



**Coventry Local Plan Review  
2024-2042:  
Main Modifications (MMs)**

**Sustainability Appraisal (SA)/  
Strategic Environmental Assessment (SEA)  
Habitats Regulations Assessment (HRA)  
Screening**

**SA Addendum Report**

**July 2026**

**Coventry Local Plan Review 2024-2042:  
Main Modifications (MMs)**

**SUSTAINABILITY APPRAISAL (SA)  
(incorporating  
Strategic Environmental Assessment SEA)  
Habitats Regulations Assessment (HRA) Screening)**

**SA Addendum Report:**

|                    |                                     |          |
|--------------------|-------------------------------------|----------|
| date:              | July 2026 (draft)                   |          |
| prepared for:      | Coventry City Council               |          |
| prepared by:       | Barbara Carroll<br>Dr Trevor Turpin | Enfusion |
| quality assurance: | Barbara Carroll                     | Enfusion |

## CONTENTS

Non-Technical Summary (NTS)

Page

### 1 Introduction

|                                                                       |   |
|-----------------------------------------------------------------------|---|
| Coventry Local Plan Review 2024-2042                                  | 1 |
| Sustainability Appraisal (SA) & Habitats Regulations Assessment (HRA) | 2 |
| Purpose and Methods for this SA/HRA Addendum Report                   | 3 |

### 2 Screening the Main Modifications for SA & HRA Significance

|                                        |   |
|----------------------------------------|---|
| Context & Approach                     | 4 |
| Findings of Screening for Significance | 4 |

### 3 Sustainability Appraisal of Main Modifications

|                                                                                                   |    |
|---------------------------------------------------------------------------------------------------|----|
| Change to Plan Period, Housing Land Need & Supply                                                 | 7  |
| Change to Plan Period, Employment Land Need & Supply                                              | 8  |
| Reasonable Alternatives: Release Green Belt Land; Retain Brownfield Land First & Monitor Delivery | 9  |
| Changes to Residential Land Supply, Amended & New Site Allocations                                | 12 |
| Changes to Employment Land Supply; New Site Allocation                                            | 19 |
| Other Significant Policy Changes                                                                  | 20 |
| Habitats Regulations Assessment Screening Update                                                  | 20 |
| Implications for the SA of the Plan Overall                                                       | 21 |

#### Appendices:

- I Screening of MMs for SA & HRA Significance
- II SA of Change to Plan Period, Local Housing Need
- III SA of Change to Plan Period, Local Employment Need
- IV SA of Reasonable Alternatives –Release Green Belt Land; Retain Brownfield Land First & Monitor Delivery
- V SA of New Site Allocations – Housing, Employment, Gypsy & Traveller

#### Tables:

- 3.1 Summary SA of Options for Development in/out of the Green Belt
- 3.2 Summary SA of New Site Allocations

## NON-TECHNICAL SUMMARY (NTS)

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

1. This is the NTS of the SA Addendum Report documenting the processes of Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) within an integrated appraisal for the Coventry Local Plan Review (CLPR, 2022-2042). The SA Addendum reports the process and findings of the SA of the Main Modifications proposed to the Local Plan.

### The Coventry Local Plan Review (CLPR) 2022-2042: Proposed Main Modifications (MMs)

2. The draft CLPR [CD1] was submitted to the Secretary of State for independent examination by Planning Inspectors on 9 September 2025 and hearing sessions were held over 9 days March and 9 June 2026. Potential Main Modifications are necessary to inform the Inspectors' decision on whether the draft Plan is sound.
3. The potential Main Modifications (MMs) v10 [PM10] were published in July 2026. Each proposed MM was considered for its likely significant effects and implications for the SA/SEA and HRA findings – using professional judgment. Many proposed modifications are to provide greater clarity, correct errors, avoid repetition, for consistency and for updating (for example, with national policy and legislation changes), and as such are not likely to be significant for the findings of the assessment processes.
4. The key changes to the draft Plan that are significant for the findings of the submitted SA Report (October 2024) [CD4 & 4a], as follows:
  - Change in plan period from 2021-2041 to 2024-2042 resulting in change for local housing need from 29,100 new homes to a minimum of 26,046 net additional homes
  - Change in plan period resulting in a change for local employment land need from 60 hectares to 96 hectares
  - Updating of site allocations, including proposed new and amended sites
  - Other policy changes significant for the SA

### SA of the proposed Main Modifications

5. The SA was undertaken in the same way and using the same framework of SA Objectives and significance categories as the previous SA – to ensure consistency and comparability of findings.
6. The changes to plan period with changes to housing and employment need and supply necessitated revisiting certain strategic options for the plan with reasonable alternatives identified, as follows:

- Submitted 29,100 new homes & proposed 26,06 new homes
  - Submitted 60 hectares & proposed 38.77 hectares local employment land
  - Release of Green Belt land & retain Brownfield land first plus monitoring
7. SA was also carried out for the other policies, such as GE3 Biodiversity and Policy EM4 Flood Risk, and the amended and new site allocations.
  8. The SA found that the changes to the other policies strengthened the policies through provision of more clarity and/or further requirements for new development that ensure such mitigation measures are effective. No significant negative effects were identified.
  9. The SA found similar effects for the options of housing and employment need. Potential negative effects are mitigated through other policies, and the reasoning for continuing to progress the preferred approach of brownfield land first, rather than further release of Green Belt land, is outlined. The shortfall in housing supply is mitigated through consideration of the significant new homes that will be delivered through the Northern Regeneration Area in the later 2030s. The delivery of new housing will be monitored and if supply is not being delivered, then a replacement plan will be prepared.
  10. The SA of the new and amended site allocations did not find any significant negative effects, and positive effects were indicated for development and communities.
  11. The Habitats Regulations Assessment (HRA) was revisited and the proposed Main Modifications to the Plan do not affect the conclusions of the HRA screening. These remain relevant and valid.
  12. Overall, potential negative effects from new development have been avoided and positive effects have been found, including cumulative effects and in the longer term.

### Consultation & Next Steps

13. This SA Addendum Report will be published alongside the Proposed Main Modifications to the Coventry Local Plan 2024-2042 and any consultation comments will be taken into account by the Inspectors to inform their decision on whether the Local Plan can be adopted, as modified.

## 1.0 INTRODUCTION

### The Coventry Local Plan Review (CLPR) 2024-2042

- 1.1 The review of the Coventry Local Plan<sup>1</sup> has been developed iteratively since early studies and consultation in 2023, through continuing technical studies and further consultations. The proposed draft Coventry Local Plan Review (CLPR, Regulation 19 Proposed Submission) was submitted to the Secretary of State for independent examination by Planning Inspectors on 9 September 2025. Hearing sessions were held over 9 days at the Council offices in One Friargate, Coventry between 24 March and 9 June 2026.
- 1.2 Potential Main Modifications have been proposed in response to the Inspectors' questions and action points arising from hearing sessions. These Main Modifications (MMs) are necessary to inform the Inspectors' decision on whether the draft Plan is sound and/or how it could be made sound by such MMs. The Inspectors requested in their Post Hearing Note [IN16]<sup>2</sup> that the potential MMs should be subject to further Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) as necessary.
- 1.3 The Inspectors requested that ...*"where relevant, reasonable alternatives to the potential MMs should be considered in relation to:*
- *Modifications to paragraphs 3.9 and 6.10 which make clear that the Plan does not identify a sufficient housing land supply to meet the minimum requirement to 2042*
  - *Modifications to include an additional employment allocation at Brickhill Lane (JE2.9 and policy DS4 part E)*
- With regard to the former, a reasonable alternative could potentially involve modifications to increase the amount of housing land identified in the Plan to ensure that the minimum requirement to 2042 can be met in full (including, if necessary, by removing land from the Green Belt to allocate for housing development)."*
- 1.4 The Inspectors have advised that they will publish a further note setting out next steps in the examination after they have considered the findings of the SA and HRA screening. The addendum reports will be published as part of the MMs public consultation. The Inspectors' final conclusions will be reached taking any representations, including on the SA and HRA, into account.

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<sup>1</sup> <https://www.coventry.gov.uk/planning-policy/local-plan-review>

<sup>2</sup> <https://www.hwa.uk.com/projects/coventry-local-plan-review/>

## Sustainability Appraisal (SA) & Habitats Regulations Assessment (HRA) Screening

- 1.5 The emerging elements of the draft Coventry Local Plan Review have been tested through Sustainability Appraisal (SA), incorporating requirements for Strategic Environmental Assessment (SEA), and informed by the findings of Habitats Regulations Assessment (HRA). Each draft of the CLPR has been accompanied by SA and HRA Reports through consultation stages of plan-making. Representations to the SA and HRA reports have been taken into consideration in the following iteration of assessments.
- 1.6 The SA and HRA studies have been undertaken by independent specialists, Enfusion Ltd. The SA/SEA [CD4-CD4a] and HRA [CD5] reports (October 2024)<sup>3</sup> were submitted as evidence supporting the draft Local Plan. No concerns had been raised by the statutory environmental bodies (Environment Agency EA, Historic England HE, Natural England NE) during formal consultation on the SA and HRA screening of the Regulation 19 draft Plan. The Environment Agency queried the supporting evidence to inform Section 5 and Appendix V of the SA Report. This relates to their concern about the provision of Level 2 Strategic Flood Risk Assessments (SFRAs) to inform decision-making on site allocations in the draft plans. This matter was subject to discussions between the Council and the EA and resulted in a Statement of Common Ground (SOCG, August 2025). Some concerns about impacts on heritage were raised by HE on the draft plan with regard to requirements for heritage impact assessments for certain site allocations; but there were no specific concerns for the SA itself. This matter was also addressed through a SOCG (December 2025) between the Council and HE.
- 1.7 Natural England in their letter of 3 March 2026, advised that they agreed with the findings of the HRA Screening Report (October 2024). *"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."*
- 1.8 The SA/SEA and HRA reports were discussed during the hearing session on 24 March 2026. The environmental bodies did not make any representation on the SA/SEA or HRA to the examination hearings. One representation from a member of the public was concerned about strategic flood assessment and strategic transport assessment evidence for the plan and the SA. Other representations from developers and/or their agents raised issues for the SA that may be summarised as follows:
- It has not been informed by a sufficiently robust evidence base
  - It has not adequately assessed reasonable alternatives
  - The SA relies on the GB Technical Update Study (EB35)
  - The SA is not robust and does not afford appropriate weight to economic factors

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

- 1.9 Most of these comments were related to potential use of Green Belt land for employment development uses. This issue was not considered by the Inspector to be a concern with regard to legal or procedural matters at the onset of the examination but was further discussed during the hearing sessions on 28-29 April and 9 June. Detailed discussions related mostly to the draft plan itself rather than the SA and are reported in Action Points [IN12 and IN13]. This has resulted in proposed changes to the plan with regard to an additional employment allocation now proposed at Brickhill Lane (JE2.9 and policy DS4 part E) and consideration of this potential modification is addressed within this SA Addendum Report.

### **Purpose & Methods for this SA/HRA Addendum Report**

- 1.10 This SA Addendum constitutes part of the SA/SEA Report submitted [CD4-CD4a] - for the purposes of demonstrating compliance with SA and SEA legal and procedural requirements. It also addresses updating of the HRA [CD5] Screening Report. This Addendum Report only addresses the implications for the assessments with regard to the potential MMs; it does not reconsider any other aspects of the Plan. Thus, the purpose of the SA Addendum is to assess the proposed MMs that are likely to have significant effects and to demonstrate that the requirements for SA, SEA and HRA have been met.
- 1.11 A proportionate and appropriate approach has been taken to the assessments. The MMs have been screened using professional judgment to assess their likely significance with regard to SA/SEA and HRA. Those MMs that were considered to be significant have been assessed using the same methods and SA Framework of Objectives (Table 2.1 CD4) to ensure consistency and compatibility of assessments; the implications for the previous SA findings are also considered. Any MMs that are relevant to the previous HRA findings have also been considered and the HRA screening updated within this SA Addendum Report.



## 2.0 SCREENING THE MAIN MODIFICATIONS FOR SA & HRA SIGNIFICANCE

### Context & Approach

- 2.1 The potential Main Modifications (MMs) v10 [PM10]<sup>4</sup> were published on the news section of the examination website and added to the examination documents list on 30 July 2026. This schedule sets out potential Main Modifications to the Regulation 19 (Proposed Submission) Plan [CD1]. Version 10 includes all of the main modifications proposed in response to the Inspectors' preliminary [IN2], further preliminary [IN2.1], supplementary questions [IN2.2], matters, issues and questions [IN3], supplementary question 1.6 [IN4], action points from week one hearing sessions [IN7], actions points from week two hearing sessions [IN10], action points from week three hearing sessions [IN12], further action points published on 11<sup>th</sup> May 2026 [IN13], and action points from the 9 June 2026 hearing session [IN15].
- 2.2 The modifications to the Proposed Submission Plan are described in words and/or indicated by ~~strike-through~~ (deleted text) and **bold underline** (new or amended text). Proposed changes to the Submission Policies Map [CD2] are set out in a separate schedule.
- 2.3 It may be noted that many proposed modifications are to provide greater clarity, correct errors, avoid repetition, for consistency and for updating (for example, with national policy changes), and as such are not likely to be significant for the findings of the assessment processes. Therefore, these are not considered further in the SA/HRA screening table as set out in Appendix 1 of this SA Addendum Report.
- 2.4 Each proposed MM was considered for its likely significant effects and implications for the SA/SEA and HRA findings – using professional judgment.

### Findings of Screening for Significance

- 2.5 Appendix 1 of this SA Addendum Report sets out the screening for significance of the potential MMs. Key MMs, including those referred to by the Inspectors' in their Post Hearing Note [IN16], are reported in full; others are summarised. The screening process identified the need for further SA, as set out in the following paragraphs:
- 2.6 **Change to Plan Period, Housing Land Need & Supply:** The plan period was determined through the examination process to change from 2021-2041 to 2024-2042. This has implications for calculating the local housing need and the revised calculation identified that rather than 29,100 new homes between 2021-2041, a minimum of 26,046 net additional homes will be required for the changed plan period 2024-2042 (see MM4, MM8). This reflects a change in

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<sup>4</sup> <https://www.hwa.uk.com/projects/coventry-local-plan-review/>

the per annum calculations from 1,455 to 1,447. The revised Table 6.1 in the Plan identifies a housing land supply with capacity for 22,046 net additional homes. In addition, a significant number of new homes are expected to be delivered in the Northern Regeneration Area from the mid 2030s in accordance with Policy CC1 part E. The land supply in the Plan is therefore expected to be sufficient to meet needs until the late 2030s. Housing delivery will be monitored and the Plan will be replaced as necessary to ensure that housing needs can continue to be met in the City.

- 2.7 This change, as set out in paragraph 3.9 and table 6.1 of the draft Local Plan, explains that the Plan does not now identify a sufficient housing land supply. It does explain that housing delivery will be monitored and that a significant number of new homes are expected to be delivered in the Northern Regeneration Area (NRA) in the longer term, in the mid 2030s. This change to the plan period and housing land supply is significant with regard to the SA/SEA findings.
- 2.8 The preferred strategic approach to the CLPR had been established through plan drafts, SA testing and consultation to be a brownfield land for development first approach – and as reported in the submitted SA Report (October 2024) [CD4 & CD4a]. However, with the changed plan period and the identified potential shortfall in housing land supply, this preferred approach and any reasonable alternatives to this approach should be tested again through the SA process. It was identified that the options of brownfield first and release of Green Belt land should be tested through the SA process.
- 2.9 **Change to Residential Land & Site Allocations:** Since the CLPR Regulation 19 draft was published, several of the proposed site allocations have been variously built out, had planning permission granted or been withdrawn as now not available. This, together with discussions during the examination hearings, has resulted in changes to some retained site allocations, proposals for 20 new residential site allocations (see MM34, MM35 (Table 6.1), MM36, MM40, MM43, MM53, MM54, and MM103-MM104 with changes to Table 6.2), and the allocation of an established gypsy & traveller site (see MM51 & MM52). All proposed housing numbers are now "indicative" capacities. These proposed site allocations had not been subject to SA and they now need to be assessed.
- 2.10 **Change to Plan Period, Employment Land Need & Supply; New Site Allocation:** A local need has been identified for at least 96 hectares of land for industrial and storage/distribution development in the period 2024 to 2042 (MM6, MM8, MM24 (Table 5.1)). Table 5.1 identifies a total employment land supply of 38.77 hectares. There is, therefore, a shortfall of at least 57.23 hectares against the minimum requirement for 96 hectares to meet local needs. In terms of strategic need, the only allocation that is considered potentially suitable for accommodating a unit of 9,000 sqm well related to the strategic road network is JE2.3 Baginton Fields, and as such this has not been included in local supply calculations. Through discussions and further work arising from the examination hearings, a new employment site allocation Policy DS4 Part E – Brickhill Lane (MM19) is proposed to help address the shortfall in local need. This had been subject to SA previously but the policy

proposed includes detailed site specific requirements such that the SA needs to be revisited.

- 2.11 Through the change in plan period, a minimum need of 43,046 sqm additional office floor space was identified, a change increase from 41,200 sqm (MM9, MM23, and MM25 Table 5.2). Provision includes a change from 39,549 to 27,100 sqm of office floor space at Friargate (Policy JE2:1) with the remainder of 15,946 sqm delivered in compliance with criteria set out in Policy JE4 (MM26, MM27 with table of employment site allocations, and MM28).
- 2.12 **Other Significant Policy Changes:** Policy GE3 Biodiversity, Geological and Landscape Conservation has been modified for clarity and updating, including requirements for the biodiversity net gain hierarchy (MM73). This clarification is significant with regard to the SA as a whole and SA objective No 11 to protect and enhance nature and biodiversity.
- 2.13 Additional explanatory text (MM82) on archaeology for Policy HE4 Archaeology as agreed through the SOCG with Historic England. This may have significant effects with regard to the SA as a whole and SA objective No 12 to protect and enhance the historic environment and its setting.
- 2.14 Additional and changed policy text in Policy EM4 Flood Risk Management (MM89) as agreed through discussions and SOCG with the Environment Agency. This may have significant effects with regard to the SA as a whole and SA objective No 7 to build resilience to climate change and No 10 to protect and conserve natural resources – soil, water, minerals & waste.
- 2.15 Changes to Policy CC1 (part E) City Centre Character Areas (MM101) Northern Regeneration Area may have significant effects with regard to the SA as a whole, particularly in the longer term, and several SA objectives.
- 2.16 **Habitats Regulations Assessment Screening Update:** The implications of the MMs need to be considered with regard to the findings of the HRA screening (October 2024) [CD5] and such updating incorporated into the SA Addendum Report.

## 3.0 SUSTAINABILITY APPRAISAL OF MAIN MODIFICATIONS

### Change to Plan Period & Housing Land Need & Supply

- 3.1 Through the process of the examination of the Coventry Local Plan Review, the plan period was amended from 2021-41 to 2024-2042. This necessitated a recalculation of the local housing need and this was then determined to be a minimum of 26,046 net additional homes. This represents a reduction from 29,100 to 26,046 homes (and a change from 1,455 to 1,447 per annum) from the submitted Plan [CD1].
- 3.2 At early stages of plan-making, the SA tested five strategic options for the quantum of housing development (63,760; 39,280; 31,500; 30,540 and 29,100 dwellings). The findings of the comparative assessment were detailed in Appendix III and discussed in section 4 of the SA Report (October 2024) [CD4 & 4a]. The SA findings were very similar for the three lower quanta of housing, and the local housing need of 29,046 was progressed in the draft Plan [CD1].
- 3.3 The proposed modifications to paragraphs 3.9 (MM4), Policy DS1 Part 1 (MM8) and 6.10 (MM34) make it clear that the housing supply figure with a capacity of 22,014 new homes does not identify sufficient supply to meet with the identified local need. This would have significant implications for the SA, reducing the major positive effects for the SA objective No 4 Housing. However, the modifications also make it clear that a significant number of new homes are expected to be delivered in the Northern Regeneration Area (NRA) from the mid 2030s, indicating that the land supply is expected to be sufficient to meet needs until the late 2030s. Whilst this does not extend to 2042, the modification also commits to continuing monitoring of housing delivery such that the Plan can be replaced as necessary to ensure that housing needs can continue to be met in the City. Thus, the potential reduction for the SA in positive effects from the changes to plan period and housing need/supply is mitigated, and major positive effects remain for SA housing objectives.
- 3.4 **Revised Quantum of Housing 26,046 dwellings over Revised Plan Period 2024-2042** (previously 29,100 dwellings over 2021-2041): The submitted SA [CD4 & 4a] tested 5 options for housing numbers and progressed the lowest figure of 29,100 as being the most sustainable. The option of 26,046 new homes has not been previously subject to the SA process. Therefore, the previously identified local housing need of 29,100 new homes was revisited in a comparable and consistent manner with an SA of the new identified need for 26,046 new homes.
- 3.5 The findings of the SA of these two strategic options are detailed in Appendix II of this SA Addendum Report. Both options indicate the same effects as reported in the submitted SA documents [CD4 & 4a]. Major positive effects are likely for SA objective No 2 housing and No 4 services/facilities; minor positive effects indicated for SA objective No 1 communities, No 3 health,

No 6 Net Zero Carbon, No 7 resilience to climate change, No 11 Biodiversity, and No 13 Townscape/Landscape. Plan policies provide mitigation measures against potential negative effects such that these are reduced to neutral for SA objective No 8 Transport, No 9 Pollution, No 10 Natural Resources, and No 12 Historic Environment. Some uncertainty remains at this strategic stage since precise significance depends on detailed location and effectiveness of mitigation possibilities.

- 3.6 **Reasons for Selection/Rejection of Options for Changed Quantum of Housing:**  
The outline reasoning for proposing the option for 26,046 new homes is that it progresses the Local Need figure as modified to align with the changed plan period.

### Change to Plan Period & Employment Land Need & Supply

- 3.7 The change to the plan period from 2021-41 to 2024-2042 also necessitated a recalculation of the local employment land need and this was then determined to be a minimum of 96 hectares of employment land to meet local needs. This is an increase from the 60 hectares proposed in the submitted plan [CD1] and subject to SA [CD4 & 4a].
- 3.8 It is understood that studies and calls for sites have not identified any further possible employment sites for consideration. The examination and discussions at the hearings have resulted in a changed approach to the possible omission site Land North of A45 and this is specifically dealt with later in this SA Addendum. The shortfall in provision of local employment land is understood and acknowledged in MM23-MM28. This could have significant implications for the SA, potentially for reducing the major positive effects for SA objective No 5 Economic Growth.
- 3.9 At early stages of plan-making, the SA tested three strategic options for the quantum of local employment development (147.6 ha; 60 ha that can be accommodated; 60 ha + 11.81 ha Land North of A45 located in the Green Belt. The findings of the comparative assessment were detailed in Appendix III and discussed in section 4 of the SA Report (October 2024) [CD4 & 4a].
- 3.10 **Revised Quantum of Employment 96 ha over Revised Plan Period 2024-2042** (previously 60 ha over 2021-2041): The submitted SA [CD4 & 4a] tested 3 options but the revised figure of 96 ha has not been previously subject to the SA process. Therefore, the previously identified local employment need of 60 ha was revisited in a comparable and consistent manner with an SA of the new identified need for 96 ha. MM19 Policy DS4 new Part E sets out that the proposed employment allocation New Policy Brickhill Lane, located in the Green Belt, should meet comprehensive specific development requirements to provide mitigation measures for potential negative effects. These proposed additional policy requirements have been taken into account in the revised SA of employment land options.

- 3.11 The findings of the SA of these two strategic options (60ha; 96 ha including 11.81 ha with mitigation measures of site specific requirements as located in the Green Belt) are detailed in Appendix III of this SA Addendum Report. Both options indicate the similar effects as reported in the submitted SA documents [CD4 & 4a] but the site specific requirements as set out in MM19 with the new Policy DS4 Part E Brickhill Lane provide strong mitigation measures to resolve the concerns with negative effects previously identified for development in the Green Belt.
- 3.12 Major positive effects are more likely for SA objective No 5 Economic Growth as Option 2 better approaches the identified local employment need; uncertainty remains as there is still a shortfall. The previous SA had found minor negative effects for the higher quantum of employment land in Option 2 that includes the site located in the Green Belt - minor negative effects for soil and landscape impacts and location in the Green Belt. However, the proposed MM19 with new Policy DS4 Part E provides strong mitigation measures that should reduce such concerns to at least neutral effects. The comprehensive site-specific requirements include a LVIA, a landscaped buffer, built form to reduce scale and a palette to minimise visual impacts – all of which could provide positive effects for SA No 13 on landscape & Green Belt for that element of the identified capacity for local employment land (and see later for revised SA of this specific site Land North of A45). Minor negative effects remain for the site and permanent loss of Grade 3 agricultural land (some 11.5 of the total 11.8 ha).
- 3.13 **Reasons for Selection/Rejection of Options for Changed Quantum of Employment Land:** The outline reasoning for proposing the option for 60 ha plus one site located in the Green Belt is that it better progresses the identified need and that concerns about negative effects arising through the location of the additional site in the Green Belt can be mitigated such that there are no significant major negative effects associated with Green Belt purposes, although minor negative effects remain due to loss of agricultural land.

### **Reasonable Alternatives: Release Green Belt Land; Retain Brownfield Land First & Monitor Delivery**

- 3.14 As a result of the modifications to the plan period and identified local housing need, the Council considers that it is still appropriate to retain a brownfield first approach. However, in consideration of the Plan only being able to identify a housing land supply of 22,014 new homes (albeit that the NRA has been identified for the later stages of the Plan period), it is necessary for the SA to test any reasonable alternatives to continuing with the brownfield first approach.
- 3.15 As discussed in the examination hearings and as suggested by the Inspectors in their Post Hearing Note [IN16], it is appropriate for the SA to test the implications of development on further release of Green Belt land in order to increase the capacity of local housing land supply. It may be noted that the SA had previously tested the two strategic options of development in the

Green Belt and no development in the Green Belt – findings detailed in Appendix IIIe and discussed in paragraphs 4.97 – 4.115 and tables 4.6a & b [CD4 & 4a]. Whilst 11.81 ha for employment land is now proposed within the Green Belt, it may also be noted that no further site options have been forthcoming with regard to local employment land – within or without the Green Belt. However, site options have variously been proposed for housing development during the plan preparation.

3.16 Therefore, the SA of two strategic options was undertaken:

- Release Green Belt Land
- Brownfield Land First & Monitor Delivery

3.17 These two strategic approaches to the revised plan period and local housing supply were tested through SA using the same framework of SA objectives and methods as applied throughout the SA/SEA process [CD4 & CD4a] in order to ensure consistency and compatibility. The findings of the SA are detailed in Appendix IV.

3.18 The summary findings of the SA of strategic options for development in the Green Belt are presented in Table 3.1, as follows:

| <b>Table 3.1: Options –</b><br><b>1. Development in the Green Belt</b><br><b>2. No Development in the Green Belt</b><br><br><b>Sustainability Objective</b> | <b>1_ Development within the Green Belt</b> | <b>2_ No development in the Green Belt</b> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|--------------------------------------------|
| 1: To enable vibrant and inclusive communities                                                                                                              | -?                                          | 0                                          |
| 2: To provide accessible essential services and facilities for all residents                                                                                | 0                                           | 0                                          |
| 3: To improve health & promote active living                                                                                                                | +?                                          | ++?                                        |
| 4: To provide decent and affordable housing for all                                                                                                         | 0                                           | 0                                          |
| 5: To support sustainable inclusive economic growth                                                                                                         | +?                                          | -?                                         |
| 6: To help achieve the Council's ambition to reach net zero carbon emissions                                                                                | 0                                           | 0                                          |



|                                                                                          |    |   |    |   |
|------------------------------------------------------------------------------------------|----|---|----|---|
| 7: To build resilience to climate change                                                 | 0  |   | 0  |   |
| 8: To reduce traffic & improve sustainable transport choices                             | 0? |   | +? |   |
| 9: To reduce air, noise & light pollution                                                | 0  |   | 0  |   |
| 10: To protect & conserve natural resources – soil, water, minerals & waste <sup>5</sup> | 0  | 0 | +  | 0 |
| 11: To protect and enhance nature & biodiversity                                         | +? |   | +  |   |
| 12: To protect and enhance the historic environment, and its setting                     | 0  |   | +? |   |
| 13: To protect and enhance the quality and character of townscapes & landscapes          | -- |   | ++ |   |

3.19 These SA findings remain essentially the same as those reported in the submitted SA report [CD4 & 4a] (paragraphs 4.97-4.111). A minor adjustment is given for effects associated with SA objective No 11 as all new development must meet with 10% BNG and some uncertainty is only retained for development in the GB as significance depends on precise locations and possibilities for mitigation. Major negative effects remain for SA Objective No 11 to protect and enhance the quality and character of landscapes, including on the purposes of the Green Belt; avoiding new development in the Green Belt confirms that major positive effects are indicated for Option 2.

3.20 **Reasons for Selection/Rejection of Options for Development in or out of Green Belt:** The outline reasoning for proposing to maintain the approach of avoiding new development in the Green Belt is to ensure that the important openness and landscapes are protected. The risk of not meeting identified local housing need with associated potential negative effects has been mitigated through the provision of significant new homes in the Northern Regeneration Area in the medium term with the commitment to monitor delivery.

## Changes to Residential Land Supply, Amended & New Site Allocations

3.21 The SA report [CD4 & 4a] of the submitted CLPR included assessment of all the site allocations proposed – see details in Appendix V and summary findings discussed in section 5 of the main SA report. Since that time, some of these site allocations have been deleted because they have been completed by 31 March 2025, others have gained planning permission, some are no longer being promoted for residential development, and two sites have no

<sup>5</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste



reasonable prospect of development by 2042. This is detailed in MM104 and as it relates to amendments for Table 6.2, and may be summarised, as follows:

- Deletion of allocations that were completed by 31 March 2025 – H2:5, H2:10, H2:11, H2:13, H2:17, H2.18, H2.23,
- Planning permission granted: H2:14, H2:21, H2:25, H2:36
- Deletion of allocations no longer being promoted for residential H2.25, H2.31
- No reasonable prospect of development by 2042 – H2:16, H2:20

These deletions are significant for the SA but are not needed to be considered any further since new site allocations have been identified and these have been subject to SA.

### **SA of Proposed Amended Site Allocations**

3.22 Some of the site allocations have been amended, for example, changes to capacity and/or site-specific requirements, and these changes are significant for the SA and the implications have been assessed; relevant allocations are, as follows:

- H2:3; H2:9; H2:14; H2:15; H2:19; H2:21; H2:22; H2:26; H2:27; H2:30; H2:32; H2:33; H2:36; H2:37

3.23 Policy H2:3 Walsgrave Hill Farm: A revised indicative capacity has been agreed from 900 to 700 new homes and this will maintain the major positive effects identified for SA objectives on housing and communities. These requirements have been pulled through from the previous plan such that the findings of the previous SA remain and are still valid.

3.24 Policy H2:9 Land at London Road/Allard Way: A revised indicative capacity has been agreed from 200 to 293 dwellings as this reflects planning consent .

3.25 Policy H2:14 Former Transco Site, Abbots Lane: A revised indicative capacity has been agreed from 100 to 690 to reflect that planning permission for 690 dwellings has been granted. Thus, sustainability effects have been considered and need not be considered further in this SA Addendum.

3.26 Policy H2:15 Land at Sandy Lane: New site specific requirement for the Powerhouse Locally Listed building within the newly proposed Northern element of the allocation and consideration of the setting of the Daimler Office Locally Listed building on Sandy Lane. This will ensure that heritage considerations are appropriately addressed and confirm the mitigation measures to achieve neutral effects with regard to SA No 12 Historic Environment.

3.27 Policy H2:19 Land at Mitchell Avenue: Refinements of requirements for reversion of existing playing field land (and ancillary facilities) will ensure

implementation of mitigation to confirm positive effects for SA No 2 Services & Facilities.

- 3.28 Policy H2:21 Woodfield School Site, Stoneleigh Road: A revised indicative capacity has been agreed from 30 to 24 dwellings to reflect that planning permission has been granted for 24 dwellings. Thus, sustainability effects have been considered and need not be considered further in this SA Addendum.
- 3.29 Policy H2:22 Land at Junction of Jardine Crescent & Jobs Land: Indicative capacity retained at 25 new homes but no requirement for new retail such that effects for SA No 5 Economic Growth no longer applicable.
- 3.30 Policy H2:26 Coventry Central Police Station: Additional site requirement, as agreed through SOCG with Historic England, for a Heritage Impact Assessment at the planning application stage. This should remove the uncertainty reported by the SA for No 12 Historic Environment.
- 3.31 Policy H2:27 New Union Street Carpark: Additional site requirement, as agreed through SOCG with Historic England, for an Heritage Impact Assessment and an Archaeological Assessment should be required at planning application stage. This should remove the uncertainty reported by the SA for No 12 Historic Environment. Green space should be incorporated into the southern-most area of the site and this should remove the uncertainty reported by the SA for No 11 Biodiversity.
- 3.32 Policy H2:30 Whitefriars Street Car Park: Additional requirements, as agreed by SOCG with HE, the design, layout, scale and site capacity of development proposals must be informed by, and responsive to, preliminary archaeological site investigation such that the significance of the Carmelite Friary is sustained. Development design proposals should seek to minimise harm to archaeological remains that contribute to the understanding and significance of Whitefriars and its designated heritage assets. This should remove the uncertainty reported by the SA for No 12 Historic Environment. Development must provide a landscaped separation to Whitefriars Lane to deliver a high-quality pedestrian route. Proposals must include assessment of impacts upon view cones 6 and 7 of the CCC View Management SPD and local views from designated Heritage Assets, inclusive of the supply of verified Townscape Visual Impact Assessments (TVIAs) – and this will confirm the likely positive effects reported by the SA.
- 3.33 Policy H2:32 Dale Buildings, Tower Street: Additional requirements, as agreed by SOCG with HE, development within the setting of Cook Street Gate and other nearby heritage assets must make a positive contribution to their setting, that seeks to sustain and enhance their significance. Development must deliver passive surveillance onto Cook Street Gate and its surroundings. Development must respect View Cone One of the CCC View Management framework and deliver massing responsive to retaining views to Holy Trinity and St Michaels spires. This should remove the uncertainty reported by the SA for No 12 Historic Environment and confirm the positive effects for SA No 13 Townscapes.

- 3.34 H2:33 The Allesley Hotel, Birmingham Road: Additional requirements as agreed by SOCG with HE, - due to the site's positive contribution to the Conservation Area a Heritage Impact Assessment should be required with any application. This should remove the uncertainty reported by the SA for No 12 Historic Environment.
- 3.35 H2:36 Land at Spon End: : Additional requirements as agreed by SOCG with HE, a Heritage Impact Assessment should be required alongside a masterplan. This should remove the uncertainty reported by the SA for No 12 Historic Environment.
- 3.36 H2:37 City Centre South: Additional information on the Grade II Listed Three Tuns mural provided for clarity and this remove the uncertainty reported by the SA for No 12 Historic Environment.

### **SA of Proposed New Site Allocations**

- 3.37 Proposed new site allocations H2:38 – H2:58 have been identified, were not previously subject to SA and these have now been assessed through SA. The established Gypsy & Traveller site at Burbages Lane has now been allocated in the modified plan with an additional 6 pitches (MM51 & MM52) and therefore, has now been subject to SA. The new proposed site allocations (Policies H2:38-H2:58) and the established Gypsy & Traveller site were subject to SA using the same methods in a consistent and comparable manner as had been applied to the sites proposed in the submission Plan.
- 3.38 It may be noted that all proposed site allocations in the modified plan now list "indicative" capacities for new housing numbers. This allows some flexibility for updating and over time that will support the implementation of mitigation measures designed to resolve any potential negative effects.
- 3.39 The findings of the SA of the new housing site allocations are detailed in Appendix V of this SA Addendum Report. (One employment site option was subject to revised SA, reported in Appendix V and discussed in the following section.) The summary findings from the SA of the proposed site allocations are presented in the following Table 3.2. There were no significant negative effects identified for any of the proposed new housing site allocations. Such sites have been assessed and carefully selected to avoid significant negative effects and to optimise potential positive effects. The examination and hearings discussions have identified site specific requirements that provide further mitigation measures to those provided by other plan policies.
- 3.40 The summary findings from the SA of the proposed new site allocations are presented in the following Table 3.2, and the details of the assessments are provided in Appendix V of this SA Addendum Report. There were no significant negative effects identified for any of the proposed new housing site allocations. Such sites have been assessed and carefully selected to avoid significant negative effects and to optimise potential positive effects. The proposed site allocations will be subject to other plan policies such that

the cumulative effects of the modified proposed development (as guided by allocations and policies) are assessed and reported later in this SA Report.

- 3.41 Policy H7 Part 1 (MMs51-52) set out the proposal that the existing Traveller site at Burbages Lane has capacity for a further 6 pitches to help meet the amended identified need for such housing land. The SA found positive effects for housing and inclusive communities; there were no significant negative effects identified.

**Table 3.2: Summary of SA Findings for Proposed New Site Allocations**

| Proposed Site Allocations                       | Capacity (no. of dwellings) | 1. Communities | 2. Services & Facilities | 3. Health & Active Living | 4. Housing | 5. Economic Growth | 6. Net Zero Carbon | 7. Resilience to Climate Change | 8. Sustainable Transport | 9. Reduce Pollution | 10. Natural Resources <sup>6</sup> | 11. Nature & Biodiversity | 12. Historic Environment | 13. Townscapes & Landscapes |
|-------------------------------------------------|-----------------------------|----------------|--------------------------|---------------------------|------------|--------------------|--------------------|---------------------------------|--------------------------|---------------------|------------------------------------|---------------------------|--------------------------|-----------------------------|
| <b>New Housing Allocations</b>                  |                             |                |                          |                           |            |                    |                    |                                 |                          |                     |                                    |                           |                          |                             |
| H2:39 Land at Park Hill Lane                    | 5                           | +              | +                        | +                         | +          | 0                  | 0                  | 0                               | +                        | 0                   | 0                                  | 0                         | +                        | 0                           |
| H2:40 Wisteria Lodge                            | 8                           | +              | +                        | +                         | +          | 0                  | 0                  | 0                               | ++                       | 0                   | +                                  | 0                         | +                        | 0                           |
| H2: 41 Former CovRad Sir Henry Parkes Rd        | 190                         | +              | +                        | +                         | ++         | 0                  | 0                  | 0                               | ++                       | 0                   | +                                  | 0                         | +                        | 0                           |
| H2:42 146-164 Lockhurst Lane/Livingstone Road   | 45                          | +              | +                        | +                         | +          | 0                  | 0                  | 0                               | +                        | 0                   | +                                  | 0                         | +                        | 0                           |
| H2:43 Burbidge & Son South Side of Awson Street | 63                          | +              | +                        | +                         | ++         | 0                  | 0                  | 0                               | +                        | 0                   | +                                  | 0                         | +                        | 0                           |
| H2:44 Silverton Road                            | 3                           | +              | +                        | +                         | +          | 0                  | 0                  | 0                               | +                        | 0                   | +                                  | 0                         | +                        | 0                           |
| H2:45 2 Lewis Road                              | 4                           | +              | +                        | +                         | +          | 0                  | 0                  | 0                               | +                        | 0                   | 0                                  | 0                         | +                        | 0                           |
| H2:46 Newfield House, Kingfield Road            | 50                          | +              | +                        | +                         | ++         | 0                  | 0                  | 0                               | +                        | 0                   | +                                  | 0                         | +                        | 0                           |
| H2:47 Bridge Street                             | 4                           | +              | +                        | +                         | +          | 0                  | 0                  | 0                               | +                        | 0                   | 0                                  | 0                         | +                        | 0                           |

<sup>6</sup> First cell refers to land/soil & water resources; second cell refers to minerals & waste

|                                                        |               |   |   |   |    |    |   |   |    |   |   |   |     |   |    |
|--------------------------------------------------------|---------------|---|---|---|----|----|---|---|----|---|---|---|-----|---|----|
| H2:48 Land at Caradoc Close, Henley                    | 30            | + | + | + | +  | 0  | 0 | 0 | +  | 0 | 0 | 0 | +   | 0 | 0  |
| H2:49 Land at Halford Lane                             | 10            | + | + | + | +  | 0  | 0 | 0 | +  | 0 | 0 |   | +   | 0 | 0  |
| H2:50 Land off Longford Road                           | 20            | + | + | + | +  | 0  | 0 | 0 | +  | 0 | + | 0 | +   | 0 | +  |
| H2:51 Land at Roseberry Avenue                         | 10            | + | + | + | +  | 0  | 0 | 0 | +  | 0 | 0 | 0 | +   | 0 | +  |
| H2:52 St Nicholas Church Radford, Sherwood Jones Close | 60            | + | + | + | ++ | 0  | 0 | 0 | +  | 0 | + | 0 | +   | 0 | 0  |
| H2:53 Lansdowne Street                                 | 8             | + | + | + | +  | 0  | 0 | 0 | +  | 0 | + | 0 | +   | 0 | 0  |
| H2:54 Bishop Street/Tower Street                       | 129           | + | + | + | ++ | 0  | 0 | 0 | ++ | 0 | + |   | +   | 0 | +  |
| H2:55 Land at Nickson Road                             | 10            | + | + | + | +  | 0  | 0 | 0 | +  | 0 | 0 | 0 | +   | 0 | 0  |
| H2:56 Former Faseman House, Faseman Avenue             | 50            | + | + | + | ++ | 0  | 0 | 0 | +  | 0 | + | 0 | +   | 0 | 0  |
| H2:57 Land at Ferrers Close                            | 50            | + | + | + | ++ | 0  | 0 | 0 | +  | 0 | + | 0 | +   | 0 | 0  |
| H2:58 Land at Attoxbhall Road                          | 63            | + | + | + | ++ | 0  | 0 | 0 | +  | 0 | + | 0 | +   | 0 | 0  |
| <b>Gypsy &amp; Traveller Site</b>                      |               |   |   |   |    |    |   |   |    |   |   |   |     |   |    |
| H7 Part 1 Burbages Lane Travellers Site                | 5 + 6 pitches | + | + | + | +  | 0  | 0 | 0 | +  | 0 | + | 0 | +   | 0 | 0  |
| <b>New Employment Site Policy: DS4 Part E</b>          |               |   |   |   |    |    |   |   |    |   |   |   |     |   |    |
| JE2:9 Land North of A45 West of Brickhill Lane         | 11.8 hectares | + | + | + | 0  | ++ | 0 | 0 | +  | 0 | - | 0 | ++? | 0 | 0? |

## Changes to Employment Land, Amendments & New Site Allocation

- 3.41 Through the process of the examination of the Coventry Local Plan Review, the plan period was amended from 2021-41 to 2024-2042. This necessitated a recalculation of the employment land need as set out in MM23-MM28. The revised quantum of local employment land needed over revised plan period 2024-2042 has been identified to be 96 hectares (it was previously 60 ha over 2021-2041); (office supply is 27,100 ha – unchanged). The proposed modifications acknowledge that there remains a shortfall – 57.2 hectares – but it is also understood that there have been no further possible sites for employment identified or proposed.
- 3.42 Employment sites proposed in the submission Plan [CD1] have been deleted or amended to reflect updating (MM27), as follows:
- JE21 Friargate Mixed Use – deleted because now covered by MM28 Policy JE2 Part 2 and allocates Friargate for around 27,100 sqm additional office floorspace as part of mixed use development H2:38 delivered
  - JE2:2 Lyons Park – deleted because now delivered
  - JE2:3 Whitley Business Park – amended from 30 to 2.9 to reflect that part delivered
  - JE2:4 Land at Baginton – 9.8 ha retained & application awaited; boundary change proposed to avoid the Local Wildlife Site north of the A45 and land at Baginton Fields school
  - JE2:5 A45 Eastern Green – under construction
  - JE2:6 Whitmore Park – 8 ha reduced to 2.89 to reflect that part delivered
  - JE2:7 Durbar Avenue – deleted as no reasonable prospect of delivery
  - JE2:8 Land at Aldermans Green Road & Sutton Stop – 1.5 ha retained & application awaited
  - JE2:9 Land North of A45 West of Brickhill Lane – new site allocation for 11.8 ha and application awaited
- 3.43 **JE2:9 New Policy DS4 Part E - North of A45 West of Brickhill Lane Employment Allocation.** The findings of the previous SA assessment of this site were detailed in Appendix V and discussed in Section 5 of the SA Report (October 2024) [CD4 & 4a]. The SA was revised to take into account the proposed site specific requirements as set out in MM19 and the subsequent changes to the SA findings are shown summarised in Table 3.2 and described, as follows.
- 3.44 The requirement to ensure that the development provides access to local employment opportunities in line with Policy JE7 confirms the major positive effects for SA No 4 Economy. The requirement (recently constructed) to provide suitable vehicular access from the existing A45 Pickford Gate roundabout to the south confirms implementation to reduce any potential negative effects and, together with the requirement for a Travel Plan, confirms the likely positive effects for SA No 8 Transport.

- 3.45 The permanent loss of Grade 3 agricultural land remains a minor negative effect for SA Objective No 10 and protection of natural resources (in part). The requirement to avoid any built development in Flood Zones 2 or 3 ensures mitigation measures are implemented with regard to water resources.
- 3.46 The site specific requirements that the development should meet the highest viable BREEAM standards, aiming to achieve Excellent/Outstanding certification has implications for the findings of the SA objective No 7 Net Zero Carbon and No 8 Resilience to Climate Change – amending the previous neutral effects to minor positive with some uncertainty of precise significance at this stage.
- 3.47 The site specific requirements to incorporate an appropriate landscaped buffer to protect the amenity of neighbouring residential properties, appropriately mitigating issues of noise, light and air quality alongside minimising visual impact to the surrounding landscape confirms implementation of mitigation measures and the neutral effects for SA No 7 Pollution (and also contributes to No 13 Protection of Landscape/Green Belt).
- 3.48 The site specific requirements to establish a green and blue infrastructure corridor focused on the Pickford Brook and its tributary; retention of existing mature trees and hedgerows; respect ancient woodland buffers to Pinkett's Wood; avoid harm to Harvest Hill Daffodil Meadow LWS, Pinkett's Wood LWS or Pinkett's Farm Ponds LWS, maintaining an appropriate buffer, inclusive of green infrastructure which enhance ecological connectivity of the Local Wildlife Sites – all contribute to major positive effects on SA No 11 Biodiversity.
- 3.49 The site specific requirements that proposals must be accompanied by an appropriate archaeological assessment will confirm that mitigation measures will be implemented to protect the historic environment and confirm the previous findings for neutral effects for SA No 12.
- 3.50 The site specific requirements include:
- Provide a material palette to both built form and hard landscape, which minimizes the visual impact upon the surrounding landscape, including the use of green walling and green parking areas.
  - Built form to reduce in scale to the Northern, Eastern and Western site perimeters, resulting in an appropriate scale relationship to surrounding properties.
  - Built form should be delivered as a collection of visual elements, incorporating rooflines which respect the surrounding landscape character.
  - Undertake a Landscape Visual Impact Assessment (LVIA) to ensure the impact of development upon the surrounding landscape is fully considered.

These requirements provide mitigation measures that reduce the major negative effects on the landscape and Green Belt that had been identified by the SA previously from major negative towards minor negative effects. It



was acknowledged during discussions at the examination hearings that there would still be visual harm even with the proposed mitigation measures.

## Other Significant Policy Changes

- 3.51 **MM65 Green Belt:** The proposed changes to Plan paragraphs 9.3-9.8 are for clarity with regard to safeguarded land in the Green Belt, and, as such, help ensure that the purposes of Green Belt are not adversely affected thus supporting SA Objective No 13 Landscapes. The proposed MMs also have regard to the future needs of the neighbouring district and provide flexibility over the long term. This would relate to a future plan and continues to protect the Green Belt with mitigation measures that will be cumulative and effective in the longer term.
- 3.52 **MM73 Policy GE3 Biodiversity:** The Policy has been amended for updating and clarification with regard to which elements of the requirements relate to statutory Biodiversity Net Gain (BNG), and to clarify the hierarchy of onsite vs offsite delivery of BNG. Such modification will help ensure that development is guided in accordance with relevant new legislation, strengthens the policy and its effectiveness for providing mitigating measures to resolve potential negative effects on biodiversity.
- 3.53 **MM82 SOCG with Historic England:** Additional text for Plan paragraph 11.4 associated with archaeological investigations and reporting; *preservation in situ* is usually the preferred approach. This will strengthen the policy effectiveness for protecting and enhancing the historic environment and its setting SA Objective No 12.
- 3.54 **MM89 SOCG with Environment Agency & Policy EM4 Flood Risk Management:** Amendments to text for clarity ensure that the policy is more effective to provide mitigation for potential negative effects on SA Objective No 10 Protection of Natural Resources; also, positive implications for SA Objective No 7 Resilience to Climate Change.
- 3.55 **MM97 Policy EM12 Reducing Operational Carbon in New Build Non-Residential Development:** PBSA has been added to the list for clarification and to aid effectiveness of policy with regard to building efficiency – supports SA Objective No 6 Ambition to Reach Net Zero Carbon.

## Habitats Regulations Assessment Screening Update

- 3.56 A Habitats Regulations Assessment (HRA Screening Report) was prepared (August 2024) [CD5] and accompanied the submission CLPR on Regulation 19 Consultation. The HRA considered the potential for likely significant effects on Ensor's Pool SAC and the Severn Estuary SAC/SPA/Ramsar. It also gave consideration to the SACs associated with the Lake Vyrnwy/River Severn water transfer. The HRA screening found that there are no impact pathways and thus, no adverse effects alone from the Coventry Local Plan Review on

the integrity of the SAC, SPA and Ramsar sites. In the absence of any adverse effects alone, there will be no adverse effects in combination with other plans and projects.

- 3.57 Natural England in their letter of 3 March 2026, advised that they agreed with the findings of the HRA Screening Report (October 2024). *"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."*
- 3.58 The proposed modifications to the Plan period from 2021-2041 to 2024-2042 with determination of a minimum of 26,046 new homes (rather than 29,100) and new employment land identified for 90 hectares will not change the conclusions reached by the previous HRA screening. No impact pathways or zones of influence were identified; and Ensor's Pool is an isolated abandoned clay pit on the western edge of Nuneaton. The conclusions of the HRA screening remain that there no adverse effects alone, or in-combination, from the proposed modifications to the Coventry Local Plan Review 2024-2042 on the integrity of the SAC, SPA and Ramsar sites.

### Implications for the SA of the Plan Overall

- 3.59 **Vibrant & Healthy Communities** (SA Objective Nos 1-5): The provision and delivery towards the identified needs for housing and employment through the proposed site allocations will continue to have major positive effects for housing and economic growth objectives. The shortfall in identified supply for housing development is mitigated since significant number of new homes are expected to be delivered in the Northern Regeneration Area from the mid 2030s in accordance with Policy CC1 part E. The land supply in the Plan is therefore expected to be sufficient to meet needs until the late 2030s. Housing delivery will be monitored and the Plan will be replaced as necessary to ensure that housing needs can continue to be met in the City. The proposed site allocations will be subject to other plan policies such that the cumulative effects of the modified proposed development (as guided by allocations and policies) will continue to have positive effects to promote vibrant and healthy communities.
- 3.60 **Sustainable Transport & Active Living** (SA Objective No 8): The urban environment for Coventry is well connected and with a good transport system. The proposed sites in the city centre locations have easy, walking access to a wide range of services, facilities, work and entertainment – all with major positive effects for sustainable transport objectives. The new site allocations have been chosen to promote sustainable transport and active living.
- 3.61 **Environmental Quality** (SA Objective Nos 6,7, 9-13): Selection of new site allocations and amendments/updating to retained site allocations has ensured that environmental effects are avoided or can be mitigated. Modifications to policies and supporting text on Green Belt and Biodiversity

have strengthened their effectiveness and thus improved their ability to provide mitigation measures for potential negative effects on SA Objective Nos 11 & 13. Modifications arising from the SOCG with Historic England have strengthened the mitigation associated with flood risk management. Overall, the protection of, and encouragement of enhancement, for environmental quality has been confirmed and strengthened by the proposed modifications.

### **Cumulative Effects**

- 3.62 Out of the 14 amended site allocations, 3 are greenfield of which one already has planning consent. Of the 21 new site allocations and allocation of the existing Traveller site, 5 sites are on greenfield land. However with the exception of the new employment allocation the rest of the greenfield sites are small (10 dwellings or fewer) and mainly associated with the urban environment such that the potential negative cumulative effects are not considered to be significant. There is some loss of agricultural land through the allocation of the new employment site DS4 Part E Land North of A45 but there are environmental enhancements for biodiversity that will have positive effects and some mitigation for visual/landscape effects. Overall, it is considered that the loss of greenfield and Green Belt land will not have any significant negative cumulative effects.
- 3.63 Overall, the proposals for housing and employment land will have cumulative positive effects for housing and communities, especially in the longer term.