

Cabinet

15th March 2022

Name of Cabinet Member:

Cabinet Member for Housing and Communities – Councillor D Welsh

Director Approving Submission of the report:

Director of Streetscene and Regulatory Services

Ward(s) affected:

All

Title:

Open Space Supplementary Planning Document - Adoption

Is this a key decision?

Yes – The proposals in the report will significantly affect residents and businesses in all wards of the city

Executive Summary:

This report seeks to adopt the Open Space Supplementary Planning Document (SPD) following public consultation which was undertaken between 30th November 2021 and 18th January 2022.

SPDs add further detail to the policies in the development plan but cannot introduce new policy. SPDs provide additional guidance for development and are capable of being a material consideration when making decisions on planning applications.

The purpose of the Open Space SPD is to set out the Council's approach towards the provision of public open space in new residential development. It supplements Policy GE1 of the adopted Local Plan, which states that: "new development proposals should make provision for green infrastructure to ensure that such development is integrated into the landscape and contributes to improvements in connectivity and public access, biodiversity, landscape conservation, design, archaeology and recreation".

The additional guidance provided within the SPD aims to provide clear information for applicants about policy requirements: which developments will trigger a requirement for open space provision, how much open space should be provided, what kind of open space is needed, and clear expectations in terms of design and delivery.

Responses to the consultation have been analysed and taken account of when amending the SPD. The proposed final version is attached at Appendix 1 to the report, and a summary of representations along with responses and proposed amendments can be seen at Appendix 2 to the report.

Recommendations:

Cabinet is recommended to:

- 1) Adopt the Open Space Supplementary Planning Document (SPD).
- 2) Delegate to the Strategic Lead (Planning), following consultation with the Cabinet Member for Housing and Communities, any necessary further non-substantive (minor) changes to the document.

List of Appendices included:

Appendix 1 - Open Space Supplementary Planning Document
Appendix 2 - Consultation: summary of representations and responses
Appendix 3 - Strategic Environmental Assessment Screening Report
Appendix 4 - Equalities Impact Assessment

Background papers:

None

Other useful documents:

Local Plan: adopted December 2017
National Planning Policy Framework July 2021

Has it been or will it be considered by Scrutiny?

No - however, the draft SPDs were considered by the Communities and Neighbourhoods Scrutiny Board (4) on 15th December 2021 as part of the consultation process.

Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?

No

Will this report go to Council?

No

Report title: Open Space Supplementary Planning Document - Adoption

1. Context (or background)

- 1.1 The National Planning Policy Framework (NPPF) defines Supplementary Planning Documents (SPDs) as *'documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues.... Supplementary Planning Documents are capable of being a material consideration in planning decisions but are not part of the development plan'*.
- 1.2 Requiring developers to provide open space as part of their proposals is a key requirement of Policy GE1 (Green Infrastructure) of the adopted Coventry Local Plan.
- 1.3 The additional guidance provided within the SPD aims to provide clear information for developers about policy requirements: which developments will trigger a requirement for open space provision, how much open space should be provided, what kind of open space is needed, and clear expectations in terms of design and delivery.
- 1.4 Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012 set out the requirements for producing SPDs. This includes a minimum statutory public consultation period of four weeks: the Council's recently adopted Statement of Community Involvement however sets out a local standard that SPDs should be consulted on for six weeks. Because of the Christmas period consultation was undertaken over seven weeks between 30th November 2021 and 18th December 2022. Further detail is set out in section 3 of the report.
- 1.5 It is also a legal requirement, as set out in the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations), to consider whether or not Strategic Environmental Assessment (SEA) of the SPD should be undertaken. The process for determining whether or not an SEA is required is called screening. This is to determine whether a plan will have significant environmental effects. The screening opinion undertaken is attached at Appendix 3 to the report. This concludes that no SEA is needed as the SPD elaborates on existing policy. This screening report must be consulted on so that three statutory bodies (Historic England, Natural England and the Environment Agency) can respond. The screening report was made publicly available for comment at the same time as the SPD was being consulted on.
- 1.6 Finally, an Equalities Impact Assessment (EIA) been undertaken, this is attached at Appendix 4 to the report and was publicly consulted on.
- 1.7 Responses have been analysed and the SPD amended accordingly. In line with the legislation, this Cabinet report will include a statement setting out the details of the consultation, a summary of the main issues raised and how they have been addressed. This is contained at section 3 and Appendix 2 to the report

2. Options considered and recommended proposal

- 2.1 Cabinet may wish for the Council to rely upon the current Local Plan policies along with the National Planning Policy Framework along with the existing Coventry City Council Green Space Strategy. However, this approach does not provide the detail needed to give developers, officers and decision makers the clarity and consistency which is needed. This option is not recommended

- 2.2 The recommendation is to adopt a new Open Space SPD, as per Appendix 1. This approach is recommended in order to give developers, officers and decision makers the clarity and consistency which is needed. This will accurately reflect the adopted Local Plan and national policy and ensure delivery in accordance with local need.

3 Results of consultation undertaken

- 3.1 Public consultation was undertaken between 30th November 2021 and 18th January 2022. The minimum statutory period for SPD consultations is four weeks, the council's Statement of Community Involvement recommends six weeks however in this instance a seven-week consultation period was undertaken to allow for the Christmas holidays.
- 3.2 The council made all consultation documentation available on its website and in hard copy at the Council House and all libraries. A notification email was sent to all consultees on the planning policy consultation database, statutory consultees and Duty to Co-operate bodies (as set out in the regulations) which provided background to the SPD consultation and explained where people could view the documents and the various ways in which they could provide comments. The council also used its social media platforms and local press to publicise the consultation.
- 3.3 Regulation 12 of the Local Planning Town and Country Planning (Local Planning) (England) Regulations 2012 states that, before a local planning authority can adopt an SPD it must first prepare a statement setting out the persons consulted during the preparation of the document, with a summary of the main issues raised and how they have been addressed in the SPD. This report addresses these requirements, and details of the comments submitted, the officer response and changes made to the SPD as a result can be viewed at Appendix 2.
- 3.4 The Communities and Neighbourhoods Scrutiny Board (4) considered the draft SPD and supporting documents on 15 December 2021 as part of the consultation process. There was a discussion around the impact of open space and green space on wellbeing and how it can be well designed and delivered by developers, including consideration of how open spaces can be made safer for their users with particular reference in the discussions to the safety of lone women. The Scrutiny Board agreed with the content of the draft SPD's in principle.
- 3.5 Alongside the SPD, the SEA screening opinion and Equality Impact Assessment were made available for public comment as set out in section 1 of this report. In terms of the SEA screening, the statutory consultation bodies Natural England and Historic England concurred with the council's view that Strategic Environmental Assessment is not required. The Environment Agency did not respond. The screening assessment at Appendix 3 has been updated to reflect this conclusion. The Equality Impact Assessment at Appendix 4 has been updated as a result of feedback.

4 Timetable for implementing this decision

- 4.1 The SPD can be adopted immediately.

5 Comments from the Chief Operating Officer (Section 151 Officer) and the Director of Law and Governance

- 5.1 Financial implications

There are no financial implications associated with this report.

5.2 Legal implications

There are no direct implications as a result of this report. Regulations 11 to 16 of The Town and Country Planning (Local Planning) (England) Regulations 2012 set out the requirements for producing SPDs. The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) also require the Council to consider whether or not Strategic Environmental Assessment (SEA) of the SPD should be undertaken.

6 Other implications

6.1 How will this contribute to achievement of the Council's Plan?

Planning policy documents and planning applications help deliver the aims and objectives of the One Coventry Corporate Plan by determining the type and quantum of development needed, where this should be located, areas which should be protected, enhanced or improved and the infrastructure which should be provided. In line with the Corporate Plan, this document focuses upon supporting local communities creating an attractive, clearer and greener city and improving health and wellbeing through provision of a network of well-maintained open spaces.

6.2 How is risk being managed?

There are no risks associated with this report.

6.3 What is the impact on the organisation?

No direct impact.

6.4 Equalities Impact Assessment / EIA

A full Equality and Impact Assessment (EIA) was undertaken as part of developing the Local Plan. As part of that analysis, the Council had due regard to its public sector equality duty under section 149 of the Equality Act (2010). The Supplementary Planning Document elaborates on Local Plan policy and so a further EIA has been undertaken (Appendix 4)

6.5 Implications for (or impact on) climate change and the environment

This is an elaboration of Local Plan policy relating to the delivery of sustainable development and, whilst it does not introduce new policy it will assist in ensuring that developers make appropriate provision for open space through their planning applications.

6.6 Implications for partner organisations?

The Supplementary Planning Document will provide further detail to the adopted Local Plan policy which will assist those organisations involved in the delivery of open space and green infrastructure.

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This report is published on the council's website: www.coventry.gov.uk/councilmeetings



Coventry City Council

Open Space

Supplementary Planning Document (SPD)

March 2022

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Executive Summary

The purpose of this document is to set out the Council's approach towards the provision of open space in new residential development. It supplements Policy GE1 of the adopted Local Plan, which states: "New development proposals should make provision for Green Infrastructure to ensure that such development is integrated into the landscape and contributes to improvements in connectivity and public access, biodiversity, landscape conservation, design, archaeology and recreation."

The Council's approach can be summarised as follows:

The Council will ensure that all new residential development makes appropriate provision for new or enhanced open space. The Council's minimum size standard for new open space will be 0.1 hectares, as shown in chapter 4 of this document and in line with thresholds set out in the Green Space Strategy. This will apply to all residential development involving 10 or more dwellings or exceeding 1ha in gross site area. Although on-site provision will be encouraged on smaller schemes, the Council accepts that a financial contribution towards off-site provision or enhancement of existing open space may be more appropriate.

If the quantitative requirement is greater than or equal to the minimum size standard (0.1ha), that requirement should be delivered on-site. If the quantitative requirement is lower than the minimum size standard, or is in the city centre, within the ring road, an off-site contribution which is equivalent to that requirement will be sought. Site contributions for the improvement of an existing open space will be equivalent to the quantitative requirement calculated using the method set out in Table 6.

There will be a general presumption in favour of on-site provision of public open space, unless there are valid reasons why this cannot or should not be achieved e.g. the site is too small or through consultation with the Parks Service there is a demonstrable surplus of existing open space in the locality.

As set out in Local Plan Policy DS4 General Masterplan Principles, the delivery of open spaces should be provided in a strategic, coherent and co-ordinated manner. Public open spaces must be completed to the Council's reasonable satisfaction before 75% of homes are occupied on a development or any phase of development. This is to ensure occupiers have access to on-site open space in a timely manner.

The provision of public open space or a financial contribution towards open space, including maintenance, will be secured through a Section 106 legal agreement or planning condition.

This document provides the basis for establishing public open spaces as part of new developments. It provides details on national and local policy and the mechanism by which open space must be provided.

The document provides a series of examples from which stakeholders can calculate the amount of open space their specific proposals would generate per 1000 population.

The document discusses Green Infrastructure (GI) which is a network of green spaces and other environmental features which contribute to the quality of life for residents and the health of flora and fauna. Landscape design, biodiversity enhancements, tree considerations and requirements for multi-functional green space on site are all factors that will form part of the GI of a site and its surroundings.

Whilst this document focuses on the provision of open space in residential developments, the council encourages the provision of appropriate open space and SUDs in commercial, industrial and mixed-use developments. The creation of open spaces in commercial and industrial developments can make a significant contribution towards health and wellbeing in the workplace and can contribute to modal shift to sustainable transport modes.

The document also provides commentary and guidance on the provision of Sustainable Urban Drainage systems (SUD's) and how to integrate both public open space, the water environment and biodiversity.

1.0 Introduction

Overview

- 1.1 Access to well-planned and maintained open space, children's play areas and recreational facilities forms an important role in promoting sustainable communities. The Council attaches great importance to the provision of good quality open space in connection with new housing developments. Open space can provide a valuable formal and informal recreation facility for children and adults. It can also add character and interest to a housing development thus considerably enhancing its quality.
- 1.2 New development, both residential and commercial, can increase the demand for the use of open spaces and recreational facilities. It is important that it contributes to ensure existing spaces are enhanced and new spaces created consistent with demand.
- 1.3 Well planned and maintained open spaces provide opportunities for recreation, culture, informal and formal sport, natural environments for wildlife and even storm water management.
- 1.4 Development plays an important role in any sustainable locality. Whether it is the provision of new homes, employment or recreational facilities, development is essential to provide for our current and future needs. However, development comes with its pressures on the environment, community and general amenity.
- 1.5 The National Planning Policy Framework (NPPF)¹ defines open space as:

All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.
- 1.6 Green space is a subset of open space which includes vegetated land or water within an urban area such as parks and public gardens, playing fields, children's play areas, nature reserves, woods and other natural areas, grassed areas, cemeteries and allotments along with green corridors like paths, disused railway lines, rivers and canals. The formal definition of Green Space does not include agricultural land, private gardens or civic spaces that are part of the built landscape.
- 1.7 For the purposes of this document we use the term 'Open Space' to ensure that this includes the public realm and civic spaces which can all play a vital role in the way in which a sustainable community operates.
- 1.8 The Council expects all qualifying developments to provide open space on-site and only in exceptional circumstances will off-site provision or contributions be considered. The types of development that will qualify for contributions towards the provision or enhancement of open spaces are all developments of 10 dwellings or more or those which exceed 1ha in gross site area.
- 1.9 Green and open spaces within a development should connect to each other so that the entire development can be traversed seamlessly via green routes by pedestrians and cyclists. Where there are opportunities to link to the wider green infrastructure network,

¹ <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>

developments should be designed to maximise connections as this helps create better connected communities as well as corridors for wildlife and a more pleasant environment overall. More detail is provided in chapter 4.

- 1.10 A cumulative approach to the delivery of open spaces by more than one stakeholder may be appropriate in certain circumstances. Where there is a cumulative need and where joined up working can deliver the greatest benefit for residents and visitors a co-ordinated approach will be welcomed subject to the satisfaction of the council.

Benefits of Green and Open Spaces

- 1.11 Green and open spaces provide multi-functional places which have significant health, environmental, economic and social benefits for those who live, work and enjoy the recreational facilities within the city and the surrounding area.
- 1.12 Professor Sir Michael Marmot's 2010 report Fair Society, Healthy Lives (The Marmot Review) identified a 'social gradient' in health. This means that those living in the most deprived neighbourhoods die earlier and spend more time in ill health than those living in the least deprived neighbourhoods.
- 1.13 In April 2013, responsibilities for public health were transferred to local government providing the Council with an opportunity to broaden its ownership of the health inequalities agenda. The Council committed to delivering rapid change in health inequalities and was one of seven cities in the UK invited to participate in the UK Marmot Network and become a Marmot City.
- 1.14 The Marmot Review identified that reducing health inequalities requires creating and developing healthy and sustainable places and communities which is also identified in the NPPF through its presumption in favour of sustainable development.
- 1.15 One of these benefits is to prioritise policies and interventions that both reduce health inequalities and mitigate climate change by improving good quality open and green spaces.
- 1.16 Benefits of green and open spaces include:
- Improved mental and physical wellbeing through exercise in a safe and pleasant environment.
 - Establishing community and social inclusion by providing areas for sport, recreation and play.
 - Supporting early years development and education.
 - Assisting with tackling community safety issues.
 - Providing wildlife habitats and encouraging biodiversity.
 - Promoting lifelong education and learning.
 - Alleviation of flood risks.
 - Instilling unique character to areas and providing local identities.
 - Encouraging ongoing revenue streams through tourism
 - Attracting local investment to the area
 - Improving air quality
 - Improving water quality

Purpose of this SPD

- 1.17 This Supplementary Planning Document (SPD) supplements Policy GE1 of the adopted Local Plan, which states that: “New development proposals should make provision for green infrastructure to ensure that such development is integrated into the landscape and contributes to improvements in connectivity and public access, biodiversity, landscape conservation, design, archaeology and recreation.”
- 1.18 This document provides guidance on how the policies of the Local Plan will be applied when proposals are made for new housing development in terms of the following:
- What open spaces should be provided in association with new housing development;
 - Where they should be located;
 - What purpose they should fulfil; and
 - What arrangements should be made where the requirement is for off-site provision or improvement / upgrading of existing facilities.
- 1.19 Whilst this document focuses mainly on the provision of open space in residential developments, the council also encourages the provision of appropriate open space and SUDs in commercial, industrial and mixed-use developments. The creation of open spaces in such developments can make a significant contribution towards health and wellbeing in the workplace and can contribute to modal shift to sustainable transport modes
- 1.20 It should also be noted that while this document makes reference to sports pitches, guidance on sports provision and associated standards will be covered in the Coventry Playing Pitch Strategy. This SPD aims to provide standards for open space as part of development and not details of formally laid out sports provision such as those governed by national sports governing bodies.
- 1.21 Through discussion and negotiation, the Council will aim to ensure that new provision / improvements are the most appropriate solution for a particular area and that facilities will be utilised to their full potential.

2.0 Policy Context

National Policy

- 2.1 Paragraph 93 of the National Planning Policy Framework (NPPF 2021) states: “To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:
- Plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.”
- 2.2 Paragraph 98 of the National Planning Policy Framework (NPPF) 2021 and Planning Practice Guidance on Open Space, Sports and Recreation Facilities, Public Rights of Way and Local Green Space 2014² stress the need to ensure effective planning for high quality open spaces, sport and recreation facilities based on robust assessments of the existing and future needs of communities.
- 2.3 The NPPF advises that the assessments should include the following information:
- quantitative elements (how much new provision may be needed);
 - a qualitative component (against which to measure the need for enhancement of existing facilities); and
 - accessibility (including distance thresholds and consideration of the cost of using a facility).
- 2.4 The city council has undertaken an open space audit in accordance with Government guidance (Green Space Strategy 2019) and will apply the local standards derived from this study throughout this SPD.
- 2.5 The NPPF states that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. It requires planning policies that promote opportunities to improve the local open space network and create high quality public open spaces within new development, which encourages the active and continual use of public areas.
- 2.6 The Government attaches great importance to the protection of Green Belts and strategic networks of green spaces, commonly referred to as green infrastructure, which can provide a wide range of environmental benefits. The NPPF states that Local Authorities should create policies that enable the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. It also requires Local Authorities to recognise the wider benefits of ecosystem services and minimise negative impacts on biodiversity.
- 2.7 The NPPF has also created the ability for local communities, through neighbourhood plans, to identify and protect green areas of particular importance. These areas will be known as Local Green Spaces and will be protected in the same way as the green corridors, although specific criteria must be met for this to apply.

² <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-and-safe-communities>

Local Policy

2.8 [The Coventry Local Plan](#) was adopted in 2017. It includes a suite of policies which provide a framework to ensure that new development delivers open space to meet future needs and forms the context for the development of this SPD. The relevant policies listed below can be found in Appendix 1.

- GE1: Green Infrastructure
- GE2: Green Space
- GE3: Biodiversity, Geological, Landscape and Archaeological Conservation
- GE4: Tree Protection
- GB1: Green Belt and Local Green Space
- DS4: General Masterplan Principles
- EM4: Flood Risk Management
- EM5: Sustainable Drainage Systems
- H9: Residential Density
- DE1: Ensuring High Quality Design

Relevant Council Policies and Strategies

2.9 Regard should be had to the following documents or any subsequent updates or replacements and the Council's planning policy web pages should be checked in terms of any relevant updates³. They form part of the wider evidence base for this document and therefore are considered material planning considerations when assessing proposals.

Green Space Strategy 2019-2024

Recognises and promotes the multi-functional nature of green spaces and aims to ensure that green spaces are well managed, maintained and accessible to all.

Urban Forestry Strategy 2021-2031

Ensures our historical character of the Forest of Arden is maintained and enhanced for the long term. Enabling an understanding by all, of how the urban forest will be planned, managed and protected for the future.

Playing Pitch Strategy 2014-2019

The Coventry Playing Pitch Strategy seeks to provide guidance for planning decisions made across Coventry. By addressing the issues identified in the Assessment Report and using the strategic framework presented in the Strategy, the current and future sporting and recreational needs of Coventry can be satisfied. The Strategy will identify where there is a deficiency in provision and how best to resolve this in the future.

Coventry Local Flood Risk Management Strategy 2015

The Local Flood Risk Management Strategy (LFRMS) is an important tool to help residents, neighbourhood and business communities understand the City Council's management of flood risk throughout the city. The strategy will help develop better understanding of local flood risk and how sustained partnership working can successfully manage down the risks of flooding.

³ <https://www.coventry.gov.uk/planning-policy>

The following are adopted Supplementary Planning Documents:

Trees and Development Guidelines Supplementary Planning Document 2019

This formal planning document provides a comprehensive guide to the preservation and protection of trees during development in Coventry, leading to an improved approach to the retention and planting of trees.

Urban Extension Design Guidance Supplementary Planning Document 2019

This formal planning document provides a clear guide and steer for how new larger developments within the area should be designed and delivered. It helps inform the master planning process and detailed design proposals.

Air Quality SPD

This guidance aims to simplify the consideration of air quality impacts associated with development schemes and focus on incorporation of mitigation at design stage, countering the cumulative impacts of aggregated developments, providing clarity to developers and defining of sustainability in air quality terms. In doing so the Supplementary Planning Document (SPD) provides technical guidance and support to Policy EM7 of the city's Local Plan (2016).

Coventry Connected SPD

This SPD provides developers with clear guidance on the application of the Local Plan and outlines what information should be provided in planning applications, regarding transport. This should result in the submission of high quality planning applications which will speed up the planning process and ultimately deliver developments that support a high-quality transport network.

Health Impact Assessment SPD

Under policy HW1 of the Coventry Local Plan (see chapter 4.2 of this SPD), the Council requires applicants to mitigate against potentially significant negative health impacts. A HIA is a tool that is used to identify these impacts (and their potential severity) and to inform design of a development during the decision-making process. This leads to a development which is sustainable and healthy with a strong, vibrant community. A HIA would also identify positive impacts that the proposed development might have on health and allow them to be recorded and highlighted to the community and stakeholders

New Supplementary Planning Documents

It should be noted that other relevant Supplementary Planning Documents are being developed including ones on Biodiversity Net Gain and Residential Design. The planning policy pages of the Council's website will be updated as they progress.

3.0 Green and Open Space definitions and recommendations

Definitions (Local Plan)

3.1 The adopted Local Plan sets out that suite of green infrastructure assets, as defined by the Green Space Strategy, is divided into three overarching categories of ‘formal’, ‘informal’ and ‘functional’, as follows:

- Formal - urban parks, country and regional parks, formal and private gardens, institutional grounds (for example schools and hospitals), outdoor sports facilities and civic squares and spaces.
- Informal - recreation spaces and playing fields, play areas, village greens, urban commons, incidental green space, natural and semi-natural spaces including woodlands, hedgerows, scrub, meadows, wetlands, open and running water, and bare rock habitats, rivers and canals including their banks, road and rail corridors and verges, cycling routes and rights of way, national and local nature reserves and locally designated sites for nature conservation, historic landscapes, archaeological and historic sites.
- Functional - allotments, community gardens, city farms, orchards, roof gardens, urban edge farmland, cemeteries and churchyards, sustainable urban drainage schemes and flood storage areas, historic landscapes and archaeological sites.

3.2 When the Green Space strategy was being developed, an assessment of the quantity, and accessibility of green space in Coventry was carried out.

3.3 A green space typology as set out in the table below has been used to classify all types of green space according to their primary purpose. The Green Space Strategy 2019-2023 recognises that green spaces are multi-functional but a single classification according to the primary purpose has been used to ensure consistency and that spaces are only recorded once, otherwise they could be double counted. The Green Space typology is set out in the table below.

Table 1: Green Space Typology

Level 1 Typology	Primary Purpose	Coventry Local Plan Designation
Parks and gardens	Includes urban parks, formal gardens and ornamental areas offering accessible, high quality opportunities for informal recreation and community events.	Formal
Outdoor sports facilities	Natural and artificial surfaces for sport and recreation offering opportunities for participation in outdoor sports, pitch sports, tennis, bowls, athletics or countryside and water sports. Includes school playing fields and golf courses.	Formal
Provision for Children and Young People	Areas designed primarily for play and social interaction involving children and young people, such as equipped play areas, ball courts, skateboard areas and teenage shelters. Play spaces often form part of a larger spaces,	Formal

	such as parks and gardens, which may be used to designate the primary purpose. All play spaces have also been recorded on a separate mapping layer.	
Natural and semi-natural green spaces	Includes country parks, publicly accessible woodlands, urban forestry, grasslands, commons and wetlands for wildlife conservation, bio-diversity and environmental education and awareness.	Informal
Green Corridors	Linear routes such as river banks and corridors, towpaths, cycle routes and other connected routes for walking, cycling or horse riding, whether for leisure purposes or travel, and opportunities for wildlife migration.	Informal
Amenity green space	Informal green space often found in housing areas or adjacent to highways providing opportunities for informal activities close to home or work or enhancement of the appearance of residential or other areas.	Informal
Community Gardens, and Allotments	Designated areas offering opportunities for those people who wish to do so to grow their own produce as part of the long term promotion of sustainability, health and social inclusion. Excludes private gardens.	Functional
Cemeteries and Churchyards	Cemeteries, churchyards and crematoria grounds providing quiet contemplation and burial of the dead, often linked to the promotion of wildlife conservation and biodiversity. Also includes closed burial grounds used for informal recreation.	Functional

Green space hierarchy

- 3.4 All green spaces have also been classified according to their significance in a hierarchy. The hierarchy is applied across all green space types.

Table 2: Green Space Hierarchy

Hierarchy level	Description
City	The most significant green spaces acting as destination spaces and attracting visitors from across the city. War Memorial Park and Coombe Country Park are the two city wide green spaces.
District	Those sites whose significance should attract people from up to 1200 metres. Usually large sites with a range of facilities or designated importance for history or nature conservation.
Neighbourhood	Those sites which perform a function that serves a more immediate community. Unlikely to attract people from across the city but may draw people from up to 800 metres.
Local	Those sites which serve just the local area, up to 400m – typically areas of amenity green space.

Recommendations

- 3.5 Open space should:
- be an integral part of the development taking account of adopted Local Plan Policies GE1 (Green Infrastructure) and DE1 (Ensuring High Quality Design)
 - incorporate significant existing landscape features wherever possible, including mature trees and watercourses even if these are not located centrally;
 - be designed and located to reduce opportunities for crime in line with Secured by Design guidance and any other good practice which secures safe open spaces for all users and especially those with certain protected characteristics⁴ who may be particularly vulnerable.
 - be designed to avoid risk of noise, disturbance and nuisance;
 - where appropriate and to the satisfaction of the council, be provided in a joined up and co-ordinated manner, such that open spaces can yield greatest benefit to residents and visitors.
- 3.6 In particular, equipped play areas should:
- be sited in line with the Fields in Trust recommendations as outlined in paragraph 3.8.
 - not be located in peripheral areas of the site or where access would be by narrow alleyways;
 - be sited such that there is a clear delineation between highway and pedestrian areas and which allow safe and easy pedestrian access;
 - avoid awkwardly shaped and leftover areas of land which should not form part of the open space provision for the site.
- 3.7 Such areas of land are usually best planted and incorporated into gardens; and be linked by green corridors to allow people and wildlife to move between areas.
- 3.8 As set out by the Fields In Trust, the recommended distance of a playground from a

⁴ Equality Act 2010

residential property is: 400 meters for Locally Equipped Areas of Play (LEAPS) and 1000 meters for Neighbourhood Equipped Areas of Play (NEAPS).⁵ Indicative costs for the provision of LEAPS and NEAPS are provided in Appendix 4. Measurements should be based on safe and convenient walking routes.

⁵ <http://www.fieldsintrust.org/knowledge-base/guidance-for-outdoor-sport-and-play>

4.0 The planning process: how development must contribute

Design

- 4.1 In line with Local Plan Policy GE1 it is strongly encouraged that a stand-alone green infrastructure parameters plan, with open space typologies and area by square metre highlighted, is provided as part of any major planning application where the minimum threshold for delivering on-site open space is 0.1ha or more. This will assist council officers when assessing the necessary requirements for the provision of on-site open space.
- 4.2 Where possible green and open spaces within a development should connect to each other so that the entire development can be traversed seamlessly via green routes by pedestrians and cyclists. Developments should pay special attention to connecting their site to any neighbouring developments; whether established, in progress or due to come forward in the future. Connections need to extend to the wider network of pedestrian routes, cycle routes and green spaces. Such linkages also provide vital connections for wildlife, ensuring that green spaces are linked and not fragmented. Residents, workers and visitors need to be able to access the extensive areas of open space throughout the city and the surrounding area via safe and, where possible, green routes. Pedestrian and cycle routes throughout the development should be integral to the design and provide sufficient green links to the surrounding area and existing areas of settlement. In general, it would be beneficial for developers to consult early on with organisations such as National Grid and National Highways. This is to ensure development or the creation of open space under or close to power lines is appropriately assessed.

Calculating need

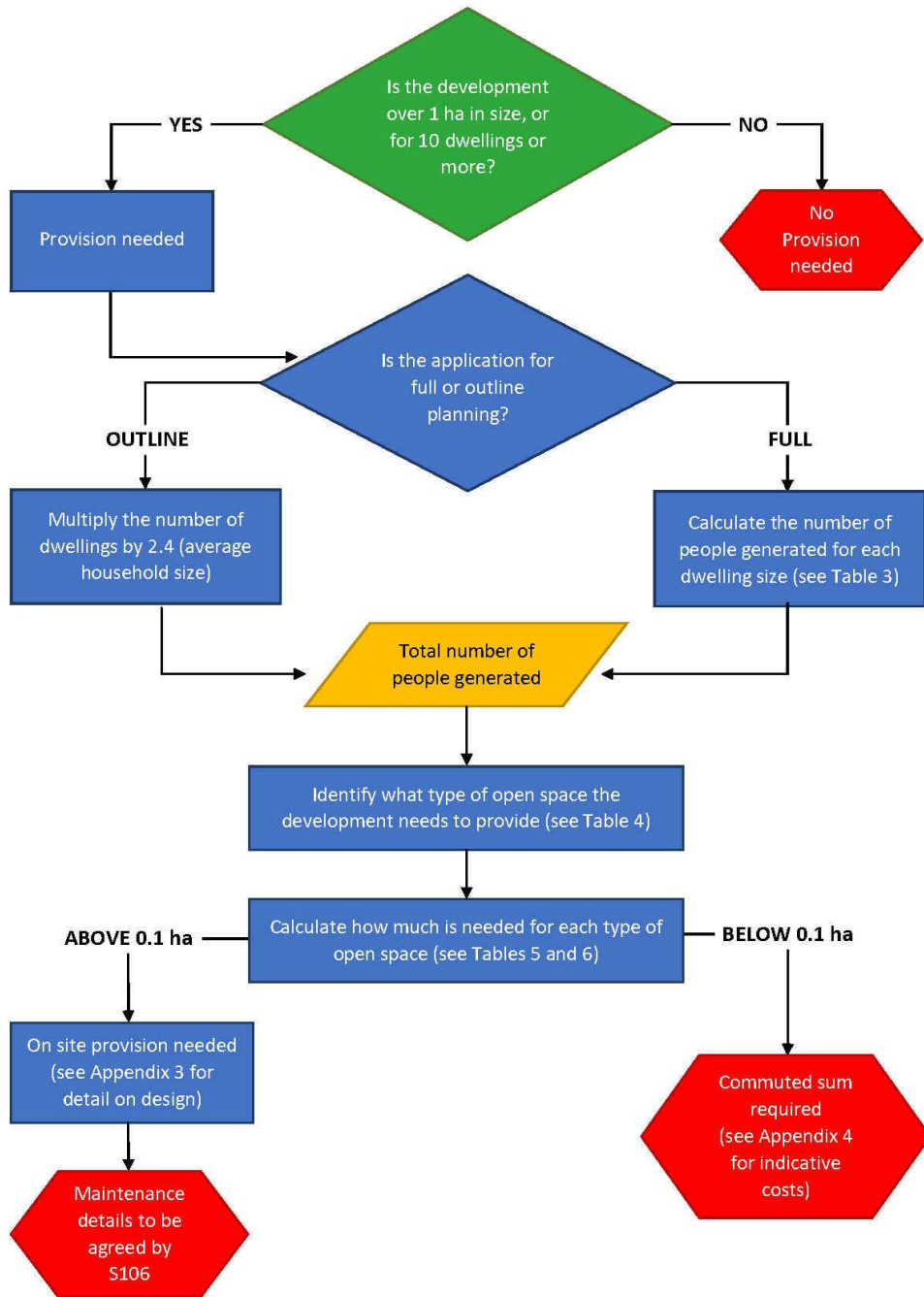
- 4.3 In determining how much new and/or improved open space provision should be delivered alongside new housing development, the starting point is to calculate the level of demand (additional population) generated by that development. Depending on whether a planning application is made in full (including reserved matters applications) or outline form, the method of calculating the resultant population and the consequent level of demand will vary.
- 4.4 The flow chart outlines the process which should be followed in order to identify the amount of open space to be provided by a particular proposal. The flow chart should be read in conjunction with:

Table 3: Household Size

Table 4: Provision of Open Space by Accommodation

Table 5: Minimum Requirements for On-site Open Space

Table 6: Worked examples of minimum standard requirements



4.5 Where the precise details of a development scheme are available, i.e. the size, mix and number of dwellings, the most appropriate way of calculating the population to be generated is to use the number of bed-spaces within a dwelling type as an approximation of household size. Table 3 below sets out the average household size (number of people) for each size of dwelling. The number of units of a given size within a development scheme should be multiplied by the relevant average household size to calculate the resultant population. See Table 6 for worked examples.

Table 3: Household Size

Dwelling Size	Average Household Size
1 Bedroom	1
2 Bedrooms	2
3 Bedrooms	3
4 Bedrooms	4
5 or more Bedrooms	5

4.6 It is important to note that certain types of residential development will not generate demand / place additional pressure on certain types of open space, e.g. an extra care housing scheme will not generally generate demand for Equipped Play Areas. Table 4 sets out what forms of development will generate additional demand for each form of open space. However, this can only be taken into consideration where the precise details of the scheme are available. Local context will also be relevant in determining the precise requirements, particularly the proximity to existing facilities. If a proposal does not generate demand for a particular type of open space, then the equivalent provision of an alternative typology should be provided. Applicants will be required to justify through evidenced documentation, why a particular typology cannot be provided.

Table 4: Provision of open space by accommodation

Dwelling Type	Size	Informal and Formal Open Space	Equipped Play Areas	Amenity Open Spaces
Houses and Flats (open market and affordable)	1 bed	Yes	No	Yes
	2 bed	Yes	Yes	Yes
	3 bed	Yes	Yes	Yes
	4 bed	Yes	Yes	Yes
	5+ bed	Yes	Yes	Yes
Student Accommodation	Any size	Yes	No	Yes
Extra Care or equivalent	Any size	Yes	No	Yes
HMOs	Any Size	Yes	No	Yes

Outline Applications

- 4.7 For applications seeking outline planning permission, population should be calculated using an average household size of 2.4 people per dwelling, which accords with evidence provided by the [City Councils Strategic Housing Market Assessment](#). The density of developments will be determined at the Reserved Matters stage.

Calculating the on-site green space requirement

- 4.8 Having calculated the number of people generated by development, the minimum requirement for each form of open space is to be calculated using the information in Table 5 below. As a minimum we expect sites of 10 dwellings or more to provide these on-site open spaces. It should be noted that these are taken from the [Green Space Strategy](#), which includes a wider range of open space typologies. These can be seen in full in Appendix 3. In some instances, additional types of open space may be required depending upon the nature of the scheme proposed. For example, allotments in an area where there is high demand and a shortfall of provision. These cases will be considered on their own merits.

Table 5: Minimum Requirements for On-site Open Space.

Type of Green Space	Planning Classification	Quantity Standard (ha/1000)
Provision for Children & Young People	Formal	0.84
Amenity Green Space, natural and semi-natural Green Space and green Corridors	Informal	2.12
E.G. Community Gardens, and Sustainable Urban Drainage system	Functional	0.37

(Figures are taken from the Green Space Strategy Appendix A)

- 4.9 Table 6 below demonstrates how this calculation should be applied. Values for the minimum standard requirements should replace the "X" in the first column of the calculation formula, e.g. 0.84 ha per 1,000 population for the provision of formal open space for Children and Young People. Appendix 3 of this SPD provides further information on the necessary standards in terms of quantity but also the expected quality and design aspects. For the purposes of these worked examples the figure of 2.4 people per dwelling has been used in order to replicate an outline application (see para 4.6). The minimum threshold which would result in a requirement for delivering on-site open space is 0.1ha (gross).
- 4.10 Depending on whether or not the minimum size standard is exceeded, either an on-site or off-site contribution will be required.

Table 6: Worked examples of minimum standard requirements

Applicable Standard				
X ha per 1,000 population	X	Number of people generated by development	=	Quantitative Requirement (ha)
Worked example, using "Children and young people" standard				
(0.84 / 1000)	x	250	=	0.21 ha

The above example would require delivery on-site as its above the minimum threshold of 0.1ha.

Applicable Standard X ha per 1,000 population	X	Number of people generated by development	=	Quantitative Requirement (ha)
Worked example, using "Amenity Green Space" standard				
(2.12 / 1000)	x	250	=	0.53 ha

The above example would require delivery on-site as its above the minimum threshold of 0.1ha.

Worked examples where the minimum threshold is not met

Applicable Standard X ha per 1,000 population	X	Number of people generated by development	=	Quantitative Requirement (ha)
Worked example, using "Children and young people" standard				
(0.84 / 1000)	x	36	=	0.03 ha

The above example would require delivery off-site, as its below the minimum threshold of 0.1ha.

Applicable Standard X ha per 1,000 population	X	Number of people generated by development	=	Quantitative Requirement (ha)
Worked example, using "Amenity Green Space" standard				
(2.12 / 1000)	x	36	=	0.07 ha

The above example would require delivery off-site, as its below the minimum threshold of 0.1ha.

- 4.11 If the quantitative requirement is greater than or equal to the minimum size standard (0.1ha), that requirement should be delivered on-site. If the quantitative requirement is lower than the minimum size standard, an off-site contribution which is equivalent to that requirement will be sought. Site contributions for the improvement of an existing open space will be equivalent to the quantitative requirement calculated using the method outlined above.
- 4.12 Open spaces that do not meet the required minimum size standard will not count towards meeting the quantitative requirement. Nevertheless, this should not preclude the incorporation of grass verges, planted areas and other smaller landscaping features within development schemes where they help to provide visually attractive housing developments. Local Plan Policies H9: Density and DE1: Ensuring High Quality Design are of relevance in this regard. Areas of incidental open space that cannot be reasonably used or accessed by the public must not be counted towards meeting the quantitative requirement.
- 4.13 A clear management strategy to ensure appropriate and long-term maintenance should be provided. If a green space is to be adopted by the City Council, then a commuted sum will be required. These costs will be determined on a case by case basis.

Costings

- 4.14 Indicative costings for the provision of formal open space including equipped play areas are set out in Appendix 4 of this document. The costs serve as guidance only and are based on 2019 figures which will be refreshed when new costings are available. Final costs will be subject to the context of the specific proposal, its location, accessibility and the quantity and quality of existing local provision, as set out in the [Green Space Strategy](#).

Guidance on design and standards is set out in Appendix 3.

Off Site contributions

- 4.15 A set out earlier in this SPD, there may be exceptional circumstances where off site contributions are needed. This includes development inside the ring road where on site provision is unlikely to be realistic and contributions must contribute to the shared public spaces within the city centre along with innovative on-site provision such as roof gardens and other opportunities for shared spaces such as balconies and terraces for example. These features are in-line with Local Plan Policy H3, where the amenity of residents and users of space is considered. By their very nature, exceptional circumstances are often site specific but may include viability or physical space due to the layout or size of site. Therefore, should there be instances where on-site provision cannot be undertaken, or where a cumulative and joined up approach is taken by multiple stakeholders, relevant justification must be provided to the satisfaction of the council.

Securing Delivery

- 4.16 Paragraphs 56 and 57 of The National Planning Policy Framework (NPPF) state that Local Planning Authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. It also states that planning obligations should only be sought where they meet all of the following legal tests⁶:

A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is:

- (a) necessary to make the development acceptable in planning terms;*
- (b) directly related to the development; and*
- (c) fairly and reasonably related in scale and kind to the development*

⁶ <https://www.legislation.gov.uk/ukdsi/2010/9780111492390/regulation/122>

5.0 Implementation

On site provision

- 5.1 Full details of the layout, landscaping (including any play equipment etc.) and phasing of all on-site open space provision will be secured by conditions attached to the planning permission.
- 5.2 If the land is to be offered to the Council this should take place within one year of the open space being laid out, landscaped and equipped. It is preferable for the plots adjoining open space to have been completed by this stage. Any adoption will be subject to a maintenance sum to be determined through negotiation.
- 5.3 As set out in Local Plan Policy DS4 General Masterplan Principles, the delivery of open spaces should be provided in a strategic, coherent and co-ordinated manner. Public open spaces must be completed to the Councils reasonable satisfaction before 75% of homes are occupied on a development or any phase of development. This is to ensure occupiers have access to on-site open space in a timely manner.

Off site provision

- 5.4 Contributions for off site facilities will be dealt with through a Section 106 Legal Agreement (see Appendix 2).

6.0 Open Spaces and the Water Environment

River Corridors and Riparian Areas

6.1 Many of the Local Plan development allocations have watercourses either adjacent or running through the sites. Open space provision will often be centred around these areas. Not exclusively, this is because:

- development of built infrastructure should be directed away from areas at risk of flooding (Local Plan Policy EM4);
- development of built infrastructure should be set back at least 8m from Main River and 5m from ordinary watercourses (EM4);
- where a development proposal lies adjacent to a river corridor or tributary, a natural sinuous river channel should be retained or, where possible, re-instated (GE1);
- all opportunities to undertake river restoration and enhancement including de-culverting, removing unnecessary structures and reinstating a natural, sinuous watercourse will be encouraged (EM4); and
- both Keresley and Eastern Green SUE's require publicly accessible green and blue infrastructure corridors along the brooks running through these allocations (see Local Plan Policy DS4 parts C and D, and Local Plan Table 4.2).
- the use of appropriate buffers to protect local habitats and biodiversity will be encouraged.

Sustainable Urban Extension SPD

6.2 The natural landscape section of the Coventry Urban Extensions Design Guide (page 89) provides guidance on blue infrastructure.

6.3 Blue infrastructure will provide a key component of incorporating high quality design as well as supporting the overall drainage and flood risk strategy. This can take the form of individual pools, or in the case of Keresley and Eastern Green in particular existing and established brook corridors. These brook corridors should become focal points for the green and blue infrastructure strategy and provide a high quality useable route through the wider developments – connecting with the wider natural landscape both within the sites and beyond. They should incorporate high quality footpaths and cycle ways whilst providing a magnet for ecology and biodiversity to thrive across the sites. To ensure ecological habitats are not compromised, appropriate buffers will be encouraged.

River restoration and natural morphology

6.4 The Lead Local Flood Authority can provide advice and guidance on river restoration requirements. This may include site specific mitigation measures to help achieve the requirements of the Water Framework Directive.

6.5 Access routes and other greenspace assets are encouraged within river corridors. When locating these, the natural morphology of the river should be considered. Features should either be located away from areas where the river may encroach over time, or be easily movable. This is to avoid:

- damage to assets and associated replacement costs; and / or
- costly and inappropriate river engineering
- Allowing river channels to naturally migrate over time is always preferred if possible.

Consideration of flood risk within Green Spaces

6.6 As well as often being located adjacent to rivers and watercourses, greenspaces are often located within other areas not appropriate for development due to flood risk, such as surface water flood risk areas and exceedance flow routes. Areas may also be designed to flood, such as flood storage areas and SuDS.

6.7 It is stated within national flood risk guidance: “Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms” are described as water compatible in national guidance and therefore appropriate for siting within flood risk areas.

<https://www.gov.uk/guidance/flood-risk-and-coastal-change#flood-zone-and-flood-risk-tables>

6.8 Consideration should be given in design to use of the greenspace during and after flood events. For example:

- In areas of high flood risk, flood warning signs should be considered warning users they may be temporarily affected.
- Key assets should be located in areas where flood water dissipates quickly after storm events. There may be locations where flood water will remain for longer periods, for example where floodplain does not drain freely back to a river due to site levels.
- Where flood water dissipates, greenspaces may still remain saturated for a time after flood events. Most soils in Coventry are clayey not freely draining. This should be considered in design, for example, through provision of hard surfaced footpaths.
- Flood water also has the potential to be contaminated or carry debris and refuse. This should be considered within landscape management and maintenance plans.
- Nature based solutions and natural flood risk management measures have the potential to reduce flood risk downstream from greenspaces, whilst also providing additional biodiversity and habitat benefits to wider greenspace.

6.9 The intended use of greenspaces or joint use amenity spaces should be compared with flood risk information provided in a site specific flood risk assessment, including flood risk hazard ratings.

Existing ponds

6.10 It is recommended that existing ponds are usually retained as part of greenspaces and semi natural environments, and not used or enhanced as SuDS.

Sustainable Drainage Systems in Greenspaces

- 6.11 As is stated in the Local Plan “SuDS involve a range of techniques that mimic the way that rainfall drains in natural systems and avoids any increase in flood risk and improves water quality.”
- 6.12 In policy EM5 it is stated “all development must apply SuDS and ensure that surface water runoff is managed as close to its source as possible”.
- 6.13 The Councils’ preference is for above ground SuDS which deliver multiple benefits. SuDS are therefore often located within development greenspaces.

Design considerations relevant to open spaces

- 6.14 More detailed design requirements for SuDS are provided within the Coventry SuDS in design guide (in draft). Standing advice is available here:
[https://www.coventry.gov.uk/downloads/file/28181/flood_risk_management_and_drainage - standing advice](https://www.coventry.gov.uk/downloads/file/28181/flood_risk_management_and_drainage_-_standing_advice)
- 6.15 SuDs in greenspaces should bring amenity, landscaping and biodiversity benefits as well as the water management elements required. They can be designed to meet wider greenspace requirements, such as for the provision of biodiversity for net gain requirements, or to be used as joint use amenity spaces.
- 6.16 They should interface well with the surrounding space and be incorporated into usable green space for most of the year. For example; pathways running the perimeter of ponds to allow people to interact with the feature.
- 6.17 Other requirements pertinent to greenspaces are:
- SuDs should usually be built within the natural ground conditions.
 - SuDS storage should not usually be located within areas of fluvial flood risk.
 - Given they are located in publicly accessible areas, design for safety is paramount.

Adoption and maintenance

- 6.18 The adoption and maintenance of all drainage features are a key consideration to ensure the long-term operation at the designed standards. Underground drainage infrastructure such as pipes and tanks will be considered for adoption by a Sewerage Undertaker. The Council will consider the adoption of open-air sustainable drainage within areas of public open space, (subject to a commuted sum). This will be considered on a case by case basis and be subject to consultation with the Lead Local Flood Authority. Such features could include semi-dry detention basins which form joint-use amenity space. Open attenuation features must be accessible by appropriate maintenance vehicles and require a maintenance strip with a minimum width of 3 metres, and potentially wider to suit the specific development. Severn Trent Water now adopt certain SuDS, but only the functional drainage aspects of them <https://www.stwater.co.uk/building-and-developing/new-site-developments/water-sewerage-connection/sewer-adoption/>
- 6.19 SuDS within greenspaces have unfortunately been mistreated by residents in certain

areas in the past, particularly for the disposal of rubbish. Consideration should be given to this within asset maintenance plans.

Developer contributions

- 6.20 The Council may seek developer contributions related to greenspaces and water. Contributions are sought to reduce flood risk and deliver improvements to the water environment, with benefits for both people and nature, safeguarding against the future impacts of climate change and development creep.
- 6.21 Paragraph 34 of the NPPF 2021 discusses contributions. - Plans should set out the contributions expected from development. This should include for flood and water management and green infrastructure. Such policies should not undermine the deliverability of the plan.

In what circumstances will development contributions be sought? When, why, where and how?

- 6.22 Developer contributions will only be sought where they meet all of the following tests from NPPF para. 57:
- a) necessary to make the development acceptable in planning terms;
 - b) directly related to the development; and
 - c) fairly and reasonably related in scale and kind to the development.
- 6.23 Contributions may be considered for both on-site and off-site requirements, consistent with Local Plan Policy IM1: *The Council will, where appropriate, seek to secure site-specific infrastructure investments and/or contributions as well as off-site contributions and/or investments.* In accordance with NPPF para 53, contributions will only be sought where they are directly related to the development.

On-site SuDS, watercourses and other assets

- 6.24 As stated in Local Plan Policy IM1, The Council will, where appropriate, seek to secure site-specific infrastructure investments and/or contributions, contributions as well as off-site contributions and/or investments.
- 6.25 Where the Local Authority will maintain SuDS, watercourse or other assets on-site, contributions will be required to support ongoing maintenance over the lifetime of the development.
- 6.26 Account will also be taken of the ease of maintaining a system according to its design, with reference to health and safety. Some assets will need more frequent maintenance or replacement; therefore, this will be taken into consideration when setting the term over which a contribution will be required.
- 6.27 Where SuDS are combined with amenity or biodiversity or provide such benefits lower contributions may be applied. If separate, then the rate will reflect the full cost and if any manufactured product is used maintenance costs will be based on the recommended manufacturer's regime and relevant technical guidance (e.g. CiRIA SuDS Manual).
- 6.28 Contributions will be tailored towards the development proposals and contributions will be advised. Contributions are normally negotiated at the pre-application, outline or full application stage where matters of principle are established. In all cases we encourage applicants to seek pre-application advice from the LLFA; the details of which can be found on the Council's website here:

http://www.coventry.gov.uk/info/70/water_management_and_flooding/3153/pre-application_planning_advice

- 6.29 Depending on the situation, it may also be beneficial to seek pre-application advice from other risk management authorities such as the Environment Agency.

Additional flood storage

- 6.30 In accordance with Local Plan Policy EM4(2) “All opportunities to reduce flood risk in the surrounding area must be taken, including creation of additional flood storage. In this instance reference should be made to the Council’s Infrastructure Delivery Plan (IDP) or regulation 123 list.”
- 6.31 In the IDP, under Water and Flood Mitigation, a city-wide Flood Prevention programme is listed as a Category 1 item (essential infrastructure) to “Prevent/mitigate potential issues in the future and resolve existing issues. To ensure all homes, business and public spaces are free from flood risk”.
- 6.32 Additional flood storage therefore may be required in greenspaces. Other entries in the Plan under the Water and Flood Mitigation, and Green and Blue Infrastructure sections are relevant, including site specific schemes. A site-specific evaluation will be required to determine the necessary mitigations of the specific flood risk within the catchment associated with the new development.

River and catchment restoration including de-culverting

- 6.33 In accordance with the Local Plan policy EM4(2c) which refers to the surrounding area, “all opportunities to undertake river restoration and enhancement including deculverting removing unnecessary structures and reinstating a natural, sinuous watercourses will be encouraged”. For example, a contribution may be sought to secure the deculverting of watercourse to secure flood and water management benefits. Reference should also be made to the Green and Blue Infrastructure section of the IDP.

Watercourse access

- 6.34 A contribution may be sought for supporting the creation or improvement of access and linkages to river corridors for maintenance and amenity purposes.

7.0 Biodiversity and Green Infrastructure

- 7.1 Local Plan Policies GE1 and GE3 of the Local Plan discuss green infrastructure and biodiversity. These policies set out the framework and criteria which must be considered when preparing a development proposal.
- 7.2 Green Infrastructure (GI) is a network of green spaces and other environmental features which contribute to the quality of life for residents and the health of flora and fauna. Landscape design, biodiversity enhancements, tree considerations and requirements for multi-functional green space on site are all factors that will form part of the GI of a site and its surroundings. GI will also encompass access to, from and through the site including links to adjacent GI resources (e.g. links to hedges on surrounding land), opportunities for recreation, sustainability (e.g. climate change, pollutant filtration, Sustainable Drainage systems (SuDS), swales, low water demanding planting species, use of FSC sustainably managed timber products and soil products) and community involvement.
- 7.3 Biodiversity can be defined as the variety of all animal and plant species, the genetic diversity within them and the variety of communities and natural processes they give rise to. In the UK many species and habitats are protected under legislation and planning policy. Measures are required to avoid or mitigate impacts from development to protect these species and habitats and to provide biodiversity enhancement.
- 7.4 The Natural Environment & Rural Communities (NERC) Act 2006 – gives Local Planning Authorities responsibility to consider ‘general’ biodiversity, not just legally protected species/sites. The species and habitats to be considered are listed in Section 41 of the Act.
- 7.5 With respect to the NERC Act 2006, this places a legal duty on Local Authorities to have regard to biodiversity conservation (including opportunities for restoration and enhancement) in carrying out their functions. The determination of planning applications would be an example of one such function. Importantly the duty includes habitats and species found outside sites designated for their nature conservation interest, but which are considered of principal importance for the conservation of biodiversity (known as priority habitats and species). Examples include species-rich hedgerows and species such as hedgehogs and toads. Relevant national policy is contained in the National Planning Policy Framework and Planning Practice Guidance. The council seeks to meet the requirements of national policy and legislation, including the requirements of the NERC Act, through the Local Plan.
- 7.6 The provision of green space as part of development can also include features which enhance the natural environment and encourage biodiversity. This must, of course, be done at the right scale and in the right location to ensure existing habitats are not compromised and that any provision of new habitat is compatible with the location to ensure long-term sustainability. A balance should be struck between creating spaces for members of the public and preserving important local wildlife and protected species. Appropriate buffers should be considered, which enable safe and undisturbed wildlife habitats to co-exist with the public. Therefore, clarification should be sought from the Councils Ecologist prior to the provision of biodiversity and wildlife friendly features to ensure the longevity of the environment and the ability for the green space to function for all.
- 7.7 Careful consideration should be given to lighting and its impact on protected species and local wildlife, such as flood lights on sports pitches and the location of large noisy

carparks for more informal spaces. As well as care taken during construction particularly near to areas known for wildlife, protected species and BAP priorities and important Local Wildlife Sites/ Nature Reserves and SSSIs.

- 7.8 The Environment Act, was passed in November 2021, and is set to become mandatory in November 2023. Developers will be expected to conform to the requirements of the act and any subsequent revisions.

Appendices

Appendix 1: Local Plan Policies

Appendix 2: Section 106 Template

Appendix 3: Design Standards

Appendix 4: Indicative Costings

Appendix 1: Local Plan Policies

Policy GE1 Green Infrastructure

1. The Council will protect green infrastructure based on an analysis of existing assets, informed by the Green Infrastructure Study and Green Space Strategy by incorporating the Council's Green Space Standards, and characterisation assessments.
2. New development proposals should make provision for green infrastructure to ensure that such development is integrated into the landscape and contributes to improvements in connectivity and public access, biodiversity, landscape conservation, design, archaeology and recreation.
3. Coventry's existing and planned network of green infrastructure should be used as a way of adapting to climate change through the management and enhancement of existing habitats. This must be demonstrated through the creation of new habitats wherever possible to assist with species movement, to provide a source of locally grown food through allotments and community gardens, to provide sustainable and active travel routes for people, to provide shade and counteract the urban heat island effect, and to assist in improving public health and wellbeing.
4. New development will be expected to maintain the quantity, quality and functionality of existing green infrastructure. Where quantity is not retained, enhancement to quality is expected. Where the opportunity arises, and in line with the city's most up-to-date Green Space Strategy, the Council will also expect new developments to enhance green infrastructure and create and improve linkages between individual areas. Any development which is likely to adversely affect the integrity of a green corridor will be required to be expressly justified and where appropriate, mitigation measures put in place.
5. A key element of Coventry's approach to green infrastructure will be the continued development of a network of green spaces, water bodies, paths and cycle ways, with priority given to those parts of the city where there is an identified deficiency of green space. Where a development proposal lies adjacent to a river corridor or tributary, a natural sinuous river channel should be retained or, where possible, re-instated. Culverts should be removed unless it can be demonstrated that it is impractical to do so.
6. Development must respect the importance of conservation, improvement and management of green infrastructure in order to complement and balance the built environment. A strategic network of green infrastructure already exists in the city, connecting natural heritage, green space, biodiversity, historic landscapes or other environmental assets, together with links to adjacent districts in Warwickshire and Solihull. This strategic network will be safeguarded and enhanced by:
7. Not permitting development that compromises its integrity and that of the overall green infrastructure framework (including the Coventry/Oxford Canal);
 - a. Using developer contributions to facilitate improvements to its quality, connectivity, multi- functionality and robustness;
 - b. Investing in enhancement and restoration where opportunities exist, and the creation of new resources where possible, such as linking green infrastructure to other forms of infrastructure;
 - c. Improving its functionality, quality, connectivity and accessibility;

- d. Ensuring that a key aim of green infrastructure is the maintenance and improvement and expansion of biodiversity;
- e. Integrating proposals to improve green infrastructure in the delivery of new developments, particularly through area-based regeneration initiatives and major proposals and schemes;
- f. Flood risk management and improving surface water quality.

Policy GE2: Green Space

1. Development involving the loss of green space that is of value for amenity, recreational, outdoor sports and/or community use will not be permitted unless specifically identified as part of a strategic land use allocation, or it can be demonstrated that:
 - a. An assessment showing there is no longer a demand, or prospect of demand, for the recreational use of the site or any other green space use; or
 - b. A deficiency would not be created through its loss, measured against the most up-to-date Coventry Green Space standards; or
 - c. The loss resulting from any proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location of the city.
2. To support the proposed allocations at H2:19 and JE2:4 the following sites are allocated for the provision of new replacement sports pitches:
 - a. Land at Charter Avenue (former Alderman Harris School site).
 - b. Land east of Coundon Wedge Road.

Policy GE3: Biodiversity, Geological, Landscape and Archaeological Conservation

1. Sites of Special Scientific Interest (SSSIs), Local Nature Reserves (LNRs), Ancient Woodlands, Local Wildlife and Geological Sites will be protected and enhanced. Proposals for development on other sites, having biodiversity or geological conservation value, will be permitted provided that they protect, enhance and/or restore habitat biodiversity. Development proposals will be expected to ensure that they:
 - a. lead to a net gain of biodiversity, where appropriate, by means of an approved ecological assessment of existing site features and development impacts;
 - b. protect or enhance biodiversity assets and secure their long term management and maintenance;
 - c. avoid negative impacts on existing biodiversity;
 - d. preserve species which are legally protected, in decline, are rare within Coventry or which are covered by national, regional or local Biodiversity Action Plans.
2. Where this is not possible, adequate mitigation measures must be identified. If mitigation measures are not possible on site, then compensatory measures involving biodiversity offsetting will be considered, but only in exceptional circumstances.
3. Biodiversity will be encouraged particularly in areas of deficiency, in areas of development and sustainable urban extensions, and along wildlife corridors. Opportunities will be sought to restore or recreate habitats, or enhance the linkages between them, as part of the strategic framework for green infrastructure. Protected Species, and species and habitats identified in the Local Biodiversity Action Plan (LBAP), will be protected and conserved through a buffer or movement to alternative habitat. Identified important landscape features,

including Historic Environment assets, trees protected by preservation orders, individual and groups of ancient trees, ancient and newly-planted woodlands, ancient hedgerows and heritage assets of value to the locality, will be protected against loss or damage. In the case of archaeological remains, all practical measures must be taken for their assessment and recording in accordance with Policy HE2.

Policy GE4: Tree Protection

1. Development proposals will be positively considered provided:
 - a. there is no unacceptable loss of, or damage to, existing trees or woodlands during or as a result of development, any loss should be supported by a tree survey;
 - b. trees not to be retained as a result of the development are replaced with new trees as part of a well- designed landscape scheme; and
 - c. existing trees worthy of retention are sympathetically incorporated into the overall design of the scheme including all necessary measures taken to ensure their continued protection and survival during construction.
2. Development proposals that seek to remove trees that are subject to 'Protection', without justification, will not be permitted.

Policy GB1: Green Belt and Local Green Space

1. The city's most up-to-date Green Belt and Local Green Space boundaries are identified on the Policies Map.
2. A: Inappropriate development will not be permitted in the Coventry Green Belt unless very special circumstances exist. Development proposals, including those involving previously developed land and buildings, in the Green Belt will be assessed in relation to the relevant national planning policy.
3. B: Within areas designated as Local Green Space, the erection of small buildings and structures which are ancillary to the primary use of the land may be acceptable. Other development will not be permitted unless very special circumstances are demonstrated.
4. In addition to appropriate development in the Green Belt identified in the NPPF, limited infill development would be considered appropriate. Any proposal in these locations will be expected to be of an appropriate density to reflect surrounding properties should not impact negatively on the openness and character of the wider Coventry Green Belt and will also need to accord with Policy H3.

Policy DS4 (Part A) – General Masterplan principles

The following General Principles should be adhered to when master planning any major development proposal:

- i. Where appropriate the Masterplan should clearly identify any phasing of development along with the timely provision of supporting infrastructure;
- ii. Where the site is identified as an allocation within the Local Plan or City Centre AAP it should plan positively to meet in full the requirements identified within the relevant policies associated with the allocation. Where the proposal represents a

phase or phases of a wider scheme however, the quantum of development should reflect the relative size and characteristics of the phase, including its position within the wider site;

- iii.** Where possible, all proposals should be planned in a comprehensive and integrated manner reflecting partnership working with relevant stakeholders. Where proposals represent a phase of a larger development the Masterplan should have full regard to any adjoining land parcels and development proposals to ensure it delivers appropriate parts of the strategic or site-wide infrastructure and other relevant features. This should support the wider delivery of the comprehensive scheme;
- iv.** Opportunities to deliver higher density residential and mixed-use development should be maximised along public transport corridors and in designated centres with lower densities provided elsewhere (in accordance with policies H9 and R3);
- v.** Employment and commercial proposals should respond positively to market demands and requirements, maximising opportunities to locate within or close to designated centres (as appropriate) and provide a range and choice of opportunities to meet business and customer needs;
- vi.** Identify appropriate highway infrastructure along with sustainable transport corridors that include the provision for integrated public transport, cycling and walking which provides excellent connectivity and linkages to within the site itself, the city centre and with the surrounding area and existing networks;
- vii.** Appropriate levels of car and cycle parking should be made in accordance with the Local Plan's parking requirements. Spaces should be well integrated within the development and laid out to ensure they do not result in the obstruction of the highway as a result of excessive on-street parking;
- viii.** Where appropriate social and community facilities should be concentrated within mixed use hubs and designated centres and easily accessed by public transport, walking and cycling (having regard to Policy CO1);
- ix.** Proposals should respond to the local context and local design characteristics (in accordance with Policies GE3, HE2 and DE1), to create new well designed developments with a distinctive character which residents will be proud of;
- x.** Features of the historic environment should be respected as part of new developments with existing heritage assets conserved and enhanced as part of development proposals (in accordance with Policy HE2). Where appropriate, this should include the setting of buildings and spaces and the restoration of assets at risk of loss;
- xi.** Sympathetically integrate existing landscape, biodiversity and historic features of the site into the development taking opportunities to protect, enhance and manage important features along with mitigation and

enhancement measures to provide satisfactory compensatory provisions where appropriate (having regard to Policies GE1-4);

- xii. Provide fully integrated, accessible and connected multi-functional green and blue infrastructure which forms strategically important links to the surrounding area to provide routes for people and wildlife and open spaces for sports, recreation and play;
- xiii. Where appropriate incorporate innovative and creative approaches to energy generation, the provision of utilities and information technology, mitigation of pollutants, management of surface water and flood risk and waste management solutions. These should be adopted to make new developments more sustainable and resistant to the impacts of climate change; and
- xiv. All new Masterplans should be informed by consultation with existing communities in adjoining areas. This should take place prior to the submission of a planning application to ensure feedback can influence the final proposals.

Policy EM4 Flood Risk Management

1. All major developments must be assessed in respect of the level of flood risk from all sources. If development in areas at risk of flooding is the only option following the application of the sequential test, it will only be permitted where all of the following criteria are met:
 - a. the type of development is appropriate to the level of flood risk associated with its location with reference to Coventry's Strategic Flood Risk Assessment (SFRA) flood zone maps and advice on appropriate uses within these zones from the Environment Agency and/or Lead Local Flood Authority;
 - b. it is provided with the appropriate minimum standard of flood defence and resilience to aid recovery (including suitable warning and evacuation procedures) which can be maintained for the lifetime of the development;
 - c. it does not impede flood flows, does not increase the flood risk on site or elsewhere or result in a loss of floodplain storage capacity;
 - d. in the case of dwellings, it is evident that as a minimum, safe, dry pedestrian access would be available to land not at high risk;
 - e. in the case of essential infrastructure, access must be guaranteed and must be capable of remaining operational during all flooding events.
2. All opportunities to reduce flood risk in the surrounding area must be taken, including creating additional flood storage. In this instance reference should be made to the Councils IDP or Regulation 123 list. In order to achieve this:
 - a. the functional floodplain (Flood Zone 3b) should be protected from development and reinstated in brownfield areas wherever possible;
 - b. single storey buildings, basements and buildings on stilts will not be acceptable in Flood Zone 3;

- c. all opportunities to undertake river restoration and enhancement including de-culverting, removing unnecessary structures and reinstating a natural, sinuous watercourse will be encouraged;
- d. unless shown to be acceptable through exceptional circumstances, development should be set back at least 8m (from the top of bank or toe of a flood defence) of Main Rivers and 5m from Ordinary watercourses for maintenance access. This includes existing culverted watercourses.
- e. finished floor levels must be set a minimum of 600mm above the 1% AEP (1 in 100 year) plus climate change flood level.

Where a development benefits from an existing or proposed flood defence scheme, the development should contribute towards the capital and/or maintenance of these defences over its lifetime.

- 3. For sites in Flood Zone 3a, development should not impede flow routes, reduce floodplain storage or consume flood storage in a 'flood cell' within a defended area. If the development does result in a loss of storage, compensatory floodplain storage should be provided on a 'level for level' and 'volume for volume' basis.
- 4. For sites in Flood Zone 3a, all types of new development behind flood defences should be avoided, where possible, due to the residual risks of breach and overtopping. Development should ensure that it would not prevent the water bodies' ability to reach good status or its potential to do so as set in the Severn River Basin Management Plans and should support, where possible, to improving the status class.
- 5. A sequential, risk-based approach to the location of suitable development will be undertaken by the Council based on the Environment Agency's latest flood maps, SFRA flood zones and Vulnerability Classification to steer new development to areas with the lowest probability of flooding avoiding, where possible, flood risk to people and property and managing any residual risk.
- 6. The Exception Test (for use when there are large areas in Flood Zones 2 and 3, where the Sequential Test alone cannot deliver acceptable sites, but where some continuing development is necessary) will apply where development will provide wider sustainability benefits that outweigh flood risk, fully informed by an appropriately scaled Flood Risk Assessment (FRA) which indicates that development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible reducing flood risk overall.
- 7. Land that is required for current and future flood management will be safeguarded from development. Where development lies adjacent to or benefits from an existing or future flood defence scheme they may be expected to contribute towards the cost of delivery and/or maintenance of that scheme in accordance with Policy IM1.
- 8. A Flood Risk Assessment is required, appropriate to the scale and nature of the development proposed, where the development is:
 - a. within a river floodplain, as defined by the Coventry SFRA indicative flood zonemaps;
 - b. within 20 metres of any watercourse;
 - c. adjacent to, or including, any flood bank or other flood control structure;
 - d. within an area where there may be surface water issues and drainage problems;

Policy EM5 Sustainable Drainage Systems (SuDS)

1. All development must apply SuDS and should ensure that surface water runoff is managed as close to its source as possible.
2. SuDS are the preferred way of managing and conveying surface water. All developments will consider and demonstrate how the following hierarchy for the discharge of surface water from a site will be applied:
 - a. Discharge by infiltration and water reuse technologies.
 - b. Discharge to a watercourse allied with water reuse technologies.
 - c. Discharge to surface water sewer allied with water reuse technologies.
3. All development should carry out infiltration tests and a ground water risk assessment, including seasonal groundwater monitoring, to demonstrate whether infiltration is possible and that ground water would not be polluted to Environment Agency and Lead Local Flood Authority requirements. Where it is proven that infiltration is not possible, allied with water reuse technologies, surface water should be discharged into a watercourse (in agreement with the Environment Agency and Lead Local Flood Authority) at a rate no greater than Qbar greenfield runoff, or an appropriate minimum rate for small sites, agreed by the Lead Local Flood Authority. If there is no watercourse available then, allied with water reuse technologies, surface water should be discharged to a surface water sewer at a rate no greater than Qbar greenfield runoff.
4. In exceptional circumstances, where a sustainable drainage system cannot be provided, it must be demonstrated that it is not possible to incorporate sustainable drainage systems, and an acceptable means of surface water disposal is provided at source which does not increase the risk of flooding or give rise to environmental problems and improves on the current situation with a reduction in peak and total discharge.
5. The long-term maintenance arrangements for all SuDS must be agreed with the relevant risk management authority. A separate SPD will be produced to detail how SuDS schemes will be designed in accordance with the technical standards set out by the Coventry Lead Local Flood Authority and by the Department for Environment, Food and Rural Affairs.

Policy H9: Residential Density

1. Residential development, including conversions, must make the most effective and efficient use of land whilst ensuring compatibility with the quality, character and amenity of the surrounding area.
2. Therefore, outside of the Ring Road (The A4053) a minimum of 35 dwellings per hectare (net) should be provided on Previously Developed Land.
3. Developments inside the Ring Road (The A4053) should aim to achieve a minimum of 200 dwellings per hectare (net).
4. Developments on Greenfield sites should achieve a minimum of 30 dwellings per hectare (net).

DE1 Ensuring High Quality Design

1. All development proposals must respect and enhance their surroundings and positively contribute towards the local identity and character of an area.
2. The setting, integrity and character of heritage assets will be protected in accordance with Policy HE2.
3. All development will be expected to meet the following key principles:
 - a. respond to the physical context of the site;
 - b. consider the local distinctiveness and identity of the site but also have regard to opportunities to enhance the local built and natural environment through new development and enhanced design;
 - c. where appropriate, retain and incorporate into the layout the protection of important views, including key views of the three spires;
 - d. preserve or enhance the character and setting of the historic built, landscape and where appropriate archaeological environment;
 - e. preserve or enhance the character and setting of major road, rail and canal corridors;
 - f. clearly define the boundaries between public and private spaces and enclosure of space;
 - g. provide attractive, safe, uncluttered, active and easily identifiable, high quality public spaces;
 - h. make places that inter-connect and are easy to move through;
 - i. ensure places are easily understood by users, with clear routes and distinct physical features;
 - j. seek high quality design and attention to detail in the layout of developments, individual buildings and infrastructure in terms of function and impact, not just for the short term, but over the lifetime of the development;
 - k. be adaptable to changing social, technological, economic and market conditions and ensure that developments maximise the use of the site;
 - l. promote diversity through mixes of uses within a site or building, which work together to create vital and viable places;
 - m. be proactive in responding to climate change and adopt sustainable and low carbon construction principles in terms of their design, layout and density;
 - n. consider green infrastructure at the earliest stage in the design process, to ensure that it is well planned, designed, managed and maintained. It should also be well integrated and serve multiple purposes (as appropriate);
 - o. support the integration of through routes for public transport and incorporate suitable bus priority measures as appropriate;
 - p. minimise adverse impact on important natural resources;
 - q. conserve, restore or enhance biodiversity; and
 - r. respect and enhance landscape quality including trees, hedges and other landscape features of value.

Appendix 2 Section 106 Template

Off-site Open Space Contribution	Means the sum of £XXXXXX towards the [enhancement/improvement/provision] of off-site open space and play facilities at [LOCATION];
OS Completion Certificate	means a written certificate confirming that the relevant part of the Open Space has been completed to the reasonable satisfaction of the Council.
Open Space	means those areas of open space to be provided as part of the Development in the general locations shown on Plan XXXX
Open Space Maintenance and Management Strategy	means a scheme setting out the future management and maintenance regime for the Open Space including details of its transfer to and future maintenance by a Management Company (including details of the identity of the proposed management company) or the Council (if proposed by the Owner and accepted by the Council).
Open Space Management Company	means a company set up or appointed by the Owner to manage and maintain the Open Space.
Open Space Maintenance Sum	means a commuted sum of £XXXX for maintenance of the Open Space payable by the Owner upon the transfer of the Open Space.
Open Space Specification	means a written scheme detailing the location layout and specifications of the Open Space which accords with Green Flag Standards or any other standards the Local Authority deem appropriate.

OFF-SITE OPEN SPACE CONTRIBUTION

- 1.1. Prior to the Commencement of Development, the Owner covenants with the Council to pay to the Council the Off-Site Open Space Contribution.

- 1.2. The Owner will not permit or cause the Commencement of Development until the Off-Site Open Space Contribution has been paid to the Council.

ON-SITE OPEN SPACE PROVISION

The Owner covenants with the Council:

- 1.1. That prior to Commencement of Development they will submit to the Council the Open Space Maintenance and Management Strategy for written approval and that they shall not permit or cause Commencement of Development until the Open Space Maintenance and Management Strategy has been approved by the Council in writing.

- 1.2. To complete the laying out, planting and equipping of the Open Space in accordance with the Open Space Specification and to the satisfaction of the Council prior to Occupation of 75% of the Residential Dwellings.

- 1.3. Not to Occupy or permit the Occupation of more than 75% of the Residential Dwellings until the Open Spaces have been laid out, planted and equipped in accordance with the Open Spaces Specification and to the satisfaction of the Council; and

- 1.4. To write to the Council and invite it to inspect the Open Space within 10 Working Days of its completion.
- 1.5. In the event Defects are identified by the Council following its inspection pursuant to **paragraph 1.4** to rectify such Defects.
- 1.6. Within 10 Working Days of rectifying the Defects pursuant to **paragraph 1.5** to invite the Council to inspect the Open Space and identify any Defects requiring attention following which the steps set out in **paragraph 1.5** and this **paragraph 1.6** shall be repeated provided that in the event no Defects are identified following an inspection by the Council and the OS Completion Certificate is issued in respect of that part of the Open Space no further repeat of the steps will be required.
- 1.7. Following the issue of the OS Completion Certificate pursuant to **paragraph 1.6** above the Owner shall provide written notification to the Council confirming it intends to offer the Open Space to the Council or whether it will be transferring the Open Space to an Open Space Management Company.
- 1.8. On receipt of the notification, in the event the Owner offers the Open Space to the Council the Council will confirm whether or not it intends to adopt the Open Space together with any requirements for adoption.
- 1.9. If the Owner elects to transfer the Open Space to an Open Space Management Company or the Council declines to accept the Open Space, the Owner will within 60 Working Days of the issue of the OS Completion Certificate for the Open Space:
 - 1.9.1. Transfer the Open Space at nil consideration to an Open Space Management Company subject to all rights of way and rights reasonably required for the use of the Open Space and subject to the reservation of all rights of access and rights of way and passage of services and rights of entry reasonably necessary for the purpose of the Development and a covenant on behalf of the relevant Open Space Management Company to retain and maintain the Open Space transferred in perpetuity;
 - 1.9.2. The Owner will agree with the Council the Articles of Association for the Open Space Management Company prior to the formation and registration of the Company unless the Open Space Management Company is already in existence;
 - 1.9.3. To provide sufficient funds to the Open Space Management Company for the future maintenance of the Open Space as agreed between the Open Space Management Company and the Owner;
 - 1.9.4. to maintain the Open Space until it is transferred to the relevant Open Space Management Company and from the date of issue by the Council of the Certificate of Practical OS Completion Certificate, in accordance with the standards of maintenance set out in the Open Space Maintenance and Management Strategy.
- 1.10 If the Owner has elected to offer the Open Space to the Council and the Council has indicated a willingness to accept the transfer of the Open Space pursuant to paragraph 1.7 above, the Owner will within 60 Working Days of the issue of the OS Completion Certificate for the Open Space,:
 - 1.10.1 Offer to transfer at nil consideration the Open Space to the Council subject to all rights of way and rights reasonably required for the use of that Open Space and subject to the reservation of all rights of access and rights of way and passage of services and rights of entry reasonably necessary for the purpose of the Development;

1.10.2 To pay the Open Space Maintenance Sum to the Council on the date of the transfer.

1.10.3 To maintain the Open Space until it is transferred to the Council and from the date of issue by the Council of the OS Completion Certificate, in accordance with the standards of maintenance set out in the Open Space Maintenance and Management Strategy;

OPEN SPACE COUNCIL COVENANTS

1.1.1. The Council covenants with the Owner as follows:

3.1.1 To confirm in writing within 20 Working Days (or such other period as may be agreed with the Phase Owner) of receipt whether or not an Open Space Maintenance and Management Strategy is approved.

3.1.2 To arrange for an inspection of the Open Space within 20 Working Days (or such other period as may be agreed with the Phase Owner) of receiving a request pursuant to paragraph 1.4 above

3.1.3 To accept any transfer of the Open Space pursuant to paragraph 1.10.1 above and to use reasonable endeavours to complete any transfer within 3 months of a draft transfer being received by the Council

3.1.4 In the event that the Council does not approve or reject an Open Space Maintenance and Management Strategy within 20 Working Days (or such other period as may be agreed with the Owner) of receipt of the relevant document then the Phase Owner shall be entitled to consider the relevant Open Space Maintenance and Management Strategy as being approved

3.1.5 In the event that the Council does not approve or reject the Articles of Association of the Open Space Management Company within 20 days (or such other period as may be agreed with the Phase Owner) of receipt then the Phase Owner shall be entitled to consider the relevant Articles of Association of the Open Space Management Company as being approved.

Appendix 3: Design Standards

Public Open Space Design Guidance

Open space is a key facet of creating a successful place. As a starting point, existing features should be retained wherever possible and utilised to define design character and allow new development to assimilate naturally into its context.

Overall landscape design should be done with reference to the council's green space strategy April 2019. This sets out both the standard and amount of provision the city council would expect to see within or near to the development work.

The adopted Coventry Green Space strategy in line with the adopted Coventry Local Plan Policy GE1 classifies green spaces according to three broad categories: Formal; Informal and Functional. The table below shows the component types of green space within each classification. Guidance on sports provision and associated standards will be covered in the Coventry Playing Pitch Strategy.

Type of Green Space	Planning Classification
Parks and Gardens	Formal
Outdoor Sports Facilities (with unrestricted access)	
Provision for Children & Young People	
Amenity Green Space	Informal
Natural and Semi-natural Green Space	
Green Corridors	
Community Gardens	Functional
Cemeteries & Churchyards	

The ongoing care and maintenance of open space is also a key issue in ensuring that its quality is enduring. The Council will expect full details to be provided regarding the proposed management of open space within all new residential and mixed use developments.

Formal Open Space

A clean, safe and well maintained and drained green space which is capable of receiving a Green Flag award with a score of at least 70 (out of 100). The site will demonstrate a high level of design to reinforce the sense of enclosure. The design element should allow the space to flow naturally and sit well within a more informal space if required. It will contain ornamental planting, some formal tree planting e.g. avenue and at least one formal element possibly more, depending on size, including play area; play equipment; outdoor gym equipment; sports/games area, band stand/performance area, artwork/sculpture. The site and its ancillary features (footpaths, seats, gates and fencing etc.) will be both safe to use and comply with the requirements of the Disability Discrimination Act 1995 / Equality Act 2010 as applicable. Ideally the site will contain a Lucy pillar or metered mains electricity supply to allow for catering/entertainment concessions.

Informal Open Space

A clean, safe and well maintained and drained green space which is capable of achieving Green Flag score of 60 (out of 100). The site will be big enough and of sufficient variety of landscape to encourage natural play and other forms of informal recreation and leisure. It will be easily accessed with welcoming entrances and well-constructed all weather footpaths and defined by suitable well-constructed boundary fencing. The site and its ancillary features (footpaths, seats,

gates and fencing etc.) will be both safe to use and comply with the requirements of the Disability Discrimination Act 1995 / Equality Act 2010 as applicable. The site will have appropriate and sufficient furniture for its potential users, with a minimum of one bin for each bench and each entrance. The site will have attractive soft landscaping including structural tree planting of diverse native species, shrubs, grassed areas and other natural features which promote and support biodiversity. The site will have a spacious outlook and will enhance the appearance of the surrounding environment.

Quality Standards

Type of provision	Required standard	Relevant links																
Quality Standard for Open Space	The proposed quality standard is 70 (out of 100) for all formal green spaces- broadly equivalent to achieve the Green Flag Award. The proposed quality standard is 60 (out of 100) for all informal green spaces. All informal green spaces should achieve a minimum of 'good' against the Green Flag Award Standard.	Coventry Green Space Strategy Green Flag Award																
Accessibility to Public Open Space	Coventry Green Space Strategy; All residents should be within 1200m of a District Level Space or All residents should be within 800m of a Neighbourhood level space or All residents should be within 400m of a Local Level Space. Functional Green Space; all residents should be within 1200m of a community garden, churchyard or cemetery.	Coventry Green Space Strategy																
Provision for Children and Young People	<p>Whilst Provision for Children and Young people forms part of the classification Formal Green Space, the Green Space Strategy and Local Standards do not propose a quantity standard for equipped provision for children and young people. However, the authority has adopted the Fields in Trust accessibility standards⁷ as summarised below.</p> <table border="1"> <thead> <tr> <th colspan="2">Designation</th> <th>Accessibility Standard</th> </tr> </thead> <tbody> <tr> <td rowspan="4">Equipped / designated play areas</td> <td>LAP</td> <td>Local Area for Play (and informal recreation)</td> <td>100 m</td> </tr> <tr> <td>LEAP</td> <td>Local Equipped Area for Play (and informal recreation)</td> <td>400 m</td> </tr> <tr> <td>NEAP</td> <td>Neighbourhood Equipped Area for Play (and informal recreation, and provision for children and young people)</td> <td>1,000 m</td> </tr> <tr> <td>MUGA</td> <td>Multi Use Games Area</td> <td>700 m</td> </tr> </tbody> </table>	Designation		Accessibility Standard	Equipped / designated play areas	LAP	Local Area for Play (and informal recreation)	100 m	LEAP	Local Equipped Area for Play (and informal recreation)	400 m	NEAP	Neighbourhood Equipped Area for Play (and informal recreation, and provision for children and young people)	1,000 m	MUGA	Multi Use Games Area	700 m	Coventry Green Space Strategy Fields in Trust Guidance for Outdoor sport and play
Designation		Accessibility Standard																
Equipped / designated play areas	LAP	Local Area for Play (and informal recreation)	100 m															
	LEAP	Local Equipped Area for Play (and informal recreation)	400 m															
	NEAP	Neighbourhood Equipped Area for Play (and informal recreation, and provision for children and young people)	1,000 m															
	MUGA	Multi Use Games Area	700 m															

⁷ Fields in Trust (2018) – Guidance for Outdoor Sport and Play : Beyond the Six Acre Standard (England)

The Coventry Green Space Strategy proposes the following minimum quantity standards

Type of Green Space	Planning Classification	Quantity Standard (ha/1000)
Parks and Gardens	Formal	0.84
Outdoor Sports Facilities (with unrestricted access)		
Provision for Children & Young People		
Amenity Green Space	Informal	2.12
Natural and Semi-natural Green Space		
Green Corridors		
Community Gardens	Functional	0.37
Cemeteries & Churchyards		
TOTAL		3.11

NB : There is no proposed quantity standard for provision for children and young people since this is determined by access standards as published by the Fields in Trust.

Provision for Children and Young People

The Green Space Strategy and Local Standards do not propose a quantity standard for green space and equipped play provision for children and young people. However, the authority has adopted the Fields in Trust accessibility standards⁸ as summarised below.

	Designation		Accessibility Standard
Equipped / designated play areas	LAP	Local Area for Play (and informal recreation)	100 m
	LEAP	Local Equipped Area for Play (and informal recreation)	400 m
	NEAP	Neighbourhood Equipped Area for Play	1,000 m

⁸ Fields in Trust (2018) – Guidance for Outdoor Sport and Play : Beyond the Six Acre Standard (England)

		(and informal recreation, and provision for children and young people)	
	MUGA	Multi Use Games Area	700 m

Summary table: Specifications for children’s play provision

A detailed specification must be submitted with a full application or at Reserved Matters stage and will be subject to community consultation.

Type	Minimum Size	Equipment/Facilities	Design Considerations	Distance from dwellings	Boundary Treatment	Management
LAP	100 sqm	A designed space for natural play, using changes in level, natural features such as boulders, logs or small dips, and planting with a range of textures, scents and colours. Creating a space that will stimulate senses and enable young children to claim the space as their own. Provision of seating.	<ul style="list-style-type: none"> • Appropriate to community needs • Unique to the development • Taking into account natural features • Integrated within the open space • Accessible to children with disabilities 	5m for boundary	Incorporated within open space, planting may be used to indicate boundaries. Perimeter fencing is not appropriate. The open space itself may be fenced from roads if appropriate.	Arrangements for graffiti removal, litter picking, dog waste clearance, dog waste and general waste collection.
LEAP	400 sqm	At least 5 types of play equipment, providing a range of activities ² , avoiding duplication of nearby play facilities. Planting to provide a range of textures, scents and colours. Seating in sun and shade. Litter bins.	<ul style="list-style-type: none"> • Good natural surveillance • Safer surfacing • Generous use of planting 	20m from facade	Recognisable by either fencing or landscaping. Perimeter fencing is generally inappropriate although the site may be fenced from adjoining roads and other hazards.	In addition to LEAP requirements - Post installation RoSPA inspection. Inspection regime incorporated in management and maintenance plan. Weekly visual inspections. 3 monthly inspections to a recognised standard.

NEAP	1000 sqm	In addition to LEAP requirements - minimum activity zone of 1,000m ² , with play equipment and structures. Hard surfaced area of 465sqm for five a side football and other games. Separation of more adventurous play.		30m from boundary		
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Design Standard

Streetpride and Greenspace work towards the Green Flag standard of maintenance in the city and currently have 5 Green Flag Awards. Due to the size and number of dwellings in this development the green space represents a significant provision and should also aim towards the Green Flag Award Standard.

Applicants are judged against 27 different criteria divided into eight sections. These are not a list of requirements – the strength of the Green Flag Award is that it provides a framework for good management that professionals can evaluate and apply to their own particular site. For some sites, some of the sub-criteria will be ‘not applicable’ and for every site their proportionate importance will vary widely. This approach provides a clear but flexible framework for current management and future planning, and helps to make a case for funding, proving the value of the site to the community that it serves (often in ways that are otherwise difficult to quantify) and recognising the hard work of staff and volunteers.

The eight sections are:-

A Welcoming Place, Healthy Safe & Secure, Well Maintained & Clean, Environmental Management, Biodiversity Landscape & Heritage, Community Involvement, Marketing & Communication and Management.

Outlines for these sections can be seen in Fig. 1 and details found here; <http://www.greenflagaward.org.uk/media/1019/green-flag-award-guidelines.pdf>

Figure 1



Section 4: Environmental Management

This section seeks to ensure that the way the site is managed has a positive impact on the environment, locally and globally, both now and for the future. Where choices can be made for future procurement, landscaping or buildings, they should aim to minimise energy and resource consumption and waste, and design in benefits to the local and global environment. Policies should seek to eliminate the use of peat and chemicals to control pests and as fertilisers. Horticultural and arboricultural decisions should reflect an understanding of the impacts of climate change.

- 14. **Managing Environmental Impact**
- 15. **Waste Minimisation**
- 16. **Chemical Use**
- 17. **Peat Use**
- 18. **Climate Change Adaption Strategies**

Section 5: Biodiversity, Landscape and Heritage

Attention should be paid to the appropriate management and conservation of natural features, wildlife and flora; landscape features; and buildings and structures. Their particular character and requirements should be identified and appropriate management strategies put in place to conserve and enhance them.

- 19. **Management of Natural Features, Wild Fauna and Flora**
- 20. **Conservation of Landscape Features**
- 21. **Conservation of Buildings and Structures**

Section 6: Community Involvement

This section examines the extent to which the managing organisation:

- + understands the community it seeks to serve;
- + actively and appropriately involves members of the community in making decisions about the site's development;
- + provides opportunities for active participation in site projects; and
- + ensures that there is appropriate provision of recreational facilities and activities for all sectors of the community.

- 22. **Community Involvement in Management and Development**
- 23. **Appropriate Provision for Community**

Section 7: Marketing and Communication

This section seeks to examine the ways that managers understand the key benefits of the site and how they use this information to promote it appropriately. They should understand who the main user groups are, could be or should be, and use a fitting range of interpretation and engagement techniques to communicate with them. This basis ensures that appropriate facilities, events and activities can be offered and most effectively promoted, and forms a solid foundation for development now and in the future.

24. Marketing and Promotion

25. Appropriate Information Channels

26. Appropriate Educational and Interpretational Information

Section 8: Management

This section evaluates how well the management plan is implemented on site.

27. Implementation of Management Plan

Appendix 4: Indicative Costings

Indicative costs of creating a new NEAP or LEAP based on 2019 figures. Note: Labour costs are not included.

Requirement	LEAP	NEAP	Qty	Guide Cost LEAP Example Swanswell Park	Guide Cost NEAP Example Allesley Park	Supporting Comments
Supply of play equipment	x	x	1	£37K	70k	5 pieces of equipment (min LEAP) for young play , covering different aspects of play. 8 pieces min (NEAP) young - teen.
Supply of Safety Surface	x	x	1	£21k	35K	Surface type decided on site by site basis.
Supply and installation of dog proof fencing or segregation of areas. Two self closing gates.	x	x	1	£7K	9k	Fencing: 80 liner meters accounted for LEAP, 100 NEAP. Segregation such as bolders and planting may be considered.
Supply and installation of litter bins x2 (min)	x	x	1	£750	£750	Includes a pad for installation
Supply and installation of seating areas x 2 (Min)	x	x	1	£3,100	£3,100	Includes a pad for installation
Signage (usage rules)	x	x	1	£420	£420	
Community Board plus	-	x	1	N/A	£2,160	

installation						
Bike Parking frame.	-	x	1	N/A	£800	
Purpose built sports area.	-	x	1	N/A	£45,000	
Post installation Inspection x 1	x	x	1	£120	£150	Based on ROSPA inspection
Total			Total	£69,390	£166,380	
Plus 20% installation			Plus 20%	£13,878	£33,276	
Preliminary works (10% of total cost)			10%	£8,327	£19,966	Variable depending site topology
Final totals				£91,595	£219,622	

Inspection and Maintenance Costs Leap:

Inspection: The inspection costs are based on the annual costs multiplied by the term that Coventry City Council require the developer to contribute to the up-keep of any provision.

£2036 x 20 years = £40,720

Maintenance: The maintenance costs are broken down over four 5 year periods and a percentage of the total cost per period, based upon wear and tear, replacement equipment and surfacing.

Year 1 - 5 (20%) = £13,920

Year 6 - 10 (25%) = £17,400

Year 11 - 15 (40%) = £27,840

Year 16 - 20 (15%) = £10,440

Maintenance costs of a Leap: £69,600

Inspection costs for a Leap: £40,720

Total: £110,320

Inspection and Maintenance Costs Neap:

Inspection: The inspection costs are based on the annual costs multiplied by the term that Coventry City Council require the developer to contribute to the up-keep of any provision.

£2036 x 20 years = £ 40,720

Maintenance: The maintenance costs are broken down over four 5 year periods and a percentage of the total cost per period, based upon wear and tear, replacement equipment and surfacing.

Year 1 - 5 (20%) = £36000

Year 6 - 10 (25%) = £45000

Year 11 - 15 (40%) = £72000

Year 16 - 20 (15%) = £27000

Maintenance costs of a Neap: £180,000

Inspection costs for a Neap: £40,720

Total: £220,720

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Comment Reference	Respondent	Page/Para reference	Consultation Response (Summary)	Officer Response	Proposed Change
OS1	Severn Trent Water	-	No comments	-	None
OS2	National Highways	-	No comments	-	None
OS3	Canal and Rivers Trust	-	No comments	-	None
OS4	Birmingham Airport	-	No comments	-	None
OS5	Historic England	Para 3.1	Although we acknowledge that the Green Space Typology set out in Table 1 uses a single classification according to the primary purpose, we suggest that reference to the historic environment should be included within the various relevant Green Space typologies, such as 'Parks and gardens', 'Natural and semi-natural green spaces', 'Green corridors' and 'Cemeteries and churchyards'.	Comment noted. The typologies are taken from the adopted Local Plan and Green Space Strategy. Any addition in this SPD would result in inconsistent definitions across documents. Therefore, we don't propose a change.	No change
OS6	Sport England	Para 2.9	SPD should state PPS 2014-2019 (and any subsequent update) to ensure that the new PPS is referred to when assessing proposals to establish the current and future sporting and recreational needs, and how best to address any deficiencies identified.	There is already wording at 2.9 which states "or any subsequent updates or replacements." This covers all documents listed beneath it.	No change.

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OS7	Sport England	Para 3.7	Chapter 4 sets out the methodology for how developments will contribute to open spaces. From the worked examples it is unclear whether formal playing pitches are covered within the SPD despite the reference to the PPS as a relevant document for the SPD. It should be noted that the Council on the completion of the new PPS will have access to its Playing Pitch Calculator (PPC). The PPC helps local authorities estimate the demand that may be generated for the use of playing pitches by a new population quantifying needs in terms of on site provision or monetary value for off site contribution (actual figure depending on local costings of project to meet the demand identified). The PPC is designed to assist those developing and implementing a Playing Pitch Strategy by giving a consistent starting point to help estimate the demand from a new population.	The Open Spaces SPD focuses on the provision of green and open spaces. The playing pitch strategy is the document which will provide detail on the provision of sports pitches and wider sports provision.	New wording at para 1.19 added for clarity.
OS8	Warwickshire Wildlife Trust	General	We note that the document sets a threshold of 10 dwellings but doesn't consider the cumulative impact of a number of nearby sites just under 10. Such as where a number of smaller application are submitted as part of a wider scheme and would have a large cumulative impact.	Comments noted. As set out in the executive summary, provision of open space is encouraged on all schemes. However, it may be that a financial contribution towards off-site enhancement maybe be more appropriate in some cases.	No change
OS9	Warwickshire Wildlife Trust	Para 3.1	Under 3.1 in the Open Space SPD it is also noted that designated sites such as 'Local Wildlife Sites' and 'Nature Reserves' are not listed	Comment noted. The typologies are taken from the adopted Local Plan and Green Space Strategy. Any	No change

				addition in this SPD would result in inconsistent definitions across documents. Therefore we don't propose a change.	
OS10	Warwickshire Wildlife Trust	General	We are also concerned regarding reaching a balance between creating spaces for members of the public and preserving important local wildlife and protected species. There is a need for buffers of semi natural vegetation and we suggest at least 10 meters away from members of the public and busy footpaths. In terms of site design for example next to water courses, it is important to have one side at least as a green/ blue footpath that isn't used by the public and is an Informal space for nature.	Comments noted. Relevant additions to para 7.6 will be made. "A balance should be struck between creating spaces for members of the public and preserving important local wildlife and protected species. Appropriate buffers should be considered, which enable safe and undisturbed wildlife habitats to co-exist with the public."	Add additional wording to para 7.6. to address this point.
OS11	Warwickshire Wildlife Trust	Para 7.0	Careful consideration should be given to lighting and its impact on protected species and local wildlife, such as flood lights on sports pitches and the location of large noisy carparks for more informal spaces. As well as care taken during construction particularly near to areas known for wildlife, protected species and BAP priorities and important Local Wildlife Sites/ Nature Reserves and SSSIs.	Comments noted. Insert into section 7 para 7.7. 'Careful consideration should be given to lighting and its impact on protected species and local wildlife,	New wording at para 7.7 to address this point.

				such as flood lights on sports pitches and the location of large noisy carparks for more informal spaces. As well as care taken during construction particularly near to areas known for wildlife, protected species and BAP priorities and important Local Wildlife Sites/ Nature Reserves and SSSIs.'	
OS12	Warwickshire Wildlife Trust	Para 6.1	6.1 River Corridors, we support the use of buffers to protect local habitats and biodiversity though suggest these should be larger in some cases, we suggest buffers of 10m in line with our guidance.	Comments noted. Given the need to ensure flexibility across a range of sites we consider adding an additional bullet point to para 6.1 to read "the use of appropriate buffers to protect local habitats and biodiversity will be encouraged."	Add additional bullet point at 6.1. to reflect this point.
OS13	Warwickshire Wildlife Trust	Para 6.3	6.3 mentions ecology and biodiversity but not how the conflicting uses with cycle paths would be managed. Such as a last resort through	Comments noted. Agree the addition of appropriate wording	Add wording to para 6.3 to reflect this point.

			the use of buffers or focusing paths on the least important locations in terms of biodiversity.	“They should incorporate high quality footpaths and cycle ways whilst providing a magnet for ecology and biodiversity to thrive across the sites. To ensure ecological habitats are not compromised, appropriate buffers will be encouraged.”	
OS14	Warwickshire Wildlife Trust	Para 6.10	6.10 page 17, we support that existing ponds should be retained as part of greenspaces, and not be used as SUDs, this section could however be enhanced by adding wording that retains ponds and the surrounding environment as semi natural environments to protect protected species and important local wildlife.	Comments noted, wording strengthened, although this is a recommended approach so there is scope for flexibility.	Amend 6.10 to address this point although it should be noted this is a recommended approach and each site will need to be considered on a case by case basis.
OS15	Warwickshire Wildlife Trust	General	We also note that Natural England’s Accessible Natural Green Space Standards (ANGS) don’t appear to have been used and we cannot find information on why alternative standards have been used.	The SPD reflects the adopted Green Space Strategy.	No change
OS16	Warwickshire County Council Lead Local Flood Authority	Para 6.13	The explicit statements regarding the use of water and sustainable drainage is welcome and the proposals, particularly in relation to adoption and maintenance could be transformational to the inclusion of SuDS across Coventry. However, it is understood from the current reading of the document that there is little policy given in terms of priority and as such there could be the potential for above-ground SuDS to be discounted on space grounds as a result of requiring	See Comments from Coventry City Council Lead Local Flood Risk Authority (OS21) which refer to green spaces potentially serving multi functional purposes.	No change to 6.13

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			formal & informal open space over functional open space. In short, it should be clarified as to a priority hierarchy.	The SPD cannot introduce new policy as this is beyond its scope. 6.13 sets out the councils preference but does not set it as an absolute requirement.	
OS17	Warwickshire County Council Lead Local Flood Authority	Appendices	Policy EM5 should be included in Appendix and list of relevant policies	Agreed	Add EM5 to Appendix
OS18	Warwickshire County Council Lead Local Flood Authority	Para 2.9	Given the references to sustainable drainage and Policy EM4, should the strategies also make reference to Coventry's SuDS guidance and local flood risk management strategy.	Agreed	Add relevant Flood Risk Management strategies to 2.9
OS19	Coventry City Council Lead Local Flood Authority	Para 6.8	Add some commentary about soils, given Coventry is predominantly clay in nature https://www.bgs.ac.uk/	Comments noted, soils are referenced in the second bullet point	No change
OS20	Coventry City Council Lead Local Flood Authority	Para 6.8	Para 6.8 an additional bullet point on natural flood risk management solutions could be beneficial. "Nature based solutions as a flood risk management measure should be considered for the benefits of flood risk reduction downstream from greenspaces." or "Nature based solutions and natural flood risk management measures have the potential to reduce flood risk downstream from greenspaces, whilst also providing additional biodiversity and habitat benefits to the wider greenspace."	Agreed. Add bullet point to read: "Nature based solutions and natural flood risk management measures have the potential to reduce	Additional bullet point at para 6.8

				flood risk downstream from greenspaces, whilst also providing additional biodiversity and habitat benefits to the wider greenspace.”	
O21	Coventry City Council Lead Local Flood Authority	Para 6.9	“The intended use of greenspaces should be compared with flood risk information provided in a site specific flood risk assessment, including flood risk hazard ratings”; we think that there would be value in referencing joint use amenity space again in this paragraph. “The intended use of greenspaces or joint use amenity spaces should be compared with flood risk information provided in a site specific flood risk assessment, including flood risk hazard ratings.	Comment noted and agreed “The intended use of greenspaces or joint use amenity spaces should be compared with flood risk information provided in a site specific flood risk assessment, including flood risk hazard ratings.”	Make change to para 6.9 to reference joint use
OS22	Jos Bigham	Exec Summary	Executive Summary ‘The London Plan. The Spatial Development Strategy for Greater London. March 2021’ has a list of objectives which, if adapted, might be of use within the executive summary: ‘Objectives include: promoting mental and physical health and wellbeing; adapting to the impacts of climate change and the urban heat-island effect; improving air and water quality; encouraging walking and cycling; supporting landscape and heritage conservation; learning about the	Noted. These issues are picked up throughout the SPD and the executive summary addresses the purpose and scope of the document.	No change

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			environment; supporting food growing and conserving and enhancing biodiversity and ecological resilience alongside more traditional functions of green space such as play, sport and recreation.'		
OS23	Jos Bigham	Document wide	This SPD document should also set the Council's approach towards the provision of open space for new commercial, industrial and mixed development. It is essential that all forms of development connect with the wider green infrastructure network; otherwise, the Council's approach towards sustainability, biodiversity recovery, improving air quality, reducing flood risk and mitigating and adapting to climate change will be undermined.	Agreed. Include written text in executive summary to encourage the provision of appropriate open space and SUDs in commercial and industrial developments.	Reference to industrial and commercial included in Executive summary.
OS24	Jos Bigham	Para 1.15 numbering now amended. 1.15 in draft document is 1.16 in final document.	Add the following bullet points: <ul style="list-style-type: none"> • Improving air quality • Improving water quality 	Agreed. Include as suggested.	Include as suggested Include additional bullet points to para 1.16
OS25	Jos Bigham	Para 1.15 numbering now amended. 1.15 in draft document is 1.16 in final document.	Change the bullet point 'Improved mental and physical health through exercise...' to 'Improved mental and physical health through experience of restorative environments and exercise	Comment noted. Suggest amended wording in line with representation Amend bullet point to read: 'Improved mental and physical wellbeing through exercise in a safe and pleasant environment.'	Amend bullet point 1.16

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OS26	Jos Bigham	Para 1.16	'...contributes to improvements in connectivity and public access...' Should there be a section on a commitment to Public Rights of Way (PRoW) and their maintenance in support of this statement?	Noted. Policy GE1 covers this	No change
OS27	Jos Bigham	Para 1.17	'...new housing development...' This section should refer to all forms of development including commercial, industrial and mixed sites.	Agreed – new paragraph added at the end of section 1 to read 'Whilst this document focuses mainly on the provision of open space in residential developments, the council also encourages the provision of appropriate open space and SUDs in commercial, industrial and mixed-use developments. The creation of open spaces in such developments can make a significant contribution towards health and wellbeing in the workplace and can contribute to modal shift to sustainable transport modes' and laso included in the executive summary.	Change made in line with officer comments

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OS28	Jos Bigham	Chapter 7 and Intro	Within the Open Spaces SPD, there should also be references made to the recent Environment Act (2021) especially with regards to 'Part 6 Nature and biodiversity' and other sections which may require signposting (https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted).	Agreed.	Insert reference in chapter 7 (para 7.8) and introduction
OS29	Jos Bigham	Para 2.8	Consider including other relevant SPDs in the bullet point list e.g., <ul style="list-style-type: none"> • Air Quality SPD • Coventry Connected SPD • Health Impact Assessment SPD • Tree and Developer Guidelines SPD (2020) 	Agreed	Insert relevant SPDs to list at 2.8
OS30	Jos Bigham	Para 2.9	Consider including the following strategies and any others which may link with the Open Spaces SPD e.g., <ul style="list-style-type: none"> • Coventry Health and Wellbeing Strategy 2019-2023 • Marmot strategy (2016-2019) • Climate change strategy (2012-2020) • Sub Regional Green Infrastructure Strategy (https://www.warwickshire.gov.uk/greeninfrastructure) 	Noted Due to dated nature of a number of documents it is considered prudent to refer to the councils website for more information.	Insert website link
OS31	Jos Bigham	Para 3.3	Table 1: Green Space Typology Change 'Community Gardens and Allotments' to 'Community Gardens, Orchards and Allotments'	The table is taken from documents which are already adopted so any change would lead to inconsistencies.	No change.
OS32	Jos Bigham	Para 3.5	3.5 adapt the third bullet point to include a reference to 'Secured by Design Development Guides' (https://www.securedbydesign.com/guidance/design-guides) e.g., <ul style="list-style-type: none"> • incorporate security into developments to meet the requirements of Secured by Design (SBD) with the aim of reducing opportunities for crime Page 12 of 23 	Agreed. Insert reference to Secured by Design in bullet point 3 of para 3.5. be designed and located to reduce opportunities for crime.."in line with guidance contained	Change to include secured by design

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				within Secured by Design”	
OS33	Jos Bigham	Para 3.6	3.6 Change ‘...meters...’ to ‘metres’	Noted	Make change
OS34	Jos Bigham	General	<p>Crime and security</p> <p>Refer to the detail in ‘Secured by Design Homes 2019’ Section 1 especially in the following areas:</p> <ul style="list-style-type: none"> • Layout of roads and footpaths • Communal areas and play space • Planting in new developments • Street lighting <p>Refer to the detail in ‘Secured by Design Commercial Developments 2015’ Section 1 especially in the following areas:</p> <ul style="list-style-type: none"> • Roads and footpaths • Perimeter security and site access • External security issues • Security lighting <p>It would also be useful involve West Midlands Police’s ‘Designing Out Crime Officer’ with this consultation so that they have an opportunity to comment and make suggestions.</p>	Comment noted. Paras 3.5 and 3.6 sufficiently cover this.	No change
OS35	Jos Bigham	Para 3.8	<p>Impenetrable barriers</p> <p>With regards to calculations of distances, impact of impenetrable barriers needs to be referred to.</p>	Comment noted. Para 3.8 states safe and convenient walking routes.	No change
OS36	Jos Bigham	Chapter 7	Suggests more commentary on ecological assessments, carbon storage and net gain as part of chapter 7.	Comments noted. Chapter 7 (para 7.8) includes reference to recent national policy changes. SPD to be updated to reflect most recent position. However, biodiversity SPD will	Insert reference to Environment Act at 7.8

				be the focus for this discussion.	
OS37	Jos Bigham	General	Electricity pylons and high voltage overhead power lines Space underneath electricity pylons is an issue which does need addressing within the SPD. In general, it would be beneficial for developers to consult early on with organisations such as National Grid and National Highways. According to the National Grid's document 'Design guidelines for development near pylons and high voltage overhead power lines', there should be a 15m buffer zone for unsupervised/open access areas	Agreed. General sentence to be included in 4.2. Include in 4.2: "In general, it would be beneficial for developers to consult early on with organisations such as National Grid and National Highways. This is to ensure development or the creation of open space under or close to power lines is appropriately assessed."	Include sentence at 4.2
OS38	Sara Maycock		How will the policy be monitored in terms of its effectiveness in practice? eg direct Impacts on health and wellbeing of residents, local biodiversity measures, climate change mitigation - there is no rigour incorporated into the document in terms of measures of success or ensuring that targets are met. The expected policy impacts should be measurable using SMART targets. Include a statement of required outcomes in the context of Coventry's social and environmental issues it is trying to target.	Comment noted. The document provides guidance to developers on the quantum and quality of open space provision as part of developments. The parameters and outcomes of provision will be dealt with on a case by case basis as part	No change

				of the planning application stage and any associated legal agreement or undertakings. As part of routine and ongoing monitoring, the delivery of developments will be assessed.	
OS39	The Coventry Society	Chapters 6 & 7	(Open Spaces and the Water Environment and Biodiversity and Green Infrastructure) look like add on's and are not well incorporated in the document since there are no references to these sections in the Executive Summary or the Overview.	Comment noted. Relevant changes to be made to executive summary.	Executive summary amended.
OS40	The Coventry Society	Executive Summary	There is a reference to the improvement to archaeology in the first paragraph of the Executive Summary but no further reference elsewhere in the document as to how green spaces can help retain or protect archaeology. How is this then a Summary? If archaeology is not considered important then why reference it at all?	Comment noted. The SPD is underpinned by Policy GE1 of the Local Plan. The reference to archaeology is contained within that policy. All development proposals must have regard for the historic environment and therefore any open spaces which is created as a result of a new development must also respect and enhance the	No change

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				historic environment.	
OS41	The Coventry Society	Executive Summary	Third para needs an addition at end 'or in the city centre inside the Ring Road', in order to properly reflect the wording in para 4.15 (p14)	Agreed. Amend third para of Exec summary to read "If the quantitative requirement is greater than or equal to the minimum size standard (0.1ha), that requirement should be delivered on-site. If the quantitative requirement is lower than the minimum size standard, or is in the City Centre, within the ring road".....	Executive summary amended to reflect change
OS42	The Coventry Society	Para 1.3	Needs to start 'Well planned and maintained open spaces can...' as 'It' can be taken to refer to the foregoing para referencing new development	Agreed	Make change to para 1.3 as suggested
OS43	The Coventry Society	Para 1.4	First sentence is contentious and unnecessary. This Overview needs to link to S6 (notably SUDS and the need for additional water storage in greenspaces (6.32) and S7 (esp 7.4 and the introduction to 7.6).	Comment noted. Consider first sentence to be appropriate in context.	No change
OS44	The Coventry Society	Para 1.15	Need to separate out 'Alleviation of flood risks' from 'Instilling unique character to areas and providing local identities'. An additional benefit which should be added is 'supporting early years development and education'.	Agreed	Make change to para 1.15 as suggested.

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OS45	The Coventry Society	Paras 3.6-3.8	Green Space and Open Space definitions and recommendations 3.6-3.8 focus on equipped play areas. They ignore the guidance from Fields in Trust on playing pitches and outdoor sports. Why? Surely such provision could and should be made in relation to larger development sites?	The Open Spaces SPD focuses on the provision of green and open spaces. The playing pitch strategy is the document which will provide detail on the provision of sports pitches and wider sports provision. This is currently being updated.	No change
OS46	The Coventry Society	Para 3.8	3.8 is fundamentally wrong. Fields in Trust guidance is for the distances of playgrounds from residential properties to be a maximum not a minimum! How far have young parents to take their children to play?!	FiT document as referenced in this SPD (https://www.fieldsintrust.org/Upload/file/guidance/Guidance-for-Outdoor-Sport-and-Play-England.pdf) provides a recommendation using benchmark guidelines and distances are neither maximum nor minimum as the guidance also sets out that the local context is important.	Replace 'minimum' with recommended in para 3.8 to reflect the FiT wording

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<p>OS47</p>	<p>The Coventry Society</p>	<p>Para 4.15</p>	<p>The Planning Process : how development must contribute Para 4.15 refers to exceptional circumstances where off-site contributions are needed. These are not set out clearly, however. Derived from the rest of the document, they appear to be - site is too small (4th para of Summary and 4.11) - demonstrable surplus of existing open space in a locality (4th para of Summary only?) - development inside the Ring Road (this para). This para needs to be expanded to reflect the circumstances that are regarded as exceptional.</p>	<p>Comment noted. 1.15 amended to include: ' By their very nature, exceptional circumstances are often site specific but may include viability or physical space due to the layout or size of site. Therefore, should there be instances where on-site provision cannot be undertaken, or where a cumulative and joined up approach is taken by multiple stakeholders, relevant justification must be provided to the satisfaction of the council.'</p>	<p>Expand para 4.15 to clarify exceptional position.</p>
<p>OS48</p>	<p>The Coventry Society</p>	<p>Para 4.16</p>	<p>4.16 is under heading Securing Delivery. This should be the first para in the next section 'Implementation'.</p>	<p>Comment noted but considered that this is in the correct location as negotiating planning obligations needs to be undertaken</p>	<p>No change</p>

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				before the scheme can be implemented.	
OS49	The Coventry Society	Para 5.3	Introduces a key requirement for developers i.e. POS must be completed to the Council's reasonable satisfaction before 50% of houses are occupied on site. This is significant information for developers. It surely needs a justification and a reference in the Executive Summary.	Paragraph 5.3 to be amended to provide the justification ie ensuring occupiers have timely access to open space but also to reflect the reality of site delivery so the threshold is increased to 75% in line with feedback from the development industry	Threshold figure amended at 5.3 and included in executive summary with justification.
OS50	The Coventry Society	Chapters 6&7	Sections 6 and 7 appear standalone and appear to have come from external sources. They are not at all well integrated into the document. If they are to be taken seriously by developers in their development proposals then they need to be referenced in the Executive Summary and the Overview. See earlier comments.	Expand reference to relevant areas in executive summary and overview.	Expand reference to relevant areas in executive summary and overview.
OS51	Turley for University of Warwick	Chapter 3	This section of the document notes that green infrastructure assets may be classified as 'formal', 'informal' and 'functional'; with both schools and hospitals categorised as 'formal'. We would take this opportunity to clarify that the University of Warwick campus includes extensive areas of landscape which fall within each of these definitions.	Comment noted. The council recognises the cross-cutting nature of the typologies, as set out in section three of this SPD, the Green Space Strategy and the Coventry Local Plan.	No change.

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OS52	Turley for University of Warwick	Para 3.5	The recommendations for open space (at Section 3.5) are broadly supported. We would suggest that the circumstance is noted where cumulative needs may indicate that a joined up and coordinated approach to open space delivery, may yield greatest benefit. This may apply to the University campus or indeed to broader strategic housing releases, for example.	Add a para re. cumulative needs and co-ordinated delivery at 3.5.	Change made as per officer comments.
OS53	Turley for University of Warwick	Para 4.15	Off Site Contributions The SPD confirms that 'off site' contributions to open space may be appropriate, only in certain circumstances – such as for sites within the ring road where provision may be unrealistic. We would suggest that offsite contributions may also be appropriate in circumstances where there is a cumulative need and where there is an opportunity for stakeholders to agree a coordinated and joined up strategy for open space delivery and derive greater benefit.	Agreed. Joined up approach added to 4.15	Joined up approach added to 4.15
OS54	Savills for Barratt	Appendix 3	The SPD requires for a total of 3.11ha of public open space to be provided per 1,000 people. Appendix 3 of the SPD states that all residents should be within: 1,200m of a District Level Space; within 800m of a Neighbourhood level space, or 400m of a Local Level Space. Appendix 3 also sets out further detail on children's play space requirements including the distance from existing facilities (e.g. a LAP within 100m) and where they should be located on sites (e.g. a LAP 5m from a proposed dwelling boundary). The SPD should not place any onerous distance requirements on developers. Barratt consider that the location of open space and play space on a site should be agreed on a site by site basis and determined on constraints/ opportunities within the site (e.g. accessibility and layout) as well as the surrounding context (e.g. connections to the existing green infrastructure network).	The distances are taken from the Field in Trust benchmarking : this is established guidance but it incorporates flexibility to enable local context to be reflected.	Amend bullet one of 3.6 to reflect the need to take into account Fields in Trust Guidance..
OS55	Savills for Barratt	Appendix 3	Appendix 3 also requires formal open space to achieve a quality standard of 70 (out of 100) and informal green space to score 60 (out of 100) to achieve the Green Flag Award. All informal green spaces should achieve a minimum of 'good' against the Green Flag Award Standard. The PPG states that SPDs should build upon policies in a	Comment noted. This reflects wording of existing documents. Re-word Appendix 3 to	Amend appendix 3 in line with officer comments.

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			local plan but “they should not add unnecessarily to financial burdens on development” (Reference ID: 61-008-20190315). The Green Flag standards are not a national requirement and its impact on the delivery of development sites has not been assessed as part of the SPD. Barratt therefore consider that Appendix 3 and the SPD should be reworded to incorporate some flexibility to ‘encourage’ applicants to ‘aim or aspire to achieve the relevant Green Flag standards’.	incorporate references to the adopted Green Space Strategy and Local Plan Policy GE1.	
OS56	Savills for Barratt	Paras 1.9 & 3.5	The SPD also states that open space should be connected to existing open space (paragraph 1.9) and should usually form part of a central feature [3.5]. We do not support the central provision of open space and consider that it should be determined on a site by site basis and its location being based on the most suitable part of the site to achieve the requirements of Policy GE1.	Comment noted. Change para 3.5 to reflect Local Plan policies GE1 and DE1 which set out how open space can be designed as an integral part of a development.	Change para 3.5 in line with officer comments.
OS57	Savills for Barratt	Para 4.15	Paragraph 4.15 states that “there may be exceptional circumstances where off site contributions are needed” [Savills emphasis]. The SPD does not explicitly set out what the Council consider are exceptional circumstances. However, it is considered that in part / whole off-site provision should be agreed on a site by site basis where there is reasoned justification.	Amend 4.15 to read: ‘By their very nature, exceptional circumstances are often site specific but may include viability or physical space due to the layout or size of site. Therefore, should there be instances where on-site provision cannot be undertaken, or where a cumulative and joined up approach is taken by	Change 4.15 in line with officer comments.

				multiple stakeholders, relevant justification must be provided to the satisfaction of the council.'	
OS58	Savills for Barratt	Para 5.3	Paragraph 5.3 states that “prior to Occupation of 50% of dwellings provided on site, the Owner shall complete public open spaces to the reasonable satisfaction of the Council”. We do not support a city-wide blanket trigger being included within the SPD. The trigger for the provision of on-site open space should be determined by the scale of the site and the location of the open space relative to the site compound. Barratt therefore request that paragraph 5.3 is amended to remove reference to 50% occupation and be reworded to state that triggers will be agreed on a site by site basis. The SPD could ‘encourage’ applicants to deliver public open space at the earliest opportunity.	Comment noted see response to OS71. It is considered that ‘at the earliest opportunity’ is too vague, however an increase to 75% is felt to be reasonable and realistic.	See OS71, change to 75%.
OS59	Savills for Barratts	Para 6.15 & Chapter 7	Biodiversity net gain is referred once in the document and there is no specific percentage requirement quoted. Barratt supports this given the SPD provides guidance on local plan policies and the adopted Local Plan has not been updated to address the 10% requirement in the Environment Act.	Section 7 to be updated to reflect recent change regarding the Environment Act. The Council will be producing a biodiversity SPD later in 2022.	Add reference to Environment act in section 7 at para 7.8
OS60	Pegasus for Persimmon		In terms of the overview of the document, Persimmon welcomes the confirmation that Coventry City Council consider water to fall within the definition of greenspace (a subset of open space), in accordance with the definition of open space included in the National Planning Policy Framework (NPPF, 2021 – Annex 2: Glossary, page 70). This provides helpful clarity that on-site SuDS and open air drainage should	Comment noted.	No change

			be considered to form part of the on-site open space provision. This approach is supported.		
OS61	Pegasus for Persimmon	Chapter 3	<p>Green and Open Space definitions and recommendations</p> <p>This section of the SPD sets out the various typologies of green space and assigns them to three overarching categories (see Table 1). It should be acknowledged that the typologies cannot be sorted into distinct categories and that there is an inevitable degree of overlap between categories.</p> <p>For example, function green space is listed as including sustainable urban drainage schemes and flood storage areas.</p> <p>However, in Table 1 natural and semi-natural green space (including wetlands) and amenity green space (including space for the enhancement of the appearance of areas) would likely include SuDS ponds and other drainage features but both are categorised as informal green space. This demonstrates how the categories will inevitably overlap and the need for the Council to take a flexible approach when attempting to split green space provision into categories.</p>	Comment noted. The council recognises the cross-cutting nature of the typologies, as set out in section three of this SPD, the Green Space Strategy and the Coventry Local Plan.	No change.
OS62	Pegasus for Persimmon	Para 3.5	<p>One of the recommendations is that open space should usually form a central feature and incorporate significant existing landscape features wherever possible. This is generally supported however there needs to be a flexible approach depending on site-specific characteristics, for example existing landscape features will not always be centrally located so open space should be located in the most advantageous location given the specific characteristics of each site.</p>	Comment noted. The word usually is included in the para and therefore provides sufficient flexibility.	No change
OS63	Pegasus for Persimmon	Para 3.6	<p>Paragraph 3.6 continues the recommendations specifically in relation to equipped play areas. The first recommendation states that equipped play areas should be sited at least 30 metres from the centre point of the building of the nearest residential property. It is not clear what evidence this recommendation is based on, particularly as the following paragraphs (see 3.8) make reference to the Fields in Trust (FiT) which also contains guidance on separation distances for different types of equipped plays areas. Fields in Trust recommends</p>	Amendment to be made to 3.6 to reference Fields in Trust recommendations.	Amend 3.6 to reference Fields in Trust recommendations.

			<p>the following buffer zones between the activity zone and nearest property containing a dwelling:</p> <ul style="list-style-type: none"> • LAP – 5m • LEAP – 20m • NEAP/MUGA – 30m <p>It is suggested that this guidance should be referred to so it clear that different types of equipped play areas should have different separation distances. This would ensure that the SPD is consistent with the national guidance. It should also be acknowledged that this is recommended guidance rather than a strict minimum separation distance and the guidance should be applied flexibly in recognition of different site circumstances.</p>		
OS64	Pegasus for Persimmon	Para 4.1	<p>Paragraph 4.1 recommends that a stand-alone green infrastructure parameters plan is provided as part of any major planning application where on-site open space is to be provided. It is not clear if major planning application is referring to any application over 10 dwellings. The statutory definition for major development is contained within the Town and Country Planning Development Management Procedure Order, which defines major development as where the number of dwellinghouses to be provided is 10 or more, or the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within subparagraph (c) (i). This could helpfully be clarified within the SPD. Parameter plans are usually only provided for large-scale applications which are accompanied by an Environmental Statement (ES). Whilst it is acknowledged that such a plan could be helpful for these types of applications it should not be a requirement for all major planning applications.</p>	<p>Parameters plans are helpful so they are to be ‘strongly encouraged’ and the wording amended to reflect this. The paragraph will also be amended to provide clarity: ‘All major applications where the minimum threshold for delivering on-site open space is 0.1ha or more’.</p>	<p>Amend in line with officer comments.</p>
OS65	Pegasus for Persimmon	Table 5	<p>The tables and worked examples to calculate population and open space requirements for a site is helpful and provides greater certainty for developers. The exemptions for 1 bedroom dwellings, student accommodation, extra care and HMOs from providing equipped play areas is supported as these types of accommodation do not generate</p>	<p>Para 3.3 acknowledges the multi-functional nature of the typologies.</p>	<p>No change</p>

			<p>demand for this type of open space. Table 5 sets out the minimum requirements for onsite open space by planning classification. As set out above, these classifications will overlap, particularly informal and function green space, so provision of on-site open space will need to be considered as a whole rather than in strict categories. This should also reflect site specific characteristics and existing open space provision in the local area.</p>		
OS66	Pegasus for Persimmon	Para 4.12	<p>Paragraph 4.12 sets out that open spaces that do not meet the required minimum size standard will not count towards meeting the quantitative requirement. The paragraph continues that this should not preclude the incorporation of grass verges, planted areas and other smaller landscaping features within development schemes. It is not clear why these types of open space should be excluded from forming part of the quantitative requirement. Furthermore, by not including such features within POS calculations would inevitably discourage the provision of smaller scale landscaping features which form an important part of overall amenity green space and are important in achieving good design. The SPD should be amended to allow smaller areas of amenity green space to contribute towards achieving the quantitative requirement.</p>	<p>The intention of this commentary is to ensure developments provide some visually attractive and soft landscaped elements. It is not agreed however that they should contribute to the overall calculations as open space needs to be functional and useable. Para to be amended to state 'Areas of incidental open space that cannot be reasonably used or accessed by the public should not be counted towards meeting the quantitative requirement.'</p>	<p>Amend 4.12 in line with officer comments.</p>

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OS67	Pegasus for Persimmon	Para 4.13	It is understood that open space requires ongoing, long-term management and maintenance (paragraph 4.13). The SPD suggests that open space may be adopted by the City Council, which would require a commuted sum which will be determined on a case by-case basis. It would be helpful if the SPD could clarify under what circumstances that City Council would look to adopt on-site open space and the basis on which the commuted sum is to be calculated.	Comment noted. This will be determined on a case by case basis.	No change
OS68	Pegasus for Persimmon	Appendix 2	In Appendix 2 Section 106 Template, paragraph 1.8 states that 'in the event the Owner offers the Open Space to the Council' and paragraph 1.9 continues that 'If the Owner elects to transfer the Open Space to an Open Space Management Company or the Council declines to accept the Open Space'. This wording leaves both options open for the Owner to decide which option is best for a specific site. Persimmon Homes support this approach and this should be reflected in the main text of the SPD.	Comments noted. It is considered that the point is sufficiently made already.	No change
OS69	Pegasus for Persimmon	Para 4.14	Paragraph 4.14 continues that indicative costings for formal open space provision are included at Appendix 4. These are 2019 costings and will be refreshed when new costings are available. It would be helpful if this SPD could include updated costings. It is acknowledged that costings should have some flexibility to reflect site-specific factors but it would be helpful if the SPD could clarify these are maximum costings and site-specific factors would lead to relevant reductions.	As stated in 4.14, these are indicative costings and are the most recent currently available. They are not maximum costings, they are a guideline. Para 4.14 provides flexibility to enable consideration on a site by site basis.	No change
OS70	Pegasus for Persimmon	Para 4.15	Paragraph 4.15 confirms that off-site delivery may be required in certain circumstances. The SPD cites location (within the ring road) as an example of when off-site provision would be appropriate. The approach of allowing for off-site contributions in certain circumstances is supported and this should include sites where the	Comments noted. This would be considered on a case by case basis.	No change

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			locality already has nearby open space provision where a contribution to upgrade these facilities would be better for the area than additional on-site provision which would duplicate and compete with existing open space provision.		
OS71	Pegasus for Persimmon	Para 5.3	Paragraph 5.3 suggests a trigger of 50% occupation. This is unlikely to be feasible for many sites as it is not practical to complete open space while construction is ongoing nearby. It is suggested that a trigger of 75% is more appropriate. The trigger would also need to allow for open space delivery to be phased on larger developments.	Agreed that 75% is an acceptable trigger which, in the case of phased developments will be applied to each separate phase.	Change trigger to 75% in 5.3
OS72	Pegasus for Persimmon	Para 5.4	Paragraph 5.4 states that off-site facilities will be dealt with through Section 106 Legal Agreements. This is generally supported although the SPD should allow for this to be dealt with through Unilateral Undertaking when required.	Comment noted. The Council's preference is for the use of s106.	No change
OS73	Pegasus for Persimmon	Para 6.10	In terms of existing ponds, paragraph 6.10 states that these should be retained and not used or enhanced as SuDS. The retention of existing ponds where possible is supported however it is not clear why these should not be used or enhanced as SuDS. This approach has been used on schemes within the City with the agreement of the lead local flood authority. If there are no technical reasons why an existing pond should not be utilised or enhanced as SuDS then this should be permitted. Indeed, this approach is likely to encourage the retention of existing ponds and integrate them into the drainage solution for sites. The integration and enhancement of existing ponds also has the potential to offer significant ecological benefit.	Noted. The paragraph states 'usually', which does provide flexibility depending upon the local context. Amend paragraph to replace 'should' with 'recommended'.	Make change as set out in officer comments.
OS74	Pegasus for Persimmon	Chapter 6	This section continues that the Council's preference is for above ground SuDS and acknowledges that this is therefore often located within development greenspaces. The preference for above ground SuDS is supported although there will be sites where this approach is not practical or feasible in which circumstances exceptions will need to be made. The acknowledgement in the SPD that above ground SuDS form part of a sites green space provision is supported and this	Comments noted. The SPD sets out the Council's recommended approach but there is flexibility to allow	No change

			<p>‘functional’ green space should not be excluded when calculating the open space requirements. As set out above, areas including SuDS often form part of amenity green space and can contribute to visual amenity function of public open space. Attractive walking routes may be provided around SuDS features, which can often be engineered to be either wet or dry depending on the site context, to encourage residents to make use of and enjoy these areas of POS. In addition, SuDS as part of wider open space provision can provide significant ecological benefits and contribute towards wider linkages. It is clear that above ground SuDS have a range of benefits, are the Council’s preferred option and their provision should be further encouraged through their inclusion as part of open space requirement calculations.</p>	<p>for local circumstances.</p>	
OS75	Pegasus for Persimmon	Para 6.18	<p>Paragraph 6.18 states that the Council will consider adoption of open-air SuDS within areas of open space, subject to a commuted sum. It would assist if the SPD could set out the circumstances under which the Council would look to adopt SuDS and provide guidance regarding the commuted sum required.</p>	<p>This will be considered on a case by case basis subject to consultation with Coventry city Council Lead Local Flood Authority.</p>	No change
OS76	Pegasus for Persimmon	Para 6.19	<p>Paragraph 6.19 sets out the SuDS features have been mistreated in the past, particularly for the disposal of rubbish and suggests this should be addressed within asset maintenance plans. This could be addressed through open space management and maintenance plans which can be secured via an appropriately worded condition</p>	<p>It is considered that this paragraph provides sufficient flexibility.</p>	No change
OS77	Pegasus for Persimmon	Para 6.20	<p>Paragraph 6.20 considers development contributions related to greenspaces and water – specifically contributions to reduce flood risk, improve the water environment and safeguard against the future impacts of climate change and development creep. This is beyond the scope of an Open Space SPD and would instead need to be addressed through a Local Plan Review in line with the Planning Obligations PPG which is clear that policies for planning obligations should be set out in plans and examined in public (Paragraph 004). Furthermore, these</p>	<p>Comment noted. All s106 requests will be compliant with reg 122 of the CIL regulations 2010. This is set out in para 6.22 which references the NPPF.</p>	<p>Amend para 6.22 to reference the correct version of the NPPF</p>

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			contributions are technical in nature and would need to be assessed and requested by the lead local flood authority rather than through open space. This paragraph should be removed from the SPD.	The NPPF paragraph reference will be updated to reflect the July 2021 version.	
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Strategic Environmental Assessment

Comment Reference	Respondent	Page/Para reference	Consultation Response (Summary)	Officer Response	Proposed Change
OS SEA 1	Historic England	SEA	Document unlikely to result in significant environmental effects, as it will provide additional guidance on existing adopted policies. Agree no requirement to undertake an SEA.	Comments noted	No change
OS SEA 2	Natural England	SEA	It is our advice, on the basis of the material supplied with the consultations, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plans. Natural England therefore agrees with your conclusions that an SEA is not required for the separate SPD's.	Comments noted.	No change

Equality Impact Assessment

Comment Reference	Respondent	Page/Para reference	Consultation Response (Summary)	Officer Response	Proposed Change
OS EIA 1	Jos Bigham	EIA	Within the EIA, the section on 'Sex' needs to be looked at again in terms of women's perception of personal safety in public places. There have been several high-profile	The EIA accompanying the SPD sets out the criteria by which any impact of a specific	Amend para 3.5 of the SPD in line with officer comments and include

			<p>murders of women recently in the media which have highlighted this issue e.g., Sabina Nessa, Sarah Everard, Julia James, and it has triggered the set-up of movements such as 'Reclaim the Streets'. Without putting mitigations in place, women may underuse open spaces and this could be perceived as a form of discrimination affecting their health and well-being.</p>	<p>group, the SPD may have from an equality perspective.</p> <p>In relation to the content of the SPD itself, the document provides guidance on the provision of open space as part of new developments. Paragraph 3.5 discusses the need for open spaces to be designed and located in a manner which reduces opportunity for crime. This will be strengthened adding text that reads 'Open space should be designed and located to reduce opportunities for crime in line with Secured by Design guidance and any other good practice which secures safe open spaces for all users and especially those with certain protected characteristics (footnote to the Equality Act 2010) who may be particularly vulnerable.'</p>	<p>reference to safety and good design in the EqIA.</p>
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APPENDIX 3

Strategic Environmental Assessment of the Open Space Supplementary Planning Document

Coventry City Council

Strategic Environmental Assessment Screening Assessment

February 2022

1. Introduction

- 1.1 This screening report has been produced to consider whether the Open Space Supplementary Planning Document (SPD) prepared by Coventry City Council should be subject to a Strategic Environmental Assessment (SEA) in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004, as amended by The Environmental Assessments and Miscellaneous Planning (Amendment)(EU Exit) Regulations.
- 1.2 Paragraph: 008 of the Planning Guidance¹ states that supplementary planning documents may in exceptional circumstances require SEA if they are likely to have significant environmental effects that have not already been assessed during the preparation of the relevant strategic policies. This screening statement considers whether there are any impacts which have not already been assessed within the Coventry Local Plan which was adopted on 6th December 2017², and determines whether or not SEA is needed for this SPD.

2. The Open Space SPD: Context

- 2.1 The Draft Open Space SPD sets out further detail on existing policies contained within the Coventry City Council Local Plan, in particular Policy GE1: Green Infrastructure. The Local Plan is the City Council's statutory planning framework which sets out how and where new homes, jobs, services and infrastructure will be delivered and the type of places and environments that will be created, enhanced and protected.
- 2.2 Requiring developers to provide open space as part of their proposals is a key requirement of Policy GE1 (Green Infrastructure) of the adopted Coventry Local Plan.
- 2.3 The additional guidance provided within the SPD aims to provide clear information for developers about policy requirements: which developments will trigger a requirement for open space provision, how much open space should be provided, what kind of open space is needed, and clear expectations in terms of design and delivery.

3. The Screening Process

- 3.1 The screening assessment is undertaken in two parts: the first will assess whether the SPD requires screening for SEA and the second part of the assessment will consider whether the SPD is likely to have a significant effect on the environment, using criteria drawn from Schedule 1 of the SEA Regulations.

¹ Reference ID: 11-008-20140306

² <https://www.coventry.gov.uk/localplan>

Table 1: Is SEA screening required?

Environmental Regulations Paragraph detail	Comments
<p>2.(1) In these Regulations- [...] "plans and programmes" means plans and programmes, including those co-financed by the European Community, as well as any modifications to them, which— (a) are subject to preparation and adoption by an authority at national, regional or local level; (b) are prepared by an authority for adoption, through a legislative procedure by Parliament or Government; and, in either case, (c) are required by legislative, regulatory or administrative provisions</p>	<p>Yes, this applies.</p> <p>The SPD is subject to preparation and adoption at local level. Whilst the SPD is not a requirement and is optional under the provisions of the Town and Country Planning Act it will, if adopted, supplement the development plan and be a material consideration in the assessment of planning applications.</p>
<p><u>Environmental assessment for plans and programmes; first formal preparatory act on or after 21st July 2004</u> 5.(2) The description is a plan or programme which— (a) is prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, and (b) sets the framework for future development consent of projects listed in Annex I or II Directive 2011/92/EU(4) of the European Parliament and of the Council on the assessment of the effects of certain public and private projects on the environment.</p>	<p>Yes, this applies.</p> <p>The SPD is prepared for town and country planning purposes. It supplements the planning policy framework of the Coventry City Local Plan, by providing detailed guidance as to how these policies are interpreted for future consent of projects listed in Schedule II of Directive 2011/92/EU(4).</p>
<p>3) The description is a plan or programme which, in view of the likely effect on sites, has been determined to require an assessment pursuant to Article 6 or 7 of the Habitats Directive.</p>	<p>No this does not apply.</p> <p>The SPD is not likely to affect sites and has been determined not to require an assessment pursuant to any law that implemented Article 6 or 7 of the Habitats Directive.</p>

	<p>Habitat Regulations Assessment is not required. The Habitat Regulation Assessment undertaken in 2016 for the Coventry City Local Plan concluded that the plan would not cause a negative effect alone or in combination with other plans. The SPD does not provide any guidance which alters the impact of the policy on designated sites.</p>
<p>6) An environmental assessment need not be carried out— (a)for a plan or programme of the description set out in paragraph (2) or (3) which determines the use of a small area at local level, or (b)for a minor modification to a plan or programme of the description set out in either of those paragraphs,</p>	<p>Yes, this applies.</p> <p>The SPD provides further detail on the implementation of green infrastructure policy within the adopted Local Plan. This applies to the whole administrative area of Coventry City Council.</p>
<p><u>Determinations of the responsible authority³</u> 9.—(1) The responsible authority shall determine whether or not a plan, programme or modification of a description referred to in— (a)paragraph (4)(a) and (b) of regulation 5; (b)paragraph (6)(a) of that regulation; or (c)paragraph (6)(b) of that regulation, is likely to have significant environmental effects. (2) Before making a determination under paragraph (1) the responsible authority shall— (a)take into account the criteria specified in Schedule 1 to these Regulations; and (b)consult the consultation bodies.</p>	<p>This screening opinion has been prepared using the criteria specified in Schedule 1 as presented in Table 2.</p> <p>The statutory bodies (Natural England, Historic England and the Environment Agency) are to be consulted as required.</p>

³ “Responsible authority”, in relation to a plan or programme, means the authority by which or on whose behalf it is prepared (Regulation 2(1)(a))

Table 2: will the SPD have a significant effect on the environment⁴

SEA requirement	Comments
1: The characteristics of plans and programmes, having regard, in particular, to	
(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;	The SPD has a minor role in setting the framework for projects. While the SPD forms a material consideration in decisions on planning applications, it has no influence on the location or volume of projects nor does it allocate resources.
(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;	The SPD does not create new policies but will support the policies in the adopted Local Plan. Other plans and programmes may outlive the SPD and during their preparation will be steered by national legislation and policy.
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	The purpose of the SPD is to provide guidance to support the green infrastructure policy of the adopted Local Plan. The Local Plan SA/SEA assessed this. The purpose of the SPD is to ensure these beneficial impacts of that policy are delivered and maintained which contributes to promoting sustainable development.
(d) environmental problems relevant to the plan or programme; and	There are no environmental problems relevant to this SPD: it elaborates adopted Local Plan policy.
(e) the relevance of the plan or programme for the implementation of retained EU law on the environment (for example, plans and programmes linked to waste management or water protection).	The SPD has no relevance to the implementation of retained EU law.
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to—	
(a) the probability, duration, frequency and reversibility of the effects;	The SPD is not allocating sites for development. The SPD is to provide guidance for the application and implementation of the policies in

⁴ As set out in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

	the adopted Local Plan and is not expected to give rise to any significant environmental effects.
(b) the cumulative nature of the effects;	The SPD is not considered to have any significant cumulative effects. As the document provides further guidance to adopted local plan policies, but does not set policies itself, it cannot contribute to cumulative impacts in combination with the Local Plan.
(c) the transboundary nature of the effects;	There are no transboundary effects as this SPD relates to the Coventry City Council area only. Any potential significant transboundary environmental effects have already been assessed as part of the local plan's sustainability appraisal, the Habitat Regulations Assessment and the plan's examination process.
d) the risks to human health or the environment (for example, due to accidents);	The SPD poses no risk to human health.
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	The SPD relates to Coventry City Council's administrative area only.
(f) the value and vulnerability of the area likely to be affected due to— (i) special natural characteristics or cultural heritage; (ii) exceeded environmental quality standards or limit values; or (iii) intensive land-use;	The SPD relates to the Coventry City Council area only; as no development is proposed via the SPD, which elaborates on existing policy, none of these are likely to be affected by the SPD. Any site-specific matters would be addressed through a planning application specific to an individual proposal.
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.	The SPD relates to the Coventry City Council area only; as no development is proposed via the SPD, which elaborates on existing policy, none of these matters are likely to be affected by the SPD. Any site-specific matters would be addressed through a planning application specific to an individual proposal.

4. Conclusion and Screening Recommendation

4.1 This screening assessment identifies that the SPD will provide guidance to support the green infrastructure policy of the Coventry City Council adopted Local Plan. It is concluded that the SPD is unlikely to have significant environmental effects and therefore that Strategic Environmental Assessment is not required. The three statutory bodies (Natural England, Historic England and the Environment Agency) were consulted between 30th November 2021 and 18th January 2022. Natural England and Historic England confirmed that SEA is not required. No response was received from the Environment Agency.



Title of EIA		EIA Open Space SPD
EIA Author	Name	Clare Eggington
	Position	Principal Town Planner (Planning Policy)
	Date of completion	01/09/2021
Head of Service	Name	David Butler
	Position	Head of Planning Policy and Environment
Cabinet Member	Name	Councillor David Welsh
	Portfolio	Housing and Communities

EIA	<ul style="list-style-type: none"> • Having identified an EIA is required, ensure that the EIA form is completed as early as possible. • Any advice or guidance can be obtained by contacting Jaspal Mann (Equalities) or Hannah Watts (Health Inequalities)
Sign Off	<ul style="list-style-type: none"> • Brief the relevant Head of Service/Director/Elected Member for sign off • Have the EIA Form ready for consultation if it is required • Amend according to consultation feedback and brief decision makers of any changes
Action	<ul style="list-style-type: none"> • Implement project / changes or finalise policy/strategy/contract • Monitor equalities impact and mitigations as evidence of duty of care

PLEASE REFER TO [EIA GUIDANCE](#) FOR ADVICE ON COMPLETING THIS FORM

SECTION 1 – Context & Background

1.1 Please tick one of the following options:

This EIA is being carried out on:

- New policy / strategy
- New service
- Review of policy / strategy
- Review of service
- Commissioning
- Other project (please give details) *Supplementary Planning Document for Open Space*



1.2 In summary, what is the background to this EIA?

The Open Space Planning Document (SPD) adds further details to the Local Plan which was adopted on 6th December 2017 and for which EIA was undertaken. SPDs do not introduce new policy, but provide further detail and guidance to enable the delivery of adopted policies.

The purpose of the Open Space SPD is to set out the Council’s approach towards the provision of public open space in new residential development. It supplements Policy GE1 of the adopted Local Plan, which states that: “new development proposals should make provision for green infrastructure to ensure that such development is integrated into the landscape and contributes to improvements in connectivity and public access, biodiversity, landscape conservation, design, archaeology and recreation”.

The additional guidance provided within the SPD aims to provide clear information for applicants about policy requirements: which developments will trigger a requirement for open space provision, how much open space should be provided, what kind of open space is needed, and clear expectations in terms of design and delivery.

1.3 Who are the main stakeholders involved? Who will be affected?

Developers who are required to deliver open spaces as part of their proposals, those who deliver and maintain the open space, and those members of the community who will use the open space.

1.4 Who will be responsible for implementing the findings of this EIA?

Coventry City Council Planning Policy Service

SECTION 2 – Consideration of Impact

Refer to guidance note for more detailed advice on completing this section.

In order to ensure that we do not discriminate in the way our activities are designed, developed and delivered, we must look at our duty to:

- Eliminate discrimination, harassment, victimisation and any other conflict that is prohibited by the Equality Act 2010
- Advance equality of opportunity between two persons who share a relevant protected characteristic and those who do not
- Foster good relations between persons who share a relevant protected characteristic and those who do not



2.1 Baseline data and information

Please include a summary of data analysis below, using both your own service level management information and also drawing comparisons with local data where necessary (go to <https://www.coventry.gov.uk/factsaboutcoventry>)

The Local Plan was formulated using detailed evidence including the Green Infrastructure Study and Green Space Strategy. The Local Plan was independently examined by a Planning Inspector to ensure that its policies were robust and formulated using appropriate evidence before it could be found sound and capable of adoption. Further detail on the Local Plan and the evidence base can be found here <https://www.coventry.gov.uk/localplan>

This SPD details how the policy will be delivered, providing clear information for developers about policy requirements: which developments will trigger a requirement for open space provision, how much open space should be provided, what kind of open space is needed, and clear expectations in terms of design and delivery

2.2 On the basis of evidence, complete the table below to show what the potential impact is for each of the protected groups.

- Positive impact (P),
- Negative impact (N)
- Both positive and negative impacts (PN)
- No impact (NI)
- Insufficient data (ID)

**Any impact on the Council workforce should be included under question 2.6 – not below*

Protected Characteristic	Impact type P, N, PN, NI or ID	Nature of impact and any mitigations required
Age 0-18	P	Almost a fifth of Coventry City Council’s residents are aged 0-15. Access to open space, including suitable play facilities, is a fundamental need for development, health and wellbeing. 22.5% of children live in low income families which is above the regional and national average (20.2% and 17% respectively) ¹ . Ensuring that developments provide appropriate, safe, accessible, well designed and good quality play and recreation facilities is essential.

¹ <https://www.gov.uk/government/statistics/children-in-low-income-families-local-area-statistics-201415-to-201819>



Age 19-64	P	Access to a network of both formal and informal open space is an essential part of any sustainable community, encouraging exercise and social activity and sustainable travel such as walking and cycling. 67% of Coventry City Council’s residents are aged between 16 and 64. Being of working age, these are the largest group likely to be accessing homes on new developments and will directly benefit from the provision of safe and well designed open space in relation to that development.
Age 65+	P	Access to a network of both formal and informal open space is an essential part of any sustainable community, encouraging exercise and social activity and sustainable travel such as walking and cycling. 13.5% of Coventry City Council’s residents are aged 65 and over and will benefit from a range of good quality, safe and well designed accessible open spaces including those relating to new developments.
Disability	P	Access to a network of both formal and informal open space is an essential part of any sustainable community, encouraging exercise and social activity and sustainable travel such as walking and cycling. Safe and well designed open spaces can positively contribute to mental and physical wellbeing. 17.7% of Coventry City Council’s residents have a limiting long term health problem or disability and appropriate open space provision may have a positive impact.
Gender reassignment	P	No direct impact although individuals may still benefit from safe and well designed open space provision
Marriage and Civil Partnership	P	No direct impact although individuals may still benefit from safe and well designed open space provision
Pregnancy and maternity	P	No direct impact although individuals may still benefit from safe and well designed open space provision
Race (Including: colour, nationality, citizenship ethnic or national origins)	P	No direct impact although individuals may still benefit from safe and well designed open space provision
Religion and belief	P	No direct impact although individuals may still benefit from safe and well designed open space provision
Sex	P	No direct impact although individuals may still benefit from safe and well designed open space provision
Sexual orientation	P	No direct impact although individuals may still benefit from safe and well designed open space provision



HEALTH INEQUALITIES

2.3 Health inequalities (HI) are unjust differences in health and wellbeing between different groups of people which arise because of the conditions in which we are born, grow, live, work and age. These conditions influence our opportunities for good health, and result in stark differences in how long we live and how many years we live in good health.

Many issues can have an impact: income, unemployment, work conditions, education and skills, our living situation, individual characteristics and experiences, such as age, gender, disability and ethnicity

A wide range of services can make a difference to reducing health inequalities. Whether you work with children and young people, design roads or infrastructure, support people into employment or deal with welfare benefits – policy decisions and strategies can help to reduce health inequalities

Please answer the questions below to help identify if the area of work will have any impact on health inequalities, positive or negative.

If you need assistance in completing this section please contact: Hannah Watts (hannah.watts@coventry.gov.uk) in Public Health for more information. More details and worked examples can be found at [https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-\(EIA\).aspx](https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx)

Question	Issues to consider	
2.3a What HIs exist in relation to your work / plan / strategy	<ul style="list-style-type: none"> ● Explore existing data sources on the distribution of health across different population groups (<i>examples of where to find data to be included in support materials</i>) ● Consider protected characteristics and different dimensions of HI such as socio-economic status or geographical deprivation 	
	<p>Response:</p> <p>The Open Space SPD supplements the policies of the adopted Local Plan which was subject to Health Impact Assessment. The Health and Wellbeing chapter of the plan, which includes Policy HW1, requires Health Impact Assessments for particular types and scale of development where there could be significant impacts. See https://www.coventry.gov.uk/localplan This was supplemented by a Health Impact Assessment SPD which provided further detail and guidance including that in relation to open space. See https://www.coventry.gov.uk/downloads/file/28900/health_impact_assessment_spd</p>	



2.3b How might your work affect HI (positively or negatively).

How might your work address the needs of different groups that share protected characteristics

Consider and answer below:

- Think about whether outcomes vary across groups and who benefits the most and least, for example, the outcome for a woman on a low income may be different to the outcome for a woman a high income
- Consider what the unintended consequences of your work might be

Response:

- Potential outcomes including impact based on socio-economic status or geographical deprivation

The Health Impact Assessment SPD referred to above includes the following:

Category 3: Access to open space and nature

Providing secure, convenient and attractive open/green space can lead to more physical activity and reduce levels of heart disease, strokes and other ill-health problems that are associated with both sedentary occupations and stressful lifestyles. There is growing evidence that access to parks and open spaces and nature can help to maintain or improve mental health.

The patterns of physical activity established in childhood are perceived to be a key determinant of adult behaviour; a growing number of children are missing out on regular exercise, and an increasing number of children are being diagnosed as overweight and obese. Access to play spaces, community or sport facilities such as sport pitches can encourage physical activity. There is a strong correlation between the quality of open space and the frequency of use for physical activity, social interaction or relaxation.

Considerations	Negative effects	Positive Effects	Relevant Local Plan Policies and Supplementary Planning Documents
<ul style="list-style-type: none"> • Opportunities for physical activity • Access to open and natural space, including water fronts • Formal and informal outdoor play spaces • Maintenance of open space and sports facilities • Integration with other outdoor uses such as growing food 	Failing to protect local green spaces and playing fields near to communities can limit opportunities for physical activity.	The provision of publicly accessible blue space, green spaces and play spaces can encourage physical activity and maintain or improve mental health	<ul style="list-style-type: none"> • DE1: Ensuring High Quality Design • DS3: Sustainable Development Policy • EM4: Flood Risk Management • EM5: Sustainable Drainage Systems (SuDS) • H3: Provision of New Housing • GE1: Green Infrastructure • GE2: Green Space • IM1: Developer Contributions for Infrastructure
	Green spaces that are of poor quality, feel unsafe, or are inaccessible will discourage physical activity and social interaction	A growing population, particularly an increase in children will require a range of formal and informal play spaces and equipment	
	Failing to provide a range of different types of open and play spaces may place pressure on	Natural spaces and tree cover provide areas of shade and can improve air quality in urban areas	



<ul style="list-style-type: none"> Maximising green infrastructure in urban environments (including green roof systems and gardens and green walls) 	existing spaces where formal and informal activities may conflict with each other	There may be opportunities to integrate play spaces with other related health and environmental programmes such as food growing and increasing biodiversity Green walls can also provide insulation or shading and cooling Green infrastructure can reduce flood risk	<ul style="list-style-type: none"> R2: Coventry City Centre – Development Strategy Community Infrastructure Levy
<p>b. Potential outcomes impact on specific socially excluded or vulnerable groups eg. people experiencing homelessness, prison leavers, young people leaving care, members of the armed forces community.</p> <p>Ensuring access to a range of suitable open spaces in relation to new developments will meet a range of needs and circumstances: this is a key aim of the Local Plan housing and green infrastructure policies and the SPD provides the further detail to ensure that those policies can be delivered.</p>			

2.4 Next steps - What specific actions will you take to address the potential equality impacts and health inequalities identified above?

This was considered through the Local Plan (the ‘parent document’), this document provides the detail to ensure the Local Plan policies can be delivered effectively

2.5 How will you monitor and evaluate the effect of this work?

The Local Plan includes monitoring indicators which includes monitoring new green infrastructure in line with the Green Space Strategy

2.6 Will there be any potential impacts on Council staff from protected groups?

No

You should only include the following data if this area of work will potentially have an impact on Council staff. This can be obtained from: lucille.buckley@coventry.gov.uk

Headcount:



Sex:

Female	
Male	

Age:

16-24	
25-34	
35-44	
45-54	
55-64	
65+	

Disability:

Disabled	
Not Disabled	
Prefer not to state	
Unknown	

Ethnicity:

White	
Black, Asian, Minority Ethnic	
Prefer not to state	
Unknown	

Religion:

Any other	
Buddhist	
Christian	
Hindu	
Jewish	
Muslim	
No religion	
Sikh	
Prefer not to state	
Unknown	

Sexual Orientation:

Heterosexual	
LGBT+	
Prefer not to state	
Unknown	

3.0 Completion Statement

As the appropriate Head of Service for this area, I confirm that the potential equality impact is as follows:

No impact has been identified for one or more protected groups

Positive impact has been identified for one or more protected groups

Negative impact has been identified for one or more protected groups

Both positive and negative impact has been identified for one or more protected groups



4.0 Approval

Signed: Head of Service:	Date:
Name of Director:	Date sent to Director:
Name of Lead Elected Member:	Date sent to Councillor:

Email completed EIA to equality@coventry.gov.uk