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Our ref: 499829
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Consultation: Regulation 19 pre-submission draft of the Coventry Local Plan

Thank you for your consultation on the above

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The Town and Country Planning (Local Planning) (England) Regulations 2012

Natural England welcomes the content of the Local Plan and we have the following comments to make.

Soundness

Natural England notes that the plan is at the publication stage and as such your authority is seeking confirmation on the soundness of the plan. As far as Natural England is concerned the plan is largely considered sound i.e the plan is positively prepared as demonstrated by policies supporting green infrastructure and preventing fragmentation of habitats. The plan is justified, the evidence base appears largely robust as far as Natural England's remit is concerned, and alternatives have been considered throughout the plan stages. As far as Natural England is concerned the policies within the plan are deliverable and flexible and therefore the plan should be effective, and the plan is consistent with national policy with regard to those within Natural England's remit.

Duty to co-operate

Natural England can confirm that the local plan largely incorporates the areas of Natural England's concerns such as:

Water quality and quantity, air pollution, biodiversity and geodiversity, landscapes, both nationally designated and local landscape character, green infrastructure including priority habitat creation, climate change, soil, waste, strategic mitigation solutions and biodiversity net gain .

Habitats Regulations Assessment (HRA)

Natural England notes the Habitats Regulations Assessment prepared in support of the plan. We agree with your conclusions with regard to Ensor's Pool Special Area of Conservation and the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar.

The Plan's vision and strategy

Natural England advises that the Plan's vision and emerging development strategy addresses impacts and opportunities for the natural environment. We note the aspiration to protect and enhance the environment and move towards a zero carbon economy.

Policies

Natural England generally accepts the rationale behind the policies within your plan. We would

express additional support for the following elements.

STRATEGIC POLICY Policy DS4 (Part A) – General Masterplan principles

4); xii. 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;

Policy DS4 (Part B) - Whitley Specific Masterplan Principles

vi. Enhance the connectivity of ecology and biodiversity at the Stonebridge meadows Local Nature Reserve (LNR) and Baginton Fields nature reserve. This should include a 'green' connection into the River Sowe along the northern edge of the site and south of the A46;

viii. Development should not compromise the presence and ecological value of the River Sowe and River Sherbourne;

Policy DS4 (Part D) – Eastern Green SUE Specific Masterplan Principles

vi. 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; vii. Establish a comprehensive green and blue infrastructure corridor focused along the Pickford Brook and its tributary.

Policy R2: Coventry City Centre – Development Strategy

1. A connected public realm including public squares and green spaces, easily accessible through the creation of desirable and legible pedestrian routes; h. Accessible for all; i. Providing an attractive and safe environment for pedestrians, cyclists and motorists; j. Provide a high-quality public transport system that benefits from seamless integration and is well connected to existing and new infrastructure;
- ; p. Supporting the reintroduction of green and blue infrastructure throughout the city centre, including opportunities for de-culverting wherever possible.

STRATEGIC POLICY Policy GB3: Local Green Space

1. The city's Local Green Space boundaries are identified on the Policies Map.
2. Inappropriate development will not be permitted unless very special circumstances exist.

Natural England strongly supports

STRATEGIC POLICY Policy GE1 Green and Blue Infrastructure

1. The Council will protect and enhance green and blue infrastructure based on an analysis of existing assets, informed by, and contributing to the delivery of the Local Nature Recovery Strategy and the Green and Blue Infrastructure Strategy and Action Plan or its future equivalent.
2. New development proposals should make provision for green and blue 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, demonstrating how this links to the wider delivery of the Local Nature Recovery Strategy and the Green and Blue Infrastructure Strategy and Action Plan.
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 and new habitats. The creation of new habitats will be supported 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 multifunctionality of existing green and blue 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 and Blue Infrastructure Strategy and Action Plan, the Council will also expect new developments to enhance green and blue 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 and blue 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, reinstated. 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 and blue infrastructure already exists in the city, connecting natural heritage, green space, biodiversity, historic landscapes water bodies and other environmental assets, together with links to adjacent districts in Warwickshire and Solihull.

Natural England strongly supports the following:

Policy GE2: Green Space

Policy GE3: Biodiversity, Geological, and Landscape Conservation

Natural England supports this policy

Policy GE4: Tree Protection

Natural England especially supports the following elements of this policy.

STRATEGIC POLICY Policy DE1 Ensuring High Quality Design

- b. consider the local distinctiveness and identity of the site but also have regard to opportunities to enhance the local built and natural environment through new development and enhanced design;
- n. be proactive in responding to climate change and adopt sustainable and low carbon construction principles in terms of their design, layout and density;
- o. consider green infrastructure at the earliest stage in the design process, to ensure that it is well planned, designed, managed and maintained. It should also be well integrated and serve multiple purposes (as appropriate);
- q. minimise adverse impact on important natural resources;
- r. conserve and enhance biodiversity; and
- s. respect and enhance landscape quality including trees, hedges and other landscape features of value.

Natural England welcomes the desire to encourage active travel within

STRATEGIC POLICY Policy AC1: Accessible Transport Network

Natural England supports...

Active Transport Provision Walking and Cycling

12.29 The Council is placing a high priority on promoting walking and cycling (as reflected in the Coventry Transport Strategy) to help reduce road traffic congestion and carbon and air pollution, but also to improve the physical and mental health of residents. Perhaps the most significant advantages which are offered by these active travel modes are the physical and mental health benefits.

Natural England strongly supports

Policy AC4: Active Transport Provision including Walking, Cycling and Micro Mobility

We are pleased to see that Coventry's local plan incorporates planning for climate change and adaptation as outlined within:

STRATEGIC POLICY Policy EM1: Planning for Climate Change Adaptation

With additional support for:

Policy EM4 Flood Risk Management

1. All opportunities to reduce flood risk in the surrounding area must be taken, including creating additional flood storage and exploring areas for natural flood management.

10. Where a development proposal lies adjacent to the existing de-culverted river Sherbourne, a natural sinuous river channel should be retained. Consideration should also be given to removing water bodies from culverts wherever possible and viable. This will be of particular importance along Fairfax Street and will be vital to create multi-functional green and blue spaces within the city centre.

Sites of Least Environmental Value

In accordance with the National Planning Policy Framework (NPPF), the plan's development strategy appears to avoid areas of high environmental value and which therefore demonstrates that sites of least environmental value are allocated i.e. they avoid designated sites and landscapes. Notwithstanding sites of local significance which others may raise.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Grady McLean on 020 802 61266. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Grady McLean
Higher Officer – Sustainable Development
West Midlands Team

