whitley	Cheylesmore	25	B1b&c, B2 & B8	<p>Surrounding land use classification and the degree to which emerging sustainable development policy is implemented and is feasible will have an impact on the outcome of most of the objectives. However, it should also be stated that they are likely to have a very positive impact on improving employment, training and education opportunities.</p> <p>This policy shines a light on a potential flaw in SA Objective 5 which seeks to provide housing to meet 'local need'. (i.e. If someone takes up a job from outside the area and move to the city, do they constitute 'local'). In this regard, it is noted that some local authorities include lengths of residency as a condition of eligibility to some lower end private sector housing.</p> <p>Two key objectives are to promote inclusive</p>	<p>No change to policy.</p>
Site Ref	Site	Ward/LPA	Area Ha (Hectares)	Employment Type																							
JE2:1	Friargate (part of mixed use site)	St. Michael's	7	Primarily B1a																							
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JE2:3	Whitley Business Park	Cheylesmore	26.5	B1b&c, B2 & B8																							
JE2:4	Land at Baginton Fields and South East of Whitley	Cheylesmore	25	B1b&c, B2 & B8																							

Policies					Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
	Business Park				<p>communities and to reduce poverty and social exclusion. However, there is no guarantee that jobs can go to local residents. However, as against this, SA objectives 19 & 20 aim to ensure good quality employment, education and training opportunities which will help to compensate for this.</p> <p>If jobs are taken up by people from outside the area, it could be argued that this could compromise SA Objective 6 (i.e. to reduce crime, disorder and the fear of crime). The negative impact of re-development could be mitigated or overcome if other modes of transport become increasingly viable as part of grouping together of employment units and economies of scale. However, if the prevailing car culture persists, the number of car journeys is likely to increase rather than diminish.</p> <p>Impact of employment facilities on SA Objective 7 (increased cultural and recreational activities) can be variable. Consideration should be given to Best Practice in this regard (i.e.: Peugeot Stoke where new recreation facility is available to whole community)</p> <p>Strategy cannot ensure that new employment premises will employ people from the surrounding community. However, as against this, SA objectives 19 and 20 which seek to ensure access to good employment, education and training opportunities.</p>	
JE2:5	A45 Eastern Green (part of mixed use site)	Bablake	15	B1b&c, B2 & B8		
JE2:6	Whitmore Park (part of mixed use site)	Holbrook	8	B1b&c, B2 & B8		
JE2:7	Durbar Avenue (part of mixed use site)	Foleshill	1.5	B1b&c & B8		
JE2:8	Former Electric Power Station Land off Aldermans Green Road (part of mixed use site)	Longford	1.5	B1c & B8		
	TOTAL		101			
<p>2. The Friargate, A45 Eastern Green, Whitmore Park and Durbar Avenue employment allocations are to be progressed as part of wider mixed-use re-development schemes and should be supported by comprehensive Masterplans.</p> <p>A minimum supply of new employment land on a 5 year rolling cycle of 58ha is required to be available at all times in Coventry and on sites outside but adjacent to the city’s administrative boundary (the “Minimum Reservoir”). This will be achieved by using a combination of newly allocated and recycled land. A balanced portfolio of employment land supply offering a choice of sites will be maintained, with details of need and supply set out in the Annual Monitoring Report.</p>						
Policy JE3 Provision of Employment Land and Premises						
<p>Proposals for the redevelopment in whole or in part of employment land for non-employment purposes will not be permitted unless it can be demonstrated that the part(s) of the site where non-employment development is proposed are:</p>					<p>Need to be realistic in the short term in that there is no advantage to the city in sterilising land that cannot deliver jobs.</p> <p>Impact on many SA objectives may be neutral or</p>	

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>a) No longer suitable for employment use bearing in mind their physical characteristics, access arrangements and/or relationship to neighbouring land-uses and there is evidence of unsuccessful active and substantial marketing of the site for employment use using a variety of media which supports this; or</p> <p>b) It would not be financially viable to re-use or re-develop the land or buildings on the land in whole or in part for employment purposes; or</p> <p>c) The non-employment development proposed would be used for purposes which are clearly ancillary to and will support the operations of a primary employment use on the land; or</p> <p>d) The non-employment development would generate significant employment gains which are of sufficient weight to justify the loss of employment land.</p> <p>2. In addition to at least one of the above criteria being satisfied it will also need to be demonstrated that:</p> <p>a) The potential of the site to contribute to the employment land requirements of the city over the plan period is not significant; and</p> <p>b) The proposal would not significantly compromise the viability or deliverability of other adjacent employment land or land allocated in this Plan for employment development; and</p> <p>c) The proposal will not have an unacceptable adverse impact on the continuing operation of any nearby existing businesses.</p> <p>3. Planning applications to which this Policy applies should be accompanied by written evidence to demonstrate that the proposed development satisfies the exceptions criteria highlighted above.</p> <p>4. This Policy applies to land which is currently in use or was last used for employment purposes unless such land has been allocated in this Plan wholly for non-employment use.</p>	<p>unknown.</p>	
Policy JE4 Location of Office development		
<p>1. New office development (including change of use of buildings to provide office accommodation and the expansion of existing office uses) should normally be sited within Coventry city centre or other defined centres (as</p>	<p>Impact on many SA objectives may be neutral or unknown. Furthermore, it should also be noted that there may be circumstances whereby</p>	

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>defined on the Policies Map).</p> <p>2. The Friargate site within Coventry city centre is the Council's preferred location for new large scale office development. This site is allocated for primarily B1 office development under Policy JE2.</p> <p>3. Proposals for new office development in other locations will only be permitted if the following criteria are satisfied:</p> <ul style="list-style-type: none"> a) Having regard to locational factors, there are no suitable sequentially preferable sites available within the city centre, another defined centre or in an edge-of-centre location (if no Defined Centre sites are suitable and available); or b) The proposal is for small scale rural offices; <p>In addition to at least one of the above criteria being satisfied it will also need to be demonstrated that:</p> <ul style="list-style-type: none"> a) The proposal would not have a significant adverse impact on the vitality and viability of defined centres and on existing, committed and planned public and private investment in office development within a defined centre; and b) The site is accessible by a choice of means of transport or will be made accessible by a choice of means of transport as a consequence of planning permission being granted for the development; and c) There is good access from the development to a primary route on the highway network and an acceptable impact on the capacity of that network; and d) The proposals are compatible with other Plan Policies. <p>Proposals for new office development outside of Defined Centres shall be accompanied by a Sequential Assessment and where a proposal is for 2,500 square metres (gross) or more of office floor space an Impact Assessment shall also be provided which examines the impact of the proposal on the vitality and viability of Defined Centres and its impact on existing, committed and planned public and private investment in office development within Defined Centres.</p>	<p>employment development may actually result in improvement of the environment as many investors want to create a business friendly image.</p> <p>Could involve the loss of jobs from long established sites now considered to be non-conforming uses.</p> <p>Policy cannot ensure employment to local community but will promote access to employment, education and training opportunities from which the whole community can benefit.</p>	
<p>Policy JE5: Location of R&D, Industrial and Storage/Distribution Development</p>		

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>The Council's preferred location for new Research & Development (R&D), industrial and storage/distribution development are the sites allocated for such purposes under Policy JE2</p> <p>However proposals for new R&D, industrial and storage/distribution development (including changes of use and the expansion of existing operations) on sites not allocated under Policy JE2 will be permitted provided that they are:</p> <p>Accessible by a choice of means of transport or will be made accessible by a choice of means of transport as a consequence of planning permission being granted for the development; and</p> <p>Have good access to a primary route on the highway network and an acceptable impact on the capacity of that network; and</p> <p>The proposal would not significantly compromise the viability or deliverability of land allocated in this Plan for employment development; and</p> <p>The development is compatible with other Plan Policies.</p> <p>In addition to the above, proposals for new general industrial and storage/distribution development (including changes of use and the expansion of existing operations) on all sites (including those allocated under Policy JE2) will also be required to demonstrate that the proposed development would not result in significant harm to the amenities of persons occupying nearby residential property or other land occupied by uses sensitive to environmental pollution.</p>	<p>The group was unable to reach consensus on sustainability objectives 8 and 9. Whilst one opinion considered that <i>any</i> new employment would have a negative impact on biodiversity, the historic environment, green spaces etc, it was also considered that, for example, directing employment to the city centre would preserve biodiversity, green spaces, green belt in the countryside locations and hence be beneficial in a city centre location. From the stance that employment growth is certain to occur, it was argued that the harm to biodiversity in one area, may have a preservation impact on other important areas. Agreement was however not reached in the group and hence these two indicators were not incorporated in our sustainability appraisal.</p>	<p>No change to policy.</p>
<p>Policy JE6: Tourism/Visitor Related Development</p>		
<p>Proposals for development within Coventry city centre (as defined on the Policies Map) or on sites at or adjacent to the Ricoh Arena or the Coventry and Warwick University campuses which would contribute towards the city's role as a tourist destination will be supported subject to compatibility with other Plan Policies.</p>	<p>It is noted that establishing employment in the same location as tourism related development (B5) returned a relatively low score on the sustainability matrix. Whilst in theory locating housing and employment together is positive in sustainability terms, the assessment scoring reflects the practically rather than theoretically. It is the case that a significant range of jobs would be required to be provided alongside the homes in order for the people to live where they work. Environment matters generally related to Note 5</p>	<p>Change policy wording to enable more flexibility? (e.g. certain types of retail development such as A3-A5 uses or small scale A1 which support the Arena as a visitor attraction will be permitted subject to compliance with other Plan policies/NPPF)</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
	<p>above. Improving the environment must come first as the City Centre will then be more likely to attract the other uses and activities.</p> <p>More parking considered generally not sustainable but recognition that some is needed to support City Centre activities. Long stay (commuter) parking really not favoured.</p>	
Policy JE7: Accessibility to Employment Opportunities		
<p>Planning applications for new employment development (including changes of use and the expansion of existing operations) will be required to demonstrate how job opportunities arising from the proposed development will be made accessible to the City's residents, particularly those in the most deprived areas of the City.</p> <p>Measures which could be referred to may include:</p> <ul style="list-style-type: none"> enhancement of the accessibility of the development to residents by a choice of means of transport, the provision of support to residents in applying for jobs arising from the development and/or the provision of training opportunities to assist residents in accessing employment opportunities. <p>In respect of major planning applications for new employment development the City Council may require applicants to make financial or other contributions secured through planning obligations or its CIL Charging Schedule to maximise the accessibility of job opportunities to the City's residents.</p>	<p>All locations are likely to result in significant positive impacts for Coventry's economy, providing good access to employment opportunities and good training opportunities. The greatest benefit is likely to be from locating new employment in the city centre (B1), given the existing range of functions and facilities, with the least positive impact on the edge of city boundary (B3) and constructing new employment in the same location as new housing (B5).</p>	<p>Consider making reference to the Equalities Act so that planning applications for new developments creating employment should also demonstrate how they will make equality real for local people.</p>
Policy H1: Housing Land Requirements		

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>1. Provisions will be made for a minimum of 24,600 additional dwellings between 2011 and 2031.</p> <p>2. This requirement is to be phased in the following way: a) 2011-2016 (first 5 years): 1,020 homes per annum b) 2017-2031 (following 15 years): 1,300 homes per annum</p> <p>3. Housing land will be released in order to maintain a continuous 5 year supply of housing land in order to support a varied and flexible land supply to support housing delivery and sustainable development. This will be monitored through the Council's Annual Monitoring Report.</p>	<p>It is uncertain that development on PDL will be compatible with SA Objectives 8 & 9 (protect landscape & protect diversity) as development could potentially adversely affect an existing urban landscape.</p> <p>The contribution of the policy towards the objectives to reduce flooding and climate change is questionable although this can be mitigated through policies EM5 and EM4.</p>	<p>No change to policy.</p>
Policy H2: Housing Allocations		
<p>1. Table 4.2 identifies the sites to be allocated for housing development alongside essential details that will support the principles of sustainable development. The development of all sites will also need to be considered in accordance with other policies in this Local Plan (and supporting documents) and the Infrastructure Delivery Plan, with the infrastructure needs of each site to be secured through legal agreements and/or the Council's CIL Charging Schedule where appropriate.</p> <p>2. The urban extension proposals at Keresley and Eastern Green are to be brought forward in full accordance with comprehensive Masterplans and in accordance with the Council's Urban Extension Design Guidance SPD.</p>	<p>The success in sustainability terms of locating new employment with new housing depends largely on the type and range of employment opportunities provided.</p> <p>No specific mention appears to be made of housing at the other end of the spectrum - executive housing.</p>	<p>Need to state how CIL will play a role in securing high level infrastructure to deliver housing in the Policy so that objectives 18 and 19 can be realised.</p>
Policy H3: Provision of New Housing		
<p>1. New residential development, including opportunities for self-build homes and starter homes, must provide a high quality residential environment which assists in delivering urban regeneration or contributes to creating sustainable communities and which overall enhances the built environment.</p> <p>2. In addition, opportunities to provide self-build homes and starter homes will be considered acceptable as part of limited infill within existing ribbon developments within the Green Belt where it is demonstrated that they do</p>	<p>The benefit of high earners to the local economy should be able to be substantiated in the supporting text to the policy.</p> <p>The contribution of the policy towards the objectives to reduce flooding and climate change is questionable.</p> <p>Identification of potential location/s should be considered at an early stage to ensure predictability to groups and individuals that may</p>	<p>Reference in the policy to sustainable communities.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>not have an adverse impact upon the openness and integrity of the wider Green Belt.</p> <p>3. A suitable residential environment will include safe and appropriate access, have adequate amenity space and parking provision and be safe from environmental pollutants such as land contamination, excessive noise and air quality issues.</p> <p>4. New developments should also be:</p> <ul style="list-style-type: none"> a) within 2km radius of local medical services; b) within 1.5km of a designated centre within the city hierarchy (policy R3); c) within 1km radius of a primary school; d) within 1km of indoor and outdoor sports facilities; and e) within 400m of a bus stop f) within 400m of publicly accessible green space. <p>5. Proposals should also be in conformity with all other relevant plan policies.</p> <p>6. The delivery of self-build homes will be supported where they meet the criteria of this policy</p> <p>7. Developer Contributions via Community Infrastructure Levy and/or Section 106 Obligations may be required to address any deficiency.</p>	<p>be affected.</p>	
Policy H4: Securing a Mix of Housing		
<p>The Council will require proposals for residential development to include a mix of market housing which contributes towards a balance of house types and sizes across the city in accordance with the latest Strategic Housing Market Assessment. In assessing the housing mix in residential schemes the Council may take into account the following circumstances where it may not be appropriate to provide the full range of housing types and sizes in accordance with the latest Strategic Housing Market Assessment:</p> <ul style="list-style-type: none"> • physical constraints, such as those associated with small sites of less than 5 houses and conversion schemes, where opportunities for a range of different house types are limited; • locational issues, such as highly accessible sites within or close to a 	<p>Policy should indicate if there are circumstances whereby the affordable element would expect to be provided off site. Can housing developers reasonably be expected to provide 25% and 35% affordable housing in a fragile recession hit market? If developers sub divide sites to a size less than 0.5ha, could this mechanism by- pass this policy?</p>	<p>No specific change to policy but consideration must be given to viability when implementing the policy and through the SPD.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>designated centre where larger homes and low/ medium densities may not be appropriate;</p> <ul style="list-style-type: none"> • sites with severe development constraints where housing mix may impact on viability; • sites where particular house types and/ or building forms may be required in order to sustain or enhance the setting of a heritage asset; and • developments in parish or neighbourhood plan areas, where there is an up-to-date local housing needs assessment which is a more appropriate indication of housing need. 		
Policy H5: Managing Existing Housing Stock		
<ol style="list-style-type: none"> 1. Where appropriate, the existing housing stock will be renovated and improved, in association with the enhancement of the surrounding residential environment and to meet local housing needs. Where appropriate these works should include opportunities to improve energy efficiency of existing homes. 2. The conversion of buildings from non-residential to residential use will be supported providing a satisfactory residential environment is created and the proposals are compatible with other Plan Policies. 3. Demolition and redevelopment schemes will be supported where existing housing stock does not meet local housing market needs, and its redevelopment represents the principles of sustainable development. 	<p>There is a potential for increased affordability as the pressure for more energy-efficient homes continues to grow.</p> <p>There is concern that the continuing culture of private car ownership may offset the energy savings of energy efficient homes.</p> <p>Need for liaison with other strategies from other Departments (i.e. Housing) and agencies to avoid city's private housing stock falling into disrepair</p>	<p>No change to policy.</p>
Policy H6: Affordable Housing		
<ol style="list-style-type: none"> 1. New residential schemes of 25 dwellings or more (excluding student accommodation), or more than 1ha, will be expected to provide 25% of all dwellings as affordable homes. 2. Proposals within areas of existing high concentration (shown on Figure 4.1) should make provisions as follows: <ol style="list-style-type: none"> a) 10% Social/Affordable Rental provision b) 15% Intermediate Provision 3. Proposals within areas of existing medium concentration (shown on Figure 4.1) should make provisions as follows: 		<p>No change to policy.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>a) 12.5% Social/Affordable Rental provision b) 12.5% Intermediate Provision</p> <p>4. Proposals within areas of existing low concentration (shown on Figure 4.1) should make provisions as follows: a) 15% Social/Affordable Rental provision b) 10% Intermediate Provision</p> <p>5. Where the specified level of affordable housing cannot be provided, robust evidence must be presented to justify a reduced or alternative form of contribution.</p> <p>6. Through appropriate design standards, new affordable housing units must be appropriately integrated within the development and with other affordable homes adjoining the site.</p> <p>7. Through engagement with the Council, Registered Providers, and having regard to the recommendations of the SHMA, developers should ensure that affordable housing contributions comprise dwellings of the right size, type, affordability and tenure to meet local needs.</p>		
Policy H7: Gypsy and Traveller Accommodation		
<p>1. Provision will be made for at least 16 permanent pitches for Gypsies and Travellers through the re-modelling of the site at Siskin Drive, Coventry (as identified on the Policies Map).</p> <p>2. Proposals for additional permanent and temporary Gypsy and Traveller sites outside of the Green Belt (and within it, if very special circumstances have been demonstrated) will be assessed against the following criteria: a) The sites use should not conflict with other development plan policies or national planning policy relating to issues such as risk from flooding, contamination or agricultural land quality; b) Sites should be located within reasonable travelling distance of local services and community facilities, including a primary school; c) The site should enable safe and convenient pedestrian and vehicle access to and from the public highway, and adequate space for vehicle parking, turning and servicing;</p>	<p>Needs to define the distinction between travellers and gypsies. No mention is made of how the policy proposes to make an assessment of the number of 'pitches' required.</p> <p>Reference is made to transit site provision, but no reference is made to a permanent site provision. The policy may need to indicate the level of provision of private sites.</p> <p>No provision appears to be made for show people, who are not the same as travellers or gypsies.</p> <p>As it is such an exceptional use, the policy should make some form of reference to the type of commercial infrastructure permissible at the site (e.g. vehicles, storage of materials).</p>	<p>Need to understand the different social facets of the lifestyle before arriving at assumptions about how to plan for members of this community.</p> <p>No specific change to policy wording.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>d) The site should be served by adequate water and sewerage connections, power and waste facilities;</p> <p>e) The use of the site should not have an adverse impact on the amenities of occupiers of nearby properties or the appearance or character of the area in which it would be situated.</p>		
<p>Policy H8: Care Homes, Supported Housing, Nursing Homes and Older Persons accommodation</p>		
<p>Proposals for care homes, nursing homes and other specialist and supported forms of housing for the elderly and those requiring care will be encouraged in areas that are accessible by a choice of means of transport and that are situated in close proximity to key local services.</p> <p>Proposals should be of a high quality and design and be compatible with the character of the surrounding area.</p>	<p>9 of the objectives were considered to have a positive relationship with the policy whilst a further 2 were considered uncertain. The remaining 9 objectives were neutral.</p> <p>There was some uncertainty over objective 6 as it is unclear whether or not the term 'efficient use of land' considers the need to 'design out crime'? If it does then this objective is positive, if not then its negative.</p> <p>A similar position exists with objective 12. The policy is unclear whether 'efficient use of land' takes into account the impacts of flooding. The provision of open space alone is not considered sufficient to cover this objective.</p> <p>The majority of the neutral objectives were linked to environmental or economic issues. The policy should have some consideration of these issues when considering residential development as they are of equal importance.</p>	<p>Undeveloped % of sites. What does the 5% refer to? Natural, soft areas or all amenity areas, circulation space, or is it in addition to? Although the 5% is only a minimum (it might be treated as a maximum by developers) in which case there'll be a large discrepancy with what would be expected as per the GI score. I.e. with only 5% of undeveloped space a good GI score would probably be impossible to achieve (with 25% plus possibly). Also arguable that 5% for a residential development is very little, especially in high density and usually fairly high city centre developments, offering little scope to design adequate and quality (hard and soft) outdoor space as part of the development at</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
		ground level – but this depends of course also on what’s included in the 5%. Similar considerations re the other percentages – i.e. the figures should, if possible, tally roughly with proposed GI scores for landscape and external design of developments (Urban and Landscape design section) and vice versa.
Policy H9: Residential Density		
<ol style="list-style-type: none"> 1. Residential development, including conversions, must make the most effective and efficient use of land whilst ensuring compatibility with the quality, character and amenity of the surrounding area. 2. Therefore, outside of the Ring Road (The A4053) a minimum of 35 dwellings per hectare (net) should be provided on Previously Developed Land. 3. Developments inside the Ring Road (The A4053) should aim to achieve a minimum of 200 dwellings per hectare (net). 4. Developments on Greenfield sites should achieve a minimum of 30 dwellings per hectare (net). 	<p>There is a risk that a minimum density figure of 200 dwellings for the city centre - without a cap or ceiling figure will encourage much higher actual densities and therefore almost exclusively small dwellings, little variety in housing type (as promoted in H11) or population mix, and make residential quality or well-designed residential environments and good neighbourhood quality difficult to achieve?</p>	<p>The policy could be strengthened through the setting of a desired target for family orientated city centre homes as this is a key issue for Coventry's housing stock and would aim to address many of the social objectives within the appraisal framework.</p>
Policy H10: Student Accommodation		
<ol style="list-style-type: none"> 1. Purpose-built student accommodation and conversions of residential and non-residential properties to student accommodation will be encouraged where: <ol style="list-style-type: none"> a) It is directly accessible from the universities: b) Such development can play a part in the regeneration of the immediate neighbourhoods without disadvantage to local services. c) It will not materially harm the amenities of occupiers of nearby properties; and d) It will reflect and support or enhance the appearance and character of 	<p>The policy scored positively in relation to many of the socio economic objectives but there were some identified negatives in relation to the potential for noise pollution.</p>	<p>No change to policy – please see mitigation section.</p>

Policies			Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
the area.				
2. To support the intended use of the proposals the specified tenure will be secured through a Section 106 agreement.				
Policy H11: Homes in Multiple Occupation (HiMO's)				
1. The development of purpose built HiMO's or the conversion of existing homes or non-residential properties to large HiMO's will not be permitted in areas where the proposals would materially harm: a) the amenities of occupiers of nearby properties (including the provision of suitable parking provisions); b) the appearance or character of an area; and c) local services			The policy scored positively in relation to many of the socio economic objectives but there were some identified negatives in relation to the potential for noise pollution.	No change to policy – please see mitigation section.
Policy R1 – Delivering Retail Growth				
1. The following sites/areas are allocated to support the provision of retail floor space across Coventry. These schemes are to be delivered in accordance with the specifications in this policy and other policies within this plan and the City Centre AAP as appropriate.			Need to also consider sports and leisure facilities which relates to objectives 4 and 6. Need to identify land for localised retail need, particularly in respect of the railway station.	Reference be included to the new city centre destination sports and leisure facility which, at the current Spire House/Christchurch House site will be adjacent to the City Centre South development area in the explanatory text.
Site	Proposed floor space (sq.m gross)	Details		
City Centre	At least 70,100	A1-A5 uses of varying size (including bulky goods retail where appropriate) to be delivered through the Area Action Plan at City Centre South, City Centre North, Friargate, City Centre Supermarket and wider support for the creation of active frontages within the wider city centre. Also includes allowance for city centre vacant units.		
New Eastern	Up to 10,000	To include approx. 5,000sq.m		

Policies			Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
Green Major District Centre		for a new superstore, 4,000sq.m of predominantly bulky goods retail and up to 1,000sq.m of small scale local provisions.		
Cannon Park Major District Centre*	6,200	New A1 elements of the scheme should be restricted to convenience and bulky goods retail. Non A1 uses will be supported to encourage diversification of the centre, especially around A2-A5 uses.		
New Keresley Local Centre south	1,500	Local centre to include a range of small scale units providing a range of local community uses and top up provisions.		
New Keresley Local Centre north	1,000	Local centre to include a range of small scale units providing a range of community uses and top up provisions.		
Brade Drive District Centre	1,000	New retail floor space should be focused around new A1-A5 uses and other non-retail uses. This should be delivered in small scale units to support local needs and help diversify the centre's current offer.		
Jardine Crescent	500	New floor space to be		

Policies			Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
District Centre		provided as part of mixed use schemes within amended centre boundary A1-A5 uses to be provided, which reflect the existing character of the centre.		
<p>2. The comprehensive redevelopment of the Riley Square element of Bell green District Centre will be supported in accordance with an overarching Masterplan for the area.</p> <p>3. Further retail provision at Arena Park Major District Centre will not be supported during the plan period unless it is demonstrated that it will not directly impact on the city centre or is an essential element of supporting the wider parks tourism functions</p>				
Policy R2: Coventry City Centre – Development Strategy				
<p>1. The city centre will continue to be developed and regenerated to ensure it is a truly world class city centre, leading in design, sustainability and culture. This will be achieved by:</p> <ul style="list-style-type: none"> a) Enhancement of its position as a focus for the entire sub-region and as a national and international destination to live, work and play; b) Enhancement of its retail and leisure offer to strengthen the city's sub-regional role; c) Provision of high quality office space; d) Becoming a hub for education; e) Including a variety of places to live which cater for different needs; f) Preserving or enhancing the character and setting of the historic built landscape and the archaeological environment; g) A connected public realm including public squares and green spaces, easily accessible through the creation of desirable and legible pedestrian routes; h) Accessible for all; i) Providing an attractive and safe environment for pedestrians, cyclists and motorists; j) High quality sustainable built design; k) Continuing to develop a vibrant and attractive night time economy; l) Providing opportunities to improve health and wellbeing; 			<p>The bulleted list appears to be missed and confused. Perhaps it could be re-arranged to reflect the sustainability objectives and in order of importance.</p>	<p>Re-arrange the list of points to reflect importance in relation to the sustainability appraisal framework.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>m) Continuing to generate a balance and integration of the university with the wider city centre; and n) Recognising and preserving key views to the iconic three spires of St Michaels, Holy Trinity and Christchurch.</p> <p>An Area Action Plan will be developed to help deliver this strategy and support and guide development within the city centre.</p>		
Policy R3: The Network of Centres		
<p>2. To support the city centre, the Council will designate, enhance, maintain and protect a network of Centres consisting of Major District Centres, District Centres and Local Centres. These Centres will be the preferred locations for new shops, and other Main Town Centre and community facility uses which do not serve a city-wide catchment and are not more appropriately sited in the city centre.</p> <p>3. In all these Centres:</p> <ul style="list-style-type: none"> a) A balance will be sought between shops (Class A1), and other Main Town Centre and community uses in order to protect the vitality and viability of the centre as a whole; b) Proposals that reduce the concentration of A-class uses within a centre below 51% will not be approved c) a residential element will be promoted and encouraged, subject to the creation of a satisfactory residential environment and so long as it does not undermine the functionality of the centre; d) improvement to the environment and accessibility will be promoted and encouraged. <p>4. Major District Centres are shown on the Policies Map at:</p> <ul style="list-style-type: none"> a) Arena Park; b) Cannon Park; c) Brandon Road; and d) Eastern Green. <p>They will complement but not compete with the city centre and will contain a scale of development which is demonstrated to not impact negatively on the city centre and supports the needs of their part of the city (around a 3km radius) for:</p>	<p>This policy performs well in respect of the social objectives as it is to be expected that such uses should be within defined centres so would be concentrated directly away from established residential estates. Positives also realised through the economic objectives as such uses do provide jobs and help small enterprises in the catering industry.</p> <p>Potential environmental negatives given the propensity for litter and smell issues but could be mitigated if the SPD is delivered alongside the Plan.</p>	<p>Suggested wording change to tie in with objective 4. The list of Main Town Centre uses given in Annexe 2 of the NPPF could be added in the Policy wording or supporting text.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation																										
<p>e) a mix of bulk convenience and comparison shopping as well as service and catering uses;</p> <p>f) social, community and leisure uses including hotels; and</p> <p>g) offices.</p> <p>5. District Centres are shown on the Policies Map at:</p> <p>a) Ball Hill;</p> <p>b) Bell Green;</p> <p>c) Brade Drive;</p> <p>d) Daventry Road;</p> <p>e) Earlsdon;</p> <p>f) Foleshill;</p> <p>g) Jardine Crescent;</p> <p>h) Jubilee Crescent.</p> <p>They will contain a scale of development which is demonstrated to not impact negatively on higher order centres and supports the needs of their district of the city (a 2km radius) for bulk convenience shopping as well as an element of comparison shopping, service and catering uses. Social, community, leisure and small scale office uses will also be acceptable.</p> <p>6. Local Centres are shown on the Policies Map at:</p> <table border="0"> <tr> <td>a) Acorn Street;</td> <td>m) Holbrook Lane;</td> </tr> <tr> <td>b) Ansty Road;</td> <td>n) Holyhead Road;</td> </tr> <tr> <td>c) Baginton Road;</td> <td>o) Keresley North;</td> </tr> <tr> <td>d) Bannerbrook;</td> <td>p) Keresley Road;</td> </tr> <tr> <td>e) Barkers Butts Lane;</td> <td>q) Keresley South;</td> </tr> <tr> <td>f) Binley Road;</td> <td>r) Longford;</td> </tr> <tr> <td>g) Birmingham Road;</td> <td>s) Quorn Way;</td> </tr> <tr> <td>h) Broad Park Road;</td> <td>t) Radford Road;</td> </tr> <tr> <td>i) Charter Avenue;</td> <td>u) Station Avenue;</td> </tr> <tr> <td>j) Far Gosford Street;</td> <td>v) Sutton Avenue;</td> </tr> <tr> <td>k) Green Lane;</td> <td>w) Walsgrave Road;</td> </tr> <tr> <td>l) Hillfields;</td> <td>x) Willenhall;</td> </tr> <tr> <td></td> <td>y) Winsford Avenue.</td> </tr> </table> <p>They will contain an appropriate scale of development which is</p>	a) Acorn Street;	m) Holbrook Lane;	b) Ansty Road;	n) Holyhead Road;	c) Baginton Road;	o) Keresley North;	d) Bannerbrook;	p) Keresley Road;	e) Barkers Butts Lane;	q) Keresley South;	f) Binley Road;	r) Longford;	g) Birmingham Road;	s) Quorn Way;	h) Broad Park Road;	t) Radford Road;	i) Charter Avenue;	u) Station Avenue;	j) Far Gosford Street;	v) Sutton Avenue;	k) Green Lane;	w) Walsgrave Road;	l) Hillfields;	x) Willenhall;		y) Winsford Avenue.		
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Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>demonstrated to not impact negatively on higher order centres and supports their immediate locality (a 1km radius) for day-to-day convenience shopping and also some service and restaurant uses; and social, community and leisure uses. Small scale office uses will also be acceptable.</p>		
<p>Policy R4: Out of Centre Proposals</p>		
<p>1. Proposals for retail and other Main Town Centre uses (including proposals for the expansion or re-configuration of existing uses and the variation of existing conditions) will not be permitted in out-of-centre locations unless they satisfy the Sequential Assessment and the Impact Test (where appropriate).</p> <p>2. Sequential Assessment</p> <p>a) A sequential assessment will be required for all retail and other Main Town Centre use proposals outside a defined centre and should be prepared in accordance with national guidance. This should have regard to the centres hierarchy set out in policy R3.</p> <p>b) Where in-centre options are exhausted, edge of centre locations (within 300m of a centre boundary) that are well connected and accessible to the centres themselves should also be considered in advance of out of centre sites.</p> <p>c) Only where parts 2 a) and b) of this policy are satisfied the Sequential Assessment should have regard to:</p> <p>i. Vacant units within the city's out of centre retail warehouse parks; and</p> <p>ii. Local shopping parades, where the proposal is appropriate in terms of scale.</p> <p>3. Impact Test</p> <p>a) An Impact Test will be required for all retail and other Main Town Centre use proposals outside a defined centre that exceed 400sq.m (gross) floor space. The assessment of Impact should be prepared in accordance with national</p>	<p>Policy will promote efficient use and location of social and community facilities.</p> <p>Proposal is likely to be beneficial in relation to improving employment opportunities, particularly small and medium sized enterprises.</p> <p>Proposal is likely to be particularly beneficial in relation to improving employment opportunities, to promote sustainable development and the local economy.</p>	<p>Need to consider existing out of centre shopping areas as there is no available land in some of the existing defined centres to enable flexibility.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>guidance and consider the potential impact on the vitality, viability, role and character of a defined centre(s) within the centres hierarchy (as set out in policy R3).</p> <p>Catchment areas for Sequential Assessments and Impact Tests will be considered on a case by case basis to reflect the specific proposals being considered.</p>		
Policy R5: Retail Frontages Ground Floor Units in defined centres		
<p>1. Proposals to use ground floor units within defined centres for non-A class uses will normally be permitted provided that:</p> <ul style="list-style-type: none"> a) the primary retail function of the centre would not be undermined in the context of Policy R3; b) the use would make a positive contribution to the overall role, vitality and viability of the centre; and c) the use is compatible with other Plan policies. <p>2. The impact of a proposal on the primary retail function of a centre will be determined on the basis of:</p> <ul style="list-style-type: none"> a) the location and prominence of the unit within the relevant frontage; b) the width of the frontage of the unit when compared to other units in the centre; c) the number and proximity of other units occupied by 'A' class uses; and d) compatibility of the proposal with nearby uses. 	<p>The policy scores well on many of the economic and social objectives. If retail units are strengthened in defined centres this can help create vitality and viability. This can enable 'critical mass' within such centres thus developing a greater sense of community spirit and social cohesion.</p>	<p>Need to consider some criteria – what width is unacceptable and how many units?</p>
Policy: R6 Restaurants, bars and Hot Food Takeaways		
<p>1. Outlets should be located within defined centres and will normally be discouraged outside those locations.</p> <p>2. Proposals within defined centres will be permitted provided they:</p> <ul style="list-style-type: none"> a) would not result in significant harm to the amenity of nearby residents or highway safety; b) would not result in harmful cumulative impacts due to the existence of any existing or consented proposed outlet; c) are in accordance with the emerging Hot Food Takeaway Supplementary Planning Document (in particular, proposals for A5 uses); and 	<p>The policy scored positively in respect of the environmental objectives and social objectives in that they provide a meeting place for social gatherings increasing social cohesion. However, there were environmental issues in respect of noise and litter that scored negatively in relation to the environmental objectives.</p>	<p>No change given the policy directs uses to defined centres which are the most suitable area for town centre uses.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>d) are compatible with other Plan Policies</p>		
<p>Policy CO1: New or improved social community and leisure premises</p>		
<p>1. Proposals for social, community and leisure facilities will be considered through the following sequential approach:</p> <ul style="list-style-type: none"> a) Designated centres to support the centres hierarchy; b) Where no suitable sites are available in a designated centre, an edge-of-centre location; c) Where no edge of centre sites are available, a site adjacent to other associated facilities including existing schools and educational facilities; d) Only where no suitable site can be identified having regard to points 1-3, will stand alone sites be supported, subject to: <ul style="list-style-type: none"> i. The proposal addressing an unmet need within a local community; ii. There being no significant adverse impact upon the role of a defined Centre; and iii. There being no material impact on neighbouring amenity; <p>2. Proposals will be considered on the basis of:</p> <ul style="list-style-type: none"> a) The appropriateness of their proposed location in relation to their scale and intended catchment; b) Compatibility with nearby uses; c) Accessibility by a choice of means of transport; and d) Compatibility with other Plan Policies. <p>Where proposals are in accordance with the approved Masterplans for Coventry University or the University of Warwick they will normally be approved subject to high quality design proposals</p>	<p>Policy will be particularly beneficial in relation to improving access to basic services and amenities and improving employment opportunities primarily in relation to the hub and spokes.</p> <p>Policy is likely to promote objectives of sustainable, development and the local economy and social inclusion. There is insufficient information to evaluate the compatibility of the policy with SA objective 6 (to reduce crime). It is not clear whether this policy will have a significant impact on SA objective 6.</p> <p>Policy will retain primacy of the city centre in respect of the retail hierarchy.</p> <p>Policy has potential to promote the local economy and to promote sustainable development. However, major district centres also have the potential to increase journeys by car. Evaluation of the city centre in relation to objectives is challenging as the potential impact may vary. It is considered difficult to reconcile the objective of enhancing quality with minimising noise, light and air pollution.</p> <p>The achievement of some objectives is dependent on other strategies (e.g. reduction of travel by car depends on the Transport strategy).</p> <p>Policy is likely to promote objectives of sustainable development and promotion of the local economy and as well as social inclusion but only in relation to the city centre. There is some reservation that focusing on the city centre may divert re-generation resources from elsewhere.</p>	<p>Policy to consider “exceptionally” here as change of use to a designated nursery will require planning permission but childcare that retains the residential use of the dwelling probably does not. Better related to scale of the use and the size of the dwelling to accommodate a nursery without impact on residential amenity and parking?</p> <p>The policy suggests that it is about loss of housing rather than compatibility of uses.</p>
<p>Policy CO2: Re-Use of or Redevelopment of Facilities</p>		
<p>1. Proposals for the re-use or redevelopment of community premises for a use outside the scope of this policy will not be supported if:</p> <ul style="list-style-type: none"> a) There is an outstanding local need which could reasonably be met at that location; 	<p>Are alternative uses only acceptable if they result in improvements elsewhere through CIL/S106? Some schools can be set up without needing to prove need why would it then</p>	<p>Change policy to show how consolidation of social and community facilities there may be existing land and</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>b) The site remains viable for existing uses or could be made viable through appropriate diversification of use; c) the proposal is not compatible with nearby uses.</p> <p>2. In all cases consideration should be given to the suitability of the location for such facilities having regard to other Policies in this plan and its supporting documents</p> <p>3. Where replacement facilities are intended, they should: a) continue to serve the community; b) be of appropriate scale and character; and c) be of high quality design.</p>	<p>expected to demonstrate they are no longer needed?</p> <p>Whilst it is acknowledged this is a real issue not sure its appropriate to be included in the local plan. Why is this identified on the proposals map – is Coventry University? If it is then consistency in policy text needed, if not then why inconsistency in identification of sites on the proposals map.</p>	<p>buildings that become vacant and surplus to requirement</p>
<p>Policy CO3: Neighbourhood and Community Planning</p>		
<p>1. Where appropriate the Council will support communities in the preparation of: a) Parish Plans; b) Parish Design Statements, and; c) Neighbourhood Plans.</p> <p>2. When preparing these plans they must remain in accordance with national legislation, this Local Plan and any other city wide planning documents which support it.</p> <p>3. Where appropriate the Council will support the application and designation of land or buildings as Assets of Community Value.</p> <p>The Council will not support applications for Neighbourhood, Parish Plans or Assets of Community Value where they conflict with this Local Plan or supporting documentation.</p>	<p>Not really sure if this relates to the actual neighbour plan being in conflict or an application for development that is subject to land in a neighbourhood plan. Need to clarify as this influenced the assessment, particularly in the social objectives.</p>	<p>No change to policy.</p>
<p>Policy GB1: Green Belt and Local Urban Green Space</p>		
<p>1. The city's most up-to-date Green Belt and Local Green space boundaries are identified on the Policies Map.</p> <p>2. Inappropriate development will not be permitted in the Coventry Green</p>	<p>The addition of some land to the Green Belt is regarded as particularly beneficial to landscape and biodiversity enhancement.</p>	<p>No change to policy.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>Belt unless very special circumstances exist. Development proposals, including those involving previously developed land and buildings, in the Green Belt will be assessed in relation to the relevant national planning policy.</p> <p>3. The following areas will be removed from the Green Belt to accommodate future development needs and are shown on the Policies Map. Where appropriate further details are provided in Policy JE2, H2 and HE3;</p> <ul style="list-style-type: none"> a) Land part of the Wood End redevelopment (residential) b) Land at Sutton Stop (residential and employment) c) Land south at Walsgrave Hill Farm (residential) d) Land at Keresley (residential) e) Land north of Upper Eastern Green (residential and employment) f) Land at Cromwell Lane (residential) g) Land at Mitchell Avenue (residential) h) Land off Allard Way/London Road (residential) i) Land at Cheltenham Croft (residential) j) Land east of Browns Lane (residential) k) Land west of Browns Lane/Burton Close (residential) l) Land at Cryfield Heights (residential) m) Land at Woodfield School, Stoneleigh Road (Residential and infrastructure) n) Land south of Blue Coats School (Heritage and Education) o) Land at Baginton Fields and South East of Whitley Business Park (employment) p) Land to the east of the existing Energy from Waste plant at Bar Road (general industrial) <p>4. The following areas will be removed from the Green Belt and re-designated as Local Urban Green Space and are shown on the Policies Map:</p> <ul style="list-style-type: none"> a) Sowe Valley b) Sherbourne Valley c) War Memorial Park d) Tossil Wood Brook Stray e) Park Wood and Ten Shilling Wood 	<p>Green Belt and locally designated nature conservation areas should be retained and protected, including the two areas of search for the planned expansion of the urban area. Some areas of Urban Green Space could be considered for future development, if this resulted in significant long-term and sustainable improvements in quality, biodiversity and maintenance within the locality.</p>	

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<p>f) Tile Hill Wood g) Allesley Park</p> <p>5. The following areas will be removed from the Green Belt and will not be re-designated as Local Green Space as they do not serve the purposes of either: a) Land at Park Hill Lane b) Land at Westwood School and Xcel Leisure Centre</p> <p>The following areas will be designated as new areas of Local Green Space and are shown on the Policies Map: Sowe Valley Northern Extension Sherbourne Valley and Lake View Park Walsgrave Triangle, Cross Point.</p> <p>6. In addition to appropriate development in the Green Belt identified in the NPPF, limited infill development amongst existing ribbon developments would be considered appropriate where provisions for starter homes and self-build properties are proposed. Any proposal in these locations will be expected to be of an appropriate density to reflect surrounding properties should not impact negatively on the openness and character of the wider Coventry Green Belt and will also need to accord with Policy H3.</p>		
Policy GB2: Reserved Land in the Green Belt		
<p>The areas of Reserved Land proposed partly or wholly comprise the following sites and are shown on the Policies Map.</p> <p>a) Land south of Westwood Heath Road; b) Land south of Bishop Ullathorne School; c) Land south of Gretna Road; d) Playing Field south of Finham Park School; and e) Land west of Finham Primary School.</p> <p>2. The land identified above will only be released from the Green Belt for development during this plan period where it forms an integral part of a comprehensive development scheme that involves both the Reserved Land within Coventry and the adjoining land in Warwick District – this</p>	<p>Green Belt and locally designated nature conservation areas should be retained and protected, including the two areas of search for the planned expansion of the urban area. Some areas of Urban Green Space could be considered for future development, if this resulted in significant long-term and sustainable improvements in quality, biodiversity and maintenance within the locality. However, the Council was criticised for not investing sufficient resources to ensure the quality and sustainability of some existing areas of UGS.</p>	<p>Need to define what is meant by 'the land'? – Just the reserved land or both the reserved land and the adjacent WDC land to as 'described above'. Need to ensure the policy is legally compliant and in accordance with the NPPF.</p>

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<p>could involve a range of development (including infrastructure). It would be with a view to delivering the wider development needs of the city and Housing Market Area. Until such time as the trigger set out above is enacted the land will continue to remain within the Green Belt and will be subject to the associated policies within the Local Plan.</p> <p>3. Any development within the reserved areas that would prejudice future comprehensive development as described above will not be permitted.</p> <p>Upon enactment of this policy the Council may review its Local Development Scheme in accordance with Policy DS2 to support the development of cross boundary evidence or development plan documents (as appropriate).</p>	<p>On the one hand, it recognises the Reserved Land serves a clear Green Belt purpose, which justifies it being kept permanently open. On the other, it admits development within the plan period even though (unlike safeguarded land) each parcel of Reserved Land is notated as Green Belt. The two purposes are mutually exclusive. Moreover, the first object accords with the Framework. The second does not.</p>	
Policy GE1 Green Infrastructure		
<p>The Council will protect green infrastructure based on an analysis of existing assets, informed by the Green Infrastructure Study and Green Space Strategy by incorporating the Council's Green Space Standards, and characterisation assessments.</p> <p>New development proposals should make provision for green infrastructure to ensure that such development is integrated into the landscape and contributes to improvements in connectivity and public access, biodiversity, landscape conservation, design, archaeology and recreation. Coventry's existing and planned network of green infrastructure should be used as a way of adapting to climate change through the management and enhancement of existing habitats. This must be demonstrated through the creation of new habitats wherever possible to assist with species movement, to provide a source of locally grown food through allotments and community gardens, to provide sustainable and active travel routes for people, to provide shade and counteract the urban heat island effect, and to assist in improving public health and wellbeing.</p> <p>New development will be expected to maintain the quantity, quality and functionality of existing green infrastructure. Where quantity is not retained, enhancement to quality is expected. Where the opportunity arises, and in line with the city's most up-to-date Green Space Strategy, the Council will also expect new developments to enhance green infrastructure, and create and</p>	<p>Blue infrastructure can have an equally important role as green infrastructure particularly in relation to objective 10.</p>	<p>Need to ensure blue infrastructure is referenced in the policy in parallel with green infrastructure for consistency</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>improve linkages between individual areas. Any development which is likely to adversely affect the integrity of a green corridor will be required to be expressly justified and where appropriate, mitigation measures put in place.</p> <p>A key element of Coventry's approach to green infrastructure will be the continued development of a network of green spaces, water bodies, paths and cycle ways, with priority given to those parts of the city where there is an identified deficiency of green space. De-culverting in the city centre should be considered, wherever possible, in accordance with the specific policies, set out in the City Centre Area Action Plan.</p> <p>Development must respect the importance of conservation, improvement and management of green infrastructure in order to complement and balance the built environment. A strategic network of green infrastructure already exists in the city, connecting natural heritage, green space, biodiversity, historic landscapes or other environmental assets, together with links to adjacent districts in Warwickshire and Solihull. This strategic network will be safeguarded and enhanced by:</p> <p>Not permitting development that compromises its integrity and that of the overall green infrastructure framework (including the Coventry/Oxford Canal); Using developer contributions to facilitate improvements to its quality, connectivity, multi-functionality and robustness; and Investing in enhancement and restoration where opportunities exist, and the creation of new resources where possible, such as linking green infrastructure to other forms of infrastructure.</p>		
Policy GE2: Green Space		
<p>Development involving the loss of green space that is of value for amenity, recreational, outdoor sports and/or community use will not be permitted unless specifically identified as part of a strategic land use allocation, or it can be demonstrated that:</p> <ol style="list-style-type: none"> a) An assessment showing there is no longer a demand, or prospect of demand, for the recreational use of the site or any other green space use; b) A deficiency would not be created through its loss, measured against the most up-to-date Coventry Green Space standards. c) The loss resulting from any proposed development would be 	<p>It is not totally clear if compensatory provision would be required in the event that open space is lost.</p> <p>The proposed policy wording aims to protect valuable areas of open space which is a positive alignment to objective 9 – enhance biodiversity.</p> <p>Wildlife corridors should be incorporated into open space to link areas of open space by some</p>	<p>The types of green space referred to here do not tally with the bulleted list above under the GE1 explanation heading. Furthermore, the wording of GE2 also says the policy applies to 'any green space' but the policy title seems to suggest otherwise. This is all a bit confusing.</p>

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<p>replaced by equivalent or better provision in terms of quantity and quality in a suitable location of the city.</p> <p>2. To support the proposed allocations at H2:19 and JE2:4 the following sites are allocated for the provision of new replacement sports pitches:</p> <ul style="list-style-type: none"> a) Land at Charter Avenue (former Alderman Harris School site) • b) Land east of Coundon Wedge Road 	<p>form of corridor to allow wildlife to migrate without undue man-made barriers.</p> <p>There may be cases where certain forms of open space, the value of which is not currently recognised and only appreciated after a long period of public indifference, neglect or even hostility. A good example of where this has happened is allotments.</p>	<p>Change the term (the current plan uses the term Urban Green Space within which all of these various forms of green space fall. This could then be used in the policy title, policy text and explanation text to ensure consistency and clarity.</p>
<p>Policy GE3: Biodiversity, Geological, Landscape and Archaeological Conservation</p>		
<p>Sites of Special Scientific Interest (SSSIs), Local Nature Reserves (LNRs), Local Wildlife and Geological Sites will be protected and enhanced. Proposals for development on other sites, having biodiversity or geological conservation value, will be permitted provided that it protects, enhances and/or restores habitat biodiversity. Development proposals will be expected to ensure that they:</p> <ul style="list-style-type: none"> ✓ lead to a NET gain of biodiversity, where appropriate, by means of an approved ecological assessment of existing site features and development impacts; ✓ protect or enhance biodiversity assets and secure their long term management and maintenance, and; ✓ avoid negative impacts on existing biodiversity. <p>Where this is not possible, mitigation measures must be identified. If mitigation measures are not possible on site, then compensatory measures involving biodiversity offsetting will be considered.</p> <p>Biodiversity will be encouraged particularly in areas of deficiency, in areas of development and sustainable urban extensions, and along wildlife corridors. Opportunities will be sought to restore or recreate habitats, or enhance the linkages between them, as part of the strategic framework for green infrastructure. Protected Species, and species and habitats identified in the Local Biodiversity Action Plan (LBAP), will be protected and conserved through a buffer. Identified important landscape features, including Historic Environment assets, trees protected by preservation orders, individual and groups of ancient trees and woodlands, ancient hedgerows, historic environmental assets and archaeological remains of value to the locality, will</p>	<p>Need to ensure that economies of scale offered by larger areas of green space do not override the necessity to maintain smaller areas of green infrastructure which have intrinsic value. Policy is particularly robust in relation to environmental objectives</p> <p>Policy should contribute towards objective of helping meet local needs locally.</p> <p>It is considered that intention of the strategy is particularly robust. However, there is some concern in relation to the potential of green spaces to attract anti-social behaviour</p> <p>Retention of green spaces will provide sustainable drainage and help mitigate the potential of flooding within high risk areas.</p>	<p>Define local community facilities in more detail.</p>

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be protected against loss or damage and, in the case of archaeological remains, all practical measures must be taken for their assessment and recording.		
Policy GE4: Tree Protection		
<p>Development proposals will be positively considered provided:</p> <ul style="list-style-type: none"> a) there is no unacceptable loss of, or damage to, existing trees or woodlands during or as a result of development, any loss should be supported by a tree survey; b) trees not to be retained as a result of the development are replaced within a well-designed landscape scheme; and c) existing trees worthy of retention are sympathetically incorporated into the overall design of the scheme including all necessary measures taken to ensure their continued protection and survival during construction. <p>2. Development proposals that seek to remove trees that are subject to 'Protection', without justification, will not be permitted.</p>	<p>Could potentially link more explicitly with objective 15, (reducing travel by car and air) and Could link specifically with other policies to bring a more integrated approach.</p> <p>The policy could be more specific of place. e.g. in terms of local needs rather than city wide or generic aspirations. The policy scored very positive in respect to objective 9 – protect and enhance biodiversity.</p>	<p>This is not consistent with bullet point 5 of NPPF para118 which allows removal where the 'need for and benefits of the development in that location clearly outweigh the loss.'</p> <p>Change wording to ensure consistency with NPPF.</p>
Policy DE1 Ensuring High Quality Design		
<p>All development proposals must respect and enhance their surroundings and positively contribute towards the local identity and character of an area.</p> <p>2. The setting, integrity and character of heritage assets will be protected in accordance with Policy HE2.</p> <p>3. All development will be expected to meet the following key principles:</p> <ul style="list-style-type: none"> a) respond to the physical context of the site; b) consider the local distinctiveness and identity of the site but also have regard to opportunities to enhance the local built and natural environment through new development and enhanced design; c) where appropriate, retain and incorporate into the layout the protection of important views, including key views of the three spires; d) preserve or enhance the character and setting of the historic built, landscape and where appropriate archaeological environment; e) preserve or enhance the character and setting of major road, rail and canal corridors; 	<p>Achieving this is to some extent dependent on the type of sites released to meet local requirements and in particular in relation to residential development on PDL sites. However, there is some concern in relation to the potential of green spaces to attract anti-social behaviour.</p> <p>Retaining green spaces within the built up areas inevitably means greater maintenance costs which if not carried out could detract from the urban form.</p> <p>The value of pocket parks needs to be considered.</p> <p>Policy is particularly robust in relation to environmental objectives.</p>	<p>No change.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>f) clearly define the boundaries between public and private spaces and enclosure of space; g) provide attractive, safe, uncluttered, active and easily identifiable, high quality public spaces; h) make places that inter-connect and are easy to move through; i) ensure places are easily understood by users, with clear routes and distinct physical features; j) seek high quality design and attention to detail in the layout of developments, individual buildings and infrastructure in terms of function and impact, not just for the short term, but over the lifetime of the development; k) be adaptable to changing social, technological, economic and market conditions and ensure that developments maximise the use of the site; l) promote diversity through mixes of uses within a site or building, which work together to create vital and viable places; m) be proactive in responding to climate change and adopt sustainable and low carbon construction principles in terms of their design, layout and density; n) consider green infrastructure at the earliest stage in the design process, to ensure that it is well planned, designed, managed and maintained. It should also be well integrated and serve multiple purposes (as appropriate); o) minimise adverse impact on important natural resources; p) conserve, restore or enhance biodiversity; and q) respect and enhance landscape quality including trees, hedges and other landscape features of value.</p>		
Policy HE1 Conservation Areas		
<p>1. The areas listed below have been designated as Conservation Areas under Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and are detailed on the Proposals Map;</p> <ul style="list-style-type: none"> • Allesley • Chapelfields • Coventry Canal • Far Gosford Street • Greyfriars Green • Hawkesbury Junction 	<p>The positive aspects of the policy were largely focused on the environmental and social facets of the sustainability framework. It is uncertain whether or not this policy will reduce social exclusion and poverty and promote vibrant and inclusive communities. The level of cultural and recreational activity is uncertain, as it will largely be dependent on the people that use these assets and also the type</p>	<p>No change.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<ul style="list-style-type: none"> • High Street • Hill Top • Ivy Farm Lane • Kenilworth Road • Lady Herbert's Garden and The Burges • London Road • Naul's Mill • Spon End • Spon Street • Stoke Green <p>2. The following areas are proposed for designation as Conservation Areas;</p> <ul style="list-style-type: none"> • Earlsdon • Brownhill Green <p>The exact boundaries will be determined by the production of Conservation Area Appraisals and Management Plans following public consultation.</p> <p>3. Conservation Area Appraisals and Management Plans will be produced for all of the Conservation Areas to guide their preservation and enhancement. All development proposals within Conservation Areas will be determined in accordance with the appropriate Appraisal and Management plan.</p>	<p>of facilities associated with them. Travel by car and generation of waste objectives were both considered to be uncertain in relation to this policy.</p>	
Policy HE2: Conservation and Heritage Assets		
<p>In order to help sustain the historic character, sense of place, environmental quality and local distinctiveness of Coventry, development proposals will be supported where they conserve and, where appropriate, enhance those aspects of the historic environment which are recognised as being of special historic, archaeological, architectural, artistic, landscape or townscape significance, these Heritage Assets include;</p> <ul style="list-style-type: none"> • Listed Buildings and Locally Listed buildings • Conservation Areas • Scheduled Monuments and Archaeological sites • Registered Parks & Gardens • Other places, spaces, structures and features which may not be 	<p>The policy scored positively well in relation to objective 6 and 7 as it aims to protect historic assets. This can have a direct impact on objectives 17, 18 and 19 as it meets needs locally and encourages economic activity by ensuring the cities heritage plays a key role in a modern and thriving city.</p>	<p>No change to policy.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>formally designated but are recognised as significant elements of Coventry's heritage and are positively identified on the Coventry Historic Environment Record</p> <p>Proposals likely to affect the significance of a heritage asset or its setting should demonstrate an understanding of such significance in an accompanying Design and Access Statement or Heritage Statement using currently available evidence. Development proposals involving heritage assets in general and listed buildings in particular, should acknowledge the significance of the existing building and the area by means of their siting, massing, form, scale, materials and detail. The re-use of historic buildings contributes to sustainability by harnessing their embodied energy. Sympathetic and creative re-use of heritage assets will be encouraged, especially for heritage that is considered to be at risk, so long as it is not damaging to the significance of the heritage asset. The Council will use its statutory powers to secure the preservation of buildings and other heritage assets that are deemed to be at risk by the national and local heritage at risk registers. Demolition or destruction of heritage assets will usually be resisted; proposals to demolish a heritage asset will therefore need substantial justification. The greater the damage to the significance of the asset, the greater the justification required and the public benefit needed to outweigh such damage. All proposals should aim to sustain and reinforce special character and conserve the following distinctive historic elements of Coventry:</p> <ul style="list-style-type: none"> • The surviving buildings, defences and street plan of the medieval city centre and its suburbs; • The surviving pre-industrial settlements and landscape features which have been subsumed by the expansion of the city such as Walsgrave, Canley, Binley, Brownshill Green, Coundon Green, Little Heath (Spring Road), Stivichall Croft and Lower Eastern Green (at Dial House Lane); • The wider Arden rural environment on the fringe of the City comprising field-systems, ancient woodlands and commons which developed over centuries; interspersed with a mix of settlements, farmsteads and smallholdings; 		

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<ul style="list-style-type: none"> • Buildings associated with the city's industrial heritage; ribbon weaving, cycle making, motor car manufacturing, brick making, coal mining, synthetic textiles, munitions, aeronautical engineering, canals and railways; • The Victorian and Edwardian suburbs such as Earlsdon and Stoke; • Designed landscapes, including historic parks and gardens (both registered and locally listed), historic cemeteries, churchyards and public parks; • Coventry's ground-breaking post-war reconstruction including its town plan, built form, public art works and public spaces; and <p>Archaeological remains of all periods from the earliest Prehistoric human habitation to the modern industrial period.</p> <p>Where material change to a heritage asset has been agreed, recording and interpretation should be undertaken to document and understand the asset's archaeological, architectural or historic significance. The scope of the recording should be proportionate to the asset's significance and the impact of the development on the asset. The information and understanding gained should be made publicly available, as a minimum through the Coventry Historic Environment Record.</p>		
Policy HE3 - Heritage Park - Charterhouse		
<p>1. Proposals for a City Heritage Park in the grounds of the Charterhouse and London Road cemetery will be supported along with measures to improve linkages to the area along the River Sherbourne (between Charterhouse and Far Gosford Street), the former Coventry loop railway line and across the London Road. Proposals that are detrimental to the establishment of the heritage park and the improvement of linkages will be resisted.</p> <p>Land at Blue Coat School is to be removed from the Green Belt in accordance with policy GE1 to support the expansion of school facilities on condition that the existing school car park is removed from the area of the Charterhouse Scheduled Ancient Monument and proactively re-naturalised in an appropriate way in order to enhance the setting of the Charterhouse and</p>	<p>Is Charterhouse included as the key single example because of scale or historical significance? There are other key buildings still at risk (e.g. Drapers Hall) but assume Charterhouse has been singled out because of the scale of the heritage site? This may need to be explained/clarified in terms of its relationship with objective 4.</p>	<p>No change to policy.</p>

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its precinct.		
Policy Ac1 Accessible Transport Network		
<p>Development proposals which are expected to generate additional trips on the transport network should:</p> <p>Integrate with existing transport networks including roads, public transport and walking and cycling routes to promote access by a choice of transport modes.</p> <p>Consider the transport and accessibility needs of everyone living, working or visiting the city. Special attention should be paid to the needs of disabled people, young children, and people with special needs. Special attention should be paid to the needs of an aging population to make Coventry an Age Friendly City.</p> <p>Support the delivery of new and improved high quality local transport networks which are closely integrated into the built form. This includes networks which support access to strategic growth corridors. The scale of measures required should be appropriate to the scale and impact of the proposed development.</p> <p>Actively support the provision and integration of emerging and future intelligent mobility infrastructure, including electric vehicle charging points, Car Club schemes and bicycle hire.</p> <p>1. Further guidance will be contained in the Coventry Connected SPD.</p>	<p>The development of the transport network to allow greater accessibility will enable greater social mobility and open up new economic markets within the city and further afield.</p>	<p>No change to policy.</p>
Policy Ac 2: Road Network Capacity		
<p>1. New development proposals which are predicted to have a negative impact on the capacity and/or safety of the highway network should:</p> <p>a) Mitigate and manage the traffic growth which they are predicted to generate to ensure that they do not cause unacceptable levels of traffic congestion, highway safety problems and poor air quality. Highway mitigation and management measures should focus firstly on demand management measures (Policy AC3) including the promotion of sustainable modes of travel, and secondly on the delivery of appropriate highway capacity interventions. Highway capacity interventions should be appropriate to the scale of</p>	<p>Locating development by the existing network is only likely to reduce the need to travel by private car if public transport/cycling/facilities are improved.</p>	<p>No change to policy.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>development and expected impact and will be determined through the associated Transport Assessment.</p> <p>b) Developments should seek to support and accommodate, where appropriate, measures which facilitate enhancements to the wider transport network including those set out in the Infrastructure Delivery Plan.</p> <p>c) Be served by routes which are suitable for that purpose. Where this is not achievable, proposals will only be considered acceptable if appropriate interventions can be applied to suitably mitigate any negative impacts, including the construction of new access link roads.</p> <p>2. The Infrastructure Delivery Plan sets out specific measures and funding sources for the transport network improvements which are required to support the delivery of the Local Plan. The level of financial contributions that will be sought from developers for highways infrastructure will be set out in the Council's Community Infrastructure Levy Charging Schedule. The Council may also seek to secure the provision of transportation infrastructure through planning conditions and legal agreements.</p> <p>3. Further guidance will be contained in the Coventry Connected SPD</p>		
Policy Ac 3: Demand Management		
<p>Transport Assessments will be required for developments which generate significant additional trips on the transport network. Thresholds for their requirement will be based on locally determined criteria set out in the Coventry Connected SPD.</p> <p>Travel Plans will be required for new developments which generate significant additional traffic movements. Detailed guidance on the requirement for Travel Plans will be set out in the Coventry Connected SPD.</p> <p>Proposals for the provision of car parking associated with new development will be assessed on the basis of:</p> <ul style="list-style-type: none"> the accessibility of the development; 	<p>Impacts can be mitigated by minimising the need to travel by the private car, or reduced by maximising public transport, cycling and walking. However, improvement to roads may generate a shift away from public transport. Need to monitor the effects of the policy through the AMR. Better enforced travel plans" and "flexible working" were strongly linked. Travel Plans can have a major positive impact on encouraging sustainable travel, but companies must have measures in place to implement and monitor them. Flexible working has a massive potential</p>	<p>No change to policy.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<ul style="list-style-type: none"> • the type, mix and use of development; • the availability of and opportunities for public transport; • local car ownership levels, and; • an overall need to reduce the use of high-emission vehicles. <p>Appropriate provision should be made for the recharging of electric vehicles.</p> <p>Further guidance will be contained in the Coventry Connected SPD</p> <p>New development proposals which require changes to the highway network will be required to integrate with any existing UTMC and ITS infrastructure and strategy.</p> <p>Further guidance will be contained in the Coventry Connected SPD</p>	<p>to reduce congestion, but it must be recognised that not all people can adopt flexible working due to works commitments e.g. early meetings and the school run.</p>	
Policy Ac4 Walking and Cycling		
<p>1. Development proposals should incorporate appropriate safe and convenient access to walking and cycling routes. Where these links do not exist, new and upgraded routes will be required and these must appropriately link into established networks to ensure that routes are continuous. The expected type of provision will depend on the scale, use and location of the site. For larger developments, financial contributions may be required to support improved pedestrian and /or cycling routes on the wider network. Further details will be set out in the Coventry Connected SPD.</p> <p>2. A complementary network of connected Quiet Streets will be developed which include physical measures to control and restrict certain traffic movements and vehicle speeds to create an environment where walking and cycling are the preferred modes of transport. These will prioritised through the development of SUE sites, but will also be considered within existing areas of the city which are negatively affected by increased traffic associated with new development. Financial contributions will be sought to deliver those proposals where the predicted impact of development traffic is significant and measures are needed to support an improved pedestrian and cycle environment.</p> <p>3. Further details will be set out in the Coventry Connected SPD.</p> <p>High quality cycle parking and associated facilities, such as changing, shower</p>	<p>This policy scored positive in many of the environmental and social objectives. In particular, it was very positive in relation to objective 4 – reduce health inequalities and promote active living.</p> <p>Making best use of roads is more sustainable, and has been done successfully in the past to construct bus lanes and cycle routes. This option is only feasible on some major routes and not on most of the roads around the proposed "expansion/development" areas located on the periphery of the City. Many of these roads are substandard and cannot be adapted to cope with heavy traffic hence new roads may be necessary.</p> <p>Provide more parking received some positives mainly with regard to economy, employment and recreation. However, there are a number of caveats which recognise that over 30% of residents in Coventry do not have access to a car, hence would not benefit from more parking. There was some debate over whether parking does actually encourage car use and whether</p>	<p>No change to policy.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>and storage, as part of new development proposals. The expected level of provision should be based on the cycle parking standards set out in the Appendix 5.</p>	<p>parking should be restricted in residential areas. Generally it was felt that managing parking at the destination was more effective and allowing parking in residential areas reduces on-street parking, and therefore improves the street scene.</p> <p>More park and ride was generally seen as a benefit, but again had the caveat of only being of use for car owners. Many environmental benefits for having P&R, except a potential impact on the countryside due to a lack of brownfield sites for P&R, hence could be located in the green belt.</p>	
Policy Ac 5: Bus and Rapid Transit		
<p>New major development proposals should have safe and convenient access to the existing bus network. In areas where this is not achieved, new development may be required to include the provision of appropriate bus infrastructure to enable services to be fully integrated into the development site. The level of need and expected provision will be determined through Transport Assessments and Travel Plans.</p> <p>The development of a mass rapid transit network will be supported to improve accessibility to existing and new major trip attractors. Major development proposals which are expected to create significant numbers of additional trips on the network, and are located in close proximity to a proposed rapid transit route should seek to make provision for those routes, including new infrastructure to facilitate the integration of the rapid transit network into the development site. The level of need and expected provision will be determined through Transport Assessments and Travel Plans.</p> <p>Further details will be set out in the Coventry Connected SPD and West Midlands Strategic Transport Plan.</p>	<p>New Park and Ride/and or BRT facility referred to would require land take and would put pressure on public transport infrastructure at peak periods and so dedicated routes/lanes may be required.</p> <p>Financial feasibility of increased public transport provision could be compromised by improvements to road network. As a result there is general compatibility between policy and objectives with particularly compatibility with improving accessibility to basic services and amenities.</p>	No change to policy.
Policy Ac 6: Rail		
<p>Proposals which improve access to rail services will be supported. This includes:</p>	<p>This policy was positive in relation to objective 15 – reduce travel by car and air. Need to</p>	No change to policy.

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<ul style="list-style-type: none"> • Improved access to rail stations by all modes of travel • Improved interchange facilities between rail and other modes • Enhancements on the rail network which increase the frequency and quality of rail services <p>Measures which support the delivery of objectives in the Coventry rail strategy for improved rail connectivity will be supported. This includes measures which facilitate improved rail services and supporting rail infrastructure on the Coventry north-south corridor between Leamington, Kenilworth, Coventry, Bedworth, Nuneaton and Leicestershire.</p> <p>Proposals for additional local railway stations on the east-west and north/south rail corridor through Coventry will be supported where they are proven to be viable and in accordance with national, regional and local rail strategies.</p> <p>Further details are set out in the Coventry Connected SPD and Coventry Rail Investment Strategy.</p>	<p>differentiate between local rail improvements and national rail improvements to avoid ambiguity.</p>	
Policy Ac 7: Freight		
<p>New developments must accommodate sufficient onsite lorry parking and turning facilities to facilitate deliveries and overnight lorry parking to minimise disruption and safety issues on the public highway.</p> <p>New development which supports rail and air freight will generally be supported where there is an evidence demand and this does not cause an unacceptable impact on the local highway network.</p>	<p>This can be considered positive in relation to strengthening the Coventry economy by ensuring access to employment markets and reducing travel by car and air.</p>	<p>The policy is in direct conflict with the transport proposals for the road network, particularly in the Keresley area. Delete this policy.</p>
Policy EM1: Planning for Climate Change Adaptation		
<p>All development is required to be designed to be resilient to, and adapt to the future impacts of, climate change through the inclusion of the following adaptation measures:</p> <ul style="list-style-type: none"> • using layout, building orientation, construction techniques and materials and natural ventilation methods to mitigate against rising temperatures; • optimising the use of multi-functional green infrastructure for urban cooling, local flood risk management and shading, • incorporating water efficiency measures, encouraging the use of grey 	<p>Developers may be reluctant to connect to a decentralised energy network and may move their business to other areas where they are not obliged to do this.</p> <p>Developments are a large contributor to Co2 levels and adhering to BREEAM guidelines will reduce the amount of Co2 being released into the atmosphere.</p>	<p>Make reference to low water use sanitary equipment, night time cooling strategy and the role trees and vegetation can play in combating climate change.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>water and rainwater recycling,</p> <ul style="list-style-type: none"> • minimising vulnerability to flood risk by locating development in areas of low flood risk and including mitigation measures including SUDS in accordance with Policy EM4; • Where applicable, maintain and enhance the canal network to reflect the canals' role in urban cooling. <p>Applicants will be required to set out how the requirements of the policy have been complied with including justification for why the above measures have not been incorporated.</p> <p>Where justification is based on viability, this will need to be clearly demonstrated through an open book financial appraisal.</p>	<p>Using partners to promote DEN will help spread the word and could increase popularity.</p> <p>Too many demands on developers, such as the necessity to ensure development can attach to a future DEN could deter them and therefore lose potential businesses.</p> <p>With the introduction of Allowable solutions it will become easier to reach these targets as there will be funding.</p> <p>This policy links mainly with sustainability objectives 11 - enhance quality and minimise air, soil, water, light and noise pollution levels- and 13 - To minimise greenhouse gas emissions and energy use and increase energy efficiency and the proportion of energy generated from renewable resources.</p>	
Policy EM2: Building Standards		
<p>New development should be designed and constructed in line with the relevant Building Regulations and to sustainability standards which:</p> <ul style="list-style-type: none"> • Maximise energy efficiency and the use of low carbon energy; • Conserve water and minimise flood risk; • Consider the type and source of the materials used; • Minimise waste and maximise recycling during construction and operation; • Are flexible and adaptable to future occupier needs; and • Incorporate measures to enhance biodiversity value. <p>In meeting the carbon reduction targets set out in Building Regulations, the Council will expect development to be designed in accordance with the following energy hierarchy:</p> <ol style="list-style-type: none"> 1. Reduce energy demand through energy efficiency measures 2. Supply energy through efficient means (i.e. low carbon technologies) 3. Utilise renewable energy generation <p>Applicants will be required to submit a Sustainable Buildings Statement to</p>	<p>It is not just down to the new builds to meet the 80% reduction. To reduce energy demand residents need to be educated in how to reduce carbon emissions. It is possible that this could come into the refurbishment process.</p> <p>Expecting every new development to consider these points could put a financial strain on developers, resulting in a lower amount of houses being built.</p> <p>A larger number of 'zero carbon' homes being built will help the council reach its targets as well as contributing to meeting national and local CO2 targets.</p> <p>Expecting every new development or refurbishment to reach BREEAM 'Excellent' or 'Very Good' (depending on location) could put a financial strain on developers, resulting in a lower amount of buildings being erected, and in</p>	<p>Cite 'flood resilient construction' and as a minimum to meet Building Regulations encouraging developers to go beyond Building Regulations.</p> <p>Make reference to heatline network to strengthen position over connection to Heatline or other heat networks. Perhaps expectation to connect will be for City Centre developments or those within 9 quarters.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>demonstrate how the requirements of Climate Change policies in this Plan and any other relevant local climate change strategies have been met. A comprehensive update of the Delivering a More Sustainable City SPD incorporating the approach to Building Sustainability Standards will be developed.</p>	<p>turn, hinder new businesses setting up in Coventry.</p> <p>When a development is unable to meet these standards, the compensatory money will be well received in other communities around the city, for example disadvantaged communities who may not have access to basic amenities.</p> <p>SA Objective 5 (To provide decent and affordable housing) has the potential to conflict with this policy due to the current high cost building houses to a high sustainable homes standard.</p>	
Policy EM3 Renewable Energy Generation		
<p>Proposals for the installation of renewable and low carbon energy technologies, including both building-integrated and standalone schemes will be promoted and encouraged, provided that:</p> <ul style="list-style-type: none"> any significant adverse impacts can be adequately mitigated; where biofuels are to be utilised, they are obtained from sustainable sources and transportation distances are minimised; any energy centre is suitably located and designed to a high quality such that it is sympathetically integrated with its surroundings; and all proposals are consistent with any relevant Policies in this Plan. 	<p>A development may initially state that all biofuel is to come from a sustainable source but without regular inspection this may not always be the case.</p> <p>Has a strong relationship with sustainability objective 13. The policy could be strengthened through the inclusion of a biofuel inspection form to ensure robustness although this could be requested through any successful planning condition as it relates to a detailed matter rather than a strategic policy approach.</p>	<p>Ensure explanatory text refers to biofuel inspection.</p>
Policy EM4 Flood Risk Management		
<p>All major developments must be assessed in respect of the level of flood risk. If development in areas at risk of flooding is the only option following the application of the sequential test, it will only be permitted where the following criteria are met:</p> <ul style="list-style-type: none"> the type of development is appropriate to the level of flood risk associated with its location with reference to Coventry's Strategic Flood Risk Assessment (SFRA) flood zone maps and advice on appropriate uses within these zones from the Environment Agency and/or Lead Local Flood Authority; it can be demonstrated that no suitable alternative sites are available in an area of lower risk; 	<p>Too many clauses may result in a reluctance to build and in turn a decrease in the attraction of the city to new industries.</p> <p>Having a site-specific FRA may cost initially but it could potentially reduce the risk of surface water flooding is suitable mitigation measures and/or engineering solutions are put in place if flooding was to occur.</p> <p>Future proofing a development for any increase in flooding due to a change in climate will mean the possible savings over the medium to long term. Policy has potential to meet SA Objective</p>	<p>Make ref to Qbar and greenfield run-off rates and LLFA role in the Policy to make reference to all sources of flooding including surface water.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<ul style="list-style-type: none"> • it is provided with the appropriate minimum standard of flood defence (including suitable warning and evacuation procedures) which can be maintained for the lifetime of the development; • it does not impede flood flows, does not increase the flood risk on site or elsewhere or result in a loss of floodplain storage capacity; • it would not be subject to regular flooding; • in the case of dwellings, it is evident that as a minimum, safe, dry pedestrian access would be available to land not at high risk, and; • in the case of essential infrastructure, access must be guaranteed and must be capable of remaining operational during all flooding events. <p>A sequential, risk-based approach to the location of suitable development will be undertaken by the Council based on the Environment Agency's latest flood maps, SFRA flood zones and Vulnerability Classification to steer new development to areas with the lowest probability of flooding avoiding, where possible, flood risk to people and property and managing any residual risk. The Exception Test (for use when there are large areas in Flood Zones 2 and 3, where the Sequential Test alone cannot deliver acceptable sites, but where some continuing development is necessary) will apply where development will provide wider sustainability benefits that outweigh flood risk, fully informed by a Flood Risk Assessment (FRA) which indicates that development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible reducing flood risk overall. Land that is required for current and future flood management will be safeguarded from development. Where development is supported as an exception to this policy within high risk areas, applicants will need to demonstrate that they strictly comply with criteria b), c), d), and g) above.</p> <p>Applicants will be required to demonstrate how they comply with this policy by way of a Flood Risk Assessment, appropriate to the scale and nature of the development proposed, where the development is:</p> <ul style="list-style-type: none"> • within a river floodplain, as defined by the Coventry SFRA indicative flood zone maps; • within or adjacent to any watercourse; • adjacent to, or including, any flood bank or other flood control structure; 	<p>1 (To improve access to basic services and amenities). However, it is uncertain as it depends on individual site viability. Viability would be linked to the cost of installing water efficient measures and the cost of building homes to a 'high sustainable home' standard and the impact this would have on delivering homes at an affordable level. It may also be positive dependent on the use of sensitive design through provision of integral water butts. In relation to compatibility of policy with SA Objective 15 (reduce pollution and waste generation), this depends on whether water recycling facilities are incorporated into each development.</p> <p>By its nature, development is likely to increase run surface water run off which may have adverse impact on floodplains. Policy has the capability to reduce this potential impact.</p>	

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<ul style="list-style-type: none"> • within an area where there may be drainage problems; • likely to involve the culverting or diverting of any watercourse, or • of such size and nature relative to the receiving watercourse/drainage system that there could be an increase in rate or volume of surface water run-off from the area. 		
Policy EM5 Sustainable Drainage Systems (SuDS)		
<p>All development should consider SuDS unless it can be clearly demonstrated there are practical reasons for not doing so and should ensure that surface water runoff is managed as close to its source as possible. SuDS are the preferred way of managing and conveying surface water. The developer will consider and demonstrate how the following hierarchy for the discharge of surface water from a site.</p> <ul style="list-style-type: none"> • Discharge by infiltration and water reuse technologies • Discharge to a watercourse allied with water reuse technologies • Discharge to surface water sewer allied with water reuse technologies. <p>The developer will carry out infiltration tests and a ground water risk assessment to demonstrate whether infiltration is possible and that ground water would not be polluted to Environment Agency and Lead Local Flood Authority requirements. Where it is proven that infiltration is not possible, allied with water reuse technologies, surface water should be discharged into a watercourse (in agreement with the Environment Agency and Lead Local Flood Authority) at a rate no greater than greenfield runoff. If there is no watercourse available then, allied with water reuse technologies, surface water should be discharged to a surface water sewer at a rate no greater than greenfield runoff.</p> <p>In exceptional circumstances, where a sustainable drainage system cannot be provided, it must be demonstrated that:</p> <ul style="list-style-type: none"> • it is not possible to incorporate sustainable drainage systems, and; • an acceptable means of surface water disposal is provided which does not increase the risk of flooding or give rise to environmental problems and improves on the current situation. <p>The long-term maintenance arrangements for all SuDS must be agreed with the relevant risk management authority. A separate SPD will be produced to detail how SuDS schemes will be designed in accordance with the technical standards set out by the Coventry Lead Local Flood Authority and by the</p>	<p>Through extensive independent and extensive research it has been found that Coventry is not always suitable for many types of SuDS due to the underlying nature of soil and geological composition. This means a developer could overlook this policy by saying SuDS are not possible, instead of exploring alternative methods – it is good that a number of different techniques are indicated to give developers ideas.</p>	<p>No change to policy.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
Department for Environment, Food and Rural Affairs.		
Policy EM6 Air Quality		
<p>Major development schemes should promote a shift to the use of sustainable low emission transport (electric vehicles and vehicles that use biofuels) to minimise the impact of vehicle emissions on air quality. Development will be located where it is accessible to support the use of public transport, walking and cycling. All major development proposals should be suitably planned to design out any adverse impact on air quality.</p> <p>Major Development proposals will require the submission of an air quality assessment, as they may lead to a significant deterioration in local air quality resulting in unacceptable effects on human health, local amenity or the natural environment. The air quality assessment should address:</p> <ul style="list-style-type: none"> a) The existing background levels of air quality; b) The cumulative background levels of air quality (related to the cumulative impact of developments in an area); c) The feasibility of any measures of mitigation that would prevent the national air quality objectives being exceeded, or would reduce the extent of the air quality deterioration. <p>A Supplementary Planning Document will be developed to support this Policy.</p>	<p>This policy concurs with the Councils Air Quality Management Plan and performs well against the environmental objectives. Many uncertain results relating to the social objectives.</p>	<p>No change to policy.</p>
Policy EM7 Waste Management		
<p>The Council's Waste Management Strategy will be supported through:</p> <ul style="list-style-type: none"> a) encouraging less consumption of raw materials through the reduction and re-use of waste products; b) a requirement for development proposals to incorporate adequate storage for waste and recycling services along with safe access for collection vehicles; c) encouragement of new methods of processing and recycling at waste management sites; d) a requirement for development proposals to incorporate adequate storage for waste and recycling services along with safe access for collection vehicles; and e) supporting recycling proposals for aggregate materials subject to the criteria in part 2 of this policy. 	<p>The scale and type of waste and recycling facilities varies considerably from kerbside recycling to the construction of Waste Transfer Stations and Materials Recycling Facilities. The appraisal was therefore not easy to assess given the undefined recycling facility proposed at each location and thus the appraisal would depend largely on the type of facility proposed.</p> <p>In terms of small scale localised, householder recycling facilities, it was considered that the highest scored locations are sites within City Centre and Local Centres. With expanding City Centres there will be potential requirement for</p>	<p>Need to update the waste hierarchy explanation in the explanatory text to reflect the approach in the Coventry Waste Strategy.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>2. Proposed new or expanded waste management facilities will be assessed against the following criteria:</p> <ul style="list-style-type: none"> a) The effect of the proposed waste facility upon the environment and neighbouring land uses; b) The impact of traffic generated by the proposal and the availability of alternative transit modes, such as rail and waterways; c) The need for pollution control measures appropriate to the type of waste to be processed or handled; d) The impact of proposals on residential amenity. New waste facilities will not normally be approved adjacent to existing housing and proposals for anaerobic digestion will not be approved in close proximity to existing housing; e) The effect of proposals on aircraft safety; and f) The design of the proposal. Careful consideration should be given to the need to minimise environmental and visual impact. Wherever feasible, waste operations should be enclosed within buildings or sealed structures in order to minimise impacts on adjacent uses from noise, ordure, vermin and wildlife. Proposals advocating open air unenclosed storage of organic odour producing material will not be supported. <p>3. Proposals will be supported where it is demonstrated that these criteria are satisfied.</p> <p>4. Development proposals should demonstrate measures to minimise the generation of waste in the construction, use and life of buildings and promote more sustainable approaches to waste management, including the reuse and recycling of construction waste and the promotion of layouts and designs that provide adequate space to facilitate waste storage, reuse, recycling and composting.</p>	<p>increased recycling facilities or expansion of its kerbside recycling services. Local waste recycling facilities also need to be accessible to the local communities. Local initiatives such as education and community involvement should promote recycling through provision of recycling storage and community recycling services. The distance from source of waste to waste facilities should be kept to a minimum – the more 'local' the lower the transport related impacts will be. Waste recycling facilities within the city centre and local centres will meet key objectives by contributing to the local needs and sustainability.</p> <p>In terms of larger recycling facilities, considerable negative impacts would be felt through the location of such facilities in the city centre with the potential to create noise, smell and visual nuisance. Their compatibility with nearby uses would be poor and in view of the land prices in the central location, such a facility is unlikely to be competitive with residential, commercial and other uses.</p> <p>Larger facilities are likely to be more appropriate in sustainable development terms located on employment sites or transport routes, where their proximity to residential amenity is less. Compatibility with surrounding land uses will be more appropriate and pollution effects concentrated, however the processes would result in significant highway movement. Nevertheless environmental gains are likely</p>	
Policy EM8 Safeguarding Mineral Resources		
Mineral Safeguarding Areas are defined for mineral reserves that are considered to be of current or future economic importance. Where	Mineral Safeguarding can also be undertaken for heritage importance as well as economic	No change to policy.

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>developments are proposed in these areas, the application needs to acknowledge the presence of these mineral reserves. The extent of Mineral Safeguarding Areas are defined on the Policies Map.</p>	<p>importance. (e.g. if a significant listed building is made from a very specific stone, such a mineral can be safeguarded even if it is very small in terms of area). It should be noted that mining of aggregates is also dependent on current and future Government policy relating to aggregates apportionment. The result of this is that certain mineral reserves may never be utilised (open cast coal).</p>	
Policy C1: Broadband and Mobile Internet		
<p>Developers of new developments (residential, employment and commercial) will be expected to facilitate and contribute towards the provision of broadband infrastructure suitable to enable the delivery of broadband services across Coventry to ensure that the appropriate service is available to those who need it.</p> <p>Developers must make sure that broadband services that meet the ambitions of the Digital Communications Infrastructure Strategy and the European Digital Agenda are available, wherever practicable, to all residents of the development at market prices and with a full choice of all UK service providers.</p> <p>Developers are required to work with a recognised network carrier to design a bespoke duct network, for the development.</p> <p>Other forms of infrastructure, such as facilities supporting mobile broadband and Wi-Fi, should be included, wherever possible and viable and should be designed in a sympathetic and appropriate way in order to reflect the character of the surrounding area.</p>	<p>The policy scored several positives in relation to objectives 18, 19 and 20. It has many social positives as fast reliable broadband connections can increase the access and availability of services and help communities to have a greater say on decisions through electronic voting.</p>	<p>No change to policy.</p>
Policy C2: Telecommunications		
<p>When considering notifications, planning applications and prior approval applications, regard will be given to the following factors: a) operational requirements of the telecommunication networks and the technical limitations of the technology, including any technical constraints on the location of telecommunications</p>	<p>Policy scored mainly neutral in respect of the social and environmental objectives but scored positively in relation to the economic objectives.</p>	<p>No change</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>apparatus;</p> <p>b) the need for the ICNIRP Guidelines (and any other relevant guidance in place at the time of the application) for safe emissions to be met;</p> <p>c) the potential for sharing existing masts, buildings and other structures; and</p> <p>d) the impact of the development on its surroundings with particular regard to the following criteria:</p> <ul style="list-style-type: none"> i. the visual amenity, character or appearance of the surrounding area. ii. apparatus and associated structures sited on a building should be sited and designed in order to seek to minimise impact to the external appearance of the host building. iii. development should not have an unacceptable effect on conservation areas or buildings of architectural or historic interest or areas of ecological interest or areas of landscape value or sites of archaeological importance. iv. the proposed provision of landscaping. <p>Telecommunications equipment that has become obsolete or that is no longer in use should be removed as soon as practicable and the site restored to its former condition.</p>		
Policy IM 1: Developer Contributions for Infrastructure		
<p>Development will be expected to provide, or contribute towards provision of:</p> <ul style="list-style-type: none"> a) Measures to directly mitigate its impact and make it acceptable in planning terms; and b) Physical, social and green infrastructure to support the needs associated with the development <p>2. Infrastructure and mitigation measures will be provided in a timely manner to support the objectives of the Plan.</p> <p>1. The Council will, where appropriate, seek to secure site-specific infrastructure investments and/or contributions as well as off-site contributions and/or investments. The nature and scale of these will be related to the form of development and its potential impact on the site and</p>	<p>The policy should cross refer to requirements in the policies requiring developer contributions. Greater clarity of what schemes will trigger a requirement may also turn some + into ++. If contributions are realised from all developments then even areas of low development levels may benefit from improved facilities therefore reducing social exclusion and improving access to quality services.</p> <p>Objectives that have tended to score very well include those promoting easy access to key services and community facilities, especially those identified within the list of likely</p>	<p>No policy change.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>surrounding area. The cumulative impact of developments will also be taken into account.</p> <p>2. Developer contributions in the form of Planning Obligations and/or Community Infrastructure Levy (CIL) will contribute towards strategic infrastructure required to support the overall development in the Plan.</p> <p>3. Where site specific issues generate viability concerns, applicants should discuss these with the Council at the earliest possible stage in the development process. Proposals that are unable to comply with the Plan's policies on viability grounds must be accompanied by a detailed Viability Assessment.</p> <p>The Council will work in partnership with infrastructure providers and other delivery agencies in updating the Infrastructure Delivery Plan to ensure an up to date evidence base regarding infrastructure requirements and costs is maintained.</p>	<p>contributions.</p>	

7. TASK B5 AND B6: MITIGATION AND MONITORING MEASURES

Mitigating adverse impacts and maximising beneficial effects (Task B5)

- 7.1 The SEA Directive requires information to be provided on *'the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme'*. Mitigation measures also include proactive avoidance of adverse effects and measures to enhance positive effects.
- 7.2 Mitigation measures can take a wide range of forms, including:
- changes to the Local Plan options, including bringing forward new options or
 - adding or deleting options
 - refining options in order to improve the likelihood of beneficial effects and to
 - minimise adverse impacts e.g. by ensuring strong policy criteria are developed
- technical measures to be applied during the implementation stage e.g. setting guidelines or applying design principles

Mitigation

- 7.3 Mitigation measures referred to at previous stages have been taken into account, as far as possible in preparing the proposed submission local Plan. The positive effects of the Local Plan could be maximised with the addition of mitigation measures. In order to mitigate and minimise the possible negative impacts of the Local Plan, the following mitigation measures have been identified in accordance with the results of the appraisal of the policies contained in the Local Plan:

1. To improve local air quality

The large-scale housing and employment development that is proposed for Coventry could have a negative effect on air quality as a result of increased vehicle traffic in the city. It is assumed that this has the potential to be particularly damaging as the entire city is designated an AQMA. It should be noted that the transport modelling that has been undertaken for Coventry does not describe the effect of traffic increases on the AQMA as a whole.

Mitigation: The improvements to highway infrastructure that are proposed in a number of the policies could be seen as potentially encouraging increased car use by making it a more convenient mode of transport. However, they should also help to avoid creating or compounding congestion issues which can contribute to pockets of poor air quality. Temporary air quality effects could also occur from HGV traffic during the construction phase of new development.

However, many of the Local Plan policies require sustainable transport improvements to be incorporated into the new developments (e.g. walking and cycle routes or improved bus services) and all development will need to consider safe and well-lit streets and routes for walking and cycling as well as walking and public transport access to key facilities and services. Transport modelling work that has been undertaken for Coventry has indicated that, provided the identified public transport mitigation measures are incorporated, the likely effects of the overall development strategy for the city on increased pollutants would be entirely mitigated with the exception of CO₂ emissions which would be mitigated by around 60%.

2. To reduce vulnerability to flooding

The Local Plan proposes large-scale new housing and employment development, much of which will take place on greenfield land. It could be considered as having a negative effect on flood risk by increasing the overall area of impermeable surfaces in Coventry and therefore reducing infiltration rates and increasing runoff.

Mitigation: A number of the Local Plan policies incorporate measures specifically aiming to address flood risk, with the supporting text to policies EM4 and EM5 referring to the ambition of retaining greenfield runoff rates, directing development to locations within the city at the lowest risk of flooding and, where development is proposed in flood risk areas, requires mitigation measures to be in place to reduce the effects of flood water. It also supports developments which take opportunities to reduce flood risk elsewhere and requires developments to manage surface water run off with no net increase in the rate of surface water run off for greenfield sites. As a result, it is considered that there will not be significant cumulative effects on flood risk in the city as a result of the Local Plan.

3. **To ensure that the housing stock meets the housing needs of all sections of the community**

The Local Plan provides for a total of 25,000 new homes in Coventry, which is adequate to meet the identified levels of capacity. Affordable housing will be provided in new developments in line with the targets set out in policy H6 and all of the policies for the strategic sites make reference to the provision of a range of housing types, sizes and tenures, including provision for older people. They will also be required to comply with the requirement set out in policy EM2 for new housing to incorporate the design criteria of Lifetime Homes, which aim to add to the comfort and convenience of the home and support the changing needs of individuals and families at different stages of life. This means that a significant positive cumulative effect is expected in relation to this mitigation measure.

Mitigation: The Local Plan makes provision for Gypsies and Traveller's, students and others in multiple occupation in accordance with identified local need through the identified policies, which is followed through into the specific policies for the strategic housing sites. Incorporating Gypsies and Traveller sites, student accommodations and homes in multiple occupation within the housing development proposed will have further positive effects on the creation of vibrant communities (SA objective 5) and access to services (SA objective 1).

4. **To increase healthy lifestyles**

The provision of green infrastructure, open space and sports facilities within new development (as required by policies GE2 and GE1) will help to encourage higher levels of activity and healthier lifestyles amongst Coventry's residents. In addition, the provision of walking and cycle routes as part of the strategic housing sites should encourage more people to make use of active modes of transport for commuting and other journeys.

Mitigation: The policies for the strategic housing sites refer to the provision of new services and facilities within the new development, which is taken to include healthcare services such as doctors' surgeries and dentists (although this is not specified, it is referred to in the supporting text to a number of the policies). This will help to ensure that residents (including those without cars) have convenient access to healthcare services, and that existing services in different Wards of the city do not become overloaded. Although there may be temporary impacts on public amenity during construction of the proposed development, in the long-term a cumulative positive effect on health is therefore expected to result from the Local Plan.

5. **To increase access to the countryside, open space and semi-urban environments (e.g. parks)**

It is recognised that the Local Plan, if fully realised, would lead to a 10% net loss of existing Green Belt land through the planned level of growth set out in Policy DS1.

Mitigation: The measures offered in Policy GB1 provide an offsetting benefit by ensuring that new local green space designations would enable existing Green Belt land designation to be better reflected in terms of its planning status and eventual use. An example of this is the re-designation of the Sowe Valley to local urban green space.

Positive effects through mitigation are likely to result from the Local Plan policies, as policies GE2 will ensure that residents of the new strategic housing developments have easy and convenient access to

open space, walking and cycle routes, playing pitches and allotments. These new facilities will also benefit existing residents in nearby Wards.

6. To reduce waste as a result of new development

Development of the scale proposed in the Local Plan will inevitably lead to increased use of aggregates for construction as well as increased waste generation, regardless of its location, particularly as much of the new development will be located on greenfield land which means that opportunities for reusing existing building materials will be more limited than at a brownfield site. In addition, infrastructure improvements are associated with a number of the policies (e.g. new roads and widening of existing roads), which could increase demand for aggregates as well as increasing waste generation in the short-term during the construction phase, although it is uncertain the extent to which recycled and secondary aggregates may be used.

Mitigation: The impacts of the Local Plan on waste generation will depend largely on the practices used within new housing and employment sites and it is recognised that all new development will be required to comply with Policies EM1 and EM7 which both support developments that reduce waste, provides for the suitable storage of waste and allows for convenient waste collections. It also makes specific reference to encouraging development on brownfield sites, and re-using existing buildings.

Monitoring the significant effects of implementing the DPD (Task B6)

- 7.5** An Annual Monitoring Report of the Coventry Development Plan 2001 has been published since it was adopted, and reports have continued to be published up to 2015. This process will continue with the preparation of the Coventry Local Plan and will encompass monitoring information in connection with Sustainability Appraisal.
- 7.6** The Local Plan itself will need to be monitored to determine whether the recommended policy direction is appropriate. If it becomes clear that some of the suggested targets/standards become obsolete or unachievable, then they will need to be revised as appropriate.
- 7.7** A single monitoring framework is being developed to encompass the various documents that are being prepared as part of the Coventry Local Development Plan. This will ensure that the significant sustainability effects of implementing the plan are monitored to identify any unforeseen adverse effects and enable remedial action to be taken. Sustainability Appraisal monitoring will be incorporated into the existing monitoring arrangements.

APPENDIX 1: ALTERNATIVE OPTIONS – SPATIAL, QUANTUM AND LOCATIONAL RESULTS

(a) 2016 Local Plan - Scenarios for Delivering Planned Growth

Scoring

very positive	++
positive	+
uncertain	?
neutral	o
negative	-
very negative	--

		Option 1 Protecting the Green Belt	Comments	Option 2 Building within the boundary	Comments	Option 3 Sustainable Land Release	Comments
Sustainability Objectives for Coventry	1	+		+		++	based on good design and access requirements to service provision
	2	+		++		++	
	3	+		+		++	
	4	+		+	can achieve active living spaces but dependant on design	+	can achieve active living spaces but dependant on design
	5	-		+	subject to affordable housing on greenfield sites	?	lack of control due to cross boundary sites
	6	+		+		+	
	7	+		+		++	
	8	+		-		o	
	9	+		+	bio-diversity offsetting needs to be implemented	+	bio-diversity offsetting needs to be implemented
	10	+		o		++	
	11	o		-	correct mitigation to offset negative impacts	-	correct mitigation to offset negative impacts
	12	++	brownfield land is treated the same as greenfield runoff rates	o		+	

	13	-	--	net loss of vegetation within the urban area	-
	14	-	--		-
	15	+	+		++
	16	-	--		-
	17	+	+		++
	18	+	++		++
	19	+	++		++
	20	+	++		++
Rank	Nom of + 16 Nom of - 4 Rank - 3		Nom of + 17 Nom of - 8 Rank - 2		Nom of + 24 Nom of - 3 Rank - 1

Comments:

Option three scored the most number of positive results thus rendering it the most sustainable compared with options one and two. Option two, however, scored the highest number of negatives than option 1 but had slightly more positives. The Councils preferred option has scored some negatives, specifically in relation to objectives 11, 13, 14 and 16. Mitigation and monitoring measures will need to be considered to offset these likely negative outcomes.

(b) 2015 SHMA Housing Growth Projections

Scoring

very positive	++
positive	+
uncertain	?
neutral	o
negative	-
very negative	--

		Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8	Option 9	Option 10	Option 11	Option 12	Option 13	Option 14	
		3,896	13,612	18,321	19,567	20,212	20,222	20,759	23,584	26,144	27,000	33,803	34,904	36,220	42,400	
Sustainability Objectives for Coventry	1	o	+	+	+	+	+	+	+	+	+	+	++	++	++	
	2	o	o	o	o	o	o	o	o	o	o	o	++	++	++	
	3	-	+	+	+	+	+	+	++	++	++	++	++	++	++	
	4	?	?	?	?	?	?	?	?	?	?	?	+	+	+	
	5	--	-	+	+	+	+	+	++	++	++	++	++	++	++	
	6	+	++	+	+	+	+	+	+	+	+	+	+	+	+	
	7	?	?	?	?	?	?	?	?	?	?	?	++	++	++	
	8	+	+	o	o	o	o	o	o	o	o	o	-	--	--	--
	9	+	+	o	o	o	o	o	o	o	o	o	-	--	--	--
	10	?	+	+	+	+	+	+	+	+	+	+	++	++	++	
	11	+	+	o	o	o	o	o	o	-	-	-	-	--	--	--
	12	++	++	o	o	o	o	o	o	o	o	o	-	--	--	--
	13	+	+	+	+	+	+	+	+	+	+	+	+	-	-	-
	14	+	+	o	o	o	o	o	o	o	o	o	o	-	-	-
	15	o	+	o	o	o	o	o	o	-	-	-	-	--	--	--
	16	+	+	o	o	o	o	o	o	-	-	-	-	--	--	--
	17	o	+	+	+	+	+	+	+	?	?	?	?	++	++	++

	18	+	+	+	+	+	+	+	+	+	+	+	++	++	++
	19	+	+	+	+	+	+	+	+	+	+	+	++	++	++
	20	0	+	+	+	+	+	+	+	+	+	+	++	++	++
Rank	Nom of +	11	18	10	10	10	10	10	11	11	11	11	22	22	22
	Nom of -	3	0	0	0	0	0	0	3	3	3	6	14	14	14
	Rank	3	1	2	2	2	2	2	3	3	3	4	5	5	5

Commentary

Option 2 scored the most number of positives and least number of negatives indicating a strong performance across the assessment framework. Option 10 is the weakest performing option and is clearly not sustainable in the Coventry context particularly in respect of the environmental objectives. Interestingly, the performance of options 3, 4, 5, 6 and 7 were matched across the board.

In summary, the results indicate that as the housing numbers increase, the environmental impacts become more pronounced and result in negative or very negative scorings but equally the economic objectives result in more positive outcomes.

c) 2012 Core Strategy Alternative Growth Options

		Option 1 Hub and Spokes	Comments	Option 2 Expanded Centres	Comments	Option 3 Transport Corridors	Comments
Sustainability Objectives for Coventry	1	+		+		+	
	2	+		+		+	
	3	++		+		+	Need to ensure that transport routes are enhanced when they are needed. Not as proactive as other strategies
	4	++		+		+	
	5	++		++		++	
	6	+		+		+	
	7	+		+		+	
	8	+		+		+	
	9	+		+		+	
	10	++		+		?	Need to make connections better between and within developments
	11	+		+		-	
	12	+		+		+	
	13	+		+		?	Depends on scale and location of sites
	14	+		+		+	
	15	++		+		-	
	16	?	Need to allow for avg household size		?		?

Scoring

very positive
positive
uncertain
neutral
negative
very negative

++
+
?
o
-
--

Option 1: Spokes of growth stemming from the city centre which acts as the hub

Option 2: Develop and focus growth in the city centre and major district centres

Option 3: Focus growth and development along the major arterial routes across the city.

	17	++		++		+	Need to acknowledge differences along routes
	18	++		++		+	
	19	++		++		++	
	20	+		+		+	
Rank		Rank - 1		Rank - 2		Rank - 3	

d) 2010 Core Strategy - Alternative Spatial Options

Objectives	SPATIAL OPTIONS APPRAISAL							
	OPTION A - Continuation of current policies: site led approach to encourage the regeneration of the existing built-up area	OPTION B - Focus development on the city centre and other centres	OPTION C - Allow development on existing green spaces within the city and maximise densities in the existing built up area and maximise the use of existing resources	Option D - Outward expansion of the city within the boundary	Option E - Outward expansion of the city	Option F - Emerging strategy key diagram	++	very positive
							+	positive
							?	uncertain
							o	neutral/no impact
							-	negative
							--	very negative
1	+	++	+	?	?	++	Depends on the level of infrastructure	
2	+	+	+	?	?	+	Unsure at to the make-up of the community	
3	+	++	+	-	-	+		
4	+	+	-	+	+	+		
5	+	+	+	+	+	+		
6	+	+	-	+	+	+		
7	o	+	-	+	+	+		
8	+	+	-	--	--	-		
9	+	+	?	?	?	?	Ensure green infrastructure is implemented	
10	+	+	+	+	+	+		
11	+	+	--	-	-	-		
12	?	?	--	?	?	?	Requires a commitment	
13	+	+	-	-	-	-		

14	+	+	-	-	-	+		
Objectives	OPTION A - Continuation of current policies: site led approach to encourage the regeneration of the existing built-up area	OPTION B - Focus development on the city centre and other centres	OPTION C - Allow development on existing green spaces within the city and maximise densities in the existing built up area and maximise the use of existing resources	Option D - Outward expansion of the city within the boundary	Option E - Outward expansion of the city	Option F - Emerging strategy key diagram	++	very positive positive uncertain neutral/no impact negative very negative
							+	
							?	
							o	
							-	
							--	
15	+	++	+	?	?	+	Need for bus infrastructure	
16	+	+	+	-	-	o		
17	+	++	+	?	?	+	Infrastructure dependant	
18	o	+	-	+	+	+		
19	+	+	+	+	+	+		
20	+	+	+	+	+	+		
No of -/--	0	0	9	6	6	3		

Comments:

Options A and B appear to be the most sustainable, with option B attracting a higher number of double positives. Option C is the least sustainable followed by options D and E. The Councils preferred option has scored some negatives, specifically in relation to objectives 8, 11 and 13. Mitigation and monitoring measures will need to be considered.

(e) Joint Green Belt Review Parcels – SA results

Scoring

very positive	++
positive	+
uncertain	?
neutral	o
negative	-
very negative	--

		Area 1	Area 2			Area 3	Area 4	Area 5	Area 6	Area 7	Area 8			Area 9
		Broad Area 5	AL1	AL5	AL4	C1	C3	C4 Central	C4 Northern	C11 Southern	C14	C15	C16	C22
Sustainability Objectives for Coventry	1	?	+	+	+	-	-	?	?	?	+	+	+	+
	2	?	+	+	+	+	+	?	?	?	+	+	+	?
	3	+	o	o	o	?	?	+	+	+	o	o	o	?
	4	o*	o	o	o	-	-	-	?	?	?	?	?	o*
	5	+	+	+	+	+	+	+	+	+	?	?	?	+
	6	o	o	o	o	o	o	+	?	?	o	o	o	?
	7	?**	??	??	??	+	+	?	+	+	+	+	+	o
	8	--	--	--	--	-	-	--	--	--	-	-	-	-
	9	?***	-	-	-	-	-	--	--	--	-	-	-	-
	10	+	+	+	+	+	+	+	+	+	++	++	++	+
	11	-	-	-	-	--	--	-	-	-	-	-	-	-
	12	-	-	-	-	-	-	-	-	-	-	-	-	-
	13	-	-	-	-	-	-	-	-	-	-	-	-	-
	14	-	-	-	-	-	-	-	-	-	-	-	-	-
	15	**** -	-	-	-	-	-	o	o	o	o	o	o	o
	16	-	-	-	-	-	-	-	-	-	-	-	-	-

	17	+	+	+	+	+	+	+	+	+	+	+	+	+
	18	+	+	+	+	+	+	?	?	+	+	+	+	+
	19	+	+	+	+	+	+	?	?	0	0	0	0	+
	20	+	+	+	+	+	+	?	?	?	0	0	0	+
	Nom of +	7	8	8	8	8	8	7	5	5	7	7	7	7
	Nom of -	6	7	7	7	9	9	6	5	5	7	7	7	7
	Rank	2	3			5		2	1	1				4

Area 10					Area 11	Area 12	Area 13	Area 14					Area 15		
C21	C23	C17	C18	C12	C24	C25	C26	AL3	C27	C28	AL2	C29		KY2	KY1
?	?	?	?	?	+	+	+	+	+	+	+	+		+	+
?	?	?	?	?	+	+	+	+	+	+	+	+		+	+
?	?	?	?	?	0	0	0	0	0	0	0	0		0	0
?	?	?	?	?	-	-	-	-	-	-	-	-		-	-
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+	+	+	+	+	0	0	0	0	0	0	0	0		+	+
-	-	-	-	-	-	-	--	?	?	?	?	?		0	0
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?	?	?	?	?	o	++	++	+	+	+	+	+	+	+	+	+	+
?	?	?	?	?	o	++	++	+	+	+	+	+	+	+	+	+	++
?	?	?	?	?	o	++	++	+	+	+	+	+	+	+	+	+	+
2	2	2	2	2	5	11	11	8	8	8	8	8			10	11	
10	10	10	10	10	10	11	14	11	11	11	10	10			11	10	
9					8	11	13	10				6			12	7	

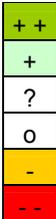
* offset by loss of a green environment but new dev. Could allow for provision of play spaces or enhancement of usable areas of green space.

** dependant on development providing for cultural facilities

*** provided it can be compensated through offsetting measures

****dependant on where development occurs so that there is suitable access to the road network

APPENDIX 2: APPRAISAL OF DRAFT LOCAL PLAN POLICIES (2015)

Policy DS1: Overall Development Needs		
	<p>Over the Plan period significant levels of housing, employment and retail development will be planned for and provided along with supporting infrastructure and environmental enhancements:-</p> <ul style="list-style-type: none"> d) 24,600 additional homes. e) 128ha of employment land within the city's administrative boundary, including: <ul style="list-style-type: none"> iv. at least 176,000sq.m of office floor space at Friargate and the wider city centre, v. the continued expansion of Whitley Business Park; and vi. 15ha strategic allocation adjoining the A45 as part of the Eastern Green sustainable urban extension f) 84,000sq.m gross comparison retail floor space and 21,900sq.m gross convenience floor space by 2031, of which at least 70,000sq.m is to be allocated to Coventry city centre. <p>Notwithstanding the above, Coventry's objectively assessed housing need for the period 2011 to 2031 is 42,400 additional homes and 369ha of employment land (including qualitative replacements). It is not possible to deliver all of this additional development land within the city boundary. As such, the Council will continue to work actively with neighbouring Councils through the Duty to Cooperate to ensure that appropriate provision is made elsewhere within the Housing Market Area.</p>	 <p>very positive positive uncertain neutral/no impact negative very negative</p>
1	Difficult to quantify given its a strategic policy	?
2		+
3		+
4		+
5		++
6		+
7	City centre issue with competing uses for the same level of space. Slight degradation but can be mitigated.	+
8	Need to give protection to historic environment through CIL and s106.	+

9		?
10		+
11		-
12		+
13		+
14		+
15		+
16		-
17		+
18		++
19		++
20		+

Comments:

In terms of assessing objectives 3, 5 and 6 against the 5 options, it is very much dependant on the housing mix and age ranges of the end users for any given development site. In respect of objective 8, there is a need to protect the historic environment such as the cathedral quarter. Also, there needs to a focus on quality intensive developments rather than 'garden grabbing'. For objective 12, each site will differ depending on its location but the strategic flood risk assessment will help to identify areas that are prone to flooding within specified periods.

If employment sites do become defunct, then it may be appropriate to use these for housing development. The scale and mix of developments is very important and therefore, the thrust should be to encourage mixed communities and not risk creating ghettos of affordable housing.

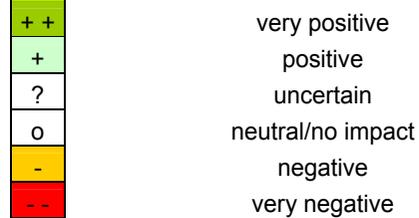
If the proposed growth point into the Green Belt at Upper Eastern Green and Keresley are then made accessible to the M6 and A45, they could have a further detrimental impact on the environment by encouraging/enabling outward migration to Birmingham/Solihull and beyond rather than meeting the city's employment-led objective. Such developments could thereby encourage longer journey times/trips and encourage more residential development on other Green Belt sites to meet the city's own needs.

Other point was the importance of protecting green spaces within the city's deprived neighbourhoods to provide opportunities for new facilities for local youth to discourage anti-social behaviour/fear of crime.

The importance of mixed development should be emphasised. If spaces are to be truly sustainable then they must be living, vibrant places that everybody has a stake in and not left to rot on the periphery. As I remember, urban green space and social infrastructure came up as particularly important issues here; the groups emphasis was on building integrated communities of physical, social and economic quality and not merely 'development' per se.

Objectives	Policy DS2 Duty to Cooperate													
	<p>Coventry City Council will work with neighbouring authorities within it's Housing Market Area to support the delivery of the development needs identified in Policy DS1 that originate from the city.</p> <p>In order to ensure the affordable housing needs of the city are met, the Council will work with its neighbouring authorities to secure opportunities for Coventry citizens to access affordable homes within Warwickshire where they are delivered as part of the city's wider housing needs being met.</p> <p>The Council will support the preparation of joint strategic evidence which will enable the successful delivery of regeneration and economic growth across the sub-region. The Council will continue to be proactive in this regard and will seek to cooperate with all partners on an on-going basis across all topic areas including housing, infrastructure, economy and jobs, transport, health and the environment.</p> <p>Should the need arise and should it be considered appropriate the Council is committed to working with partners on preparing joint development plan documents, supplementary planning documents and design guides to help deliver new sustainable development that may straddle or adjoin the city's administrative boundary.</p> <p>Where sites cross or are adjacent to administrative boundaries and are not subject to joint development plan documents, the Council will continue to work proactively and on an on-going basis with all relevant partners to enable the delivery of new development on these sites.</p> <p>The Council is committed to supporting the economic growth objectives of the sub-region and, in partnership with the CWLEP will continue to work pro-actively will all partners to deliver economic growth and prosperity across Coventry and Warwickshire.</p>	<table border="0"> <tr><td style="background-color: #90EE90; text-align: center;">++</td><td>very positive</td></tr> <tr><td style="background-color: #90EE90; text-align: center;">+</td><td>positive</td></tr> <tr><td style="background-color: #FFFFFF; text-align: center;">?</td><td>uncertain</td></tr> <tr><td style="background-color: #FFFFFF; text-align: center;">o</td><td>neutral/no impact</td></tr> <tr><td style="background-color: #FFD700; text-align: center;">-</td><td>negative</td></tr> <tr><td style="background-color: #FF0000; text-align: center;">--</td><td>very negative</td></tr> </table>	++	very positive	+	positive	?	uncertain	o	neutral/no impact	-	negative	--	very negative
++	very positive													
+	positive													
?	uncertain													
o	neutral/no impact													
-	negative													
--	very negative													
1	?													
2	+													
3	+													
4	+													
5	++													
6	+													

7	+	
8	+	
9	?	
10	+	
11	-	
12	+	
13	+	
14	+	
15	?	
16	-	
17	?	
18	++	
19	++	
20	+	

Policy DS3 Sustainable Development			
Objectives	<p>When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area, including:</p> <ul style="list-style-type: none"> • access to a variety of high quality green and blue spaces; • access to job opportunities; • low and wherever possible, zero carbon homes; • use of low carbon, renewable and energy efficient technologies; • the creation of mixed sustainable communities through a variety of dwelling types, sizes, tenures and range of community facilities • increased health, wellbeing and quality of life; • measures to adapt to the impacts of climate change; • access to sustainable modes of transport; • preservation and enhancement of the historic environment; and • sustainable waste management. <p>Planning applications that accord with the policies in the Coventry Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.</p> <p>Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise.</p> <p>This will take into account:</p> <ul style="list-style-type: none"> • Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or • Specific policies in that Framework indicate that development should be restricted. 		
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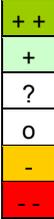
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Comments:

We ignored air travel impacts! We also failed to distinguish between building higher and more apartments, so assumed apartments meant higher buildings (unless stilts are used to build houses within functional flood plain). What to one person is an area of vacant PDL is a kick-about area to another. Also, we explored the potential anti-social behaviour impacts of building on these areas – on the one hand, the 'problem' people would be moved off, and cease to cause trouble there. But they would then congregate somewhere else to cause trouble, so it is swings and roundabouts. What is appropriate in one place is not necessarily the best solution in another – it is a case of horses for courses.

The over-arching issue is that IT DEPENDS! It depends on what was there before, and how it functioned (or not), it depends on design and layout, it depends on the target market, it depends on what is needed and what is wanted, as to whether impacts are positive or negative. We made numerous assumptions before and during the exercise: building on urban PDL means that building on an equivalent Green Belt site does not need to happen. Implicit within this is an assumption that biodiversity is safeguarded within the Green Belt at least. Flood risk is not necessarily made worse by redeveloping urban PDL, this is because if green space (either strategic landscaping or private amenity space) is included within the new development on what was previously an entirely hard surfaced site (hence not porous, runoff therefore is immediate and there is no soft ground to 'hold' water and delay runoff – thereby negating some of the risk of flash floods) then the flood risk to that site may be reduced.

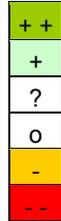
An issue regarding recycling was identified – the higher the density, the more difficult it is to collect recycling waste. Design again comes into play, for example ability to access properties with large vehicles. Higher density implies more concentrated noise and other pollution. Mixed use schemes: there is no guarantee that occupants of new housing as part of a mixed use scheme will be employed within the employment section of the development. So sustainability impact may be neutral. Energy efficiency: tower blocks were assumed to be more energy efficient, since hot air is less dense and moves upward, with the assumption that those nearer the top would require less heating than those at the bottom levels of the block.

Policy GB1: Green Belt and Local Urban Green Space			
<p>The city's most up-to-date Green Belt and Local Green space boundaries are identified on the Policies Map.</p> <p>Inappropriate development will not be permitted in the Coventry Green Belt unless very special circumstances exist. Development proposals, including those involving previously developed land and buildings, in the Green Belt will be assessed in relation to the relevant national planning policy.</p> <p>The following areas will be removed from the Green Belt to accommodate future development needs and are shown on the Policies Map. Where appropriate further details are provided in Policy JE2, H2 and HE3;</p> <ul style="list-style-type: none"> q) Land part of the Wood End redevelopment (residential) r) Land at Sutton Stop (residential and employment) s) Land south at Walsgrave Hill Farm (residential) t) Land at Keresley (residential) u) Land north of Upper Eastern Green (residential and employment) v) Land at Cromwell Lane (residential) w) Land at Mitchell Avenue (residential) x) Land off Allard Way/London Road (residential) y) Land at Cheltenham Croft (residential) z) Land east of Browns Lane (residential) aa) Land west of Browns Lane/Burton Close (residential) bb) Land at Cryfield Heights (residential) cc) Land at Woodfield School, Stoneleigh Road (Residential and infrastructure) dd) Land south of Blue Coats School (Heritage and Education) ee) Land at Baginton Fields and South East of Whitley Business Park (employment) ff) Land to the east of the existing Energy from Waste plant at Bar Road (general industrial) <p>The following areas will be removed from the Green Belt and re-designated as Local Urban Green Space and are shown on the Policies Map:</p> <ul style="list-style-type: none"> h) Sowe Valley i) Sherbourne Valley j) War Memorial Park k) Tossil Wood Brook Stray l) Park Wood and Ten Shilling Wood m) Tile Hill Wood n) Allesley Park <p>The following areas will be removed from the Green Belt and will not be re-designated as Local Green Space as they do not serve the purposes of either:</p> <ul style="list-style-type: none"> c) Land at Park Hill Lane d) Land at Westwood School and Xcel Leisure Centre <p>The following areas will be designated as new areas of Local Green Space and are shown on the Policies Map:</p> <ul style="list-style-type: none"> a) Sowe Valley Northern Extension b) Sherbourne Valley and Lake View Park c) Walsgrave Triangle, Cross Point. <p>In addition to appropriate development in the Green Belt identified in the NPPF, limited infill development amongst existing ribbon developments would be considered appropriate where provisions for starter homes and self-build properties are proposed. Any proposal in these locations will be expected to be of an appropriate density to reflect surrounding properties should not impact negatively on the openness and character of the wider Coventry Green Belt and will also need to accord with Policy H3.</p>		<p>very positive</p> <p>positive</p> <p>uncertain</p> <p>neutral/no impact</p> <p>negative</p> <p>very negative</p>	

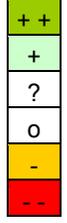
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Comments:

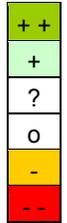
Green Belt and locally designated nature conservation areas should be retained and protected, including the two areas of search for the planned expansion of the urban area. Some areas of Urban Green Space could be considered for future development, if this resulted in significant long-term and sustainable improvements in quality, biodiversity and maintenance within the locality. However, the City Council was criticised for not investing sufficient resources to ensure the quality and sustainability of some existing areas of UGS.

Policy GB2: Reserved Land in the Green Belt		
	<p>The areas of Reserved Land proposed partly or wholly comprise the following sites and are shown on the Policies Map.</p> <ul style="list-style-type: none"> a) Land south of Westwood Heath Road; b) Land south of Bishop Ullathorne School; c) Land south of Gretna Road; d) Playing Field south of Finham Park School; and e) Land west of Finham Primary School. <p>The land identified above will only be released from the Green Belt for development during this plan period where it forms an integral part of a comprehensive development scheme that involves both the Reserved Land within Coventry and the adjoining land in Warwick District – this could involve a range of development (including infrastructure). It would be with a view to delivering the wider development needs of the city and Housing Market Area. Until such time as the trigger set out above is enacted the land will continue to remain within the Green Belt and will be subject to the associated policies within the Local Plan.</p> <p>Any development within the reserved areas that would prejudice future comprehensive development as described above will not be permitted.</p> <p>Upon enactment of this policy the Council may review its Local Development Scheme in accordance with Policy DS2 to support the development of cross boundary evidence or development plan documents (as appropriate).</p>	 <p>++ very positive + positive ? uncertain 0 neutral/no impact - negative -- very negative</p>
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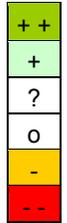
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Policy GE1 Green Infrastructure			
Objectives	<p>The Council will protect green infrastructure based on an analysis of existing assets, informed by the Green Infrastructure Study and Green Space Strategy by incorporating the Council's Green Space Standards, and characterisation assessments.</p> <p>New development proposals should make provision for green infrastructure to ensure that such development is integrated into the landscape and contributes to improvements in connectivity and public access, biodiversity, landscape conservation, design, archaeology and recreation.</p> <p>Coventry's existing and planned network of green infrastructure should be used as a way of adapting to climate change through the management and enhancement of existing habitats. This must be demonstrated through the creation of new habitats wherever possible to assist with species movement, to provide a source of locally grown food through allotments and community gardens, to provide sustainable and active travel routes for people, to provide shade and counteract the urban heat island effect, and to assist in improving public health and wellbeing.</p> <p>New development will be expected to maintain the quantity, quality and functionality of existing green infrastructure. Where quantity is not retained, enhancement to quality is expected. Where the opportunity arises, and in line with the city's most up-to-date Green Space Strategy, the Council will also expect new developments to enhance green infrastructure, and create and improve linkages between individual areas. Any development which is likely to adversely affect the integrity of a green corridor will be required to be expressly justified and where appropriate, mitigation measures put in place.</p> <p>A key element of Coventry's approach to green infrastructure will be the continued development of a network of green spaces, water bodies, paths and cycle ways, with priority given to those parts of the city where there is an identified deficiency of green space. De-culverting in the city centre should be considered, wherever possible, in accordance with the specific policies, set out in the City Centre Area Action Plan.</p> <p>Development must respect the importance of conservation, improvement and management of green infrastructure in order to complement and balance the built environment. A strategic network of green infrastructure already exists in the city, connecting natural heritage, green space, biodiversity, historic landscapes or other environmental assets, together with links to adjacent districts in Warwickshire and Solihull. This strategic network will be safeguarded and enhanced by: Not permitting development that compromises its integrity and that of the overall green infrastructure framework (including the Coventry/Oxford Canal); Using developer contributions to facilitate improvements to its quality, connectivity, multi-functionality and robustness; and Investing in enhancement and restoration where opportunities exist, and the creation of new resources where possible, such as linking green infrastructure to other forms of infrastructure.</p>		<p>very positive</p> <p>positive</p> <p>uncertain</p> <p>neutral/no impact</p> <p>negative</p> <p>very negative</p>
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Policy GE2 Green Infrastructure			
Objectives	<p>Development involving the loss of green space that is of value for amenity, recreational, outdoor sports and/or community use will not be permitted unless specifically identified as part of a strategic land use allocation, or it can be demonstrated that:</p> <ul style="list-style-type: none"> a) An assessment showing there is no longer a demand, or prospect of demand, for the recreational use of the site or any other green space use; b) A deficiency would not be created through its loss, measured against the most up-to-date Coventry Green Space standards. c) The loss resulting from any proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location of the city. <p>To support the proposed allocations at H2:19 and JE2:4 the following sites are allocated for the provision of new replacement sports pitches: Land at Charter Avenue (former Alderman Harris School site) Land east of Coundon Wedge Road</p>	 <p>very positive positive uncertain neutral/no impact negative very negative</p>	
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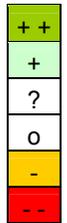
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Policy GE3: Biodiversity, Geological, Landscape and Archaeological Conservation			
Objectives	<p>Sites of Special Scientific Interest (SSSIs), Local Nature Reserves (LNRs), Ancient Woodlands, Local Wildlife and Geological Sites will be protected and enhanced. Proposals for development on other sites, having biodiversity or geological conservation value, will be permitted provided that they protect, enhance and/or restore habitat biodiversity. Development proposals will be expected to ensure that they:</p> <ul style="list-style-type: none"> a) lead to a net gain of biodiversity, where appropriate, by means of an approved ecological assessment of existing site features and development impacts; b) protect or enhance biodiversity assets and secure their long term management and maintenance, and; c) avoid negative impacts on existing biodiversity. <p>Where this is not possible, adequate mitigation measures must be identified. If mitigation measures are not possible on site, then compensatory measures involving biodiversity offsetting will be considered.</p> <p>Biodiversity will be encouraged particularly in areas of deficiency, in areas of development and sustainable urban extensions, and along wildlife corridors. Opportunities will be sought to restore or recreate habitats, or enhance the linkages between them, as part of the strategic framework for green infrastructure. Protected Species, and species and habitats identified in the Local Biodiversity Action Plan (LBAP), will be protected and conserved through a buffer or movement to alternative habitat. Identified important landscape features, including Historic Environment assets, trees protected by preservation orders, individual and groups of ancient trees and woodlands, ancient hedgerows, historic environmental assets and archaeological remains of value to the locality, will be protected against loss or damage and, in the case of archaeological remains, all practical measures must be taken for their assessment and recording.</p>		<p>very positive positive uncertain neutral/no impact negative very negative</p>
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Objectives	Policy GE4: Tree Protection													
	<p>Development proposals will be positively considered provided: there is no unacceptable loss of, or damage to, existing trees or woodlands during or as a result of development, any loss should be supported by a tree survey; trees not to be retained as a result of the development are replaced within a well-designed landscape scheme; and existing trees worthy of retention are sympathetically incorporated into the overall design of the scheme including all necessary measures taken to ensure their continued protection and survival during construction.</p> <p>Development proposals that seek to remove trees that are subject to 'Protection', without justification, will not be permitted.</p>	<table border="0"> <tr> <td style="text-align: center; width: 30px;">++</td> <td style="padding-left: 20px;">very positive</td> </tr> <tr> <td style="text-align: center;">+</td> <td style="padding-left: 20px;">positive</td> </tr> <tr> <td style="text-align: center;">?</td> <td style="padding-left: 20px;">uncertain</td> </tr> <tr> <td style="text-align: center;">0</td> <td style="padding-left: 20px;">neutral/no impact</td> </tr> <tr> <td style="text-align: center;">-</td> <td style="padding-left: 20px;">negative</td> </tr> <tr> <td style="text-align: center;">--</td> <td style="padding-left: 20px;">very negative</td> </tr> </table>	++	very positive	+	positive	?	uncertain	0	neutral/no impact	-	negative	--	very negative
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Policy Ac 1: Accessible Transport Network			
	<p>Development proposals which are expected to generate additional trips on the transport network should:</p> <p>Integrate with existing transport networks including roads, public transport and walking and cycling routes to promote access by a choice of transport modes.</p> <p>Consider the transport and accessibility needs of everyone living, working or visiting the city. Special attention should be paid to the needs of disabled people, young children, and people with special needs. Special attention should be paid to the needs of an aging population to make Coventry an Age Friendly City.</p> <p>Support the delivery of new and improved high quality local transport networks which are closely integrated into the built form. This includes networks which support access to strategic growth corridors. The scale of measures required should be appropriate to the scale and impact of the proposed development.</p> <p>Actively support the provision and integration of emerging and future intelligent mobility infrastructure, including electric vehicle charging points, Car Club schemes and bicycle hire.</p> <p>Further guidance will be contained in the Coventry Connected SPD.</p>		 <p>++ very positive + positive ? uncertain 0 neutral/no impact - negative -- very negative</p>
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Policy Ac 2: Network Capacity														
	<p>New development proposals which are predicted to have a negative impact on the capacity and/or safety of the highway network should:</p> <p>Mitigate and manage the traffic growth which they are predicted to generate to ensure that they do not cause unacceptable levels of traffic congestion, highway safety problems and poor air quality. Highway mitigation and management measures should focus firstly on demand management measures (Policy AC3) including the promotion of sustainable modes of travel, and secondly on the delivery of appropriate highway capacity interventions. Highway capacity interventions should be appropriate to the scale of development and expected impact and will be determined through the associated Transport Assessment.</p> <p>Developments should seek to support and accommodate, where appropriate, measures which facilitate enhancements to the wider transport network including those set out in the Infrastructure Delivery Plan.</p> <p>Be served by routes which are suitable for that purpose. Where this is not achievable, proposals will only be considered acceptable if appropriate interventions can be applied to suitably mitigate any negative impacts, including the construction of new access link roads.</p> <p>The Infrastructure Delivery Plan sets out specific measures and funding sources for the transport network improvements which are required to support the delivery of the Local Plan. The level of financial contributions that will be sought from developers for highways infrastructure will be set out in the Council's Community Infrastructure Levy Charging Schedule. The Council may also seek to secure the provision of transportation infrastructure through planning conditions and legal agreements.</p> <p>Further guidance will be contained in the Coventry Connected SPD</p>	<table border="1"> <tr><td>++</td><td>very positive</td></tr> <tr><td>+</td><td>positive</td></tr> <tr><td>?</td><td>uncertain</td></tr> <tr><td>0</td><td>neutral/no impact</td></tr> <tr><td>-</td><td>negative</td></tr> <tr><td>--</td><td>very negative</td></tr> </table>	++	very positive	+	positive	?	uncertain	0	neutral/no impact	-	negative	--	very negative
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Policy Ac 3: Demand Management			
Objectives	<p>Transport Assessments will be required for developments which generate significant additional trips on the transport network. Thresholds for their requirement will be based on locally determined criteria set out in the Coventry Connected SPD.</p> <p>Travel Plans will be required for new developments which generate significant additional traffic movements. Detailed guidance on the requirement for Travel Plans will be set out in the Coventry Connected SPD.</p> <p>Proposals for the provision of car parking associated with new development will be assessed on the basis of parking standards set out in Appendix 5.</p> <p>New development proposals which require changes to the highway network will be required to integrate with any existing UTMC and ITS infrastructure and strategy.</p> <p>Further guidance will be contained in the Coventry Connected SPD</p>	 <p>++ very positive + positive ? uncertain o neutral/no impact - negative -- very negative</p>	
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Policy Ac 4: Walking and Cycling		
	<p>Development proposals should incorporate appropriate safe and convenient access to walking and cycling routes. Where these links do not exist, new and upgraded routes will be required and these must appropriately link into established networks to ensure that routes are continuous. The expected type of provision will depend on the scale, use and location of the site. For larger developments, financial contributions may be required to support improved pedestrian and /or cycling routes on the wider network. Further details will be set out in the Coventry Connected SPD.</p> <p>A complementary network of connected Quiet Streets will be developed which include physical measures to control and restrict certain traffic movements and vehicle speeds to create an environment where walking and cycling are the preferred modes of transport. These will be prioritised through the development of SUE sites, but will also be considered within existing areas of the city which are negatively affected by increased traffic associated with new development. Financial contributions will be sought to deliver those proposals where the predicted impact of development traffic is significant and measures are needed to support an improved pedestrian and cycle environment.</p> <p>Further details will be set out in the Coventry Connected SPD.</p> <p>High quality cycle parking and associated facilities, such as changing, shower and storage, as part of new development proposals. The expected level of provision should be based on the cycle parking standards set out in the Appendix 5.</p>	<p>very positive positive uncertain neutral/no impact negative very negative</p>
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Comments:

"Make use of existing network" and "build more roads" are strongly linked. Making best use of roads is more sustainable, and has been done successfully in the past to construct bus lanes and cycle routes etc. This option is only feasible on some major routes and not on most of the roads around the proposed "expansion/development" areas located on the periphery of the City. Many of these roads are substandard and cannot be adapted to cope with heavy traffic hence new roads may be necessary.

"Improve Accessibility for All" was not answered as this statement should be applied in all cases.

"Provide more parking" received some positives mainly with regard to economy, employment and recreation. However, there are a number of caveats which recognise that over 30% of residents in Coventry do not have access to a car, hence would not benefit from more parking. There was some debate over whether parking does actually encourage car use and whether parking should be restricted in residential areas. Generally it was felt that managing parking at the destination was more effective and allowing parking in residential areas reduces on-street parking, and therefore improves the street scene.

More park and ride was generally seen as a benefit, but again had the caveat of only being of use for car owners. Many environmental benefits for having P&R, except a potential impact on the countryside due to a lack of brownfield sites for P&R, hence could be located in the green belt.

Policy Ac 5: Bus and Rapid Transit														
	<p>New major development proposals should have safe and convenient access to the existing bus network. In areas where this is not achieved, new development may be required to include the provision of appropriate bus infrastructure to enable services to be fully integrated into the development site. The level of need and expected provision will be determined through Transport Assessments and Travel Plans.</p> <p>The development of a mass rapid transit network will be supported to improve accessibility to existing and new major trip attractors. Major development proposals which are expected to create significant numbers of additional trips on the network, and are located in close proximity to a proposed rapid transit route should seek to make provision for those routes, including new infrastructure to facilitate the integration of the rapid transit network into the development site. The level of need and expected provision will be determined through Transport Assessments and Travel Plans.</p> <p>Further details will be set out in the Coventry Connected SPD and West Midlands Strategic Transport Plan.</p>	<table border="0"> <tr><td>++</td><td>very positive</td></tr> <tr><td>+</td><td>positive</td></tr> <tr><td>?</td><td>uncertain</td></tr> <tr><td>0</td><td>neutral/no impact</td></tr> <tr><td>-</td><td>negative</td></tr> <tr><td>--</td><td>very negative</td></tr> </table>	++	very positive	+	positive	?	uncertain	0	neutral/no impact	-	negative	--	very negative
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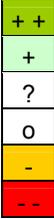
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Policy Ac 6: Rail														
	<p>Proposals which improve access to rail services will be supported. This includes:</p> <ul style="list-style-type: none"> Improved access to rail stations by all modes of travel Improved interchange facilities between rail and other modes Enhancements on the rail network which increase the frequency and quality of rail services <p>Measures which support the delivery of objectives in the Coventry rail strategy for improved rail connectivity will be supported. This includes measures which facilitate improved rail services and supporting rail infrastructure on the Coventry north-south corridor between Leamington, Kenilworth, Coventry, Bedworth, Nuneaton and Leicestershire.</p> <p>Proposals for additional local railway stations on the east-west and north/south rail corridor through Coventry will be supported where they are proven to be viable and in accordance with national, regional and local rail strategies.</p> <p>Further details are set out in the Coventry Connected SPD and Coventry Rail Investment Strategy.</p>	<table border="1"> <tr><td>++</td><td>very positive</td></tr> <tr><td>+</td><td>positive</td></tr> <tr><td>?</td><td>uncertain</td></tr> <tr><td>o</td><td>neutral/no impact</td></tr> <tr><td>-</td><td>negative</td></tr> <tr><td>--</td><td>very negative</td></tr> </table>	++	very positive	+	positive	?	uncertain	o	neutral/no impact	-	negative	--	very negative
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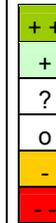
Policy Ac 7: Freight														
	<p>a. New developments must accommodate sufficient onsite lorry parking and turning facilities to facilitate deliveries and overnight lorry parking to minimise disruption and safety issues on the public highway.</p> <p>b. New development which supports rail and air freight will generally be supported where there is an evidence demand and this does not cause an unacceptable impact on the local highway network.</p>	<table border="1"> <tr><td>++</td><td>very positive</td></tr> <tr><td>+</td><td>positive</td></tr> <tr><td>?</td><td>uncertain</td></tr> <tr><td>o</td><td>neutral/no impact</td></tr> <tr><td>-</td><td>negative</td></tr> <tr><td>--</td><td>very negative</td></tr> </table>	++	very positive	+	positive	?	uncertain	o	neutral/no impact	-	negative	--	very negative
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Policy HWB1: Health Impact Assessments		
	<p>To ensure that new developments have a positive impact on the health and wellbeing of residents, the local planning authority will require a Health Impact Assessment of development proposals to a level of detail appropriate to its scale and character.</p> <p>A health impact assessment shall be carried out for all major developments as defined below:</p> <p>(a) the winning and working of minerals or the use of land for mineral-working deposits; (b) waste development; (c) the provision of dwellinghouses where— (i) the number of dwellinghouses to be provided is 10 or more; or (ii) the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i); (d) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or (e) development carried out on a site having an area of 1 hectare or more;</p> <p>To assist developers in the preparation of a Health Impact Assessment, further guidance will be provided in the form of an HIA Supplementary Planning Document.</p>	 <p>++ very positive + positive ? uncertain 0 neutral/no impact - negative -- very negative</p>
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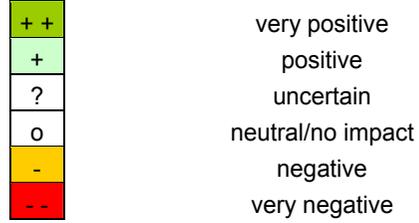
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Policy R1 Delivering Retail Growth		
The following sites/areas are allocated to support the provision of retail floor space across Coventry. These schemes are to be delivered in accordance with the specifications in this policy and other policies within this plan and the City Centre AAP as appropriate.		
Site	Proposed floor space (sq.m gross)	Details
City Centre	At least 70,100	A1-A5 uses of varying size (including bulky goods retail where appropriate) to be delivered through the Area Action Plan at City Centre South, City Centre North, Friargate, City Centre Supermarket and wider support for the creation of active frontages within the wider city centre. Also includes allowance for city centre vacant units.
New Eastern Green Major District Centre	Up to 10,000	To include approx. 5,000sq.m for a new superstore, 4,000sq.m of predominantly bulky goods retail and up to 1,000sq.m of small scale local provisions.
Cannon Park Major District Centre*	6,200	New A1 elements of the scheme should be restricted to convenience and bulky goods retail. Non A1 uses will be supported to encourage diversification of the centre, especially around A2-A5 uses.
New Keresley Local Centre south	1,500	Local centre to include a range of small scale units providing a range of local community uses and top up provisions.
New Keresley Local Centre north	1,000	Local centre to include a range of small scale units providing a range of community uses and top up provisions.
Brade Drive District Centre	1,000	New retail floor space should be focused around new A1-A5 uses and other non-retail uses. This should be delivered in small scale units to support local needs and help diversify the centre's current offer.
Jardine Crescent District Centre	500	New floor space to be provided as part of mixed use schemes within amended centre boundary A1-A5 uses to be provided, which reflect the existing character of the centre.
4. The comprehensive redevelopment of the Riley Square element of Bell green District Centre will be supported in accordance with an overarching Masterplan for the area.		
5. Further retail provision at Arena Park Major District Centre will not be supported during the plan period unless it is demonstrated that it will not directly impact on the city centre or is an essential element of supporting the wider parks tourism functions		
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Policy R2: Coventry City Centre – Development Strategy		
	<p>The city centre will continue to be developed and regenerated to ensure it is a truly world class city centre, leading in design, sustainability and culture. This will be achieved by:</p> <ul style="list-style-type: none"> Enhancement of its position as a focus for the entire sub-region and as a national and international destination to live, work and play; Enhancement of its retail and leisure offer to strengthen the city’s sub-regional role; Provision of high quality office space; Becoming a hub for education; Including a variety of places to live which cater for different needs; Preserving or enhancing the character and setting of the historic built landscape and the archaeological environment; A connected public realm including public squares and green spaces, easily accessible through the creation of desirable and legible pedestrian routes; Accessible for all; Providing an attractive and safe environment for pedestrians, cyclists and motorists; High quality sustainable built design; Continuing to develop a vibrant and attractive night time economy; Providing opportunities to improve health and wellbeing; Continuing to generate a balance and integration of the university with the wider city centre; and Recognising and preserving key views to the iconic three spires of St Michaels, Holy Trinity and Christchurch. <p>An Area Action Plan will be developed to help deliver this strategy and support and guide development within the city centre.</p>	
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	Policy R3: The Network of Centres
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<p>Policy R3: The Network of Centres</p> <p>To support the city centre, the Council will designate, enhance, maintain and protect a network of Centres consisting of Major District Centres, District Centres and Local Centres. These Centres will be the preferred locations for new shops, and other Main Town Centre and community facility uses which do not serve a city-wide catchment and are not more appropriately sited in the city centre.</p> <p>In all these Centres:</p> <ul style="list-style-type: none"> e) A balance will be sought between shops (Class A1), and other Main Town Centre and community uses in order to protect the vitality and viability of the centre as a whole; f) Proposals that reduce the concentration of A-class uses within a centre below 51% will not be approved g) a residential element will be promoted and encouraged, subject to the creation of a satisfactory residential environment and so long as it does not undermine the functionality of the centre; h) improvement to the environment and accessibility will be promoted and encouraged. <p>Major District Centres are shown on the Policies Map at:</p> <ul style="list-style-type: none"> h) Arena Park; i) Cannon Park; j) Brandon Road; and k) Eastern Green. <p>They will complement but not compete with the city centre and will contain a scale of development which is demonstrated to not impact negatively on the city centre and supports the needs of their part of the city (around a 3km radius) for:</p> <ul style="list-style-type: none"> l) a mix of bulk convenience and comparison shopping as well as service and catering uses; m) social, community and leisure uses including hotels; and n) offices. <p>District Centres are shown on the Policies Map at:</p> <ul style="list-style-type: none"> i) Ball Hill; j) Bell Green; k) Brade Drive; l) Daventry Road; m) Earlsdon; n) Foleshill; o) Jardine Crescent; p) Jubilee Crescent. <p>They will contain a scale of development which is demonstrated to not impact negatively on higher order centres and supports the needs of their district of the city (a 2km radius) for bulk convenience shopping as well as an element of comparison shopping, service and catering uses. Social, community, leisure and small scale office uses will also be acceptable.</p> <p>Local Centres are shown on the Policies Map at:</p> <table border="0"> <tr> <td style="vertical-align: top;"> <ul style="list-style-type: none"> z) Acorn Street; aa) Ansty Road; bb) Baginton Road; cc) Bannerbrook; dd) Barkers Butts Lane; ee) Binley Road; ff) Birmingham Road; gg) Broad Park Road; hh) Charter Avenue; ii) Far Gosford Street; jj) Green Lane; kk) Hillfields; </td> <td style="vertical-align: top;"> <ul style="list-style-type: none"> ll) Holbrook Lane; mm) Holyhead Road; nn) Keresley North; oo) Keresley Road; pp) Keresley South; qq) Longford; rr) Quorn Way; ss) Radford Road; tt) Station Avenue; uu) Sutton Avenue; vv) Walsgrave Road; ww) Willenhall; xx) Winsford Avenue. </td> </tr> </table> <p>They will contain an appropriate scale of development which is demonstrated to not impact negatively on higher order centres and supports their immediate locality (a 1km radius) for day-to-day convenience shopping and also some service and restaurant uses; and social, community and leisure uses. Small scale office uses will also be acceptable.</p>	<ul style="list-style-type: none"> z) Acorn Street; aa) Ansty Road; bb) Baginton Road; cc) Bannerbrook; dd) Barkers Butts Lane; ee) Binley Road; ff) Birmingham Road; gg) Broad Park Road; hh) Charter Avenue; ii) Far Gosford Street; jj) Green Lane; kk) Hillfields; 	<ul style="list-style-type: none"> ll) Holbrook Lane; mm) Holyhead Road; nn) Keresley North; oo) Keresley Road; pp) Keresley South; qq) Longford; rr) Quorn Way; ss) Radford Road; tt) Station Avenue; uu) Sutton Avenue; vv) Walsgrave Road; ww) Willenhall; xx) Winsford Avenue. 	<table border="1"> <tr><td>++</td></tr> <tr><td>+</td></tr> <tr><td>?</td></tr> <tr><td>0</td></tr> <tr><td>-</td></tr> <tr><td>--</td></tr> </table>	++	+	?	0	-	--	<p>very positive</p> <p>positive</p> <p>uncertain</p> <p>neutral/no impact</p> <p>negative</p> <p>very negative</p>
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Policy R4: Out of Centre Proposals														
<p>Proposals for retail and other Main Town Centre uses (including proposals for the expansion or re-configuration of existing uses and the variation of existing conditions) will not be permitted in out-of-centre locations unless they satisfy the Sequential Assessment and the Impact Test (where appropriate).</p> <p>Sequential Assessment A sequential assessment will be required for all retail and other Main Town Centre use proposals outside a defined centre and should be prepared in accordance with national guidance. This should have regard to the centres hierarchy set out in policy R3. Where in-centre options are exhausted, edge of centre locations (within 300m of a centre boundary) that are well connected and accessible to the centres themselves should also be considered in advance of out of centre sites. Only where parts 2 a) and b) of this policy are satisfied the Sequential Assessment should have regard to: iii. Vacant units within the city's out of centre retail warehouse parks; and iv. Local shopping parades, where the proposal is appropriate in terms of scale.</p> <p>Impact Test An Impact Test will be required for all retail and other Main Town Centre use proposals outside a defined centre that exceed 400sq.m (gross) floor space. The assessment of Impact should be prepared in accordance with national guidance and consider the potential impact on the vitality, viability, role and character of a defined centre(s) within the centres hierarchy (as set out in policy R3).</p> <p>Catchment areas for Sequential Assessments and Impact Tests will be considered on a case by case basis to reflect the specific proposals being considered.</p>		<table border="1"> <tr><td>++</td><td>very positive</td></tr> <tr><td>+</td><td>positive</td></tr> <tr><td>?</td><td>uncertain</td></tr> <tr><td>o</td><td>neutral/no impact</td></tr> <tr><td>-</td><td>negative</td></tr> <tr><td>--</td><td>very negative</td></tr> </table>	++	very positive	+	positive	?	uncertain	o	neutral/no impact	-	negative	--	very negative
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Policy R5: Retail Frontages Ground Floor Units in defined centres														
	<p>Proposals to use ground floor units within defined centres for non-A class uses will normally be permitted provided that:</p> <ul style="list-style-type: none"> the primary retail function of the centre would not be undermined in the context of Policy R3; the use would make a positive contribution to the overall role, vitality and viability of the centre; and the use is compatible with other Plan policies. <p>The impact of a proposal on the primary retail function of a centre will be determined on the basis of:</p> <ul style="list-style-type: none"> the location and prominence of the unit within the relevant frontage; the width of the frontage of the unit when compared to other units in the centre; the number and proximity of other units occupied by 'A' class uses; and compatibility of the proposal with nearby uses. 	<table border="1"> <tr><td>++</td><td>very positive</td></tr> <tr><td>+</td><td>positive</td></tr> <tr><td>?</td><td>uncertain</td></tr> <tr><td>o</td><td>neutral/no impact</td></tr> <tr><td>-</td><td>negative</td></tr> <tr><td>--</td><td>very negative</td></tr> </table>	++	very positive	+	positive	?	uncertain	o	neutral/no impact	-	negative	--	very negative
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Policy: R6 Restaurants, bars and Hot Food Takeaways														
	<p>Outlets should be located within defined centres and will normally be discouraged outside those locations.</p> <p>Proposals within defined centres will be permitted provided they: would not result in significant harm to the amenity of nearby residents or highway safety; would not result in harmful cumulative impacts due to the existence of any existing or consented proposed outlet; are in accordance with the emerging Hot Food Takeaway Supplementary Planning Document (in particular, proposals for A5 uses); and are compatible with other Plan Policies.</p>	<table border="1"> <tr><td>++</td><td>very positive</td></tr> <tr><td>+</td><td>positive</td></tr> <tr><td>?</td><td>uncertain</td></tr> <tr><td>o</td><td>neutral/no impact</td></tr> <tr><td>-</td><td>negative</td></tr> <tr><td>--</td><td>very negative</td></tr> </table>	++	very positive	+	positive	?	uncertain	o	neutral/no impact	-	negative	--	very negative
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Policy: CO1: New or improved social community and leisure premises														
<p>Proposals for social, community and leisure facilities will be considered through the following sequential approach:</p> <p>Designated centres to support the centres hierarchy; Where no suitable sites are available in a designated centre, an edge-of-centre location; Where no edge of centre sites are available, a site adjacent to other associated facilities including existing schools and educational facilities; Only where no suitable site can be identified having regard to points 1-3, will stand alone sites be supported, subject to:</p> <p>iv. The proposal addressing an unmet need within a local community; v. There being no significant adverse impact upon the role of a defined Centre; and vi. There being no material impact on neighbouring amenity;</p> <p>Proposals will be considered on the basis of:</p> <p>The appropriateness of their proposed location in relation to their scale and intended catchment; Compatibility with nearby uses; Accessibility by a choice of means of transport; and Compatibility with other Plan Policies.</p> <ul style="list-style-type: none"> Where proposals are in accordance with the approved Masterplans for Coventry University or the University of Warwick they will normally be approved subject to high quality design proposals 		<table border="1"> <tr><td>++</td><td>very positive</td></tr> <tr><td>+</td><td>positive</td></tr> <tr><td>?</td><td>uncertain</td></tr> <tr><td>0</td><td>neutral/no impact</td></tr> <tr><td>-</td><td>negative</td></tr> <tr><td>--</td><td>very negative</td></tr> </table>	++	very positive	+	positive	?	uncertain	0	neutral/no impact	-	negative	--	very negative
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Policy CO2: Re-Use of or Redevelopment of Facilities														
Objectives	<p>Proposals for the re-use or redevelopment of community premises for a use outside the scope of this policy will not be supported if:</p> <ul style="list-style-type: none"> There is an outstanding local need which could reasonably be met at that location; The site remains viable for existing uses or could be made viable through appropriate diversification of use; the proposal is not compatible with nearby uses. <p>In all cases consideration should be given to the suitability of the location for such facilities having regard to other Policies in this plan and its supporting documents</p> <p>Where replacement facilities are intended, they should:</p> <ul style="list-style-type: none"> continue to serve the community; be of appropriate scale and character; and be of high quality design. 	<table border="1"> <tr><td style="background-color: #90EE90;">++</td><td>very positive</td></tr> <tr><td style="background-color: #90EE90;">+</td><td>positive</td></tr> <tr><td style="background-color: #D3D3D3;">?</td><td>uncertain</td></tr> <tr><td style="background-color: #D3D3D3;">0</td><td>neutral/no impact</td></tr> <tr><td style="background-color: #FFD700;">-</td><td>negative</td></tr> <tr><td style="background-color: #FF0000;">--</td><td>very negative</td></tr> </table>	++	very positive	+	positive	?	uncertain	0	neutral/no impact	-	negative	--	very negative
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Policy CO3: Neighbourhood and Community Planning														
	<p>Where appropriate the Council will support communities in the preparation of: Parish Plans; Parish Design Statements, and; Neighbourhood Plans.</p> <p>When preparing these plans they must remain in accordance with national legislation, this Local Plan and any other city wide planning documents which support it.</p> <p>Where appropriate the Council will support the application and designation of land or buildings as Assets of Community Value.</p> <p>The Council will not support applications for Neighbourhood, Parish Plans or Assets of Community Value where they conflict with this Local Plan or supporting documentation.</p>	<table border="1"> <tr><td>++</td><td>very positive</td></tr> <tr><td>+</td><td>positive</td></tr> <tr><td>?</td><td>uncertain</td></tr> <tr><td>o</td><td>neutral/no impact</td></tr> <tr><td>-</td><td>negative</td></tr> <tr><td>--</td><td>very negative</td></tr> </table>	++	very positive	+	positive	?	uncertain	o	neutral/no impact	-	negative	--	very negative
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Policy H1: Housing Land Requirements														
	<p>Provisions will be made for a minimum of 24,600 additional dwellings between 2011 and 2031.</p> <p>This requirement is to be phased in the following way: 2011-2016 (first 5 years): 1,020 homes per annum 2017-2031 (following 15 years): 1,300 homes per annum</p> <p>Housing land will be released in order to maintain a continuous 5 year supply of housing land in order to support a varied and flexible land supply to support housing delivery and sustainable development. This will be monitored through the Council's Annual Monitoring Report.</p>	<table border="1"> <tr><td>++</td><td>very positive</td></tr> <tr><td>+</td><td>positive</td></tr> <tr><td>?</td><td>uncertain</td></tr> <tr><td>o</td><td>neutral/no impact</td></tr> <tr><td>-</td><td>negative</td></tr> <tr><td>--</td><td>very negative</td></tr> </table>	++	very positive	+	positive	?	uncertain	o	neutral/no impact	-	negative	--	very negative
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Policy H2: Housing Allocations														
	<p>Table 4.2 identifies the sites to be allocated for housing development alongside essential details that will support the principles of sustainable development. The development of all sites will also need to be considered in accordance with other policies in this Local Plan (and supporting documents) and the Infrastructure Delivery Plan, with the infrastructure needs of each site to be secured through legal agreements and/or the Council's CIL Charging Schedule where appropriate.</p> <p>The urban extension proposals at Keresley and Eastern Green are to be brought forward in full accordance with comprehensive Masterplans and in accordance with the Council's Urban Extension Design Guidance SPD.</p>	<table border="1"> <tr><td>++</td><td>very positive</td></tr> <tr><td>+</td><td>positive</td></tr> <tr><td>?</td><td>uncertain</td></tr> <tr><td>o</td><td>neutral/no impact</td></tr> <tr><td>-</td><td>negative</td></tr> <tr><td>--</td><td>very negative</td></tr> </table>	++	very positive	+	positive	?	uncertain	o	neutral/no impact	-	negative	--	very negative
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15				?	Sustainable modes of travel could be enhanced through new
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Site Ref	Site	Ward	Total Dwellings	GF / PDL	
H2:1	Keresley SUE	Bablake	3,100	GF	
H2:2	Eastern Green SUE	Bablake	2,250	GF	
H2:3	Walsgrave Hill Farm	Henley and Wyken	900	GF	
H2:4	Land at Whitmore Park, Holbrook Lane	Holbrook	730	PDL	
H2:5	Paragon Park	Foleshill	700	PDL	

H2:6	Land at Browns Lane	Bablake	475	GF
H2:7	Land at Sutton Stop	Longford	285	GF
H2:8	Land West of Cromwell Lane	Westwood	240	GF
H2:9	Land at London Road/Allard Way	Binley and Willenhall	200	GF
H2:10	Former Lyng Hall playing fields	Upper Stoke	185	mix
H2:11	Elms Farm	Henley	150	GF
H2:12	Site of LTI Factory, Holyhead Road	Sherborne	110	PDL
H2:13	Grange Farm	Longford	105	GF

H2:14	Former Transco site, Abbots Lane	Sherborne	100	PDL
H2:15	Land at Sandy Lane	Radford	90	PDL
H2:16	Land at Carlton Road / Old Church Road	Foleshill	85	PDL
H2:17	Nursery Sites, Browns Lane	Bablake	80	GF
H2:18	Former Mercia sports field	Foleshill	75	GF/PDL
H2:19	Land at Mitchell Avenue	Wainbody	50	GF
H2:20	Land at Durbar Avenue	Foleshill	45	PDL
H2:21	Woodfield school site, Stoneleigh Road	Wainbody	30	mix

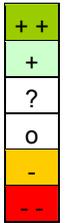
H2:22	Land at the Junction of Jardine Crescent and Jobs Lane	Woodlands	25	PDL
H2:23	Land west of Cryfield Heights, Gibbet Hill	Wainbody	20	GF
H2:24	Land West of Cheltenham Croft	Henley	15	GF

Policy H3: Provision of New Housing														
	<p>New residential development, including opportunities for self-build homes and starter homes, must provide a high quality residential environment which assists in delivering urban regeneration or contributes to creating sustainable communities and which overall enhances the built environment.</p> <p>In addition, opportunities to provide self-build homes and starter homes will be considered acceptable as part of limited infill within existing ribbon developments within the Green Belt where it is demonstrated that they do not have an adverse impact upon the openness and integrity of the wider Green Belt.</p> <p>A suitable residential environment will include safe and appropriate access, have adequate amenity space and parking provision and be safe from environmental pollutants such as land contamination, excessive noise and air quality issues.</p> <p>New developments should also be: within 2km radius of local medical services; within 1.5km of a designated centre within the city hierarchy (policy R3); within 1km radius of a primary school; within 1km of indoor and outdoor sports facilities; and within 400m of a bus stop within 400m of publicly accessible green space.</p> <p>Proposals should also be in conformity with all other relevant plan policies.</p> <p>The delivery of self-build homes will be supported where they meet the criteria of this policy</p> <p>Developer Contributions via Community Infrastructure Levy and/or Section 106 Obligations may be required to address any deficiency.</p>	<table border="1"> <tr><td>++</td><td>very positive</td></tr> <tr><td>+</td><td>positive</td></tr> <tr><td>?</td><td>uncertain</td></tr> <tr><td>o</td><td>neutral/no impact</td></tr> <tr><td>-</td><td>negative</td></tr> <tr><td>--</td><td>very negative</td></tr> </table>	++	very positive	+	positive	?	uncertain	o	neutral/no impact	-	negative	--	very negative
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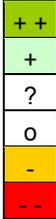
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Policy H4: Securing a Mix of Housing														
	<p>The Council will require proposals for residential development to include a mix of market housing which contributes towards a balance of house types and sizes across the city in accordance with the latest Strategic Housing Market Assessment.</p> <p>In assessing the housing mix in residential schemes the Council may take into account the following circumstances where it may not be appropriate to provide the full range of housing types and sizes in accordance with the latest Strategic Housing Market Assessment:</p> <ul style="list-style-type: none"> a) physical constraints, such as those associated with small sites of less than 5 houses and conversion schemes, where opportunities for a range of different house types are limited; b) locational issues, such as highly accessible sites within or close to a designated centre where larger homes and low/ medium densities may not be appropriate; c) sites with severe development constraints where housing mix may impact on viability; d) sites where particular house types and/ or building forms may be required in order to sustain or enhance the setting of a heritage asset; and e) developments in parish or neighbourhood plan areas, where there is an up-to-date local housing needs assessment which provides a more appropriate indication of housing need. 	<table border="0"> <tr><td>++</td><td>very positive</td></tr> <tr><td>+</td><td>positive</td></tr> <tr><td>?</td><td>uncertain</td></tr> <tr><td>o</td><td>neutral/no impact</td></tr> <tr><td>-</td><td>negative</td></tr> <tr><td>--</td><td>very negative</td></tr> </table>	++	very positive	+	positive	?	uncertain	o	neutral/no impact	-	negative	--	very negative
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Policy H5: Managing Existing Housing Stock		
	<p>Where appropriate, the existing housing stock will be renovated and improved, in association with the enhancement of the surrounding residential environment and to meet local housing needs. Where appropriate these works should include opportunities to improve energy efficiency of existing homes.</p> <p>The conversion of buildings from non-residential to residential use will be supported providing a satisfactory residential environment is created and the proposals are compatible with other Plan Policies.</p> <p>Demolition and redevelopment schemes will be supported where existing housing stock does not meet local housing market needs, and its redevelopment represents the principles of sustainable development.</p>	 <p>++ very positive + positive ? uncertain o neutral/no impact - negative -- very negative</p>
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Policy H6: Affordable Housing		
	<p>New residential schemes of 25 dwellings or more (excluding student accommodation), or more than 1ha, will be expected to provide 25% of all dwellings as affordable homes.</p> <p>Proposals within areas of existing high concentration (shown on Figure 4.1) should make provisions as follows: 10% Social/Affordable Rental provision 15% Intermediate Provision</p> <p>Proposals within areas of existing medium concentration (shown on Figure 4.1) should make provisions as follows: 12.5% Social/Affordable Rental provision 12.5% Intermediate Provision</p> <p>Proposals within areas of existing low concentration (shown on Figure 4.1) should make provisions as follows: 15% Social/Affordable Rental provision 10% Intermediate Provision</p> <p>Where the specified level of affordable housing cannot be provided, robust evidence must be presented to justify a reduced or alternative form of contribution.</p> <p>Through appropriate design standards, new affordable housing units must be appropriately integrated within the development and with other affordable homes adjoining the site.</p> <p>Through engagement with the Council, Registered Providers, and having regard to the recommendations of the SHMA, developers should ensure that affordable housing contributions comprise dwellings of the right size, type, affordability and tenure to meet local needs.</p>	 <p>++ very positive + positive ? uncertain o neutral/no impact - negative -- very negative</p>
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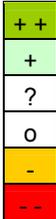
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Policy H7: Gypsy and Traveller Accommodation														
	<p>Provision will be made for at least 16 permanent pitches for Gypsies and Travellers through the re-modelling of the site at Siskin Drive, Coventry (as identified on the Policies Map).</p> <p>Proposals for additional permanent and temporary Gypsy and Traveller sites outside of the Green Belt (and within it, if very special circumstances have been demonstrated) will be assessed against the following criteria:</p> <p>The sites use should not conflict with other development plan policies or national planning policy relating to issues such as risk from flooding, contamination or agricultural land quality; Sites should be located within reasonable travelling distance of local services and community facilities, including a primary school; The site should enable safe and convenient pedestrian and vehicle access to and from the public highway, and adequate space for vehicle parking, turning and servicing; The site should be served by adequate water and sewerage connections, power and waste facilities; The use of the site should not have an adverse impact on the amenities of occupiers of nearby properties or the appearance or character of the area in which it would be situated.</p>	<table border="1"> <tr><td>++</td><td>very positive</td></tr> <tr><td>+</td><td>positive</td></tr> <tr><td>?</td><td>uncertain</td></tr> <tr><td>o</td><td>neutral/no impact</td></tr> <tr><td>-</td><td>negative</td></tr> <tr><td>--</td><td>very negative</td></tr> </table>	++	very positive	+	positive	?	uncertain	o	neutral/no impact	-	negative	--	very negative
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Policy H8: Care Homes, Supported Housing, Nursing Homes and Older Persons accommodation														
	<p>Proposals for care homes, nursing homes and other specialist and supported forms of housing for the elderly and those requiring care will be encouraged in areas that are accessible by a choice of means of transport and that are situated in close proximity to key local services.</p> <p>Proposals should be of a high quality and design and be compatible with the character of the surrounding area.</p>	<table border="1"> <tr><td>++</td><td>very positive</td></tr> <tr><td>+</td><td>positive</td></tr> <tr><td>?</td><td>uncertain</td></tr> <tr><td>0</td><td>neutral/no impact</td></tr> <tr><td>-</td><td>negative</td></tr> <tr><td>--</td><td>very negative</td></tr> </table>	++	very positive	+	positive	?	uncertain	0	neutral/no impact	-	negative	--	very negative
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Policy H9: Residential Density		
	<p>Residential development, including conversions, must make the most effective and efficient use of land whilst ensuring compatibility with the quality, character and amenity of the surrounding area.</p> <p>Therefore, outside of the Ring Road (The A4053) a minimum of 35 dwellings per hectare (net) should be provided on Previously Developed Land.</p> <p>Developments inside the Ring Road (The A4053) should aim to achieve a minimum of 200 dwellings per hectare (net).</p> <p>Developments on Greenfield sites should achieve a minimum of 30 dwellings per hectare (net).</p>	 <p>++ very positive + positive ? uncertain 0 neutral/no impact - negative -- very negative</p>
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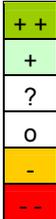
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Policy H10: Student Accommodation														
	<p>Purpose-built student accommodation and conversions of residential and non-residential properties to student accommodation will be encouraged where:</p> <p>It is directly accessible from the universities: Such development can play a part in the regeneration of the immediate neighbourhoods without disadvantage to local services. It will not materially harm the amenities of occupiers of nearby properties; and It will reflect and support or enhance the appearance and character of the area.</p> <p>To support the intended use of the proposals the specified tenure will be secured through a Section 106 agreement.</p>	<table border="1"> <tr><td>++</td><td>very positive</td></tr> <tr><td>+</td><td>positive</td></tr> <tr><td>?</td><td>uncertain</td></tr> <tr><td>0</td><td>neutral/no impact</td></tr> <tr><td>-</td><td>negative</td></tr> <tr><td>--</td><td>very negative</td></tr> </table>	++	very positive	+	positive	?	uncertain	0	neutral/no impact	-	negative	--	very negative
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Policy H11: Homes in Multiple Occupation (HiMO's)														
	The development of purpose built HiMO's or the conversion of existing homes or non-residential properties to large HiMO's will not be permitted in areas where the proposals would materially harm: the amenities of occupiers of nearby properties (including the provision of suitable parking provisions); the appearance or character of an area; and local services	<table border="1"> <tr><td>++</td><td>very positive</td></tr> <tr><td>+</td><td>positive</td></tr> <tr><td>?</td><td>uncertain</td></tr> <tr><td>0</td><td>neutral/no impact</td></tr> <tr><td>-</td><td>negative</td></tr> <tr><td>--</td><td>very negative</td></tr> </table>	++	very positive	+	positive	?	uncertain	0	neutral/no impact	-	negative	--	very negative
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Policy EM1: Planning for Climate Change Adaptation		
	<p>All development is required to be designed to be resilient to, and adapt to the future impacts of, climate change through the inclusion of the following adaptation measures: using layout, building orientation, construction techniques and materials and natural ventilation methods to mitigate against rising temperatures; optimising the use of multi-functional green infrastructure for urban cooling, local flood risk management and shading, incorporating water efficiency measures, encouraging the use of grey water and rainwater recycling, minimising vulnerability to flood risk by locating development in areas of low flood risk and including mitigation measures including SUDS in accordance with Policy EM4; Where applicable, maintain and enhance the canal network to reflect the canals' role in urban cooling. Applicants will be required to set out how the requirements of the policy have been complied with including justification for why the above measures have not been incorporated. Where justification is based on viability, this will need to be clearly demonstrated through an open book financial appraisal.</p>	 <p>very positive positive uncertain neutral/no impact negative very negative</p>
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Policy EM2: Building Standards														
	<p>New development should be designed and constructed in line with the relevant Building Regulations and to sustainability standards which:</p> <ul style="list-style-type: none"> Maximise energy efficiency and the use of low carbon energy; Conserve water and minimise flood risk; Consider the type and source of the materials used; Minimise waste and maximise recycling during construction and operation; Are flexible and adaptable to future occupier needs; and Incorporate measures to enhance biodiversity value. <p>In meeting the carbon reduction targets set out in Building Regulations, the Council will expect development to be designed in accordance with the following energy hierarchy:</p> <ul style="list-style-type: none"> Reduce energy demand through energy efficiency measures Supply energy through efficient means (i.e. low carbon technologies) Utilise renewable energy generation <p>Applicants will be required to submit a Sustainable Buildings Statement to demonstrate how the requirements of Climate Change policies in this Plan and any other relevant local climate change strategies have been met.</p> <p>A comprehensive update of the Delivering a More Sustainable City SPD incorporating the approach to Building Sustainability Standards will be developed.</p>	<table border="0"> <tr> <td style="text-align: center;">++</td> <td>very positive</td> </tr> <tr> <td style="text-align: center;">+</td> <td>positive</td> </tr> <tr> <td style="text-align: center;">?</td> <td>uncertain</td> </tr> <tr> <td style="text-align: center;">0</td> <td>neutral/no impact</td> </tr> <tr> <td style="text-align: center;">-</td> <td>negative</td> </tr> <tr> <td style="text-align: center;">--</td> <td>very negative</td> </tr> </table>	++	very positive	+	positive	?	uncertain	0	neutral/no impact	-	negative	--	very negative
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Policy EM3 Renewable Energy Generation														
	Proposals for the installation of renewable and low carbon energy technologies, including both building-integrated and standalone schemes will be promoted and encouraged, provided that: any significant adverse impacts can be adequately mitigated; where biofuels are to be utilised, they are obtained from sustainable sources and transportation distances are minimised; any energy centre is suitably located and designed to a high quality such that it is sympathetically integrated with its surroundings; and all proposals are consistent with any relevant Policies in this Plan.	<table border="1"> <tr><td>++</td><td>very positive</td></tr> <tr><td>+</td><td>positive</td></tr> <tr><td>?</td><td>uncertain</td></tr> <tr><td>o</td><td>neutral/no impact</td></tr> <tr><td>-</td><td>negative</td></tr> <tr><td>--</td><td>very negative</td></tr> </table>	++	very positive	+	positive	?	uncertain	o	neutral/no impact	-	negative	--	very negative
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Policy EM4 Flood Risk Management		
<p>All major developments must be assessed in respect of the level of flood risk. If development in areas at risk of flooding is the only option following the application of the sequential test, it will only be permitted where the following criteria are met: the type of development is appropriate to the level of flood risk associated with its location with reference to Coventry's Strategic Flood Risk Assessment (SFRA) flood zone maps and advice on appropriate uses within these zones from the Environment Agency and/or Lead Local Flood Authority; it can be demonstrated that no suitable alternative sites are available in an area of lower risk; it is provided with the appropriate minimum standard of flood defence (including suitable warning and evacuation procedures) which can be maintained for the lifetime of the development; it does not impede flood flows, does not increase the flood risk on site or elsewhere or result in a loss of floodplain storage capacity; it would not be subject to regular flooding; in the case of dwellings, it is evident that as a minimum, safe, dry pedestrian access would be available to land not at high risk, and; in the case of essential infrastructure, access must be guaranteed and must be capable of remaining operational during all flooding events. A sequential, risk-based approach to the location of suitable development will be undertaken by the Council based on the Environment Agency's latest flood maps, SFRA flood zones and Vulnerability Classification to steer new development to areas with the lowest probability of flooding avoiding, where possible, flood risk to people and property and managing any residual risk. The Exception Test (for use when there are large areas in Flood Zones 2 and 3, where the Sequential Test alone cannot deliver acceptable sites, but where some continuing development is necessary) will apply where development will provide wider sustainability benefits that outweigh flood risk, fully informed by a Flood Risk Assessment (FRA) which indicates that development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible reducing flood risk overall. Land that is required for current and future flood management will be safeguarded from development. Where development is supported as an exception to this policy within high risk areas, applicants will need to demonstrate that they strictly comply with criteria b), c), d), and g) above. Applicants will be required to demonstrate how they comply with this policy by way of a Flood Risk Assessment, appropriate to the scale and nature of the development proposed, where the development is: within a river floodplain, as defined by the Coventry SFRA indicative flood zone maps; within or adjacent to any watercourse; adjacent to, or including, any flood bank or other flood control structure; within an area where there may be drainage problems; likely to involve the culverting or diverting of any watercourse, or of such size and nature relative to the receiving watercourse/drainage system that there could be an increase in rate or volume of surface water run-off from the area.</p>		<p>++ very positive + positive ? uncertain 0 neutral/no impact - negative -- very negative</p>
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Policy EM5 Sustainable Drainage Systems (SuDS)		
	<p>All development should consider SuDS unless it can be clearly demonstrated there are practical reasons for not doing so and should ensure that surface water runoff is managed as close to its source as possible. SuDS are the preferred way of managing and conveying surface water. The developer will consider and demonstrate how the following hierarchy for the discharge of surface water from a site.</p> <p>Discharge by infiltration and water reuse technologies Discharge to a watercourse allied with water reuse technologies Discharge to surface water sewer allied with water reuse technologies.</p> <p>The developer will carry out infiltration tests and a ground water risk assessment to demonstrate whether infiltration is possible and that ground water would not be polluted to Environment Agency and Lead Local Flood Authority requirements. Where it is proven that infiltration is not possible, allied with water reuse technologies, surface water should be discharged into a watercourse (in agreement with the Environment Agency and Lead Local Flood Authority) at a rate no greater than greenfield runoff. If there is no watercourse available then, allied with water reuse technologies, surface water should be discharged to a surface water sewer at a rate no greater than greenfield runoff.</p> <p>In exceptional circumstances, where a sustainable drainage system cannot be provided, it must be demonstrated that: it is not possible to incorporate sustainable drainage systems, and; an acceptable means of surface water disposal is provided which does not increase the risk of flooding or give rise to environmental problems and improves on the current situation.</p> <p>The long-term maintenance arrangements for all SuDS must be agreed with the relevant risk management authority. A separate SPD will be produced to detail how SuDS schemes will be designed in accordance with the technical standards set out by the Coventry Lead Local Flood Authority and by the Department for Environment, Food and Rural Affairs.</p>	 <p>++ very positive + positive ? uncertain 0 neutral/no impact - negative -- very negative</p>
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Policy EM6 Air Quality		
	<p>Major development schemes should promote a shift to the use of sustainable low emission transport (electric vehicles and vehicles that use biofuels) to minimise the impact of vehicle emissions on air quality. Development will be located where it is accessible to support the use of public transport, walking and cycling. All major development proposals should be suitably planned to design out any adverse impact on air quality.</p> <p>Major Development proposals will require the submission of an air quality assessment, as they may lead to a significant deterioration in local air quality resulting in unacceptable effects on human health, local amenity or the natural environment. The air quality assessment should address:</p> <p>a) The existing background levels of air quality; b) The cumulative background levels of air quality (related to the cumulative impact of developments in an area); c) The feasibility of any measures of mitigation that would prevent the national air quality objectives being exceeded, or would reduce the extent of the air quality deterioration.</p> <p>A Supplementary Planning Document will be developed to support this Policy.</p>	<p>very positive positive uncertain neutral/no impact negative very negative</p>
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17	+	
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Policy EM7 Waste Management														
	<p>The Council's Waste Management Strategy will be supported through:</p> <ul style="list-style-type: none"> a) encouraging less consumption of raw materials through the reduction and re-use of waste products; b) a requirement for development proposals to incorporate adequate storage for waste and recycling services along with safe access for collection vehicles; c) encouragement of new methods of processing and recycling at waste management sites; d) a requirement for development proposals to incorporate adequate storage for waste and recycling services along with safe access for collection vehicles; and e) supporting recycling proposals for aggregate materials subject to the criteria in part 2 of this policy. <p>Proposed new or expanded waste management facilities will be assessed against the following criteria:</p> <ul style="list-style-type: none"> a) The effect of the proposed waste facility upon the environment and neighbouring land uses; b) The impact of traffic generated by the proposal and the availability of alternative transit modes, such as rail and waterways; c) The need for pollution control measures appropriate to the type of waste to be processed or handled; d) The impact of proposals on residential amenity. New waste facilities will not normally be approved adjacent to existing housing and proposals for anaerobic digestion will not be approved in close proximity to existing housing; e) The effect of proposals on aircraft safety; and f) The design of the proposal. Careful consideration should be given to the need to minimise environmental and visual impact. Wherever feasible, waste operations should be enclosed within buildings or sealed structures in order to minimise impacts on adjacent uses from noise, ordure, vermin and wildlife. Proposals advocating open air unenclosed storage of organic odour producing material will not be supported. <p>Proposals will be supported where it is demonstrated that these criteria are satisfied.</p> <p>Development proposals should demonstrate measures to minimise the generation of waste in the construction, use and life of buildings and promote more sustainable approaches to waste management, including the reuse and recycling of construction waste and the promotion of layouts and designs that provide adequate space to facilitate waste storage, reuse, recycling and composting.</p>	<table border="0"> <tr> <td style="text-align: center;">++</td> <td>very positive</td> </tr> <tr> <td style="text-align: center;">+</td> <td>positive</td> </tr> <tr> <td style="text-align: center;">?</td> <td>uncertain</td> </tr> <tr> <td style="text-align: center;">0</td> <td>neutral/no impact</td> </tr> <tr> <td style="text-align: center;">-</td> <td>negative</td> </tr> <tr> <td style="text-align: center;">--</td> <td>very negative</td> </tr> </table>	++	very positive	+	positive	?	uncertain	0	neutral/no impact	-	negative	--	very negative
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Comments:

The scale and type of waste and recycling facilities varies considerably from kerbside recycling to the construction of Waste Transfer Stations and Materials Recycling Facilities. The appraisal was therefore not easy to assess given the undefined recycling facility proposed at each location and thus the appraisal would depend largely on the type of facility proposed.

In terms of small scale localised, householder recycling facilities, it was considered that the highest scored locations are sites within City Centre and Local Centres. With expanding City Centres there will be potential requirement for increased recycling facilities or expansion of its kerbside recycling services. Local waste recycling facilities also need to be accessible to the local communities. Local initiatives such as education and community involvement should promote recycling through provision of recycling storage and community recycling services. The distance from source of waste to waste facilities should be kept to a minimum – the more 'local' the lower the transport related impacts will be. Waste recycling facilities within the city centre and local centres will meet key objectives by contributing to the local needs and sustainability.

In terms of larger recycling facilities, considerable negative impacts would be felt through the location of such facilities in the city centre with the potential to create noise, smell and visual nuisance. Their compatibility with nearby uses would be poor and in view of the land prices in the central location, such a facility is unlikely to be competitive with residential, commercial and other uses.

Larger facilities are likely to be more appropriate in sustainable development terms located on employment sites or transport routes, where their proximity to residential amenity is less. Compatibility with surrounding land uses will be more appropriate and pollution effects concentrated, however the processes would result in significant highway movement. Nevertheless environmental gains are likely

Policy EM8 Safeguarding Mineral Resources		
	Mineral Safeguarding Areas are defined for mineral reserves that are considered to be of current or future economic importance. Where developments are proposed in these areas, the application needs to acknowledge the presence of these mineral reserves. The extent of Mineral Safeguarding Areas are defined on the Policies Map.	<p>++ very positive + positive ? uncertain 0 neutral/no impact - negative -- very negative</p>
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Policy JE1: Overall Economy and Employment Strategy														
	<p>The Council will work positively and proactively with the business community in the city, inward investors, the city's two Universities, key public sector employers, the CWLEP and neighbouring local authorities to support sustainable economic growth and job creation. In this regard the Council will:</p> <p>Promote continued diversification of the city's economic base, particularly through supporting the expansion of companies operating in growth sectors and partnership working with the city's Universities to promote innovation;</p> <p>Ensure that job opportunities arising from employment development are accessible to all of the city's working age residents, particularly priority groups and those in the most deprived areas of the city;</p> <p>Provide for a readily available range and choice of employment sites and premises to meet projected need over the Plan period related to growth of the city's population and the pivotal role of the city in the CWLEP's ambitious growth agenda for the sub-region;</p> <p>Safeguard existing employment sites and premises from being lost to non-employment uses unless certain exceptional circumstances are demonstrated;</p> <p>Support companies in retaining, expanding and/or relocating their headquarters operations within the city.</p> <p>Seek to direct office development to locations in the city centre and other defined centres with new large scale office development focused on the city centre's Friargate Business District;</p> <p>Ensure that new research and development, light industrial, general industrial and storage/distribution developments are appropriately sited and designed to maximise their accessibility by a choice of means of transport, have an acceptable impact on the highway network and to minimise the potential for environmental conflict with nearby sensitive land uses;</p> <p>Support tourism/visitor related development in respect of Coventry city centre, the Ricoh Arena and the Coventry and Warwick University Campuses.</p>	<table border="1"> <tr><td>++</td><td>very positive</td></tr> <tr><td>+</td><td>positive</td></tr> <tr><td>?</td><td>uncertain</td></tr> <tr><td>o</td><td>neutral/no impact</td></tr> <tr><td>-</td><td>negative</td></tr> <tr><td>--</td><td>very negative</td></tr> </table>	++	very positive	+	positive	?	uncertain	o	neutral/no impact	-	negative	--	very negative
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Comments:

Based on our *reduced* appraisal, the preferable location for new employment to be sustainable is:

1. City Centre (11 +'s)
2. Other Centre (9 +'s)
3. Along a Transport Route (6 +'s)
4. Same location as new housing (6 +'s)
5. Edge of City Boundary (2 +'s)

The group was unable to reach consensus on sustainability objectives 8 and 9. Whilst one opinion considered that *any* new employment would have a negative impact on biodiversity, the historic environment, green spaces etc, it was also considered that, for example, directing employment to the city centre would

preserve biodiversity, green spaces, green belt in the countryside locations and hence be beneficial in a city centre location. From the stance that employment growth is certain to occur, it was argued that the harm to biodiversity in one area, may have a preservation impact on other important areas. Agreement was however not reached in the group and hence these two indicators were not incorporated in our sustainability appraisal.

All locations are likely to result in significant positive impacts for Coventry's economy, providing good access to employment opportunities and good training opportunities. The greatest benefit is likely to be from locating new employment in the city centre (B1), given the existing range of functions and facilities, with the least positive impact on the edge of city boundary (B3) and constructing new employment in the same location as new housing.

It is noted that establishing employment in the same location as new housing (B5) returned a relatively low score on the sustainability matrix. Whilst in theory locating housing and employment together is positive in sustainability terms, we assessed the proposal practically rather than theoretically. It is the case that a significant range of jobs would be required to be provided alongside the homes in order for the people to live where they work. It is apparent that many people do not live where they work because their skills are not appropriate to local employment. An example put forward was the residents of Canley are unlikely to work in Westwood.

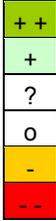
The success in sustainability terms of locating new employment with new housing depends largely on the type and range of employment opportunities provided.

Policy JE2: Provision of Employment Land and Premises																																																							
<p>A total of 101ha of land are allocated for employment development within the city's administrative area. The allocations are as specified below together with details of the type of employment development that will be promoted on each of these sites.</p> <table border="1"> <thead> <tr> <th>Site Ref</th> <th>Site</th> <th>Ward/LPA</th> <th>Area Ha (Hectares)</th> <th>Employment Type</th> </tr> </thead> <tbody> <tr> <td>JE2:1</td> <td>Friargate (part of mixed use site)</td> <td>St. Michael's</td> <td>7</td> <td>Primarily B1a</td> </tr> <tr> <td>JE2:2</td> <td>Lyons Park</td> <td>Bablake</td> <td>16.5</td> <td>B1, B2 & B8</td> </tr> <tr> <td>JE2:3</td> <td>Whitley Business Park</td> <td>Cheylesmore</td> <td>26.5</td> <td>B1b&c, B2 & B8</td> </tr> <tr> <td>JE2:4</td> <td>Land at Baginton Fields and South East of Whitley Business Park</td> <td>Cheylesmore</td> <td>25</td> <td>B1b&c, B2 & B8</td> </tr> <tr> <td>JE2:5</td> <td>A45 Eastern Green (part of mixed use site)</td> <td>Bablake</td> <td>15</td> <td>B1b&c, B2 & B8</td> </tr> <tr> <td>JE2:6</td> <td>Whitmore Park (part of mixed use site)</td> <td>Holbrook</td> <td>8</td> <td>B1b&c, B2 & B8</td> </tr> <tr> <td>JE2:7</td> <td>Durbar Avenue (part of mixed use site)</td> <td>Foleshill</td> <td>1.5</td> <td>B1b&c & B8</td> </tr> <tr> <td>JE2:8</td> <td>Former Electric Power Station Land off Aldermans Green Road (part of mixed use site)</td> <td>Longford</td> <td>1.5</td> <td>B1c & B8</td> </tr> <tr> <td colspan="3">TOTAL</td> <td>101</td> <td></td> </tr> </tbody> </table> <p>The Friargate, A45 Eastern Green, Whitmore Park and Durbar Avenue employment allocations are to be progressed as part of wider mixed-use re-development schemes and should be supported by comprehensive Masterplans.</p> <p>A minimum supply of new employment land on a 5 year rolling cycle of 58ha is required to be available at all times in Coventry and on sites outside but adjacent to the city's administrative boundary (the "Minimum Reservoir"). This will be achieved by using a combination of newly allocated and recycled land. A balanced portfolio of employment land supply offering a choice of sites will be maintained, with details of need and supply set out in the Annual Monitoring Report.</p>					Site Ref	Site	Ward/LPA	Area Ha (Hectares)	Employment Type	JE2:1	Friargate (part of mixed use site)	St. Michael's	7	Primarily B1a	JE2:2	Lyons Park	Bablake	16.5	B1, B2 & B8	JE2:3	Whitley Business Park	Cheylesmore	26.5	B1b&c, B2 & B8	JE2:4	Land at Baginton Fields and South East of Whitley Business Park	Cheylesmore	25	B1b&c, B2 & B8	JE2:5	A45 Eastern Green (part of mixed use site)	Bablake	15	B1b&c, B2 & B8	JE2:6	Whitmore Park (part of mixed use site)	Holbrook	8	B1b&c, B2 & B8	JE2:7	Durbar Avenue (part of mixed use site)	Foleshill	1.5	B1b&c & B8	JE2:8	Former Electric Power Station Land off Aldermans Green Road (part of mixed use site)	Longford	1.5	B1c & B8	TOTAL			101		<p>++ very positive + positive ? uncertain 0 neutral/no impact - negative -- very negative</p>
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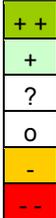
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Policy JE3: Non-Employment Uses on Employment Land		
	<p>Proposals for the redevelopment in whole or in part of employment land for non-employment purposes will not be permitted unless it can be demonstrated that the part(s) of the site where non-employment development is proposed are:</p> <p>No longer suitable for employment use bearing in mind their physical characteristics, access arrangements and/or relationship to neighbouring land-uses and there is evidence of unsuccessful active and substantial marketing of the site for employment use using a variety of media which supports this; or It would not be financially viable to re-use or re-develop the land or buildings on the land in whole or in part for employment purposes; or The non-employment development proposed would be used for purposes which are clearly ancillary to and will support the operations of a primary employment use on the land; or The non-employment development would generate significant employment gains which are of sufficient weight to justify the loss of employment land.</p> <p>In addition to at least one of the above criteria being satisfied it will also need to be demonstrated that:</p> <p>The potential of the site to contribute to the employment land requirements of the city over the plan period is not significant; and The proposal would not significantly compromise the viability or deliverability of other adjacent employment land or land allocated in this Plan for employment development; and The proposal will not have an unacceptable adverse impact on the continuing operation of any nearby existing businesses.</p> <p>Planning applications to which this Policy applies should be accompanied by written evidence to demonstrate that the proposed development satisfies the exceptions criteria highlighted above.</p> <p>This Policy applies to land which is currently in use or was last used for employment purposes unless such land has been allocated in this Plan wholly for non-employment use.</p>	<p>very positive positive uncertain neutral/no impact negative very negative</p>
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Policy JE4: Location of Office Development		
	<p>New office development (including change of use of buildings to provide office accommodation and the expansion of existing office uses) should normally be sited within Coventry city centre or other defined centres (as defined on the Policies Map).</p> <p>The Friargate site within Coventry city centre is the Council's preferred location for new large scale office development. This site is allocated for primarily B1 office development under Policy JE2.</p> <p>Proposals for new office development in other locations will only be permitted if the following criteria are satisfied: Having regard to locational factors, there are no suitable sequentially preferable sites available within the city centre, another defined centre or in an edge-of-centre location (if no Defined Centre sites are suitable and available); or The proposal is for small scale rural offices;</p> <p>In addition to at least one of the above criteria being satisfied it will also need to be demonstrated that: The proposal would not have a significant adverse impact on the vitality and viability of defined centres and on existing, committed and planned public and private investment in office development within a defined centre; and The site is accessible by a choice of means of transport or will be made accessible by a choice of means of transport as a consequence of planning permission being granted for the development; and There is good access from the development to a primary route on the highway network and an acceptable impact on the capacity of that network; and The proposals are compatible with other Plan Policies.</p> <p>Proposals for new office development outside of Defined Centres shall be accompanied by a Sequential Assessment and where a proposal is for 2,500 square metres (gross) or more of office floor space an Impact Assessment shall also be provided which examines the impact of the proposal on the vitality and viability of Defined Centres and its impact on existing, committed and planned public and private investment in office development within Defined Centres.</p>	 <p>very positive positive uncertain neutral/no impact negative very negative</p>
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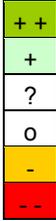
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Policy JE5: Location of R&D, Industrial and Storage/Distribution Development			very positive positive uncertain neutral/no impact negative very negative
	<p>The Council's preferred location for new Research & Development (R&D), industrial and storage/distribution development are the sites allocated for such purposes under Policy JE2</p> <p>However proposals for new R&D, industrial and storage/distribution development (including changes of use and the expansion of existing operations) on sites not allocated under Policy JE2 will be permitted provided that they are:</p> <p>Accessible by a choice of means of transport or will be made accessible by a choice of means of transport as a consequence of planning permission being granted for the development; and</p> <p>Have good access to a primary route on the highway network and an acceptable impact on the capacity of that network; and</p> <p>The proposal would not significantly compromise the viability or deliverability of land allocated in this Plan for employment development; and</p> <p>The development is compatible with other Plan Policies.</p> <p>In addition to the above, proposals for new general industrial and storage/distribution development (including changes of use and the expansion of existing operations) on all sites (including those allocated under Policy JE2) will also be required to demonstrate that the proposed development would not result in significant harm to the amenities of persons occupying nearby residential property or other land occupied by uses sensitive to environmental pollution.</p>		
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Policy JE6: Tourism/Visitor Related Development														
	Proposals for development within Coventry city centre (as defined on the Policies Map) or on sites at or adjacent to the Ricoh Arena or the Coventry and Warwick University campuses which would contribute towards the city's role as a tourist destination will be supported subject to compatibility with other Plan Policies.	<table border="1"> <tr><td>++</td><td>very positive</td></tr> <tr><td>+</td><td>positive</td></tr> <tr><td>?</td><td>uncertain</td></tr> <tr><td>o</td><td>neutral/no impact</td></tr> <tr><td>-</td><td>negative</td></tr> <tr><td>--</td><td>very negative</td></tr> </table>	++	very positive	+	positive	?	uncertain	o	neutral/no impact	-	negative	--	very negative
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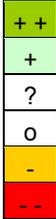
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Policy JE7: Accessibility to Employment Opportunities		
	<p>Planning applications for new employment development (including changes of use and the expansion of existing operations) will be required to demonstrate how job opportunities arising from the proposed development will be made accessible to the City's residents, particularly those in the most deprived areas of the City and priority groups. In this regard applicants will be expected to give consideration to a range of measures including:</p> <p>enhancement of the accessibility of the development to residents by a choice of means of transport; the provision of support to residents in applying for jobs arising from the development; the provision of training opportunities to assist residents in accessing employment opportunities; Childcare provision which enables residents to access employment opportunities; and/or Measures to assist those with physical or mental health disabilities to access employment opportunities.</p> <p>In respect of planning applications for new employment development the Council may require applicants to make financial or other contributions secured through planning obligations or its CIL Charging Schedule to maximise the accessibility of job opportunities to the city's residents.</p>	 <p>++ very positive + positive ? uncertain o neutral/no impact - negative -- very negative</p>
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<p>Policy DE1 : Ensuring High Quality Design</p> <p>All development proposals must respect and enhance their surroundings and positively contribute towards the local identity and character of an area. Conservation Areas, and buildings & sites of local and national architectural, archaeological or historic interest will also be protected.</p> <p>All development will be expected to meet the following key principles:</p> <ul style="list-style-type: none"> • respond to the local physical, economic and social context, reflecting local distinctiveness and identity, including, where appropriate, the protection of important views, including key views of the three spires; • preserve or enhance the character and setting of the historic built, landscape and where appropriate archaeological environment; • preserve or enhance the character and setting of major road, rail and canal corridors; • clearly define the boundaries between public and private spaces and enclosure of space; • provide attractive, safe, uncluttered, active and easily identifiable, high quality public spaces; • make places that inter-connect and are easy to move through; • ensure they are easily understood by users, with clear routes and distinct physical features; • seek high quality design and attention to detail in the layout of developments, individual buildings and infrastructure in terms of function and impact, not just for the short term, but over the lifetime of the development; • be adaptable to changing climate, social, technological, economic and market conditions; • promote diversity through mixes of uses within a site or building, which work together to create vital and viable places; • adopt sustainable and low carbon construction principles in terms of the design, layout and density, including developing buildings which are adaptable to a variety of uses and ensure that developments maximise the use of the site; • consider green infrastructure at the earliest stage in the design process, to ensure that it is well planned, designed, managed and maintained as an integrated, multidisciplinary and continuous requirement; • minimise adverse impact on important natural resources; • conserve, restore or enhance biodiversity; and • respect and enhance landscape quality including hedges of value. <p>Minimum submission requirements for outline permission:</p> <p>Indicative landscape and external design proposal in plan form at a scale of at least 1:500, or a larger, more detailed scale, to be provided with all applications for outline permission (plus smaller scale site proposal plans where 1:500 does not enable viewing the whole site in context one due to its size), as well as concept plans, at smaller scale where appropriate. Such plans need to show all existing and proposed built and external hard and soft elements (including existing vegetation), their functions and relationships with each other and surrounding site context. In addition, full or typical cross-sections and larger scale detail areas, elevations and three dimensional drawings should be provided as appropriate to illustrate the proposed landscape scheme in its built development and other site context.</p> <p>Submission requirements for full permission and reserved matters: Full landscape proposal plans (normally at least 1:200 or larger scale depending on scheme) showing hard and soft materials, as well as planting plans, plans and construction details for hard landscape structures and surfaces, hard and soft specification details, landscape maintenance and management plans.</p> <p>Full and more detailed submission requirements will be set out in SPD and application validation checklist.</p> <p>A Supplementary Planning Document will be prepared to promote good design practice in the Coventry context.</p>	<table border="1"> <tr> <td style="background-color: #90EE90; text-align: center;">++</td> <td style="text-align: center;">very positive</td> </tr> <tr> <td style="background-color: #90EE90; text-align: center;">+</td> <td style="text-align: center;">positive</td> </tr> <tr> <td style="background-color: #FFFFFF; text-align: center;">?</td> <td style="text-align: center;">uncertain</td> </tr> <tr> <td style="background-color: #FFFFFF; text-align: center;">o</td> <td style="text-align: center;">neutral/no impact</td> </tr> <tr> <td style="background-color: #FFD700; text-align: center;">-</td> <td style="text-align: center;">negative</td> </tr> <tr> <td style="background-color: #FF0000; text-align: center;">--</td> <td style="text-align: center;">very negative</td> </tr> </table>	++	very positive	+	positive	?	uncertain	o	neutral/no impact	-	negative	--	very negative
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Policy HE1 Conservation Areas		
	<p>4. The areas listed below have been designated as Conservation Areas under Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and are detailed on the Proposals Map;</p> <ul style="list-style-type: none"> • Allesley • Chapelfields • Coventry Canal • Far Gosford Street • Greyfriars Green • Hawkesbury Junction • High Street • Hill Top • Ivy Farm Lane • Kenilworth Road • Lady Herbert's Garden and The Burges • London Road • Naul's Mill • Spon End • Spon Street • Stoke Green <p>5. The following areas are proposed for designation as Conservation Areas;</p> <ul style="list-style-type: none"> • Earlsdon • Brownhill Green <p>The exact boundaries will be determined by the production of Conservation Area Appraisals and Management Plans following public consultation.</p> <p>6. Conservation Area Appraisals and Management Plans will be produced for all of the Conservation Areas to guide their preservation and enhancement. All development proposals within Conservation Areas will be determined in accordance with the appropriate Appraisal and Management plan.</p>	 <p>++ very positive + positive ? uncertain 0 neutral/no impact - negative -- very negative</p>
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Policy HE2: Conservation and Heritage Assets														
	<p>In order to help sustain the historic character, sense of place, environmental quality and local distinctiveness of Coventry, development proposals will be supported where they conserve and, where appropriate, enhance those aspects of the historic environment which are recognised as being of special historic, archaeological, architectural, artistic, landscape or townscape significance, these Heritage Assets include;</p> <ul style="list-style-type: none"> Listed Buildings and Locally Listed buildings Conservation Areas Scheduled Monuments and Archaeological sites Registered Parks & Gardens Other places, spaces, structures and features which may not be formally designated but are recognised as significant elements of Coventry's heritage and are positively identified on the Coventry Historic Environment Record <p>Proposals likely to affect the significance of a heritage asset or its setting should demonstrate an understanding of such significance in an accompanying Design and Access Statement or Heritage Statement using currently available evidence. Development proposals involving heritage assets in general and listed buildings in particular, should acknowledge the significance of the existing building and the area by means of their siting, massing, form, scale, materials and detail. The re-use of historic buildings contributes to sustainability by harnessing their embodied energy. Sympathetic and creative re-use of heritage assets will be encouraged, especially for heritage that is considered to be at risk, so long as it is not damaging to the significance of the heritage asset. The Council will use its statutory powers to secure the preservation of buildings and other heritage assets that are deemed to be at risk by the national and local heritage at risk registers. Demolition or destruction of heritage assets will usually be resisted; proposals to demolish a heritage asset will therefore need substantial justification. The greater the damage to the significance of the asset, the greater the justification required and the public benefit needed to outweigh such damage. All proposals should aim to sustain and reinforce special character and conserve the following distinctive historic elements of Coventry:</p> <ul style="list-style-type: none"> The surviving buildings, defences and street plan of the medieval city centre and its suburbs; The surviving pre-industrial settlements and landscape features which have been subsumed by the expansion of the city such as Walsgrave, Canley, Binley, Brownhill Green, Coundon Green, Little Heath (Spring Road), Stivichall Croft and Lower Eastern Green (at Dial House Lane); The wider Arden rural environment on the fringe of the City comprising field-systems, ancient woodlands and commons which developed over centuries; interspersed with a mix of settlements, farmsteads and smallholdings; Buildings associated with the city's industrial heritage; ribbon weaving, cycle making, motor car manufacturing, brick making, coal mining, synthetic textiles, munitions, aeronautical engineering, canals and railways; The Victorian and Edwardian suburbs such as Earlsdon and Stoke; Designed landscapes, including historic parks and gardens (both registered and locally listed), historic cemeteries, churchyards and public parks; Coventry's ground-breaking post-war reconstruction including its town plan, built form, public art works and public spaces; and <p>Archaeological remains of all periods from the earliest Prehistoric human habitation to the modern industrial period. Where material change to a heritage asset has been agreed, recording and interpretation should be undertaken to document and understand the asset's archaeological, architectural or historic significance. The scope of the recording should be proportionate to the asset's significance and the impact of the development on the asset. The information and understanding gained should be made publicly available, as a minimum through the Coventry Historic Environment Record.</p>	<table border="1"> <tr><td>++</td><td>very positive</td></tr> <tr><td>+</td><td>positive</td></tr> <tr><td>?</td><td>uncertain</td></tr> <tr><td>o</td><td>neutral/no impact</td></tr> <tr><td>-</td><td>negative</td></tr> <tr><td>--</td><td>very negative</td></tr> </table>	++	very positive	+	positive	?	uncertain	o	neutral/no impact	-	negative	--	very negative
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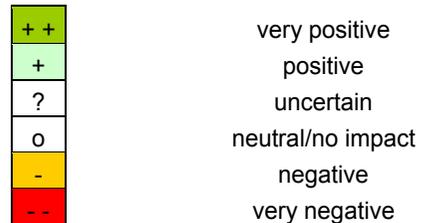
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Policy HE3 Heritage Park Charterhouse		
	<p>Proposals for a City Heritage Park in the grounds of the Charterhouse and London Road cemetery will be supported along with measures to improve linkages to the area along the River Sherbourne (between Charterhouse and Far Gosford Street), the former Coventry loop railway line and across the London Road. Proposals that are detrimental to the establishment of the heritage park and the improvement of linkages will be resisted.</p> <p>Land at Blue Coat School is to be removed from the Green Belt in accordance with policy GE1 to support the expansion of school facilities on condition that the existing school car park is removed from the area of the Charterhouse Scheduled Ancient Monument and proactively re-naturalised in an appropriate way in order to enhance the setting of the Charterhouse and its precinct.</p>	 <p>very positive positive uncertain neutral/no impact negative very negative</p>
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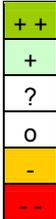
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Policy C1: Broadband and Mobile Internet		
	<p>Developers of new developments (residential, employment and commercial) will be expected to facilitate and contribute towards the provision of broadband infrastructure suitable to enable the delivery of broadband services across Coventry to ensure that the appropriate service is available to those who need it.</p> <p>Developers must make sure that broadband services that meet the ambitions of the Digital Communications Infrastructure Strategy and the European Digital Agenda are available, wherever practicable, to all residents of the development at market prices and with a full choice of all UK service providers.</p> <p>Developers are required to work with a recognised network carrier to design a bespoke duct network, for the development.</p> <p>Other forms of infrastructure, such as facilities supporting mobile broadband and Wi-Fi, should be included, wherever possible and viable and should be designed in a sympathetic and appropriate way in order to reflect the character of the surrounding area.</p>	<p>very positive positive uncertain neutral/no impact negative very negative</p>
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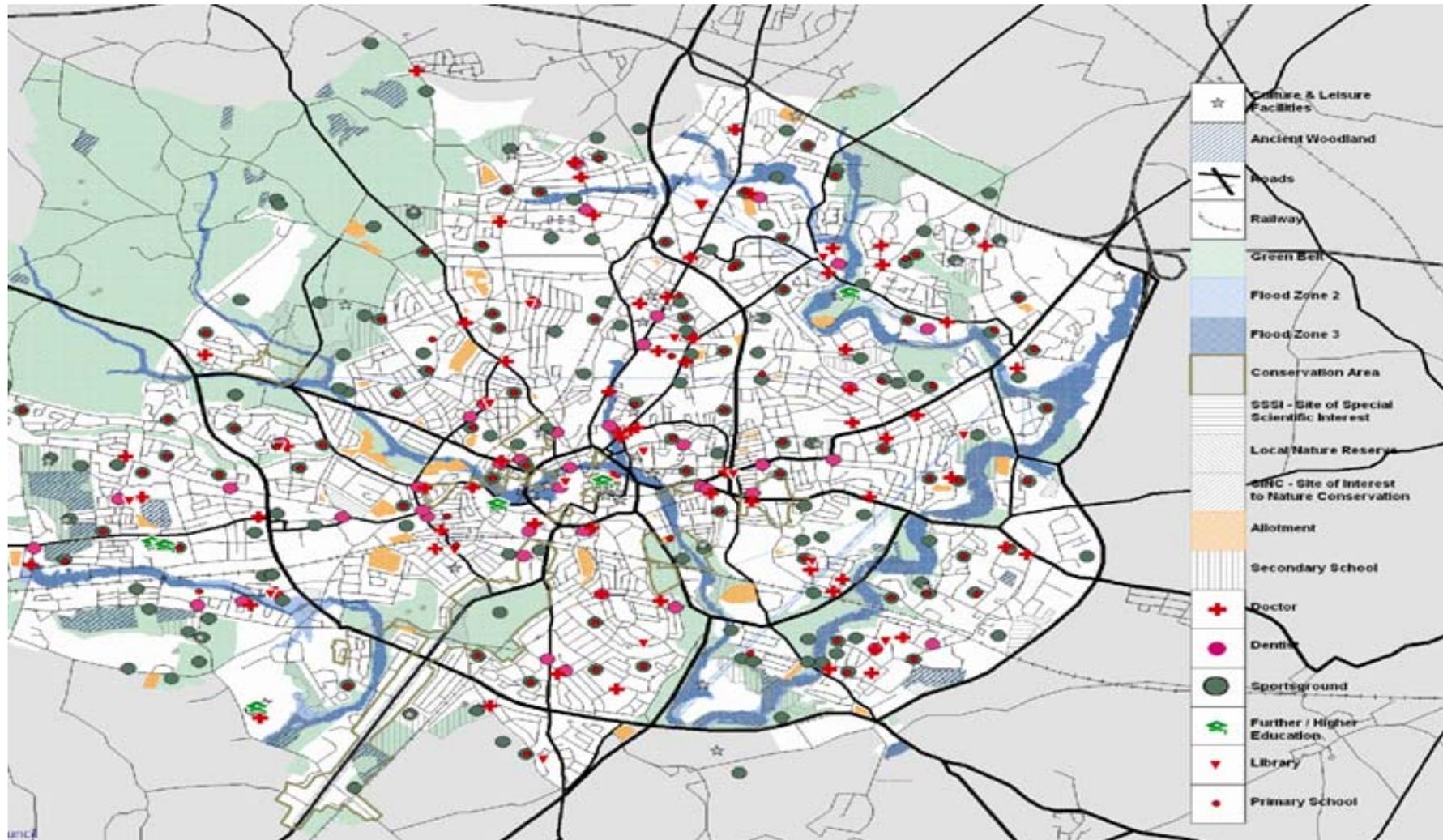
Policy C2: Telecommunications		
	<p>When considering notifications, planning applications and prior approval applications, regard will be given to the following factors:</p> <p>a) operational requirements of the telecommunication networks and the technical limitations of the technology, including any technical constraints on the location of telecommunications apparatus;</p> <p>b) the need for the ICNIRP Guidelines (and any other relevant guidance in place at the time of the application) for safe emissions to be met;</p> <p>c) the potential for sharing existing masts, buildings and other structures; and</p> <p>d) the impact of the development on its surroundings with particular regard to the following criteria:</p> <p>i. the visual amenity, character or appearance of the surrounding area.</p> <p>ii. apparatus and associated structures sited on a building should be sited and designed in order to seek to minimise impact to the external appearance of the host building.</p> <p>iii. development should not have an unacceptable effect on conservation areas or buildings of architectural or historic interest or areas of ecological interest or areas of landscape value or sites of archaeological importance.</p> <p>iv. the proposed provision of landscaping.</p> <p>Telecommunications equipment that has become obsolete or that is no longer in use should be removed as soon as practicable and the site restored to its former condition.</p>	 <p>++ very positive + positive ? uncertain o neutral/no impact - negative -- very negative</p>
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Policy IM1: Developer Contributions for Infrastructure		
	<p>Development will be expected to provide, or contribute towards provision of:</p> <p>a) Measures to directly mitigate its impact and make it acceptable in planning terms; and b) Physical, social and green infrastructure to support the needs associated with the development</p> <p>2. Infrastructure and mitigation measures will be provided in a timely manner to support the objectives of the Plan.</p> <p>The Council will, where appropriate, seek to secure site-specific infrastructure investments and/or contributions as well as off-site contributions and/or investments. The nature and scale of these will be related to the form of development and its potential impact on the site and surrounding area. The cumulative impact of developments will also be taken into account.</p> <p>Developer contributions in the form of Planning Obligations and/or Community Infrastructure Levy (CIL) will contribute towards strategic infrastructure required to support the overall development in the Plan.</p> <p>Where site specific issues generate viability concerns, applicants should discuss these with the Council at the earliest possible stage in the development process. Proposals that are unable to comply with the Plan's policies on viability grounds must be accompanied by a detailed Viability Assessment.</p> <p>The Council will work in partnership with infrastructure providers and other delivery agencies in updating the Infrastructure Delivery Plan to ensure an up to date evidence base regarding infrastructure requirements and costs is maintained.</p>	 <p>very positive positive uncertain neutral/no impact negative very negative</p>
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APPENDIX 3: KEY ENVIRONMENTAL CONSTRAINTS AND SOCIAL ASSETS



APPENDIX 4: GLOSSARY OF TERMS

Affordable Housing

Dwellings at rent or price that can be afforded by people who are in housing need and would otherwise be accommodated by the City Council.

Annual Monitoring Report (AMR)

A report, which assesses the implementation of the Local Development Scheme and the extent to which the policies are being achieved.

Baseline Information

This is information gathered to describe current conditions, and which future changes can be measured against.

Biodiversity

The variety of life on Earth or in a region, measurable as the variety within species and between species, and the variety of ecosystems.

Carbon Dioxide

A naturally occurring greenhouse gas in the atmosphere, concentrations which have increased as a result of humans' burning of coal, oil, natural gas and organic matter.

Core Output Indicators

The main purpose of core output indicators is to measure quantifiable physical activities that are directly related to, and are a consequence of, the implementation of planning policies. Local Authorities are required keep the Core Output Indicators up to date in the Annual Monitoring Report.

Coventry Development Plan

It is a Local Plan and it sets out planning policies and allocations of land for development. It sets out where different types of development – from housing to shops, offices and employment sites could be built during the plan period (2001-2011). Following the PCPA 2004 the Local Plan has been superseded by Local Development Frameworks.

Defra

Department for Environment, Food and Rural Affairs.

Development Plan Document (DPD)

One of a number of documents which is part of the development plan for the city and which is subject to independent testing.

Greenhouse Gases

Atmospheric gases that slow the passage of re-radiated heat through the Earth's atmosphere by absorbing infrared radiation. While they occur naturally in the environment, their release can be accelerated by human activity, including emissions from the combustion of fossil fuels. Key gases are carbon dioxide (produced by combustion), water vapour and methane (often produced by anaerobic digestion such as occurs in landfill sites, and from the guts of cattle), but also Nitrous Oxide (in vehicle exhaust fumes), PFCs (perfluorocarbons), SF (sulphur hexafluoride) and HFC6 (hydrofluorocarbons – in refrigerants).

Indicator

A measure of variables over time which can be used to measure achievement of objectives.

Listed Building

Building or other structure held to be of special architectural, historical or cultural significance included on statutory list and assigned a grade (I, II* or II). A listed building may not be demolished, extended or altered.

Local Plan

The document, which will set out the vision, objectives and spatial planning strategy for the City.

Local Development Document (LDD)

One of a number of documents which make up the Local Development Framework, including Development Plan Documents and Supplementary Planning Documents.

Local Development Framework (LDF)

It is the portfolio of Local Development Documents, which constitute the spatial planning policies for the city.

Nature Conservation

Policies and programmes for the long-term retention, management and enhancement of natural plants and animal communities, and occasionally modified vegetation, as representative samples of their kind.

Objective

A statement of what is aimed for, specifying the desired direction of change.

Planning and Compulsory Purchase Act 2004 (PCPA)

New legislation that introduced significant changes to the plan making process at all levels.

Scoping

The process of deciding the scope and level of detail of a sustainability appraisal (SA), including the sustainability effects and options which need to be considered, the assessment methods to be used, and the structure and contents of the SA report.

Strategic Environmental Assessment (SEA) Directive

Internationally used term to describe environmental assessment was applied to policies, plans and programmes. The European 'SEA Directive' (2001/43/EC) requires a 'formal assessment of certain plans and programmes, including these in the field of planning and land use'.

Stakeholder

A broad grouping being an individual, group or organisation with an interest in, or influence over, a plan, programme or project.

Supplementary Planning Document (SPD)

A document, which elaborates on policies in Development Plan Documents and does not have development plan status. It requires community involvement in line with the Statement of Community Involvement or minimum regulations.

Sustainability Appraisal (SA)

A tool for appraising the likely impacts of plans and policies from an environmental, economic and social perspective.

Sustainable Development

The most common definition is from the Brundtland Commission (1987) "Development which meets the needs of the present generation without compromising the ability of future generations to meet their own needs".

Sustainable Drainage System (SUDS)

These are designed to limit or reduce the existing rate of run-off. Impermeable surfaces are created in most built development, and if water is allowed to run-off rather than percolate into the ground this can increase flooding as well as create pollution, damaging watercourse habitats and causing bank erosion.

If you need this information in another format or language
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