

# **Sustainability Appraisal/ Strategic Environmental Assessment**

## **Adoption Statement – Local Plan & City Centre Area Action Plan**

**December 2017**



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## 1. SA ADOPTION STATEMENT

### Introduction

**1.1** Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of a Local Plan or Area Action Plan. SA incorporates the requirements for Strategic Environmental Assessment (SEA) and a Sustainability Appraisal/Environmental Statement for the Coventry Local Plan and City Centre Area Action Plan have been prepared in accordance with the following requirements:

- Regulation 36 of the Town & Country Planning (Local Development) (England) Regulations 2004
- Regulation 16 of the Environmental Assessment of Plans & Programmes Regulations 2004
- Paragraph 165 of the National Planning Policy Framework 2012

**1.2** For the purpose of this Statement that complies with planning and environmental assessment Regulations, the integrated appraisal will be referred to as the Sustainability Appraisal (SA).

**1.3** The SA process comprises a number of stages that are designed to comply with the requirements of the SEA Regulations and as guided through Government Planning Practice 2. This SA Adoption Statement satisfies the requirements for post adoption (Stage E) and demonstrates compliance with the requirements of the SEA Regulations as follows:

- (a) how environmental considerations have been integrated into the plan or programme;
- (b) how the environmental report has been taken into account;
- (c) how opinions expressed in response to— (i) the invitation referred to in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;
- (d) how the results of any consultations entered into under regulation 14(4) have been taken into account;
- (e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- (f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme

## 2. DEVELOPMENT OF THE COVENTRY LOCAL PLAN AND CITY CENTRE AREA ACTION PLAN

**2.1** The preparation of the Sustainability Appraisal of the Local Plan and City Centre Area Action Plan have involved two stages:

- Stage A: the production of a Scoping Report<sup>1</sup>, which sets out the scope of the Sustainability Appraisal for the Coventry Local Development Plan and
- Stage B: the production of the Sustainability Appraisal Report and Addendum Report, 2016 and 2017 respectively.

**2.2** The first stage of the Sustainability Appraisal involved reviewing relevant plans programmes and strategies, collecting information to develop an understanding of the social, environmental and economic health of the city to help understand the impact the Local Plan and City Centre Area Action Plan. The Sustainability Appraisal Framework was also developed to assess the Local Plan and City Centre Area Action Plan in a systematic and logical way. This information was set out in a Scoping Report and a targeted consultation was undertaken in 2015 to update baseline data and the assessment of all relevant plans and programmes.

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

**2.3** A range of options were put forward to address the key planning issues facing the city up to 2031. These were appraised against each of the Sustainability Objectives thus showing how the options compared in sustainability terms. This has aided the development and refinement of the identified options. The next stage was to predict and evaluate the effects of the Local Plan and City Centre Area Action Plan. This was 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.

### **3. HOW ENVIRONMENTAL & SUSTAINABILITY CONSIDERATIONS HAVE BEEN INTEGRATED INTO THE LOCAL PLAN; HOW HAS THE SUSTAINABILITY/ ENVIRONMENTAL REPORT BEEN TAKEN INTO ACCOUNT**

**3.1** During the plan-making process, SA (incorporating SEA) has been carried out as an iterative and ongoing process to inform decision making for the developing Local Plan and City Centre Area Action Plan. The SA was undertaken in accordance with government guidance for a staged approach that integrates appraisal to consider the effects of the emerging plan on socio-economic as well as environmental factors. The in-house approach coupled with utilising an external SA consultant as a critical friend ensured the findings and recommendations from the SA were integrated into each developing stage of the Local Plan and City Centre Area Action Plan.

**3.2** The SA of the Local Plan and City Centre Area Action Plan used the same SA Framework developed during the SA scoping process as the basis for assessing the emerging Plans. Relevant plans/programmes had been reviewed; baseline information regarding the character of the area and its likely evolution collated and analysed; and sustainability problems, issues and opportunities had been identified during the SA scoping to compile a Framework of Objectives and Decision-Aiding Questions that seek to resolve the sustainability issues identified and relevant to the plans and wider Coventry area. The assessment used both quantitative and qualitative assessments, including defined thresholds of significance, where possible.

**3.3** The SA considered the likely significant effects of the implementation of the Local Plan and City Centre Area Action Plan on the sustainability objectives for the Coventry area. For each aspect of the Local Plan and City Centre Area Action Plan, the assessment against the SA Objectives was recorded with a narrative provided describing any significant effects identified, mitigation of any significant negative effects, and any suggestions for enhancing potential beneficial effects. In line with requirements of the SEA Regulations, the appraisal considered effects including short, medium and long term, permanent, and temporary, positive and negative, secondary, cumulative and synergistic, wherever possible and relevant. Any gaps or difficulties were also reported.

**3.4** The findings and recommendations of the SA informed plan-making and were integrated into the further development of the Local Plan and City Centre Area Action Plan - and as set out in the Submitted SA Reports (2016) and the SA Addendum Reports (2017 for the Main Modifications). The SA Reports recorded that overall, the Local Plan and City Centre Area Action Plan are considered to have likely significant positive effects and sufficient mitigation measures are in place to minimise or avoid significant negative effects, as follows:

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

**3.5** The most significant possible negative effect that has been identified would be if the Local Plan policies lead to the wholesale release of Greenfield and Green Belt land to meet additional development pressures beyond the identified capacity within the administrative boundary of Coventry. In addition, significant potential effects were identified on the natural and historic environments. For example, accommodating all of Coventry's objectively assessed housing need (42,400) would lead to an unsustainable loss of Greenfield land, including huge tracts of Green Belt many with diverse and rich ecological and historic qualities. However, sites allocated for development are likely to be positive for improving some people's access to a home and supporting economic activity necessary for regeneration. However, the negative would mean increased resource consumption, traffic generation and domestic waste. Appropriate mitigation and compensatory measures would need to be developed to offset these identified allowable weaknesses.

**3.6** The SA concluded that the overall impact of the Local Plan and City Centre Area Action Plan on the 20 sustainability objectives were likely to be positive. However, it suggested that policy drafting could improve performance even further. The overarching mitigation measures that could be incorporated into policy include:

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

**3.7** Where relevant, the SA made recommendations for mitigating likely negative effects, for example, by suggesting refinements of policy wording and, in particular, the findings of the SA guided the selection of potential site allocations by identifying sustainability issues especially the cumulative effects of development for settlements and sensitive receptors.

**3.8** The proposed changes and Main Modifications to the Local Plan and City Centre Area Action Plan arising from the Examination and issues discussed at the Hearings were subject to SA, reported and subject to consultation. Generally, the SA found that the changes to the Local Plan and City Centre Area Action Plan strengthened the positive effects that had been identified, particularly for housing and community objectives. The modifications strengthen and confirm implementation of mitigation measures, including site-specific requirements that confirm protection or enhancement of environmental and heritage assets. This improved the overall sustainability of the Local Plan and City Centre Area Action Plan.

- 3.9** The SA reports have been available on the Council’s website and at each stage, the responses to comments made and issues raised have been reported. Throughout, the appraisals have been proportionate and appropriate to the stages of plan-making. Thus, environmental and sustainability considerations have been integrated and the SA Reports taken into account throughout the plan-making process.

## **4. HOW THE RESULTS OF CONSULTATION HAVE BEEN TAKEN INTO ACCOUNT**

- 4.1** Consultation is an important aspect of SA and there was statutory and public consultation at each key stage of the Local Plan and City Centre Area Action Plan preparation and the SA as follows:
- 4.2** The 2015 Local Plan builds upon previous stages and iterations of the replacement Development Plan. This expressly includes the Issues and Options (2006), the Options (2007), the Emerging Strategy (2008), the Proposed Submission (2009), the revised Issues and Options (2011) the proposed submission Core Strategy (2012), the Preferred Emerging Strategy (2014) and submission Local Plan (2016).

The CCAAP was 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 two specific consultation stages – preferred options and submission on the AAP and modifications consultation.

- 4.3** SA and consultation responses have been considered in an iterative and ongoing way with the plan-making process and in accordance with the requirements of the SEA Regulations. Representations have been recorded and the responses made to issues and concerns raised have been published, including at key statutory stages

## **5. REASONS FOR CHOOSING THE LOCAL PLAN AS ADOPTED, IN THE LIGHT OF OTHER REASONABLE ALTERNATIVES**

- 5.1** The SEA Regulations requires assessment of the likely significant effects of implementing the plan and “*reasonable alternatives*” taking into account the objectives and geographical scope of the plan; and the reasons for selecting alternatives should be outlined in the Report. Extant SA/SEA guidance advises that the term “*reasonable alternative*” should be taken to mean “*realistic and relevant*” i.e. deliverable and within the timescale of the plan.
- 5.2** At each stage of the development of the Local Plan and City Centre Area Action Plan, all strategic options and any reasonable alternatives to policy and site allocation proposals have been considered and assessed through SA/SEA. Options for the level of growth and spatial distribution were considered at a range of stages. This included consideration of three bespoke scenarios for development growth patterns and various growth options identified through the Coventry and Warwickshire Joint SHMA work.
- 5.3** The reasons for progressing or rejecting options are provided in Section 4 of the Submission SA report. The do-nothing scenario is not an option for a local plan or City Centre Area Action

Plan as Councils are required to provide for identified development needs; however, this was considered by the SA process and the SA reported that significant negative effects on environmental factors were likely without a plan and that positive effects for socio-economic factors were less likely to be implemented.

- 5.4** Overall, the reasons for choosing the Local Plan and City Centre Area Action Plan as adopted include that the adopted Local Plan and City Centre Area Action Plan progresses the Vision, Objectives and Strategy for high quality development planning in Coventry with the most benefits and the least negative effects for sustainable development.

## **6. MEASURES THAT ARE TO BE TAKEN TO MONITOR THE SIGNIFICANT SUSTAINABILITY & ENVIRONMENTAL EFFECTS OF THE IMPLEMENTATION OF THE LOCAL PLAN**

- 6.1** The SEA Regulations require that the significant environmental effects of implementing the plans should be monitored with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action. Local Planning Authorities are required to produce Monitoring Reports on the progress of Local Plan and City Centre Area Action Plan. Government Guidance on SA/SEA advises a pragmatic approach with shared monitoring for the SA/SEA and the Plan.
- 6.2** The Coventry Monitoring Framework includes a wide range of indicators that also relate to the SA Framework. It is considered that these indicators will be sufficient to identify any unforeseen adverse effects at an early stage, and provide information on the predicted effects from the SA. Monitoring of the Local Plan and City Centre Area Action Plan will be incorporated into the Council's Monitoring Report available to view on the Council's website – [www.coventry.gov.uk/localplan](http://www.coventry.gov.uk/localplan)

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