

**Sustainability Appraisal/Strategic  
Environmental Assessment**

**Addendum Report**

**City Centre Area Action Plan**

**Proposed Modifications**

**March 2017**



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## 1. NON-TECHNICAL SUMMARY

1.1 The Sustainability Appraisal/Strategic Environmental Assessment report has been produced alongside the City Centre Area Action Plan (or CCAAP for short) Proposed Modifications, 2017. It is a requirement of the UK and European Legislation. The CCAAP will set out the broad policy framework for the key planning issues facing the city centre up to 2031 and considers:

- What the centre 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.

The CCAAP proposed modifications aims to provide:

- an appropriate statutory basis for the development of the sites and buildings in the City Centre up to 2031;
- a coherent and logical policy framework based on a suite of areas/quarters so the Council can positively respond to planning applications which raise specific locational issues that go to the heart of city centre developments.

1.2 The Sustainability Appraisal aims to promote sustainable development through the integration of economic, environmental and social considerations into the preparation of Development Plans. A key function of the Sustainability Appraisal is to illustrate the benefits and risks of different policy options, to enable 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 NPPF7 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 CCAAP to reflect the changes to Policy; and
- Section 4 sets out the overall summary findings and next steps for the CCAAP and the SA.
- Technical Appendices 1-2 provide details of the further sustainability appraisal work undertaken.

## Methodology

- 1.3** The preparation of the Sustainability Appraisal of the proposed modifications to the CCAAP has involved two stages:
- Stage A: The production of a Scoping Report<sup>1</sup>, which sets out the scope of the Sustainability Appraisal framework; and
  - Stage B: The production of this Sustainability Appraisal Addendum Report, 2017.
- 1.4** The first stage of the Sustainability Appraisal involved reviewing relevant plans programmes and strategies, collecting information to develop an understanding of the social, environmental and economic health of the city to help understand the impact the CCAAP may have coupled with the identification of key sustainability issues. The Sustainability Appraisal Framework was also developed to assess the CCAAP 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.
- 1.6** 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 CCAAP. 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

- 1.5** The Scoping Report has enabled a Sustainability Appraisal Framework to be developed and this framework has been used to appraise the sustainability of the CCAAP. As part of the framework, 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).
- 1.6** The Councils CCAAP has been tested against the sustainability objectives in appraisal matrices to identify likely positive effects and negative impacts that could arise. Headline findings of this appraisal concluded that the CCAAP is likely to have an overall positive effect, mainly on the economic, but also on

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<sup>1</sup> This report is available for download on the Council's website: [www.coventry.gov.uk/localplan](http://www.coventry.gov.uk/localplan)

social and environmental aspects of sustainability. Amongst the positive effects that are likely to be realised through the CCAAP:

- Provision of new employment and training opportunities;
- Reduction in social exclusion and poverty by providing accessibility to housing and employment needs;
- Promotion of improved health;
- Opportunities for good design within new development to contribute to local distinctiveness; and
- Enhanced overall physical and built environment within the city centre.

**1.7** The most significant possible negative impacts identified may include:

- Significant increases predicated in the number of car-based trips to the City Centre as the diversity and number of retail and cultural facilities increases;
- Potential for increased levels of carbon emissions;
- Increases in higher concentrations of poor air quality in and around the Strategic Road Network.

**1.8** The SA concluded that the overall impact of the CCAAP on the 20 sustainability objectives is likely to be positive. However, it suggests that policy drafting could improve its performance even further to offset and mitigate:

- the likely increase in car journeys through the provision of an increased retail and cultural offer;
- potential increases in direct energy consumption through the increase in the number of new buildings;
- anticipated increased air pollution through the predicted likely increase in the number and frequency of vehicular trips.

## **SA of Proposed Modifications**

**1.9** The Council is proposing a number of modifications to the CCAAP. These Proposed Modifications (PMs) comprise amendments to Policies. 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 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 CCAAP are set out in Section 5 of the Submission SA Report. The overall effects of the new and amended CCAAP 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.

## Mitigation measures

**1.11** The SA concluded that the overall impact of the CCAAP 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 CCAAP, measures to increase the self-sufficiency and the level of travel generated by new development.
- Achieving high design standards in new developments, especially to protect historic environments within city centre and to maintain and create local distinctiveness.
- Include measures to protect exposed areas of the river Sherbourne corridor from development.
- The green infrastructure elements such as landscaping, green corridors, public open space and trees which should be part of the Friargate proposals (Greyfriars Quarter) should be identified.
- Further enhancement of the cityscape could be achieved through a strategy of street tree planting in line with the Councils Climate Change Strategy.
- Future consideration of the management and financing of the open spaces is also required.

## Monitoring

**1.12** A single monitoring framework is being developed to encompass the various documents that are being prepared as part of the Coventry Local Development Framework. 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 Proposed Modifications to the City Centre Area Action Plan (or CCAAP for short) document. Local Planning Authorities are required to undertake a SA for all Local Development Documents.
- 2.2** Government guidelines recommend that SA should be undertaken in a staged approach. Table 1 shows an outline of the stages as well as their relation to this and other documents. The SA was carried out in compliance with the European SEA Directive requirements.

### What is the City Centre Area Action Plan?

- 2.3** Area Action Plans are the part of the statutory planning process that provides the planning framework for areas where significant change or intervention is needed. They are central to the delivery of a plan led process in that they set the policies and proposals that direct development to the city's key regeneration areas, as well as to the major opportunity sites.
- 2.4** The CCAAP policies explain the mechanisms for the delivery of the city centre vision for it to be a growing, accessible city centre where people choose to live, work and be educated and businesses choose to invest. The AAP does identify specific sites and areas to accommodate growth and key regeneration projects.
- 2.5** The CCAAP has been developed using the latest available evidence which includes the Shopping & Centres Study (2015). There has been extensive consultation exercises related to the Swanswell Masterplan, the Jerde "City Centre Masterplan" document (2008-2009) and the City Council's Urban Design Framework (UDF) document (2009). Previous versions of the City centre AAP were also issued for consultation in 2009 and 2010, whilst more targeted consultation activity around City Centre South, Friargate, Broadgate and wider public realm improvements have taken place in recent years. The AAP presents the Councils preferred approach for the future development of the city centre which has built upon the legacy of these past documents and outcomes of consultation events.

Table 1: Stages in the Sustainability Appraisal

Stage	Description	Where is it published?
Stage A	Setting the context and objectives, establishing the baseline and deciding on the scope.	Scoping Report - 2015
Stage B	Developing and refining options and assessing effects	This report.
Stage C	Preparing the SA Report	This report.
Stage D	Consulting on the draft AAP and SA Report	February 2015 – April 2015.

Stage E	Monitoring the significant effects of implementing the AAP	To be done at a later stage.
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- 2.6** The appraisal process has identified and recommended some additions that could improve policy development and its potential impacts. These suggested changes are highlighted in the conclusion section and will be explored as part of the consultation process.

## Engagement

- 2.7** This report accompanies the CCAAP, proposed modifications document. The Council welcomes your views on any aspects of this report. In particular the following questions are asked:

- Are there any significant effects that were not identified?
- Has the sustainability appraisal process been carried out in a clear and understandable way?

- 2.8** Following public engagement, responses will be collated, and sent to the Planning Inspectorate for consideration.

## SEA Requirements

- 2.9** Table 2 of the SA report for the submission Local Plan (AAP5) 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](http://www.coventry.gov.uk/cldp)

- 2.10** 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.

- 2.11** 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 (AAP5) submitted alongside the CCAAP 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 CCAAP 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**

- 3.3** 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.
- 3.4** The Sustainability Appraisal Framework developed in the Scoping Report is used to appraise the sustainability of all Local Development Documents (LDDs). The framework was developed as part of Stage A (refer to Table 1) in

the Sustainability Appraisal process, and its preparation involved the following tasks:

- Identify and review relevant policies, plans, programmes, and sustainability objectives;
- Collate environmental, social and economic baseline information;
- Identify and discuss sustainability issues and problems relevant to Coventry;
- Develop 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
- Consult on the scope of the SA: the consultation period took place in 2014, and changes suggested to the framework during the consultation period were taken into account in the preparation of this SA process.

**3.5** Table 3 shows the 20 Sustainability Objectives that were developed in the Scoping Report, and which have been used throughout this document to assess the sustainability performance of the City Centre Area Action Plan.

Table 3: Sustainability Objectives for Coventry

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

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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 CCAAP, 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 AAP and may also help to refine the objectives.

### Method

- 4.1 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 AAP SA/SEA report remain valid.
- 4.2 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.
- 4.3 In many ways the compatibility of the AAP objectives with the SA objectives will depend on how they are implemented through the policies. Therefore the approach to the appraisal was undertaken on the basis of the following assumptions:
- Any development should have due regard to the need to protect and enhance biodiversity and the natural, built and historic environment;
  - Development should take place in a way that limits the potential for pollution and greenhouse gas emissions and uses resources efficiently to limit waste production; and
  - Acceptance that the wider population would naturally increase over time based on past trends and population projections.

## Findings

- 4.4** The overall findings for implementation of the CCAAP 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 (AAP5).

## 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 Realistic Alternative Options

- 5.2 The CCAAP strategy sets out the identification of spatial approaches for the future development of the city centre through the identification of nine character areas. The evolution of the AAP through past documents and the current document sensibly indicates there are a suite of four realistic alternative options for the future development of the city centre. These are shown in table 6. A comprehensive analysis of the suitable alternative options is set out in table 7 which details the outcomes of the appraisal process against the sustainability framework objectives. Para 155 of the NPPF is 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 Through the evolution of the CCAAP, the outcomes of the consultation to date suggest there are actually limited options given the continual pace of piecemeal development so doing nothing is not an option. It is important to note that the physical boundary of the city centre has been considered through previous public consultations and has been subsequently amended to focus on a more compact and tightly drawn geographical boundary. The focal point is within the ring road but some key areas such as Swanswell pool and Techno Park are integrated and inexplicably linked to support a growing city centre.
- 5.4 The extent to which the city centre in terms of its boundary and its relationship with the wider city has varied over time, mainly drawing on defensible boundaries and developable opportunities, but has always retained the land within the Ring Road as the focal point and prioritised opportunities to bridge or break through the Ring Road. The development of specific planning policy guidance is considered essential to the rejuvenation of Coventry city centre. To

that extent, it has been feasible to draw out three distinct options for the relative geographical size of the city centre based on the following options:

## 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 CCAAP (AAP5).

## 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 emerging CCAAP, as well as the sustainability implications of the CCAAP 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:

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++	very positive
+	Positive
?	uncertain
0	neutral/no impact
-	negative
--	very negative

### Predicting effects of the CCAAP

- 6.3 The Proposed Modifications include site specific policies 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, 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 centre 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 CCAAP 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 and an overall assessment of the findings is detailed below.

## **Socio- Economic**

- 6.7** All policies will either directly or indirectly enhance the retail facilities and the shopping experience in the city centre, and will positively affect the economic growth of the local (and regional) economy by improving access to a wider range of services and facilities (objective 1). By concentrating a diverse offer of services and retail in one area, the policies will reduce the need for travel (mainly by private car), therefore reducing carbon emissions and pollutants associated with car use (Objective 15). The policies will encourage residents and visitors to walk or cycle within the city centre, contributing positively to the vibrancy of this area by increasing the presence of the public on the streets.
- 6.8** The suite of area based policies have all been assessed as having positive effects on SA Objective 7, as providing additional retail floorspace is likely to enhance the diversity of Coventry's retail offer and encouraging new retail businesses to the area. This will encourage greater economic activity and attract visitors to the Centre, thus supporting the vitality and vibrancy of the City Centre.
- 6.9** The policies would contribute to defining the City Centre as Coventry's premium office-based employment hub. This is expected to reduce car use and encourage public transport (SA Objective 15) as the City Centre has good public transport links. Concentrating offices and associated employment alongside other services, such as retail, will reduce the need for residents to travel to different areas for work and shopping, therefore reducing the number of car journey and associated greenhouse gas and pollutant emissions made in the City (SA objective 13).
- 6.10** The policies are likely to have a positive feedback on the local economy because as more business move to, or start up, the City Centre has the potential to be seen as an exciting place to trade. This will increase the vitality and vibrancy of the city as there will be more opportunities for residents in terms of both employment and the services these businesses provide. They will also encourage economic regeneration by encouraging re-use of existing office stock.
- 6.11** The policies are anticipated to have positive effects on SA Objectives 18, 19 and 20 as a greater range and number of office-based employment opportunities may help residents in life-long learning by accessing training through work. Residents are also more likely to be satisfied with where they live if there is a suitable range of employment opportunities accessible to them.

- 6.12** Providing floorspace for new leisure opportunities is likely to encourage economic growth in the cultural and leisure area (SA Objective 4). This is due to an increase in business opportunities in the leisure sector, which in turn is likely to lead to employment opportunities and greater levels of local spending. The area specific policies in this area are expected to have a strong positive effect on SA Objective 4 as it is also expected to support the vitality and vibrancy of the City Centre, as it will encourage more visitors in the daytime and evening. It is also expected to contribute a sense of place in the City Centre, as a lively and interesting place to be.
- 6.13** The overarching policy approach to accessibility will have potential to encourage walking and cycling, and public transport use by making routes more suited to the needs of residents, such as creating additional bus stops. This is also likely to increase accessibility of goods and services in Coventry, as getting between two areas of the City will be easier, particularly for those unable to drive (SA Objective 15). The policy should also make road travel and parking more efficient, thus reducing congestion and the number of cars parked on roadsides and grass verges.
- 6.14** By developing the Fairfax regeneration area is likely to have positive effects to support a range of employment, business, retail and leisure facilities, both business activity and spending is expected to increase in the area. By promoting the Fairfax Quarter as a vibrant destination for both sport and shopping, it is likely that a greater number of people will start to use the area, thus attracting public-facing businesses, such as retail and leisure, and increasing spending in the area. Increased services and employment opportunities will also improve access to these for local people, who may not require daily use of the PSA (SA Objective 1).

### **Environmental**

- 6.15** Sustainability implications of development in the Bishopgate Regeneration Quarter are uncertain in terms of SA Objectives 10 and 11. The SA Scoping Report notes that canals are a unique cultural heritage asset and contribute strongly to the townscape character of Coventry. Development in this area is likely to alter the built environment of this historic townscape. This will have implications for both SA Objectives 10 and 11, as historic features and the townscape are closely linked in this part of the City Centre.
- 6.16** This could have positive impacts if investment in learning facilities encourages regeneration of the surrounding townscape, including maintenance of the canal and towpath and refurbishment of historic buildings. Alternatively development could have a negative impact on the surrounding landscape if design of development is at odds with the historic environment or results in degradation of conservation features, such as demolition of listed buildings. The setting of the canal may be damaged if development would detract from its current historic setting.
- 6.17** New buildings will inevitably create new demand for transport, but the CCAAP will encourage developers to include measures that promote walking and

cycling and the use of public transport as well as promote mixed-use developments, reducing the need for commuting to work. Several of the impacts that have been identified in table 8 are irreversible. These include:

- The "heat island" effect: concentration of heat emitting buildings in a densely defined area can exacerbate the temperature of a specific environment comparable to areas in close proximity.
- The loss of certain "urban" habitats may result in the loss of some species which are dependent upon that particular habitat. For example, pigeons and rats, birds of prey.

- 6.18** It is however recognised that there is a need for new homes, more office and retail floorspace premises together with associated infrastructure (highways, transport, public realms and green and blue infrastructure) in order to accommodate and deliver the transformational change in the city centre.
- 6.19** The policies are expected to protect and enhance Coventry's townscape character through re-use of existing buildings and contributing to the creation of a vibrant economic city centre (SA Objective 11). They scored positively in respect of increasing resource efficiency by encouraging use of disused buildings and building within existing urban boundaries, therefore protecting rural and agricultural land (SA Objectives 8 and 11).
- 6.20** Whilst an increase in impermeable surfaces is often associated with increased flood risk, the policies are expected to have no, or little, effect on flood risk as housing is to be delivered on existing housing sites and upper floors of commercial buildings. Most of the City Centre has low or very low risk of surface water flooding and there is no currently recognised flood risk as set out in the 2015 Strategic Flood Risk Assessment, Level 1 and Level 2 findings.
- 6.21** The overarching policy approach in respect of environmental management is assessed as having strong positive impacts against SA Objectives 9-15, as it promotes green infrastructure, which can contribute to reducing flood risk and improving carbon dioxide absorption. It also encourages buildings to be designed to both prepare for and mitigate climate change, including incorporation of renewable sources of energy, such as solar panels and PV arrays. The use of 'eco-friendly construction products' implies that resource use during construction will be minimised, as materials will be from recycled or sustainable sources (SA Objective 13).
- 6.22** Table 9 is an appraisal of the main policy areas outlined in the emerging CCAAP. As noted earlier, the appraisal was carried out through a dedicated workshop and results in recommendations for taking the policy areas forward.

Table 8: Predicting the effects of the CCAAP Proposed Modifications

### Appraisal of City Centre Area Action Plan

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 AAP

		AAP	Likely <i>Positive</i> effects of PMs on sustainability objectives	Possible <i>Negative</i> impacts of PMs on sustainability objectives
<b>Sustainability Objectives</b>	1	+	1) The PMs make attempts to encourage public transport use hence potentially making services and amenities more accessible. 2) Locating services near to housing (and vice versa) could have a positive impact on accessibility. Walking distance to local services would be enhanced through new routes.	It is not the case that people necessarily wish to live where they work, hence in practice, the attempts of the AAP may have neutral impact on sustainability objectives.
	2	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. Participation in the decision making process has been substantial in terms of political meetings, community forums. Improved accessibility into the city centre means people can access points to vote in an easier way.	No real negative impact identified between the PMs and this Sustainability Objective.
	3	+	Long term positive impact potential: provision of new homes, many being affordable and new employment opportunities may provide for those who are currently excluded. Clearance of land which was previously used for anti-social behaviour will also have positive impacts to reduce such behaviour. If regeneration areas are realised then that would attract investment which could provide job opportunities.	No real negative impact identified between the PMs and this Sustainability Objective.

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. Cycling and walking routes would provide opportunities for active lifestyles, including promoting cycling to work.	Higher density buildings could result in reduced levels of private green spaces having negative impact for promoting health and active wellbeing.
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. Opportunity for affordable housing in the context of new dwellings could enable local needs to be realised.	No real negative impact identified between the AAP and this Sustainability Objective.
6	+	Some potential for crime reduction to be built into new developments. May however be more influenced by other SPD rather than as a direct effect of this PMs. Increased lighting of a 24 hour city could reduce the fear of crime. However, with improved public realm plus more residential and employment opportunities within the CC there will be opportunities to increase natural surveillance and reduce the fear of crime. There will be a balancing act as the point about pubs/clubs is a valid one.	If aspirations for a '24 hour' city are realised this means pubs and clubs are open late, likely to increase crime and disorder.
7	+	Maintaining views of three spires would encourage the presentation of the heritage of the city and the regeneration areas helping enhance cathedral setting and the 4 character areas in the city centre that can help ensure excellent design.	Loss of some urban green spaces may reduce recreational opportunities.
8	+	PMs provide the potential to contain growth in areas and protect other areas - such as some areas of green belt, open countryside and green spaces.	Loss of urban spaces to development - significant short and long term negative impact on environment.
9	0	No real biodiversity losses or gains - some biodiversity is affected detrimentally by development, whereas other areas are protected and hence also their biodiversity.	No real biodiversity losses or gains - some biodiversity is affected detrimentally by development, whereas other areas are protected and hence also their biodiversity.
10	++	Long term possibility to create high quality built environment through new development of improving design and could lead to local distinctiveness.	No real negative impact identified, although high density development <i>may</i> impact upon this objective. This highlights the importance of excellent design.

11	0	PMs will encourage reduction in pollution levels through reducing the need to travel and encouraging active and sustainable travel as well as promoting high quality buildings that are more energy efficient. 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	Deculverting of the river Sherbourne together with Flood Risk Assessments for specific development sites would mitigate any proposed water management and drainage issues.	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	PMs will encourage reduction in pollution levels and look to reduce the city centres carbon footprint through initiatives such as Heatline and other renewable energy programmes. 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. It's almost not applicable, simply because other plans address the issues of green house gas emissions.
14	0	No real negative impact identified between the PMs and this Sustainability Objective	No real negative impact identified between the PMs and this Sustainability Objective.
15	+	This PMs has real potential to achieve medium and long term positive impacts to reduce car travel (less potential to reduce air travel) by encouraging sustainable modes of transport, and developing houses, employment and services in close proximity.	As the city centre becomes more vibrant more people will be attracted to visit it, which could create more car usage, although public transport improvements does give opportunities to minimise this impact .
16	+	Establishment of some large scale recycling facilities could have positive long term environmental benefits. The opportunity for new buildings to connect to Heatline project emphasise this. Provision of small scale recycling facilities could also result in some short term environmental gains and encourage reduction in 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 encourage the growth of Coventry city centre to provide for employment, housing and service needs. Potential to create short, 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.	No real negative impact identified between the PMs and this Sustainability Objective.
	19	++	The PMs has a positive potential to provide access to good quality employment for all through the establishment of new employment opportunities.	No real negative impact identified between the PMs and this Sustainability Objective.
	20	++	This PMs may open up training and education opportunities through vocational training alongside the establishment of new employment. The continued growth of the University and expansion of local education facilities within the Swanswell area will all have positive effects.	May not provide training and education for <i>all</i> but does increase opportunities and accessibility to learning.



Table 9 – Sustainability Appraisal of CCAAP policy areas

Policies	Comments by workshop participants (Critical analysis )	Implication for AAP and Recommendation
<b>CC1 Development Strategy</b>		
<p>The city centre will continue to be developed and regenerated to ensure it is a truly world class city centre, leading in design, sustainability and culture.</p> <p>This will be achieved by:</p> <ul style="list-style-type: none"> <li>• Enhancement of its position as a focus for the entire sub-region and as a national and international destination to live, work and play;</li> <li>• Enhancement of its retail and leisure offer to strengthen the city’s sub-regional role;</li> <li>• Provision of high quality office space;</li> <li>• Becoming a hub for education</li> <li>• Including a variety of places to live which cater for different needs;</li> <li>• Preserving or enhancing the character and setting of the historic built landscape and the archaeological environment;</li> <li>• A connected public realm including public squares and green spaces, easily accessible through the creation of desirable and legible pedestrian routes;</li> <li>• Accessibility for all;</li> <li>• Providing an attractive and safe environment for pedestrians, cyclists and motorists;</li> <li>• Provide a high quality public transport system that benefits from seamless integration and is well connected to existing and new infrastructure;</li> <li>• Being a gigabyte city that offers high speed Wi-Fi and broadband facilities throughout the city centre</li> <li>• High quality sustainable built design;</li> <li>• Continuing to develop a vibrant and attractive night time economy;</li> <li>• Providing opportunities to improve health and wellbeing;</li> <li>• Continuing support greater integration of the university within the wider city centre in accordance with the policies in the Area Action Plan;</li> <li>• Recognising and preserving key views to the iconic three spires of St. Michaels, Holy Trinity and Christchurch; and</li> <li>• Supporting the reintroduction of green and blue infrastructure throughout the city centre, including opportunities for deculverting wherever possible.</li> </ul>	<p>Achieving this is to some extent dependent on the type of sites released to meet the transformational change and in particular in relation to urban green spaces. However, there is some concern in relation to the potential of green spaces to attract anti-social behaviour.</p> <p>There may be cases where certain forms of heritage assets suggest the value of which is not currently recognised and only appreciated after a long period of public embrace, neglect or even hostility. A good example of where this has happened is the traditional 1960s designs.</p>	<p>No change to policy.</p>
<b>CC8 Green and Blue Infrastructure</b>		
<p>a. New development will be expected to maintain the quantity, quality and</p>	<p>The environmental positivity's are beyond</p>	<p>No change to policy.</p>

Policies	Comments by workshop participants (Critical analysis )	Implication for AAP and Recommendation
<p>functionality of existing green and blue infrastructure. In line with the city's Green Space Strategy and Local Flood Risk Management Strategy, development proposals should enhance blue and green infrastructure, and create and improve linkages between the areas. Any development which is likely to adversely affect the integrity of a blue or green corridor will be required to be robustly justified and where appropriate, mitigation measures put in place. Development shall support meeting the objectives of the Severn River Basin Management Plan through ensuring that no deterioration of the River Sherbourne or its tributaries shall occur that may result in it failing its objectives under the Water Framework Directive.</p> <p>b. Developments adjacent to the Ring Road should maximise all opportunities to develop the greening of vertical surfaces as far as reasonably possible. Opportunities to add greenery to the area on a north-south and east-west axis through the city centre, defined on figure 5 as 'Green Spines', will be encouraged and supported.</p> <p>c. Trees that contribute towards public amenity shall be retained and protected unless they are of poor quality, have a short life expectancy (less than 10 years), are dangerous or the benefits of removing the tree significantly outweighs the harm that would be caused by its removal. Where trees are lost, replacement planting must be provided to a commensurate value to that which is lost.</p>	<p>reproach and the resultant social benefits meant this scored positive in respect of the social objectives. It is logical and reasonable to assert that users of these spaces are likely to experience beneficial outcomes of their experiences and visits to these areas of the city centre as they offer a welcome respite to the high density built up nature of the city centre.</p>	
<b>CC9 Drainage and Flood Risk</b>		
<p>a. Development shall be designed and located to minimise the risk of flooding and if permitted development, be resilient to flooding. The opportunity must be exercised to maximise the absorption of surface water run-off by the ground. Sustainable Drainage methods shall be incorporated into new developments including treatment for water quality. Such provisions should consider opportunities to reflect the alignment of the River Sherbourne and/or its tributaries.</p> <p>b. When development occurs, a Flood Risk</p>	<p>This scored particularly positive in respect of all environmental objectives and indirectly in relation to the economic. If businesses benefit from improved drainage and less risk of flooding there are more likely to invest further in the city centre.</p>	<p>No change to policy.</p>

Policies	Comments by workshop participants (Critical analysis )	Implication for AAP and Recommendation
<p>Assessment will need to be produced to appropriately consider the risk of flooding from all sources.</p> <p>c. When development occurs, it must consider the evidence in the Local Flood Risk Management Strategy, Surface Water Management Plan and Strategic Flood Risk Assessment. This includes all sites being treated as a Greenfield site when calculating permissible discharge rates in line with Policy EM5 of the Local Plan.</p> <p>d. When development is proposed it should utilise water use reduction systems such as grey water harvesting to reduce the water usage within the proposed developments.</p> <p>e. 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 (having regard to Figure 6). 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.</p>		
<b>CC11 Accessibility</b>		
<p>a. Development proposals in the city centre will be required to incorporate improvements to the significant routes and linkages as shown in Figure 8 above.</p> <p>b. Where appropriate, development proposals will be required to incorporate improvements to crossing the Ring Road to ensure enhanced connectivity between the city centre and the wider city for pedestrians and cyclists and should reflect the priorities in the supporting text above. This will be of particular relevance at:</p> <ul style="list-style-type: none"> <li>• Ring Road Junctions 1, 2, 4 and 5</li> <li>• The Canal Basin crossing between Ring Road junctions 9 and 1</li> <li>• Connectivity between Parkside and Much Park Street</li> </ul>	<p>It is considered that intention of the policy is particularly robust particularly in relation to economic objectives 18, 19 and 20.</p>	<p>No change to policy.</p>

Policies	Comments by workshop participants (Critical analysis )	Implication for AAP and Recommendation
<p>Development proposals should support the needs of pedestrians and cyclists by incorporating new dedicated safe and direct pedestrian and cycle routes which integrate seamlessly into established networks including connecting to the public transport network, interchanges and stops to deliver seamless integration together with provision of high quality cycle parking.</p> <p>c. City centre cycling and walking routes should be connected to the wider Metropolitan Strategic Cycle Network and be in partnership with TfWM.</p> <p>d. Development proposal should have regard to, and where appropriate, make provision for:</p> <p>e. Infrastructure which supports the intelligent mobility agenda;</p> <p>f. The inclusion of public transport infrastructure;</p> <p>g. The development of Mobility Hubs;</p> <p>h. The delivery of the Coventry Station Masterplan.</p> <p>i. The provision of high quality cycle parking; and</p> <p>j. The development of Rapid Transit.</p> <p>Proposals for the redevelopment, intensification and enhancement of the following car parks will be encouraged as part of the wider regeneration of the city centre. Redevelopment proposals must consider the following factors:</p> <ul style="list-style-type: none"> <li>• Changes which affect the provision of public car parking spaces must be clearly justified as part of an on-going strategic review process and shown to have an acceptable impact on the performance and accessibility of the city centre and overall car parking provision.</li> <li>• The redevelopment and improvement of surface level car parks will be prioritised.</li> <li>• New car parking should be accommodated in a multi-storey format.</li> <li>• Proposals for multi storey car parks should respect the charter and scale of the surrounding environment and maximise opportunities for high quality aesthetics.</li> </ul>		

Policies	Comments by workshop participants (Critical analysis )	Implication for AAP and Recommendation
<ul style="list-style-type: none"> <li>• Changes should have regard to other relevant policies including the Coventry Connected SPD, Coventry Car Parking Strategy and TfWM Strategic Transport Plan parking policy objectives, including any future metropolitan wide parking strategy. Parking needs and the role of the car will also be balanced with promoting the use of public transport, cycling and walking,</li>   <li>k. The provision of new surface level car parking will not be supported within the city centre unless its provision is to support the implementation of longer term regeneration schemes. In such cases surface level provision will only be allowed on a temporary basis.</li>   <li>l. Development proposals which result in significant changes to the location or supply of public car parking spaces will be required to address any associated necessary changes to associated car park signing and management systems.</li> </ul> <p>Proposals for the redevelopment of White Street Coach Park will be encouraged, where they are linked to appropriate amendments to Ring Road junction 2.</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 This chapter considers significant potential adverse effects that have been identified through the assessment process and recorded as uncertain using the assessment classification. Mitigation measures can take a wide range of forms, including:
- changes to the CCAAP options, including bringing forward new options or adding or deleting options;
  - refining options in order to improve the likelihood of beneficial effects;
  - minimising adverse impacts by ensuring strong policy criteria are developed technical measures to be applied during the implementation stage. This may also include setting guidelines or applying design principles.
- 7.3 The mitigation hierarchy has been considered a sequential process that operates in the following way: firstly, if possible, adverse effects should be avoided. Failing this, the nature of the effect should be reduced, if possible, so that it is no longer significant. If neither avoidance nor reduction is feasible, mitigation measures should be considered. Mitigation prescriptions might include changes to policy wording, advocating design guides, offsetting biodiversity effects or provision of new supporting green infrastructure. In the case of this SA Report, mitigation has been supplied to help address negative effects so that, if possible, no residual affects remain. Mitigation measures referred to at previous stages have been taken into account, as far as possible in preparing the CCAAP.
- The positive effects of the CCAAP could be maximised with the addition of mitigation measures. These include:
- An investigation as to whether new recycling facilities should be shared with a wider area (i.e. Coventry, Solihull and Warwickshire) to determine what is the most sustainable way forward in terms of the provision of new facilities in the city centre.
  - An integrated approach to development and infrastructure, co-ordinating housing provision with employment generation, public transport, environmental improvement and public service provision.
- 7.4 In order to mitigate and minimise the possible negative impacts of the CCAAP, the following mitigation measures are recommended in accordance with the draft policies contained in the CCAAP:

- Full opportunities to require new buildings to connect to the existing heat line
- Carefully plan any high density developments and ensure that the provision of apartments is not in excess of need.
- Undertake a study to establish commuting patterns over a specified time period.
- In considering sites for release, reference should be made to the need to ensure that a range of sites can be provided to accommodate small and medium size businesses and particularly those users at the lower end of the market.
- Opportunities for development on brownfield land should be fully explored and consideration given to the redevelopment for employment use of existing underused sites.
- Provision of employment land premises:
- It will be important to ensure that any future land that is promoted is suitable for a range of users, particularly small to medium size enterprises. Consideration should be given to taking steps to ensure that certain types of employment development are accommodated on sites to ensure a diversity of employment opportunities.
- Consideration needs to be given to incorporating recycling schemes into employment developments to encourage recycling
- Make provision to encourage linked trips throughout the city centre.
- Ensure the provision of SUDS within new development to minimise the risk of flooding.
- Achieve high design standards in new developments, especially to protect the historic environment within the city centre and create local distinctiveness.
- Mitigate the loss of urban green space to development through the enhancement of those green spaces that are not considered for development.

### **Accessibility**

- Potential negative effects include ensuring additional housing is located near to services and facilities that have sufficient capacity for the expected number of additional residents in the area. If this is not possible, development should be located near a high frequency bus route that provides access to services that have sufficient capacity. Alternatively, the development could provide new services or contribute to expansion of existing nearby services, where these do not currently have additional capacity.
- Consideration should be given to car free developments in the city centre, wherever possible. This could be encouraged by securing electronic charge points throughout the city centre as well as improved cycle parking facilities, improved pedestrian and cycle ways and connectivity to public transport.

### **Waste Management:**

- Consideration should be given to preparing an SPD/DPD to ensure that new waste management facilities are planned and developed in a coherent and sustainable way.

- Sustainability of new developments could be maximised by implementing the suggestions included in the critical appraisal process, including implementation of waste minimisation incentives, ensuring easy access to recycling facilities and following applicable Building Regulations and building codes such as BREEAM.

## **Historic Environment**

- Many of the policies may alter historic features through changing their surroundings. This may be temporary, during construction work, or permanently through alteration of the physical townscape, such as demolition of old buildings and construction of new ones. The first stage of the mitigation hierarchy, avoidance, may be achieved by retaining and reusing existing buildings, without any external modifications. If this is not possible, for example existing buildings are unsafe or unfit for purpose, new construction should be designed in a way that is sympathetic to any nearby historic features and it should fit in with surrounding development.
- CC11 may have a negative impact on historic features if changes in traffic flow and changes in sustainable transport services result in a greater flow of traffic in the vicinity of these features. This could occur even if there was less traffic in Coventry overall, although the likelihood of increased traffic near historic features is very low. Nevertheless, mitigation measures should be implemented to ensure that this does not occur. Suggested mitigation consists of ensuring that multiple additional bus services do not pass by historic features. If traffic restriction measures are put in place in the city centre, measures should be taken to discourage drivers from taking alternative routes that would increase traffic in the vicinity of historic features, particularly in the vicinity of the Cathedrals quarter.

## **Monitoring the significant effects of implementing the CCAAP (Task B6)**

- 7.5** This process will continue with the preparation of the Coventry Local Plan process and will encompass monitoring information in connection with Sustainability Appraisal.
- 7.6** The CCAAP 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 Local Plan. This will ensure that the significant sustainability effects of implementing the plan are monitored to identify any unforeseen adverse effects and enable remedial action to be taken. Sustainability Appraisal monitoring will be incorporated into the existing monitoring arrangements.



## APPENDIX 1: SCREENING OF PROPOSED MODIFICATIONS POLICIES

The screening matrix below should be read in conjunction with the CCAAP 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 CCAAP specifically address the issues of soundness identified by the Inspector in her letter of January 2017.

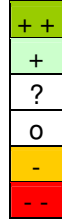
Policy	Summary of Changes	Screening – do the changes, deletions and additions significantly affect the findings of the Submissions Local Plan SA/SEA Report (LP8), 2016 or do they give rise to significant environmental effects?
CC1	A number of changes are proposed including a more inclusive reference to integrated University development, public transport system integration and supporting green and blue infrastructure (deculverting).	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.
CC2	No change to policy.	No new SA assessment required.
CC3	No change to policy.	No new SA assessment required.
CC4	No change to policy.	No new SA assessment required.
CC5	No change to policy.	No new SA assessment required.
CC6	No change to policy.	No new SA assessment required.
CC7	No change to policy.	No new SA assessment required.
CC8	A number of small adjustments are proposed in the supporting text in various parts of the AAP to reflect the updated flood risk and drainage policies in the draft Local Plan. This reflects the Councils on-going work with the Environment Agency and the most up to date national guidance. It also helps to support further encouragement for deculverting within the city centre wherever this is appropriate and viable.	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.
CC9	A number of small adjustments are proposed in the supporting text in various parts of the AAP to reflect the updated flood risk and drainage policies in the draft Local Plan. This reflects the Councils on-going work with the Environment Agency and the most up to date national guidance. It also helps to support further encouragement for deculverting within the city centre wherever this is appropriate and viable.	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.
CC10	No change to policy.	No new SA assessment required.
CC11	Continued engagement with TfWM has led to a small number of adjustments to strengthen links to sub-regional and regional public transport and cycle networks. This also strengthens further the importance of local connectivity.	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.
CC12	No change to policy.	No new SA assessment required.
CC13	No change to policy.	No new SA assessment required.
CC14	No change to policy.	No new SA assessment required.

CC15	No change to policy.	No new SA assessment required.
CC16	No change to policy.	No new SA assessment required.
CC17	No change to policy.	No new SA assessment required.
CC18	Minor wording changes to aid clarity	Due to the very minor proposed change, the findings of the SA/SEA report hold good.
CC19	No change to policy.	No new SA assessment required.
CC20	No change to policy.	No new SA assessment required.
CC21	No change to policy.	No new SA assessment required.
CC22	No change to policy.	No new SA assessment required.
CC23	No change to policy.	No new SA assessment required.
CC24	Minor wording changes to aid clarity	Due to the very minor proposed change, the findings of the SA/SEA report hold good.
CC25	Minor wording changes to aid clarity	Due to the very minor proposed change, the findings of the SA/SEA report hold good.
CC26	No change to policy.	No new SA assessment required.

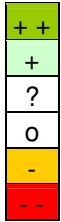
## APPENDIX 2: APPRAISAL OF PROPOSED MODIFICATIONS POLICIES

Policy CC1: Enhancement of Heritage Assets			
	<p>A) All development within, or affecting the setting of, a Conservation Area (Figure 2) shall preserve and enhance its character and appearance and adhere to the policies of the relevant Conservation Area Management Plan.</p> <p>B) All development relating to or in close proximity to heritage assets such as statutory and locally listed buildings, Scheduled Monuments, public artwork and non-designated heritage assets (Figure 2) shall be undertaken sympathetically to those heritage assets and seek to enhance their setting.</p> <p>C) Within Archaeological Constraint Areas and areas of archaeological potential (Figure 3), appropriate archaeological assessment will be required prior to the determination of a development proposal. Where significant archaeological remains are found they shall be recorded in a manner proportionate to their significance. Remains of high significance shall be preserved and protected.</p> <p>D) Development within the city centre primary shopping area must respect the principles and significant elements of the post-World War II reconstruction</p>	<p>++</p> <p>+</p> <p>?</p> <p>o</p> <p>+</p> <p>--</p>	<p>very positive</p> <p>positive</p> <p>uncertain</p> <p>neutral/no impact</p> <p>negative</p> <p>very negative</p>
1		0	
2		0	
3		0	
4		?	
5		0	
6		+	
7		++	

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

<b>Policy CC8 – Green and Blue Infrastructure</b>		
	<p>New development will be expected to maintain the quantity, quality and functionality of existing green and blue infrastructure. In line with the city's Green Space Strategy and Local Flood Risk Management Strategy, development proposals should enhance blue and green infrastructure, and create and improve linkages between the quarters. Any development which is likely to adversely affect the integrity of a blue or green corridor will be required to be expressly justified and where appropriate, mitigation measures put in place.</p> <p>Developments adjacent to the Ring Road should maximise all opportunities to develop the greening of vertical surfaces as far as reasonably possible. Opportunities to add greenery to the area on a north-south axis through the city centre, defined on figure 6 as the 'Green Spine', will generally be encouraged and supported.</p> <p>Trees that contribute towards public amenity shall be retained and protected unless they have a short life expectancy (less than 10 years), are dangerous or the benefits of their loss significantly outweigh the harm that would be caused. Where trees are lost, notable replacement planting must be provided.</p>	 <p>very positive positive uncertain neutral/no impact negative very negative</p>
1		+
2		0
3		0
4		++
5		0
6		+
7		+

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

<b>Policy CC9: Drainage &amp; Flood Risk</b>		
	<p>A) Development shall be designed and located to minimise the risk of flooding and if permitted development, be resilient to flooding. The opportunity must be exercised to maximise the absorption of surface water run-off by the ground. Sustainable Urban Drainage methods shall be incorporated into new developments including treatment for water quality.</p> <p>B) When development occurs, a Flood Risk Assessment will need to be produced to appropriately consider the risk of flooding from all sources.</p> <p>C) When development occurs, it must consider the evidence in the Local Flood Risk Management Strategy, Surface Water Management Plan and Strategic Flood Risk Assessment. This includes all sites being treated as a Greenfield site when calculating permissible discharge rates.</p> <p>D) When development is proposed it should utilise water use reduction systems such as grey water harvesting to reduce the water usage within the proposed developments.</p> <p>E) Where a development proposal lies adjacent to the existing de-culverted river Sherbourne, a natural sinuous river channel should be retained. Consideration should be given to remove culverts along Fairfax Street as shown in Figure 7 in order to create multi-functional green/blue spaces or consider opportunities to create a water channel that respects the alignment of the River Sherbourne.</p>	 <p>very positive positive uncertain neutral/no impact negative very negative</p>
1		+
2		0
3		0
4		++
5		+
6		+
7		+

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



	<b>Policy CC11 Car Parking</b>													
	<p>Proposals for the redevelopment of the following existing surface level car parks will be encouraged as part of the wider regeneration of the city centre. Schemes will be encouraged, which complement existing nearby uses and designs in those specific quarters.</p> <ul style="list-style-type: none"> <li>• Bishop St Car Park,</li> <li>• Whitefriars St Car Park,</li> <li>• Far Gosford St Car Park,</li> <li>• Leicester Row Car Park and;</li> <li>• Cox St Car Park.</li> </ul> <p>Proposals for the redevelopment of White Street Coach Park will be encouraged, where linked to amendments to the Ring Road. Proposals to redevelop/re-configure Salt Lane and Cheylsemore surface level car parks to a multi-storey format will be encouraged.</p> <ul style="list-style-type: none"> <li>• Salt Lane car park should be sympathetically designed to take account of its surroundings, specifically the Fordes Hospital site.</li> <li>• Cheylsemore car park should, where possible, be linked to the existing multi-storey car park at New Union Street, which in turn would allow for an improved design of the existing New Union Street car park.</li> </ul> <p>Proposals for shared use multi-storey car parks in the Technology Park Quarter and Fairfax Street Regeneration area will be encouraged. The council will work with partners to encourage public and private usage at appropriate times.</p> <p>Proposals for new multi-storey public car parks will be considered, provided they are of good design, are accessible by a short drive from the Ring Road and ensure an appropriate relationship with adjacent buildings and uses.</p> <p>Suitable proposals for parking in the Friargate quarter will be encouraged, subject to appropriate design and suitability to the surrounding area. Where appropriate, opportunities for shared public and private parking will be explored.</p> <p>The provision of new surface level car parking will not be supported within the city centre unless its provision is to support the implementation of longer term regeneration schemes. In such cases surface level provision will only be allowed on a temporary basis.</p> <p>New cycle parking provision should be made as part of new developments within the city centre. This should be in conformity with the requirements in the Developing a more Sustainable City SPD, or replacement document.</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
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## **APPENDIX 3: 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.

### **Core Strategy**

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

### **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 without special permission being granted by the Local Planning Authority.

**Local Development Document (LDD)**

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

**Local Development Framework (LDF)**

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

**Nature Conservation**

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

**Objective**

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

**Planning and Compulsory Purchase Act 2004 (PCPA)**

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

**Scoping**

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

**Strategic Environmental Assessment (SEA) Directive**

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

**Stakeholder**

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

**Supplementary Planning Document (SPD)**

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

**Sustainability Appraisal (SA)**

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

**Sustainable Development**

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

### **Sustainable Drainage System (SUDS)**

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

If you need this information in another format or language  
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