

**Sustainability Appraisal/
Strategic Environmental Assessment**

Addendum Report

Coventry Local Plan: Proposed Modifications

March 2017



Contents

1. Non-Technical Summary	3
2. Introduction	9
3. Background	11
4. SA of Proposed Modifications	13
5. Developing and appraising the Alternative Options	14
6. Predicting and evaluating the effects of the Proposed Modifications	15
7. Mitigation and monitoring measures	43
Appendix I: Screening of Proposed Modifications for SA Significance	47
Appendix II: New Appraisal of Proposed Modifications (2017)	52
Appendix III: Glossary of Terms	97

1. NON-TECHNICAL SUMMARY

Introduction

1.1 The Sustainability Appraisal/Strategic Environmental Assessment addendum report has been produced alongside the Local Plan proposed modifications 2017. 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 sets out the strategic policy framework for enabling and guiding development in Coventry up to 2031. Specifically, it sets 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.

Purpose and Structure of this SA Addendum Report

1.3 The purpose of this SA Addendum Report is to clearly set out the method and findings of further SA work carried out as a result of the proposed modifications to the Local Plan Examination. This SA Addendum Report has been prepared in accordance with the requirements of the SEA Regulations and the NPPF and thus constitutes part of the Sustainability Report for compliance purposes.

- Section 2 explains the approach taken and details the methods used for further SA work;
- Section 3 summarises the Proposed Modifications and updates the findings of the previous SA work for the Local Plan to reflect the changes to Policy; and
- Section 4 sets out the overall summary findings and next steps for the Local Plan and the SA.
- Technical Appendices I-III provide details of the further sustainability appraisal work undertaken.

Methodology

1.4 The preparation of the Sustainability Appraisal of the proposed modifications to the 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 Addendum Report, 2017.

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

- 1.6** 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

- 1.7** 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, climate change, economic growth, education, transport and nature conservation (please refer to table 3 in this report).
- 1.8** 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.

SA of Proposed Modifications

- 1.9** The Council is proposing a number of modifications to the Submission Local Plan. These Proposed Modifications (PMs) comprise amendments to Policies, and site allocation details. The PMs were screened for their significance with regard to the SA process and in accordance with Government guidance. The details are presented in Appendix II of this SA Addendum Report and they explain which PMs were considered to be likely to have significant effects and should be subject to refreshed and/or new assessment through SA. Certain PMs, such as minor wording changes were not considered to be likely to have significant effects and the findings of the Submission SA Report remain valid.
- 1.10** The overall findings of the SA for the implementation of the Local Plan are set out in Section 5 of the Submission SA Report. The overall effects of the new and amended Local Plan Policies as set out in the PMs were subject to SA. This was undertaken using the same method as described in the Submission SA Report and above. The SA considered the inter-relationships and potential cumulative effects from proposed modifications to sites and policies overall and how this would affect the SA findings reported in the Submission SA Report.

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 PMs 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 Modifications. 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), the Preferred Emerging Strategy (2014) and submission Local Plan (2016). This iteration of the Local Plan presents the Councils proposed modifications.

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	SA/SEA Report 2016
Stage C	Preparing the SA Report	January 2016
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 Modifications document, 2017. The Council welcomes your views on any aspects of this report. Following the period of representations, responses will be dispatched along with the suite of documents to be submitted to the Planning Inspectorate for further consideration.

SEA Requirements

- 2.7** Table 2 of the SA report for the submission Local Plan (LP8) detailed how the SEA Directive's requirements were 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

- 2.8** There is a tiering of appraisal/assessment processes that align with the hierarchy of plans - from international, national and through to local. This tiering is acknowledged by the NPPF (2012) in paragraph 167 that states that “*Assessments should be proportionate and should not repeat policy assessment that has already been undertaken.*” SEA sets the context for subsequent project level studies during Environmental Impact Assessment (EIA) for major development projects.
- 2.9** It should be noted that it is not always possible to accurately predict sustainability effects when considering plans at a strategic scale. Impacts on biodiversity and cultural heritage, for example, will depend on more detailed information and studies at a site-level. Whilst climate change science is becoming more accurate, it is difficult to predict impacts likely to result from climate change, including cumulative and synergistic effects.

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 method and approach for the SA was previously reported in Section 3 of the Submission SA Report (LP8) submitted alongside the Local Plan to the Secretary of State for Examination in 2016. This explained the scoping of the SA Framework of objectives and decision-aiding questions, how they developed and were amended to reflect updated evidence, and how they were used for the appraisal of the emerging plan at different stages. The Sustainability Appraisal of the Local Plan Proposed Modifications was carried out by Council officers in workshops. Guidance was provided and care was taken to ensure high levels of consistency.
- 3.3** 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 2: 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.

4. SA OF PROPOSED MODIFICATIONS

Purpose

- 4.1 The proposed modifications (or PMs for short) to the Local Plan, 2017 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 PMs were screened for their significance with regard to the SA process and in accordance with Government guidance (please refer to Appendix I). The details explain which PMs were considered to be likely to have significant effects and should be subject to refreshed and/or new assessment through SA. Certain PMs, such as minor word changes, were not considered to have significant environmental effects and so in these instances, the findings of the Submission Local Plan SA/SEA report remain valid.
- 4.3 The SA of the PMs were 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, 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.
- 4.4 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

- 4.5 The overall findings for implementation of the Local Plan with the Proposed Modifications were subject to a refreshed SA. This was undertaken using the same method as described in the Submission SA Report – effects are reported according to the 20 key sustainability objectives, SEA Directive topics, and the relevant requirements from the NPPF. The SA considered the inter-relationships and potential cumulative effects from proposed modifications to sites and policies overall and how this would affect the SA findings reported in the Submission SA Report (LP8).

5. 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 were developed for the Local Plan submission 2016 were clearly different ways of addressing key planning issues facing the city up to 2031 (Local Plan period). All options that were 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 were 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 were subjected to SA/SEA and an historical overview of all reasonable alternative options is set out in LP8.

Findings

- 5.4 Given that the proposed modifications represent a direct outcome of the Inspectors hearing sessions, it is considered that there are no new realistic alternative options that are available to be considered for the purposes of SA. For an exposition of the alternative options, please refer to the SA/SEA report prepared for the submission Local Plan (LP8).

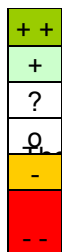
6. PREDICTING AND EVALUATING THE EFFECTS OF THE PROPOSED MODIFICATIONS

Purpose

- 6.1 The purpose of this task is to predict the social, environmental and economic effects of the Local Plan’s policies, as well as the sustainability implications of the 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 Proposed Modifications have been predicted and evaluated. A qualitative approach has been adopted and in line with current practice the following scale is used:



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 PMs

- 6.3 The Proposed Modifications include 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 Modifications are 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 PMs on the 20 Sustainability Objectives is likely to be positive. The Plan 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.

Evaluating effects of the PMs

- 6.6** Having identified and described the likely effects of the Proposed Modifications, 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.

Overall Strategy

- 6.7** The Employment Land MOU (agreed at Council in October) is referenced in this section of the Plan, whilst there is additional reference to the importance of key employers within the city such as JLR and the two universities. Policy DS1 has been updated to add a clear review mechanism to the Local Plan. This review mechanism will be triggered should the Plan not deliver the homes, jobs and infrastructure it sets out or if one of our neighbouring authorities is proven to be unable to accommodate the city's unmet need as identified through the MOU. To be proven this will need to be tested through public examination of the respective Plan. Notwithstanding the potential triggers, the proposed amendment to Policy DS1 also commits to a report being presented to Council by March 31st 2021 which reviews the Plans progress, its evidence base and its Duty to Cooperate aspects to determine whether or not a Plan review is required. Such a review could be of the Plan as a whole or in part. This review mechanism has been designed in partnership with neighbouring authorities and will be broadly consistent across Coventry and Warwickshire. Policy DS2 is updated to clearly identify sites and schemes where cross boundary cooperation will be important. This includes the growth around Whitley Business Park, Warwick University and Ansty Park amongst others.
- 6.8** At the request of the Inspector a new policy is proposed to cover Masterplan Principles. This is included as Policy DS4 (Parts A-D). Part A covers a wide range of principles that will be applied to all proposed site allocations and any other major development. Part B relates specifically to the growth around Whitley Business Park, Part C relates to the proposed Sustainable Urban Extension (SUE) at Keresley and Part D to the proposed SUE at Eastern Green. The later three parts of the policy major on the importance of infrastructure including highway provisions, public transport and green infrastructure (including biodiversity and ecology management).

Accessibility

- 6.9** Joint working with colleagues at Transport for West Midlands (TfWM) has led to a number of minor proposals throughout this section of the Plan which strengthen the links and commentary around regional transport plans, public transport and regional connectivity. Additional technical information has been added regarding the most recent transport modelling and references to SPRINT have been removed to reflect on-going work through the Combined Authority. The PMs 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 measures 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.

- 6.10** 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

- 6.11** Additional criteria is to be added to Policy GB1 alongside extra supporting text, which will ensure the policy is clear about how Local Green Space will be managed. This confirms that the creation of small buildings and structures will be acceptable, but only where they are ancillary to the primary use of the land as green space. For example, this could include sports changing rooms, play equipment or appropriate lighting. Additional supporting text is also to be added to strengthen the intention of new areas of Local Green Space being designated within key sites such as Whitley, Keresley, Eastern Green and as part of the Heritage Park. The integrity of the Local Green Space designation has also been enhanced by removing areas of existing built development (such as schools, sports centres and homes). Opportunity has also been taken to correct a small number of historic cartographical errors with the proposed boundary lines. Maps of these adjustments are included within Appendix 4. This has no impact on the amount of green space that is to be protected through the Local Plan or the amount of land to be lost to development.
- 6.12** Policy GB2 is also to be amended which will define the small number of Green Belt parcels along the city's southern boundary as safeguarded land instead of reserved land. This ensures consistency with national guidance and responds to the Inspectors action points. It does mean though that the next Local Plan will need to consider the future policy basis for these areas having regard to any developments that are brought forward by Warwick District Council on the adjoining land.
- 6.13** Policies GE1-GE4 are proposed for minor amendment to reflect consultation responses and discussions with The Environment Agency, Natural England and Warwickshire Wildlife Trust amongst others. Such changes also reflect the Inspectors action points. The purpose of these changes is to strengthen further the importance and protection of ecology and biodiversity value as well as overall green infrastructure.

Water Resources and Water Quality

- 6.14** Policy EM4 and EM5 are proposed to be amended following engagement with the Environment Agency. This ensures both policies will appropriately reflect the most up to date flood risk and mitigation information and guidance available nationally. Further to this, a new Policy (Policy EM6) is proposed to cover groundwater management and drainage on previously developed land.

Cultural Heritage

- 6.15** The primary adjustment to this section focuses on Policy He3. This policy has been developed in partnership with Bluecoats School and the Charterhouse Trust and clarifies the position around how the heritage park will be delivered and how the future expansion of the school can be supported. It also brings into the policy the specific requirement for a comprehensive Masterplan developed in partnership with both parties alongside the Council and local community.

Waste Management and Minerals

- 6.16** The amended Policy EM8 – waste management is strengthened, in discussion with the Environment Agency whilst a new policy (EM10) is added to cover non-mineral development within Mineral Safeguarding areas. This is to ensure that new development does not unnecessarily sterilise possible mineral extraction and is consistent with national guidance.

Jobs and Economy

- 6.17** Small adjustments are proposed to policies and supporting text which add further support for some of the city's key employers – most notably JLR, its supply chain and both universities. The employment land delivery and supply position is also updated to reflect the most up to date data.

Air Quality

- 6.18** 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.
- 6.19** 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

		PMs	No PMs	Likely <i>Positive</i> effects of PMs on sustainability objectives	Possible <i>Negative</i> impacts of PMs on sustainability objectives
Sustainability Objectives	1	+	-	1) The PMs 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	PMs 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 PMs 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 PMs 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. The proposed increase in the threshold for Health Impact Assessments may mean that less development considers the impacts of health. The inclusion of wider policies around building standards, air quality and active travel etc. may however offset this impact.
5	++	--	The PMs 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 the PMs.	
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	PMs provides the potential to contain growth in areas and protect other areas - such as some areas of green belt, open countryside and green spaces. Amendments to Policy HE3 also strengthen the enhancement of and access to the city's heritage assets.	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. PMs seek to minimise this.	Scale of development necessary to meet housing need will put pressure on biodiversity. PMs 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. New Masterplan Principles policy will drive even better design and developments.	No real negative impact identified.

11	0	0	PMs 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.	PMs 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	Positive outputs of the PMs will strengthen the drainage and flood risk policies in accordance with Environment Agency guidance.	Growth proposed in PMs 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	PMs 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. PMs does encourage recycling through establishment of waste management facilities.	PMs 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	Positive impacts of new policy on ground water consideration and water quality on previously developed sites. Benefits could be neutral though as offset by impact on drainage from new development.	New development on greenfield sites could have an impact on drainage and water quality.
15	++	-	This PMs 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 PMs and this Sustainability Objective provided the new facilities are carefully located - appropriate to whether the facility is large or small scale

	17	++	-	The PMs 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 PMs would have a significant direct effect on improving Coventry's employment opportunities and create a diverse modern economy.	
	19	+	-	The PMs has a positive potential to provide access to good quality employment for all through the establishment of new employment opportunities.	
	20	+	-	This PMs 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 Proposed Modifications (2017)

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) A minimum of 24,600 additional homes. b) A minimum of 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) 84,900sq.m gross retail based floor space (across use classes A1-A5 (including bulky goods)) 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 at least 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>3. The Council will undertake a comprehensive review of national policy, the regional context, updates to the evidence base and monitoring data before 31st March 2021 to assess whether a full or partial review of the Plan is required. In the event that a review is required, work on it will commence immediately.</p> <p>Furthermore, the Plan will be reviewed (either wholly or partially) prior</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 to policy.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>to the end of the Plan Period in the event of one or more of the following circumstances arising: -</p> <ul style="list-style-type: none"> a) Through the Duty to Co-operate, the unmet housing and employment needs of the city are proven to be undeliverable within the Local Plans of Warwickshire authorities; b) Updated evidence or changes to national policy suggest that the overall development strategy should be significantly changed; c) The monitoring of the Local Plan (in line with the Plan’s Monitoring Framework having particular regard to the monitoring of housing delivery) demonstrates that the overall development strategy or the policies are not delivering the Local Plan’s objectives and requirements; d) Any other reasons that render the Plan, or part of it, significantly out of date. 		
Policy DS4A General Masterplan principles		
<p>The following General Principles should be adhered to when master planning any major development proposal:</p> <ul style="list-style-type: none"> i. Where appropriate the Masterplan should clearly identify any phasing of development along with the timely provision of supporting infrastructure; ii. Where the site is identified as an allocation within the Local Plan or City Centre AAP it should plan positively to meet in full the requirements identified within the relevant policies associated with the allocation. Where the proposal represents a phase or phases of a wider scheme however, the quantum of development should reflect the relative size and characteristics of the phase, including its position within the wider site; iii. Where possible, all proposals should be planned in a comprehensive and integrated manner reflecting partnership working with relevant stakeholders. Where proposals represent a phase of a larger development the Masterplan should have full regard to any adjoining land parcels and development proposals to ensure it delivers appropriate parts of the strategic or site-wide infrastructure and other relevant features. This should support the wider delivery of the 	<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 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>No change to policy.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>comprehensive scheme;</p> <p>iv. Opportunities to deliver higher density residential and mixed-use development should be maximised along public transport corridors and in designated centres with lower densities provided elsewhere (in accordance with policies H9 and R3);</p> <p>v. Employment and commercial proposals should respond positively to market demands and requirements, maximising opportunities to locate within or close to designated centres (as appropriate) and provide a range and choice of opportunities to meet business and customer needs;</p> <p>vi. Identify appropriate highway infrastructure along with sustainable transport corridors that include the provision for integrated public transport, cycling and walking which provides excellent connectivity and linkages to within the site itself, the City Centre and with the surrounding area and existing networks;</p> <p>i. Appropriate levels of car and cycle parking should be made in accordance with the Local Plan’s parking requirements. Spaces should be well integrated within the development and laid out to ensure they do not result in the obstruction of the highway as a result of excessive on-street parking;</p> <p>ii. Where appropriate social and community facilities should be concentrated within mixed use hubs and designated centres and easily accessed by public transport, walking and cycling (having regard to Policy CO1);</p> <p>iii. Proposals should respond to the local context and local design characteristics (in accordance with Policies GE3, HE2 and DE1), to create new well designed developments with a distinctive character which residents will be proud of;</p> <p>iv. Features of the historic environment should be respected as part of new developments with existing heritage assets conserved and enhanced as part of development proposals (in accordance with Policy HE2). Where appropriate, this should include the setting of buildings and spaces and the restoration of assets at risk of loss;</p> <p>v. Sympathetically integrate existing landscape, biodiversity and historic features of the site into the development taking opportunities to protect, enhance and manage important features along with mitigation and enhancement measures to provide satisfactory</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>Policy will have a clear positive impact on objective 10 supporting high quality design and master planning early I the planning process.</p>	

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>compensatory provisions where appropriate (having regard to Policies GE1-4);</p> <p>vi. Provide fully integrated, accessible and connected multi-functional green and blue infrastructure which forms strategically important links to the surrounding area to provide routes for people and wildlife and open spaces for sports, recreation and play;</p> <p>vii. Where appropriate incorporate innovative and creative approaches to energy generation, the provision of utilities and information technology, mitigation of pollutants, management of surface water and flood risk and waste management solutions. These should be adopted to make new developments more sustainable and resistant to the impacts of climate change; and</p> <p>viii. All new Masterplans should be informed by consultation with existing communities in adjoining areas. This should take place prior to the submission of a planning application to ensure feedback can influence the final proposals.</p>		
Policy DS4B Whitley Specific Masterplan Principles		
<p>In addition to the general principles outlined in Policy DS4 (Part A) of this policy, development proposals which relate to this area should also have regard to the relevant requirements below:</p> <p>i. Any development should support and complement the existing JLR global headquarters;</p> <p>ii. New provision should be primarily focused within 'B class' uses (excluding B1 offices) unless they are shown to be ancillary and supportive to the overall provisions of the business park and in accordance with the other policies of this Plan;</p> <p>iii. Support and integrate the planned highway infrastructure across the A45 and A444 and efficiently utilise this network for vehicle access into the site(s);</p> <p>iv. Continue to maximise links and connectivity with surrounding business parks within both Coventry City and Warwick District to enhance the employment hub;</p> <p>v. Expand and enhance on existing travel plans and continue to encourage excellent connectivity to public transport as well as the provision of high quality routes to support both walking and cycling;</p>	<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 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</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"> vi. Enhance the connectivity of ecology and biodiversity at the Stonebridge meadows LNR and Baginton Fields nature reserve. This should include a 'green' connection into River Sowe along the northern edge of the site; vii. An appropriate buffer should be retained between the new commercial activity and the existing homes in and around Sedgemoor Road; viii. Development should not compromise the presence and ecological value of the River Sowe and River Sherbourne; and ix. Make positive provisions to relocate the existing sports fields (as appropriate) in accordance with Policy GE2; 	<p>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 on the periphery.</p>	
<p>Policy DS4 (Part C) – Keresley SUE Specific Masterplan Principles</p>		
<p>In addition to the general principles outlined in Policy DS4 (Part A) of this policy, development proposals which relate to this area should also have regard to the relevant requirements below:</p> <ul style="list-style-type: none"> i. Incorporate the recommendations of the Council's SUE Design Guidance SPD; ii. Ensure that the planned Local Centres are located at separate ends (north and south) in accordance with Policy R1; iii. Ensure the new defensible boundaries to the Green Belt are clearly supported on the western side of the site to Tamworth Road and to 	<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</p>	<p>No change to policy.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>the north around Thompsons Lane;</p> <p>iv. Establish a comprehensive green and blue infrastructure corridor focused around the Ancient Woodlands, Hounds Hill and the Hall Brook. This corridor should run north-south between the Burrow Hill Fort to the north and the Jubilee Woodland to the south east; and</p> <p>v. Identify clear access points to the site and make appropriate provisions for new transport infrastructure and highway improvements to support the comprehensive delivery of the site. This should include:</p> <p>a) The provision of a new Link Road in accordance with Policy H2. The Link Road should be operational to traffic prior to the full completion of all development components within the SUE;</p> <p>b) The delivery of the Link Road should not be to the detriment of Pro-Logis Park; and</p> <p>c) The management of the existing highway junctions at Bennetts Road, Tamworth Road, Fivefield Road, Sandpits Lane, Thompsons Lane, Long Lane and Watery Lane to ensure they continue to operate in a safe and appropriate way.</p>	<p>identify areas that are prone to flooding within 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 on the periphery.</p>	

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
Policy DS4 (Part D) Eastern Green SUE Masterplan Principles		
<p>In addition to the general principles outlined in Policy DS4 (Part A) of this policy, development proposals which relate to this area should also have regard to the relevant requirements below:</p> <ol style="list-style-type: none"> i. Incorporate the recommendations of the Council’s SUE Design Guidance SPD; ii. Respond to the transport and economic opportunities associated with the site’s proximity to the planned HS2 interchange to the west. iii. Ensure that the employment provisions and Major District Centre are located towards the north of the site and are accessed directly from the A45; iv. Ensure the new defensible boundaries to the Green Belt are clearly supported to Pickford Green Lane in the west and the A45 to the north; v. Provide appropriate green infrastructure along the western edge of the SUE around Pickford Green Lane to help blend and integrate the development into the wider Countryside; vi. Establish a comprehensive green and blue infrastructure corridor focused along the Pickford Brook and its tributary. This should run from Pickford Green Lane in the west and link to existing corridors off-site, for example, across Westridge Avenue and Parkhill Drive towards Allesley Park; vii. Identify clear access points to the site and make appropriate provisions for new transport infrastructure and highway improvements to support the comprehensive delivery of the site; viii. In accordance with Policy AC2, manage the existing highway junctions at Pickford Green Lane and Brick Hill Lane with the A45 to ensure they are either integrated into the new A45 junction or safely retained within the existing highway network; and ix. Make appropriate provision to aid future integration of the new rapid transit route within the site once the final route is known. 	<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 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>No change to policy.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
	<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 on the periphery.</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>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 housing pathways for all. 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 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</p>	<p>No change to policy.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
	<p>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. 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>	
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 	<p>This policy performs well in respect of the social objectives as it is to be expected that such uses should be within the city centre 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 odour issues but could be mitigated if the SPD is delivered alongside the Plan.</p>	

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>pedestrian routes;</p> <p>h) Accessible for all;</p> <p>i) Providing an attractive and safe environment for pedestrians, cyclists and motorists;</p> <p>j) Provide a high quality public transport system that benefits from seamless integration and is well connected to existing and new infrastructure</p> <p>k) High quality sustainable built design;</p> <p>l) Continuing to develop a vibrant and attractive night time economy;</p> <p>m) Providing opportunities to improve health and wellbeing;</p> <p>n) Continuing to support greater integration of the university within the wider city centre in accordance with the policies in the Area Action Plan;</p> <p>o) Recognising and preserving key views to the iconic three spires of St Michaels, Holy Trinity and Christchurch; and</p> <p>p) Supporting the reintroduction of green and blue infrastructure throughout the city centre, including opportunities for deculverting wherever possible.</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 GB1: Green Belt and Local Green Space		
<p>1. The city's most up-to-date Green Belt and Local Green space boundaries are identified on the Policies Map.</p> <p>2A: 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>2B: Within areas designated as Local Green Space the erection of small buildings and structures which are ancillary to the primary use of the land may be acceptable. Other development will not be permitted unless very special circumstances are demonstrated.</p> <p>The following areas will be removed from the Green Belt to accommodate</p>	<p>Impact on many SA objectives may be neutral or unknown. Furthermore, it should also be noted that there may be circumstances whereby 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</p>	

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>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) The following areas will be removed from the Green Belt and re-designated as Local 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) Tocil Wood Brook Stray e) Park Wood and Ten Shilling Wood f) Tile Hill Wood g) Allesley Park <p>1. 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"> a) Land at Park Hill Lane b) Land at Westwood School and Xcel Leisure Centre c) 	<p>can benefit.</p>	

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<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>2. In addition to appropriate development in the Green Belt identified in the NPPF, limited infill development would be considered appropriate. 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: Safeguarded Land in the Green Belt		
<p>The areas of Safeguarded 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) Playing Field south of Finham Park School; and d) Land west of Finham Primary School. <p>Any development of these sites will be subject to consideration through a full or partial review of this Local Plan having explicit regard to development proposals in Warwick District.</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>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.</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> <p>No change to policy.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
Policy GE1 Green Infrastructure		
<ol style="list-style-type: none"> 1. 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. 2. 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. 3. 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. 4. 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. 5. 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. Where a development proposal lies adjacent to a river corridor or tributary, a natural sinuous river channel should be retained or, where possible, re-instated. Culverts should be removed unless it can be demonstrated that it is impractical to do so. 6. 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 	<p>Blue infrastructure can have an equally important role as green infrastructure particularly in relation to objective 10.</p>	<p>Need to consider blue infrastructure with green infrastructure for consistency, although this is acknowledged in the supporting text. No change to policy.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>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> <ul style="list-style-type: none"> a) Not permitting development that compromises its integrity and that of the overall green infrastructure framework (including the Coventry/Oxford Canal); b) Using developer contributions to facilitate improvements to its quality, connectivity, multi-functionality and robustness; c) 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 including the wider public transport network d) Improving its functionality, quality, connectivity and accessibility; e) Ensuring that a key aim of green infrastructure is the maintenance and improvement and expansion of biodiversity; f) Integrating proposals to improve green infrastructure in the delivery of new developments, particularly through area based regeneration initiatives and major proposals and schemes; and g) Flood risk management and improving surface water quality. 		
<p>Policy GE3 - Biodiversity, Geological, Landscape and Archaeological Conservation</p>		
<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; c) avoid negative impacts on existing biodiversity; and d) preserve species which are legally protected, in decline, are rare within Coventry or which are covered by national, regional or local Biodiversity Action Plans. 	<p>Policy strengthens the importance and protection of ecology and biodiversity value as well as overall green infrastructure.</p>	<p>No change to policy.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>2. 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, but only in exceptional circumstances.</p> <p>3. 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, ancient and newly-planted woodlands, ancient hedgerows and heritage assets of value to the locality, will be protected against loss or damage. In the case of archaeological remains, all practical measures must be taken for their assessment and recording in accordance with Policy HE2</p>		
<p>Policy HE3 - Heritage Park – Charterhouse</p>		
<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>2. Land at Blue Coat School is to be removed from the Green Belt in accordance with policy GB1 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. In addition, the expansion of the school should also support the appropriate relocation of the all-weather sports facilities and playground areas to secure the enhancement of the riverside area. This should facilitate the re-naturalisation of the area in an appropriate way in order to enhance the setting of the Charterhouse, its precinct and the Heritage Park as a whole.</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>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>The creation of the Heritage Park and expansion of Blue Coat School should be guided by a comprehensive Master plan, which reflects the policies of this Plan (including Appendix 4).</p>		
Policy EM4 Flood Risk Management		
<p>All major developments must be assessed in respect of the level of flood risk from all sources. 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 all of the following criteria are met:</p> <ul style="list-style-type: none"> a) 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; b) it is provided with the appropriate minimum standard of flood defence and resilience to aid recovery (including suitable warning and evacuation procedures) which can be maintained for the lifetime of the development; c) 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; d) 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; e) in the case of essential infrastructure, access must be guaranteed and must be capable of remaining operational during all flooding events. <p>1. All opportunities to reduce flood risk in the surrounding area must be taken, including creating additional flood storage. In this instance reference should be made to the Councils IDP or Regulation 123 list. In order to achieve this:</p> <ul style="list-style-type: none"> a) the functional floodplain (Flood Zone 3b) should be protected from development and reinstated in brownfield areas wherever possible; b) single storey buildings, basements and buildings on stilts will not be acceptable in Flood Zone 3; c) all opportunities to undertake river restoration and enhancement 	<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 if 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 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.</p> <p>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 surface water run off which may have adverse impact on floodplains. Policy has the capability to reduce this potential impact.</p>	<p>No change to policy.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>including de-culverting, removing unnecessary structures and reinstating a natural, sinuous watercourse will be encouraged;</p> <p>d) unless shown to be acceptable through exceptional circumstances, development should be set back at least 8m (from the top of bank or toe of a flood defence) of Main Rivers and 5m from Ordinary watercourses for maintenance access. This includes existing culverted watercourses.</p> <p>e) finished floor levels must be set a minimum of 600mm above the 1% AEP (1 in 100 year) plus climate change flood level.</p> <p>where a development benefits from an existing or proposed flood defence scheme, the development should contribute towards the capital and/or maintenance of these defences over its lifetime.</p> <p>2. For sites in Flood Zone 3a, development should not impede flow routes, reduce floodplain storage or consume flood storage in a 'flood cell' within a defended area. If the development does result in a loss of storage, compensatory floodplain storage should be provided on a 'level for level' and 'volume for volume' basis.</p> <p>3. For sites in Flood Zone 3a, all types of new development behind flood defences should be avoided, where possible, due to the residual risks of breach and overtopping. Development should ensure that it would not prevent the Water bodies' ability to reach good status or its potential to do so as set in the Severn River Basin Management Plans and should support, where possible, to improving the status class.</p> <p>4. 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.</p> <p>5. The Exception Test (for use when there are large areas in Flood Zones 2 and 3, where the Sequential Test alone cannot deliver acceptable</p>		

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>sites, but where some continuing development is necessary) will apply where development will provide wider sustainability benefits that outweigh flood risk, fully informed by an appropriately scaled 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.</p> <p>Land that is required for current and future flood management will be safeguarded from development. Where development lies adjacent to or benefits from an existing or future flood defence scheme they may be expected to contribute towards the cost of delivery and/or maintenance.</p>		
Policy EM6 Redevelopment of Previously Developed Land		
<ol style="list-style-type: none"> 1. Development will be permitted where proposals do not have a negative impact on water quality, either directly through pollution of surface or ground water or indirectly through the treatment of waste water by whatever means. 2. Prior to any potential development, consultation must be held with Severn Trent Water to ensure that the required wastewater infrastructure is in place in sufficient time. In line with the objectives of the Water Framework Directive, development must not affect the water bodies' ability to reach good status or its potential as set in the Humber and Severn River Basin Management Plans and should support, where possible, to improving the status class. 3. Developers and operators must provide adequate information when submitting their proposals so that the potential impact on groundwater resources and quality can be adequately assessed'. This should include a risk assessment demonstrating there would be no adverse effect on water resources. 4. Development will not be permitted within a groundwater Source Protection Zone 1 which would physically disturb an aquifer. This will include situations where proposed waste water infrastructure could pose an unacceptable risk of pollution of the underlying aquifer or receiving watercourse. 	<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. Retaining green spaces within the built up areas inevitably means greater maintenance costs which if not carried out could detract from the urban form. The value of pocket parks needs to be considered. Policy is particularly robust in relation to environmental objectives especially objective 14..</p>	<p>No change to policy.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
Policy EM8 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) supporting recycling proposals for aggregate materials subject to the criteria in part 2 of this policy; e) Existing waste management facilities or land allocated for waste management uses being protected from encroachment by incompatible land uses that are more sensitive to odour, noise, dust and pest impacts; and f) Proposals for waste management facilities only being permitted where they would not have an unacceptable impact on the quantity or quality of surface or groundwater resources. <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 	<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 increased recycling facilities or expansion of its kerbside recycling services.</p> <p>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.</p> <p>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</p>	<p>No change to policy.</p>

Policies	Comments by workshop participants (Critical analysis)	Implication for DPD and Recommendation
<p>adjacent uses from noise, ordure, vermin and wildlife. Proposals advocating open air unenclosed storage of organic odour producing material will not be supported.</p> <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>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>	
<p>Policy EM10 Non Mineral Development in Mineral Safeguarding Areas</p>		
<p>All non-mineral development proposals in the designated Mineral Safeguarding Areas should assess and evaluate the legacy of past mining heritage and should consider this in accordance with Policy EM2. It should also ensure that development does not entirely sterilise any potential future mineral extraction should this become viable and desirable. This should be considered in partnership with the Coal Authority.</p>	<p>Although not a key objective in the SA criteria the inclusion of EM2 in the policy ensures there is adequate protection of the mining legacy through the planning process.</p>	<p>No change to policy.</p>

7. 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 modifications. The positive effects of the proposed modifications could be maximised with the addition of mitigation measures. In order to mitigate and minimise the possible negative impacts, 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 PMs

- 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. 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 I: SCREENING OF PROPOSED MODIFICATIONS FOR SA SIGNIFICANCE

The screening matrix below should be read in conjunction with The Local Plan Proposed Modifications 2017 Consultation Document which sets out the detailed modifications along with the reasons and Council's justification for the changes, deletions and additions. These modifications to the Local Plan specifically address the issues of soundness identified by the Inspector in her letter of January 2017.

Policy Screening

Policy	Summary of Changes	Screening – do the changes, deletions and additions significantly affect the findings of the Submissions Local Plan SA/SEA Report (LP8), 2016 or do they give rise to significant environmental effects?
DS1	Updated to add a clear review mechanism to the Local Plan. This review mechanism will be triggered should the Plan not deliver the homes, jobs and infrastructure it sets out or if one of our neighbouring authorities is proven to be unable to accommodate the city's unmet need as identified through the MOU.	Due to the substantive changes to the policy it is considered this represents a significant change to the findings of the SA/SEA report, which would require a fresh SA/SEA assessment.
DS2	Updated to clearly identify sites and schemes where cross boundary cooperation will be important. This includes the growth around Whitley Business Park, Warwick University and Ansty Park amongst others.	Due to the substantive changes to the policy it is considered this represents a significant change to the findings of the SA/SEA report, which would require a fresh SA/SEA assessment.
DS3	Minor word change and deletion of criteria due to the abolition of zero carbon homes.	Due to the very minor proposed change, the findings of the SA/SEA report hold good.
DS4a - d	At the request of the Inspector a suite of new policies are proposed to cover Masterplan Principles. This is included as Policy DS4 (Parts A-D). Part A covers a wide range of principles that will be applied to all proposed site allocations and any other major development. Part B relates specifically to the growth around Whitley Business Park, Part C relates to the proposed Sustainable Urban Extension (SUE) at Keresley and Part D to the proposed SUE at Eastern Green. The later 3 parts of the policy major on the importance of infrastructure including highway provisions, public transport and green infrastructure (including biodiversity and ecology management).	Given this is a new suite of policies, it is considered this represents a significant change to the findings of the SA/SEA report, which would require a fresh SA/SEA assessment.
HW1	No change to policy.	No new SA assessment required.
JE1	Small adjustments are proposed to policies and supporting text which add further support for some of the city's key employers – most notably JLR, its supply chain and both universities.	Due to the very minor proposed change, the findings of the SA/SEA report hold good.
JE2	Minor word change.	No new SA assessment required.

JE3	No change to policy.	No new SA assessment required.
JE4	No change to policy.	No new SA assessment required.
JE5	No change to policy.	No new SA assessment required.
JE6	No change to policy.	No new SA assessment required.
JE7	Minor change to ensure consistency with sustainable travel principles.	Due to the very minor proposed change, the findings of the SA/SEA report hold good.
H1	Minor change to ensure consistency with housing trajectory.	Due to the very minor proposed change, the findings of the SA/SEA report hold good.
H2	Table 4.2 of the Plan, which forms part of Policy H2 identifies the site allocations for new homes. Despite a number of additional sites being proposed during the examination process, the list of sites remains unchanged although some small adjustments to site boundaries are proposed at Keresley, Eastern Green, Cromwell Lane and the Browns Lane Nursery Site (Appendix 4). These adjustments reflect previous cartographical errors and consultation responses to the Plan and have been considered through the examination process. They make no impact on the amount of Green Belt land that is to be developed through this Plan. Amendments are proposed however to the list of essential requirements. This is with a view to strengthening the links to necessary infrastructure and highlighting key areas of consideration for the planning application stage. Proposed modifications in this regard relate to the proposed allocations at Keresley, Eastern Green, Walsgrave Hill Farm, Browns Lane, Sutton Stop, Cromwell Lane and Grange Farm. Additional clarification around transport infrastructure delivery is also added in to ensure consistency with national guidance and allow sustainable delivery of infrastructure where necessary and appropriate.	Due to the substantive changes to the policy it is considered this represents a significant change to the findings of the SA/SEA report, which would require a fresh SA/SEA assessment.
H3	Minor change to ensure consistency with sustainable development principles.	Due to the very minor proposed change, the findings of the SA/SEA report hold good.
H4	No change to policy.	No new SA assessment required.
H5	No change to policy.	No new SA assessment required.
H6	Minor change to ensure consistency with viability.	Due to the very minor proposed change, the findings of the SA/SEA report hold good.
H7	No change to policy.	No new SA assessment required.
H8	No change to policy.	No new SA assessment required.
H9	No change to policy.	No new SA assessment required.
H10	No change to policy.	No new SA assessment required.
H11	Minor change to ensure consistency with amenity standards.	Due to the very minor proposed change, the findings of the SA/SEA report hold good.
R1	Minor change to ensure consistency with retail figures.	Due to the very minor proposed change, the findings of the SA/SEA report

		hold good.
R2	The primary adjustment to this Policy is to ensure the policy and requirements are clear and fully reflective of the evidence base. To ensure this is the case retail based floor space requirements are to be split by use class, which means existing tables are to be subdivided. The end requirements remain unchanged. The threshold for impact assessments (for out of centre retail proposals) is to be increase from 400sq.m to 1,000sq.m, which reflects one of the Inspectors Action Points. This has regard to the average size of existing out of centre units around Coventry. As such, it responds to a review of local evidence and remains below the national threshold of 2,500sq.m.	Due to the substantive changes to the policy it is considered this represents a significant change to the findings of the SA/SEA report, which would require a fresh SA/SEA assessment.
R3	Minor change to delete reference to the city centre.	Due to the very minor proposed change, the findings of the SA/SEA report hold good.
R4	Minor change to delete reference to the sequential assessment.	Due to the very minor proposed change, the findings of the SA/SEA report hold good.
R5	No change to policy.	No new SA assessment required.
R6	No change to policy.	No new SA assessment required.
CO1	No change to policy.	No new SA assessment required.
CO2	No change to policy.	No new SA assessment required.
CO3	No change to policy.	No new SA assessment required.
GB1	Additional criteria is to be added to Policy GB1 alongside extra supporting text, which will ensure the policy is clear about how Local Green Space will be managed. This confirms that the creation of small buildings and structures will be acceptable, but only where they are ancillary to the primary use of the land as green space. For example, this could include sports changing rooms, play equipment or appropriate lighting. Additional supporting text is also to be added to strengthen the intention of new areas of Local Green Space being designated within key sites such as Whitley, Keresley, Eastern Green and as part of the Heritage Park. The integrity of the Local Green Space designation has also been enhanced by removing areas of existing built development (such as schools, sports centres and homes). Opportunity has also been taken to correct a small number of historic cartographical errors with the proposed boundary lines. Maps of these adjustments are included within Appendix 4. This has no impact on the amount of green space that is to be protected through the Local Plan or the amount of land to be lost to development.	Due to the substantive changes to the policy it is considered this represents a significant change to the findings of the SA/SEA report, which would require a fresh SA/SEA assessment.
GB2	Policy GB2 is also to be amended which will define the small number of Green Belt parcels along the city's southern boundary as safeguarded	Due to the substantive changes to the policy it is considered this represents a significant change to the findings of the SA/SEA report,

	land instead of reserved land. This ensures consistency with national guidance and responds to the Inspectors action points. It does mean though that the next Local Plan will need to consider the future policy basis for these areas having regard to any developments that are brought forward by Warwick District Council on the adjoining land.	which would require a fresh SA/SEA assessment.
GE1	Policy proposed for minor amendment to reflect consultation responses and discussions with The Environment Agency, Natural England and Warwickshire Wildlife Trust amongst others.	Due to the substantive changes to the policy it is considered this represents a significant change to the findings of the SA/SEA report, which would require a fresh SA/SEA assessment.
GE2	No change to policy.	No new SA assessment required.
GE3	Policy proposed for minor amendment to reflect consultation responses and discussions with The Environment Agency, Natural England and Warwickshire Wildlife Trust amongst others.	Due to the substantive changes to the policy it is considered this represents a significant change to the findings of the SA/SEA report, which would require a fresh SA/SEA assessment.
GE4	Minor change to include reference to new trees.	Due to the very minor proposed change, the findings of the SA/SEA report hold good.
DE1	Minor change to include reference to public transport and bus priority measures.	Due to the very minor proposed change, the findings of the SA/SEA report hold good.
HE1	No change to policy.	No new SA assessment required.
HE2	Minor wording changes to aid clarity.	No new SA assessment required.
HE3	This policy has been developed in partnership with Bluecoats School and the Charterhouse Trust and clarifies the position around how the heritage park will be delivered and how the future expansion of the school can be supported. It also brings into the policy the specific requirement for a comprehensive Masterplan developed in partnership with both parties alongside the city council and local community.	Due to the substantive changes to the policy it is considered this represents a significant change to the findings of the SA/SEA report, which would require a fresh SA/SEA assessment.
AC1	No change to policy.	No new SA assessment required.
AC2	No change to policy.	No new SA assessment required.
AC3	Minor change to include reference to key routes.	Due to the very minor proposed change, the findings of the SA/SEA report hold good.
AC4	No change to policy.	No new SA assessment required.
AC5	Minor change to include reference to joint working with colleagues at Transport for West Midlands (TfWM) to strengthen the links and commentary around regional transport plans, public transport and regional connectivity. Additional technical information has been added regarding the most recent transport modelling and references to SPRINT have been removed to reflect on-going work through the Combined Authority.	Due to the very minor proposed change, the findings of the SA/SEA report hold good.
AC6	Minor change to include reference to West Midlands Transport Plan	Due to the very minor proposed change, the findings of the SA/SEA report

		hold good.
AC7	No change to policy.	No new SA assessment required.
EM1	Additional reference is proposed to be added to Policy EM1 with regards blue infrastructure, whilst Policy EM2 is amended to include reference to the city's coal mining legacy.	Due to the very minor proposed change, the findings of the SA/SEA report hold good.
EM2	Minor changes to ensure consistency with Building Regulations.	Due to the very minor proposed change, the findings of the SA/SEA report hold good.
EM3	No change to policy.	No new SA assessment required.
EM4	Policy proposed to be amended following engagement with the Environment Agency. This ensures the policy appropriately reflects the most up to date flood risk and mitigation information and guidance available nationally.	Due to the substantive changes to the policy it is considered this represents a significant change to the findings of the SA/SEA report, which would require a fresh SA/SEA assessment.
EM5	Minor changes to ensure consistency with the partnership working with the Environment Agency.	Due to the very minor proposed change, the findings of the SA/SEA report hold good.
EM6	New Policy to cover groundwater management and drainage on previously developed land in partnership with the Environment Agency.	Given this is a new policy, it is considered this represents a significant change to the findings of the SA/SEA report, which would require a fresh SA/SEA assessment.
EM7	Minor changes to ensure consistency with the West Midlands Transport Emissions Framework.	Due to the very minor proposed change, the findings of the SA/SEA report hold good.
EM8	Policy has been strengthened considerably in partnership with the Environment Agency.	Due to the substantive changes to the policy it is considered this represents a significant change to the findings of the SA/SEA report, which would require a fresh SA/SEA assessment.
EM9	No change to policy.	No new SA assessment required.
EM10	New Policy to cover coal mining legacy issues at the request of the Inspector.	Given this is a new policy, it is considered this represents a significant change to the findings of the SA/SEA report, which would require a fresh SA/SEA assessment.
C1	No change to policy.	No new SA assessment required.
C2	No change to policy.	No new SA assessment required.
IM1	Minor changes to clarify infrastructure priorities.	Due to the very minor proposed change, the findings of the SA/SEA report hold good.

APPENDIX II: NEW APPRAISAL OF PROPOSED MODIFICATIONS (2017)

Policy DS1: Overall Development Needs														
	<p>4. 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> <p>d) A minimum of 24,600 additional homes.</p> <p>e) A minimum of 128ha of employment land within the city's administrative boundary, including:</p> <p>iv. at least 176,000sq.m of office floor space at Friargate and the wider city centre,</p> <p>v. the continued expansion of Whitley Business Park; and</p> <p>vi. 15ha strategic allocation adjoining the A45 as part of the Eastern Green sustainable urban extension</p> <p>f) 84,900sq.m gross retail based floor space (across use classes A1-A5 (including bulky goods)) 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> <p>5. Notwithstanding the above, Coventry's objectively assessed housing need for the period 2011 to 2031 is at least 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>6. The Council will undertake a comprehensive review of national policy, the regional context, updates to the evidence base and monitoring data before 31st March 2021 to assess whether a full or partial review of the Plan is required. In the event that a review is required, work on it will commence immediately.</p> <p>Furthermore, the Plan will be reviewed (either wholly or partially) prior to the end of the Plan Period in the event of one or more of the following circumstances arising: -</p> <p>e) Through the Duty to Co-operate, the unmet housing and employment needs of the city are proven to be undeliverable within the Local Plans of Warwickshire authorities;</p> <p>f) Updated evidence or changes to national policy suggest that the overall development strategy should be significantly changed;</p> <p>g) The monitoring of the Local Plan (in line with the Plan's Monitoring Framework having particular regard to the monitoring of housing delivery) demonstrates that the overall development strategy or the policies are not delivering the Local Plan's objectives and requirements;</p> <p>h) Any other reasons that render the Plan, or part of it, significantly out of date.</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
++	very positive													
+	positive													
?	uncertain													
o	neutral/no impact													
-	negative													
--	very negative													
1		?												
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 DS4A General Masterplan principles												
	<p>The following General Principles should be adhered to when master planning any major development proposal:</p> <ul style="list-style-type: none"> vii. Where appropriate the Masterplan should clearly identify any phasing of development along with the timely provision of supporting infrastructure; viii. Where the site is identified as an allocation within the Local Plan or City Centre AAP it should plan positively to meet in full the requirements identified within the relevant policies associated with the allocation. Where the proposal represents a phase or phases of a wider scheme however, the quantum of development should reflect the relative size and characteristics of the phase, including its position within the wider site; ix. Where possible, all proposals should be planned in a comprehensive and integrated manner reflecting partnership working with relevant stakeholders. Where proposals represent a phase of a larger development the Masterplan should have full regard to any adjoining land parcels and development proposals to ensure it delivers appropriate parts of the strategic or site-wide infrastructure and other relevant features. This should support the wider delivery of the comprehensive scheme; x. Opportunities to deliver higher density residential and mixed-use development should be maximised along public transport corridors and in designated centres with lower densities provided elsewhere (in accordance with policies H9 and R3); xi. Employment and commercial proposals should respond positively to market demands and requirements, maximising opportunities to locate within or close to designated centres (as appropriate) and provide a range and choice of opportunities to meet business and customer needs; xii. Identify appropriate highway infrastructure along with sustainable transport corridors that include the provision for integrated public transport, cycling and walking which provides excellent connectivity and linkages to within the site itself, the City Centre and with the surrounding area and existing networks; <p>Appropriate levels of car and cycle parking should be made in</p>	<table border="1"> <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 positive												
+	positive												
?	uncertain												
0	neutral/no impact												
-	negative												
--	very negative												

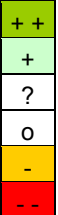
	<ul style="list-style-type: none"> ix. accordance with the Local Plan’s parking requirements. Spaces should be well integrated within the development and laid out to ensure they do not result in the obstruction of the highway as a result of excessive on-street parking; x. Where appropriate social and community facilities should be concentrated within mixed use hubs and designated centres and easily accessed by public transport, walking and cycling (having regard to Policy CO1); xi. Proposals should respond to the local context and local design characteristics (in accordance with Policies GE3, HE2 and DE1), to create new well designed developments with a distinctive character which residents will be proud of; xii. Features of the historic environment should be respected as part of new developments with existing heritage assets conserved and enhanced as part of development proposals (in accordance with Policy HE2). Where appropriate, this should include the setting of buildings and spaces and the restoration of assets at risk of loss; xiii. Sympathetically integrate existing landscape, biodiversity and historic features of the site into the development taking opportunities to protect, enhance and manage important features along with mitigation and enhancement measures to provide satisfactory compensatory provisions where appropriate (having regard to Policies GE1-4); xiv. Provide fully integrated, accessible and connected multi-functional green and blue infrastructure which forms strategically important links to the surrounding area to provide routes for people and wildlife and open spaces for sports, recreation and play; xv. Where appropriate incorporate innovative and creative approaches to energy generation, the provision of utilities and information technology, mitigation of pollutants, management of surface water and flood risk and waste management solutions. These should be adopted to make new developments more sustainable and resistant to the impacts of climate change; and xvi. All new Masterplans should be informed by consultation with existing communities in adjoining areas. This should take place prior to the submission of a planning application to ensure feedback can influence the final proposals. 	
1		+
2		+
3		+
4		+

5	Facilitate the provision of affordable housing	+
6	Policy could make reference to designing out crime but cross referenced DE1.	+
7		+
8		+
9		++
10		++
11		+
12		+
13		+
14		O
15		+
16		+
17		++
18		+
19		+
20		+

Policy DS4B Whitley Specific Masterplan Principles			
Objectives	<p>In addition to the general principles outlined in Policy DS4 (Part A) of this policy, development proposals which relate to this area should also have regard to the relevant requirements below:</p> <ul style="list-style-type: none"> x. Any development should support and complement the existing JLR global headquarters; xi. New provision should be primarily focused within 'B class' uses (excluding B1 offices) unless they are shown to be ancillary and supportive to the overall provisions of the business park and in accordance with the other policies of this Plan; xii. Support and integrate the planned highway infrastructure across the A45 and A444 and efficiently utilise this network for vehicle access into the site(s); xiii. Continue to maximise links and connectivity with surrounding business parks within both Coventry City and Warwick District to enhance the employment hub; xiv. Expand and enhance on existing travel plans and continue to encourage excellent connectivity to public transport as well as the provision of high quality routes to support both walking and cycling; xv. Enhance the connectivity of ecology and biodiversity at the Stonebridge meadows LNR and Baginton Fields nature reserve. This should include a 'green' connection into River Sowe along the northern edge of the site; xvi. An appropriate buffer should be retained between the new commercial activity and the existing homes in and around Sedgemoor Road; xvii. Development should not compromise the presence and ecological value of the River Sowe and River Sherbourne; and xviii. Make positive provisions to relocate the existing sports fields (as appropriate) in accordance with Policy GE2; 	<div style="display: flex; align-items: center;"> <div style="margin-right: 10px;"> <div style="background-color: #90EE90; border: 1px solid black; padding: 2px; text-align: center;">++</div> <div style="background-color: #90EE90; border: 1px solid black; padding: 2px; text-align: center;">+</div> <div style="background-color: #FFFFFF; border: 1px solid black; padding: 2px; text-align: center;">?</div> <div style="background-color: #FFFFFF; border: 1px solid black; padding: 2px; text-align: center;">o</div> <div style="background-color: #FFD700; border: 1px solid black; padding: 2px; text-align: center;">-</div> <div style="background-color: #FF0000; border: 1px solid black; padding: 2px; text-align: center;">--</div> </div> <div> <p>very positive</p> <p>positive</p> <p>uncertain</p> <p>neutral/no impact</p> <p>negative</p> <p>very negative</p> </div> </div>	
	1		+
	2		+
	3		+
	4		+
	5		+
	6		+

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

Comments:

Policy DS4 (Part C) – Keresley SUE Specific Masterplan Principles		
	<p>In addition to the general principles outlined in Policy DS4 (Part A) of this policy, development proposals which relate to this area should also have regard to the relevant requirements below:</p> <ul style="list-style-type: none"> vi. Incorporate the recommendations of the Council’s SUE Design Guidance SPD; vii. Ensure that the planned Local Centres are located at separate ends (north and south) in accordance with Policy R1; viii. Ensure the new defensible boundaries to the Green Belt are clearly supported on the western side of the site to Tamworth Road and to the north around Thompsons Lane; ix. Establish a comprehensive green and blue infrastructure corridor focused around the Ancient Woodlands, Hounds Hill and the Hall Brook. This corridor should run north-south between the Burrow Hill Fort to the north and the Jubilee Woodland to the south east; and x. Identify clear access points to the site and make appropriate provisions for new transport infrastructure and highway improvements to support the comprehensive delivery of the site. This should include: <ul style="list-style-type: none"> d) The provision of a new Link Road in accordance with Policy H2. The Link Road should be operational to traffic prior to the full completion of all development components within the SUE; e) The delivery of the Link Road should not be to the detriment of Pro-Logis Park; and f) The management of the existing highway junctions at Bennetts Road, Tamworth Road, Fivefield Road, Sandpits Lane, Thompsons Lane, Long Lane and Watery Lane to ensure they continue to operate in a safe and appropriate way. 	 <p>very positive positive uncertain neutral/no impact negative very negative</p>
1		+
2		+
3		+
4		+
5		+
6		+
7		+

8		+
9		++
10		++
11		+
12		+
13		+
14		O
15		+
16		+
17		++
18		+
19		+
20		+

Comments:

Policy DS4 (Part D) – Eastern Green SUE Specific Masterplan Principles														
	<p>In addition to the general principles outlined in Policy DS4 (Part A) of this policy, development proposals which relate to this area should also have regard to the relevant requirements below:</p> <ul style="list-style-type: none"> x. Incorporate the recommendations of the Council's SUE Design Guidance SPD; xi. Respond to the transport and economic opportunities associated with the site's proximity to the planned HS2 interchange to the west. xii. Ensure that the employment provisions and Major District Centre are located towards the north of the site and are accessed directly from the A45; xiii. Ensure the new defensible boundaries to the Green Belt are clearly supported to Pickford Green Lane in the west and the A45 to the north; xiv. Provide appropriate green infrastructure along the western edge of the SUE around Pickford Green Lane to help blend and integrate the development into the wider Countryside; xv. Establish a comprehensive green and blue infrastructure corridor focused along the Pickford Brook and its tributary. This should run from Pickford Green Lane in the west and link to existing corridors off-site, for example, across Westridge Avenue and Parkhill Drive towards Allesley Park; xvi. Identify clear access points to the site and make appropriate provisions for new transport infrastructure and highway improvements to support the comprehensive delivery of the site; xvii. In accordance with Policy AC2, manage the existing highway junctions at Pickford Green Lane and Brick Hill Lane with the A45 to ensure they are either integrated into the new A45 junction or safely retained within the existing highway network; and xviii. Make appropriate provision to aid future integration of the new rapid transit route within the site once the final route is known. 	<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
++	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		O
15		+
16		+
17		++
18		+
19		+
20		+

Policy H2 Housing Allocations														
Objectives	<p>3. 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>4. 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 style="background-color: #92d050;">++</td><td>very positive</td></tr> <tr><td style="background-color: #90ee90;">+</td><td>positive</td></tr> <tr><td style="background-color: #e0e0e0;">?</td><td>uncertain</td></tr> <tr><td style="background-color: #e0e0e0;">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
	++	very positive												
	+	positive												
	?	uncertain												
	0	neutral/no impact												
	-	negative												
	--	very negative												
		-												
	1	+												
	2	+												
	3	+												
	4	+												
5	?													
6	+													
7	?													
8	-													
9	+													
10	+													
11	+													

12		0
13		0
14		?
15		?
16		+
17		++
18		++
19		++
20		++

Site Ref	Site	Ward	Total Dwellings	GF / PDL	Essential Site Specific Requirements and Other Uses
H2:1	Keresley SUE	Bablake	3,100	GF	Retail space within local centres (policy R1). Distributor link road connecting Long Lane and Winding House Lane with surrounding junction improvements as appropriate. Provision of 1 x 2FE primary school and contributions towards a 8FE secondary school. Retention of medieval fishponds, ancient woodlands, important (ancient) hedgerows. Creation of publicly accessible green corridor along the Hall Brook and enhanced connectivity between the ancient woodlands. Protection of Jubilee Woodland. Inclusion of appropriate screening to existing residential areas.

H2:2	Eastern Green SUE	Bablake	2,250	GF	15ha of employment land adjacent to the A45 (policy JE2), which is to be developed in tandem with the residential development. The provision of a new Major District Centre (policy R1). Provision of 1 2FE primary school. New grade separated junction from the A45 to provide primary site access with surrounding junction improvements as appropriate. Creation of publicly accessible green corridors along the Pickford Brook and its tributaries. Retention of medieval moat at Pond Farm and retention of important hedgerows. Inclusion of appropriate screening to existing residential areas. Buffering and screening at Pickford Green to protect the transition of land use into the wider Green Belt.
H2:3	Walsgrave Hill Farm	Henley and Wyken	900	GF	Retention and enhanced setting of listed buildings at Hungerley Hall Farm. Site to incorporate blue light access linking the A46 to the University Hospital. Facilitate and work with on-going highways proposals by Highways England linked to a new Grade Separated junction at Clifford Bridge. Provision of essential drainage and flood risk infrastructure.
H2:4	Land at Whitmore Park, Holbrook Lane	Holbrook	730	PDL	As part of mixed use scheme to deliver 8ha of redeveloped employment land (policy JE2). The retention of the sports field fronting Beake Avenue. Highway works to open up Swallow Road to public traffic as appropriate. Retention of locally listed building facades and boundary walls.
H2:5	Paragon Park	Foleshill	700	PDL	Retention of building facing Foleshill Road. Remodelling of Webster Park to include a new area of playing fields adjacent to the existing primary school.
H2:6	Land at Browns Lane	Bablake	475	GF	Retention of important trees and hedgerows. Need to focus primary access to Coundon Wedge Drive.
H2:7	Land at Sutton Stop	Longford	285	GF	Total Allocation is linked to extant permission (FUL/2013/0727) and should also include a 225 berth marina and ancillary provisions (as appropriate) and 1.5ha of employment land (policy JE2). The site should also incorporate in excess of 5ha publicly accessible green space and the inclusion of appropriate screening to existing residential areas. Development will need to ensure that highways access and provisions are adequate and suitable for the site. This could include remodelling of the junction at Sutton Stop and Grange Road and at Alderman's Green Road

H2:8	Land West of Cromwell Lane	Westwood	240	GF	Creation of woodland area to the western boundary of the site to reflect Ancient Arden landscape characteristics and ensure defensible boundary to the wider Green Belt. Retain and enhance the setting of Westwood Farm and other listed buildings within and adjacent to the site. Inclusion of appropriate screening to existing residential areas. Explore opportunities to introduce residents parking schemes on site and along adjoining streets with surrounding junction improvements as appropriate.
H2:9	Land at London Road/Allard Way	Binley and Willenhall	200	GF	Retention and reuse of locally listed pumping station and lodge. Retention of important hedgerows and management of biodiversity/ecology impacts.
H2:10	Former Lyng Hall playing fields	Upper Stoke	185	mix	Provision of 1ha of publicly accessible green space as part of development
H2:11	Elms Farm	Henley	150	GF	Creation of publicly accessible green space along eastern boundary of site
H2:12	Site of LTI Factory, Holyhead Road	Sherbourne	110	PDL	
H2:13	Grange Farm	Longford	105	GF	Retention of important hedgerows. Highway improvements to Grange Road.
H2:14	Former Transco site, Abbots Lane	Sherbourne	100	PDL	Retention of sandstone boundary walls
H2:15	Land at Sandy Lane	Radford	90	PDL	Retention of the Daimler Office building on Sandy Lane
H2:16	Land at Carlton Road / Old Church Road	Foleshill	85	PDL	Retention of chimney, art-deco façade and railings of former weaving mill

H2:17	Nursery Sites, Browns Lane	Bablake	80	GF	
H2:18	Former Mercia sports field	Foleshill	75	GF/PDL	Provision of 0.5ha of publicly accessible green space as part of development
H2:19	Land at Mitchell Avenue	Wainbody	50	GF	Existing sports facilities are to be re-provided at the site of the former Alderman Harris School at Charter Avenue or an appropriate alternative site within the local area as part of this development (in accordance with policy GE2).
H2:20	Land at Durbar Avenue	Foleshill	45	PDL	As part of mixed use scheme to deliver 1.5ha of redeveloped employment land (policy JE2)
H2:21	Woodfield school site, Stoneleigh Road	Wainbody	30	mix	new homes to link in with new railway station to be delivered as part of the wider NUCKLE project (policy Ac6)
H2:22	Land at the Junction of Jardine Crescent and Jobs Lane	Woodlands	25	PDL	retail space within extended district centre (policy R1)
H2:23	Land west of Cryfield Heights, Gibbet Hill	Wainbody	20	GF	
H2:24	Land West of Cheltenham Croft	Henley	15	GF	

H2:25	The Grange Children's Home, Waste Lane	Bablake	15	PDL/GF	Locally Listed buildings to be retained and converted with limited new build allowed to support a comprehensive scheme. Dense tree boundaries to be retained to protect wider Green Belt setting.
-------	--	---------	----	--------	---

Objectives	<p>Policy R2: Coventry City Centre – Development Strategy</p> <p>2. 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"> q) Enhancement of its position as a focus for the entire sub-region and as a national and international destination to live, work and play; r) Enhancement of its retail and leisure offer to strengthen the city’s sub-regional role; s) Provision of high quality office space; t) Becoming a hub for education; u) Including a variety of places to live which cater for different needs; v) Preserving or enhancing the character and setting of the historic built landscape and the archaeological environment; w) A connected public realm including public squares and green spaces, easily accessible through the creation of desirable and legible pedestrian routes; x) Accessible for all; y) Providing an attractive and safe environment for pedestrians, cyclists and motorists; z) Provide a high quality public transport system that benefits from seamless integration and is well connected to existing and new infrastructure aa) High quality sustainable built design; bb) Continuing to develop a vibrant and attractive night time economy; cc) Providing opportunities to improve health and wellbeing; dd) Continuing to support greater integration of the university within the wider city centre in accordance with the policies in the Area Action Plan; ee) Recognising and preserving key views to the iconic three spires of St Michaels, Holy Trinity and Christchurch; and ff) Supporting the reintroduction of green and blue infrastructure throughout the city centre, including opportunities for deculverting wherever possible. <p>An Area Action Plan will be developed to help deliver this strategy and support and guide development within the city centre.</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
++	very positive													
+	positive													
?	uncertain													
0	neutral/no impact													
-	negative													
--	very negative													
		++												
1		++												
2		0												
3		+												

4		+
5		+
6		++
7		+
8		0
9		++
10		0
11		+
12		+
13		+
14		?
15		0
16		+
17		++
18		++
19		++
20		

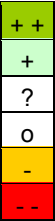
Policy GB1: Green Belt and Local Green Space													
<p>2. The city's most up-to-date Green Belt and Local Green space boundaries are identified on the Policies Map.</p> <p>2A: Inappropriate development will not be permitted in the Coventry Green Belt unless very special circumstances exist. Development 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>2B: Within areas designated as Local Green Space the erection of small buildings and structures which are ancillary to the primary use of the land may be acceptable. Other development will not be permitted unless very special circumstances are demonstrated.</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"> p) Land part of the Wood End redevelopment (residential) q) Land at Sutton Stop (residential and employment) r) Land south at Walsgrave Hill Farm (residential) s) Land at Keresley (residential) t) Land north of Upper Eastern Green (residential and employment) u) Land at Cromwell Lane (residential) v) Land at Mitchell Avenue (residential) w) Land off Allard Way/London Road (residential) x) Land at Cheltenham Croft (residential) y) Land east of Browns Lane (residential) z) Land west of Browns Lane/Burton Close (residential) aa) Land at Cryfield Heights (residential) bb) Land at Woodfield School, Stoneleigh Road (Residential and infrastructure) cc) Land south of Blue Coats School (Heritage and Education) dd) Land at Baginton Fields and South East of Whitley Business Park (employment) ee) Land to the east of the existing Energy from Waste plant at Bar Road (general industrial) 	<table border="0"> <tr> <td style="text-align: center;">++</td> <td style="text-align: center;">very positive</td> </tr> <tr> <td style="text-align: center;">+</td> <td style="text-align: center;">positive</td> </tr> <tr> <td style="text-align: center;">?</td> <td style="text-align: center;">uncertain</td> </tr> <tr> <td style="text-align: center;">0</td> <td style="text-align: center;">neutral/no impact</td> </tr> <tr> <td style="text-align: center;">-</td> <td style="text-align: center;">negative</td> </tr> <tr> <td style="text-align: center;">--</td> <td style="text-align: center;">very negative</td> </tr> </table>	++	very positive	+	positive	?	uncertain	0	neutral/no impact	-	negative	--	very negative
++	very positive												
+	positive												
?	uncertain												
0	neutral/no impact												
-	negative												
--	very negative												

	<p>The following areas will be removed from the Green Belt and re-designated as Local 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) Tocil Wood Brook Stray l) Park Wood and Ten Shilling Wood m) Tile Hill Wood n) Allesley Park <p>3. 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"> d) Land at Park Hill Lane e) Land at Westwood School and Xcel Leisure Centre <p>4. 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>5. In addition to appropriate development in the Green Belt identified in the NPPF, limited infill development would be considered appropriate. 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>	
1		+
2		+
3		?
4		?
5		+
6		?
7		+
8		-

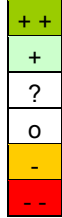
9		-
10		+
11		-
12		+
13		O
14		O
15		O
16		O
17		+
18		+
19		+
20		+

Policy GB2: Safeguarded Land in the Green Belt														
Policy GB2: Safeguarded Land in the Green Belt														
		<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
++	very positive													
+	positive													
?	uncertain													
0	neutral/no impact													
-	negative													
--	very negative													
1.	<p>The areas of Safeguarded 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) Playing Field south of Finham Park School; and d) Land west of Finham Primary School. <p>Any development of these sites will be subject to consideration through a full or partial review of this Local Plan having explicit regard to development proposals in Warwick District.</p>													
1		+												
2		-												
3		0												
4		0												
5		0												
6		0												
7		-												
8		0												
9		0												
10		-												
11		-												

12		0
13		+
14		0
15		--
16		0
17		-
18		+
19		+
20		+

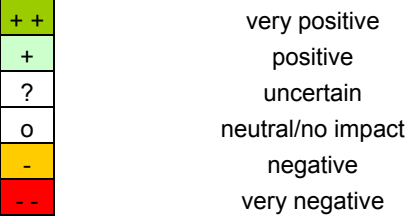
Policy GE3: Biodiversity, Geological, Landscape and Archaeological Conservation			
Objectives	<p>Sites of Special Scientific Interest (SSSIs), Local Nature Reserves (LNRs), Ancient Woodlands, Local Wildlife and Geological Sites will be protected and enhanced. Proposals for development on other sites, 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; c) avoid negative impacts on existing biodiversity; and d) preserve species which are legally protected, in decline, are rare within Coventry or which are covered by national, regional or local Biodiversity Action Plans. <p>2. 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, but only in exceptional circumstances.</p> <p>3. 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, ancient and newly-planted woodlands, ancient hedgerows and heritage assets of value to the locality, will be protected against loss or damage. In the case of archaeological remains, all practical measures must be taken for their assessment and recording in accordance with Policy HE2</p>		<p>very positive</p> <p>positive</p> <p>uncertain</p> <p>neutral/no impact</p> <p>negative</p> <p>very negative</p>
		+	
	1	+	
	2	?	
	3	?	
	4	+	
5	?		

6	+	
7	-	
8	-	
9	+	
10	-	
11	+	
12	○	
13	○	
14	○	
15	○	
16	+	
17	+	
18	+	
19	+	
20		

Objectives	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.</p>	<p>very positive positive uncertain neutral/no impact negative very negative</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>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> <ul style="list-style-type: none"> h) Not permitting development that compromises its integrity and that of the overall green infrastructure framework (including the Coventry/Oxford Canal); i) Using developer contributions to facilitate improvements to its quality, connectivity, multi-functionality and robustness; j) 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 including the wider public transport network k) Improving its functionality, quality, connectivity and accessibility; l) Ensuring that a key aim of green infrastructure is the maintenance and improvement and expansion of biodiversity; m) Integrating proposals to improve green infrastructure in the delivery of new developments, particularly through area based regeneration initiatives and major proposals and schemes; and n) Flood risk management and improving surface water quality. 	
1	+	
2	+	
3	?	
4	?	
5	+	
6	?	
7	+	
8	+	
9	+	
10	+	

11	+	
12	+	
13	○	
14	○	
15	○	
16	○	
17	+	
18	+	
19	+	
20	+	

Policy HE3 - Heritage Park – Charterhouse		
	<p>3. 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>4. Land at Blue Coat School is to be removed from the Green Belt in accordance with policy GB1 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. In addition, the expansion of the school should also support the appropriate relocation of the all-weather sports facilities and playground areas to secure the enhancement of the riverside area. This should facilitate the re-naturalisation of the area in an appropriate way in order to enhance the setting of the Charterhouse, its precinct and the Heritage Park as a whole.</p> <p>The creation of the Heritage Park and expansion of Blue Coat School should be guided by a comprehensive Master plan, which reflects the policies of this Plan (including Appendix 4).</p>	 <p>++ very positive + positive ? uncertain 0 neutral/no impact - negative -- very negative</p>
1		+
2		+
3		+
4		++
5		+
6		+
7		+
8		+
9		0
10		++
11		+

12		0
13		++
14		+
15		++
16		0
17		++
18		+
19		+
20		+

Comments:

Policy EM4 Flood Risk Management													
<p>All major developments must be assessed in respect of the level of flood risk from all sources. 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 all of the following criteria are met:</p> <ul style="list-style-type: none"> a) 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; b) it is provided with the appropriate minimum standard of flood defence and resilience to aid recovery (including suitable warning and evacuation procedures) which can be maintained for the lifetime of the development; c) 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; d) 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; e) in the case of essential infrastructure, access must be guaranteed and must be capable of remaining operational during all flooding events. 	<table border="0"> <tr> <td style="background-color: #90EE90; text-align: center;">++</td> <td style="padding-left: 20px;">very positive</td> </tr> <tr> <td style="background-color: #90EE90; text-align: center;">+</td> <td style="padding-left: 20px;">positive</td> </tr> <tr> <td style="background-color: #FFFFE0; text-align: center;">?</td> <td style="padding-left: 20px;">uncertain</td> </tr> <tr> <td style="background-color: #FFFFE0; text-align: center;">o</td> <td style="padding-left: 20px;">neutral/no impact</td> </tr> <tr> <td style="background-color: #FFD700; text-align: center;">-</td> <td style="padding-left: 20px;">negative</td> </tr> <tr> <td style="background-color: #FF0000; text-align: center;">--</td> <td style="padding-left: 20px;">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												

	<p>6. All opportunities to reduce flood risk in the surrounding area must be taken, including creating additional flood storage. In this instance reference should be made to the Councils IDP or Regulation 123 list. In order to achieve this:</p> <ul style="list-style-type: none">f) the functional floodplain (Flood Zone 3b) should be protected from development and reinstated in brownfield areas wherever possible;g) single storey buildings, basements and buildings on stilts will not be acceptable in Flood Zone 3;h) all opportunities to undertake river restoration and enhancement including de-culverting, removing unnecessary structures and reinstating a natural, sinuous watercourse will be encouraged;i) unless shown to be acceptable through exceptional circumstances, development should be set back at least 8m (from the top of bank or toe of a flood defence) of Main Rivers and 5m from Ordinary watercourses for maintenance access. This includes existing culverted watercourses.j) finished floor levels must be set a minimum of 600mm above the 1% AEP (1 in 100 year) plus climate change flood level. <p>where a development benefits from an existing or proposed flood defence scheme, the development should contribute towards the capital and/or maintenance of these defences over its lifetime.</p>	
--	---	--

<p>7. For sites in Flood Zone 3a, development should not impede flow routes, reduce floodplain storage or consume flood storage in a ‘flood cell’ within a defended area. If the development does result in a loss of storage, compensatory floodplain storage should be provided on a ‘level for level’ and ‘volume for volume’ basis.</p> <p>8. For sites in Flood Zone 3a, all types of new development behind flood defences should be avoided, where possible, due to the residual risks of breach and overtopping. Development should ensure that it would not prevent the Water bodies’ ability to reach good status or its potential to do so as set in the Severn River Basin Management Plans and should support, where possible, to improving the status class.</p> <p>9. 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.</p> <p>10. 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 an appropriately scaled 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.</p> <p>11. Land that is required for current and future flood management will be safeguarded from development. Where development lies adjacent to or benefits from an existing or future flood defence scheme they may be expected to contribute towards the cost of delivery and/or maintenance of that scheme in accordance with Policy IM1.</p> <p>8. A Flood Risk Assessment is required, appropriate to the scale and nature of the development proposed, where the development is:</p> <ul style="list-style-type: none">a) within a river floodplain, as defined by the Coventry SFRA indicative flood zone maps;b) within 20 metres of any watercourse;c) adjacent to, or including, any flood bank or other flood control structure;d) within an area where there may be surface water issues and drainage problems;	
--	--

1		0
2		0
3		0
4		0
5		0
6		0
7		0
8		0
9		++
10		+
11		++
12		++
13		+
14		++
15		0
16		+
17		0
18		0

19		0
20		0

Policy EM6 Redevelopment of Previously Developed Land.														
	<p>5. Development will be permitted where proposals do not have a negative impact on water quality, either directly through pollution of surface or ground water or indirectly through the treatment of waste water by whatever means.</p> <p>6. Prior to any potential development, consultation must be held with Severn Trent Water to ensure that the required wastewater infrastructure is in place in sufficient time. In line with the objectives of the Water Framework Directive, development must not affect the water bodies' ability to reach good status or its potential as set in the Humber and Severn River Basin Management Plans and should support, where possible, to improving the status class.</p> <p>7. Developers and operators must provide adequate information when submitting their proposals so that the potential impact on groundwater resources and quality can be adequately assessed'. This should include a risk assessment demonstrating there would be no adverse effect on water resources.</p> <p>8. Development will not be permitted within a groundwater Source Protection Zone 1 which would physically disturb an aquifer. This will include situations where proposed waste water infrastructure could pose an unacceptable risk of pollution of the underlying aquifer or receiving watercourse.</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
++	very positive													
+	positive													
?	uncertain													
o	neutral/no impact													
-	negative													
--	very negative													
1		0												
2		0												
3		0												
4		0												
5		0												
6		0												

7		0
8		0
9		++
10		+
11		++
12		++
13		+
14		++
15		o
16		+
17		?
18		o
19		o
20		o

Policy EM8 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) supporting recycling proposals for aggregate materials subject to the criteria in part 2 of this policy; e) Existing waste management facilities or land allocated for waste management uses being protected from encroachment by incompatible land uses that are more sensitive to odour, noise, dust and pest impacts; and f) Proposals for waste management facilities only being permitted where they would not have an unacceptable impact on the quantity or quality of surface or groundwater resources. <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>	<table border="0"> <tr> <td style="background-color: #90EE90; text-align: center;">++</td> <td style="padding-left: 20px;">very positive</td> </tr> <tr> <td style="background-color: #90EE90; text-align: center;">+</td> <td style="padding-left: 20px;">positive</td> </tr> <tr> <td style="background-color: #FFFFE0; text-align: center;">?</td> <td style="padding-left: 20px;">uncertain</td> </tr> <tr> <td style="background-color: #FFFFE0; text-align: center;">o</td> <td style="padding-left: 20px;">neutral/no impact</td> </tr> <tr> <td style="background-color: #FFD700; text-align: center;">-</td> <td style="padding-left: 20px;">negative</td> </tr> <tr> <td style="background-color: #FF0000; text-align: center;">--</td> <td style="padding-left: 20px;">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		0												
2		0												
3		0												

4		0
5		0
6		0
7		0
8		+
9		+
10		+
11		++
12		+
13		++
14		++
15		+
16		++
17		0
18		0
19		0
20		0

Policy EM10 Non Mineral Development in Mineral Safeguarding Areas														
	All non-mineral development proposals in the designated Mineral Safeguarding Areas should assess and evaluate the legacy of past mining heritage and should consider this in accordance with Policy EM2. It should also ensure that development does not entirely sterilise any potential future mineral extraction should this become viable and desirable. This should be considered in partnership with the Coal Authority.	<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
++	very positive													
+	positive													
?	uncertain													
o	neutral/no impact													
-	negative													
--	very negative													
1		o												
2		o												
3		o												
4		o												
5		o												
6		o												
7		o												
8		o												
9		o												
10		o												
11		o												
12		o												
13		o												

14		++
15		0
16		0
17		0
18		0
19		0
20		0

Although not a key objective in the SA criteria the inclusion of EM2 in the policy ensures there is adequate protection of the mining legacy through the planning process.

APPENDIX III: 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
please contact us

Telephone: (024) 7683 4295

E-mail: ldf@coventry.gov.uk

