
Cabinet Member for Housing and Communities

13 December 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:

Biodiversity Net Gain Supplementary Planning Document - Adoption

Is this a key decision?

No.

Although the matters within the report affect all wards in the city, it is not anticipated that the impact will be significant

Executive Summary:

This report seeks to adopt the Biodiversity Net Gain Supplementary Planning Document (SPD) following public consultation which was undertaken between 06 July 2022 to 17 August 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.

Increasing the sustainability credentials of the city by promoting biodiversity over the Plan period to 2031 is a key objective of the adopted Coventry Local Plan. Biodiversity Net Gain is an approach to development that aims to leave the natural environment in a measurably better state than it was beforehand. From 2023, the Environment Act 2021 will require a minimum of 10% gain as a result of all developments, managed for a minimum of 30 years. The aim of this SPD is to facilitate the delivery of Biodiversity Net Gain as set out in the Environment Act.

The additional guidance provided within the SPD outlines how developments can achieve Biodiversity Net Gain, both through established methods on and off site and other financial mechanisms. This includes outlining relevant policy and legislation. Responses to the consultation have been analysed and taken account of when amending the SPD. The proposed final version is attached at Appendix 1, and a summary of representations along with responses and proposed amendments can be seen at Appendix 2.

Recommendations:

1. That Cabinet adopts the Biodiversity Net Gain Supplementary Planning Document (SPD)
2. That Cabinet delegates to the Strategic Lead (Planning) in 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: Biodiversity Net Gain 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?

Yes – Scrutiny Board 4, 07 July 2022

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: Draft Affordable Housing Supplementary Planning Document

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 Delivering sufficient biodiversity enhancement over the Plan period to 2031 is a key objective of the adopted Coventry Local Plan ('the development plan'). The aim of this SPD is to facilitate the delivery of biodiversity net gain as set out in the plan and in compliance with the most up to date national policy as set out in the Environment Act 2021.
- 1.3 DEFRA's revised UK Biodiversity Indicators 2021 defines biodiversity as "the variety of all life on Earth. It includes all species of animals and plants, and the natural systems that support them. Biodiversity matters because it supports the vital benefits we get from the natural environment. It contributes to our economy, our health and wellbeing, and it enriches our lives". Across the country biodiversity is being lost and it is accepted that this loss must be reversed before the impact becomes unsustainable.
- 1.4 Biodiversity Net Gain delivers measurable improvements for biodiversity by creating or enhancing habitats in association with development. Biodiversity net gain can be achieved on-site, off-site or through a combination of on-site and off-site measures. The delivery of on-site measures, made accessible to existing and new residents, is the Council's preferred outcome.
- 1.5 Under the Environment Act 2021, planning permissions granted in England will have to deliver at least 10% biodiversity net gain from an as yet unconfirmed date (expected to be in November 2023). Biodiversity Net Gain will be measured using DEFRA's biodiversity metric and this net gain must be protected for at least 30 years.
- 1.6 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. Consultation for this report took place between 06 July 2022 to 17 August 2022.
- 1.7 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. 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.

- 1.8 Finally, an Equalities Impact Assessment (EIA) been undertaken, this is attached at Appendix 4 and was publicly consulted on.
- 1.9 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 of this Cabinet report.

2. Options considered and recommended proposal

- 2.1 Cabinet may wish for the Council to rely upon the Environment Act, the current Local Plan policies, and the National Planning Policy Framework. However, this would not honour the commitment of the adopted Local Plan to replace the outdated guidance and would mean the council is primarily reliant upon Local Plan and national policy without any further clarification which also reflects the local context. Therefore, this option is not recommended.
- 2.2 The recommendation is to adopt a new Biodiversity Net Gain SPD, as per Appendix 1, This approach is recommended in order to ensure Council guidance reflects National Policy as outlined in the 2021 Environment Act. This will accurately reflect the adopted Local Plan and subsequent changes to national policy and ensure delivery in accordance with local need.

3 Results of consultation undertaken

- 3.1 Public consultation was undertaken between 06 July 2022 to 17 August 2022. The minimum statutory period for SPD consultations is four weeks, the council's Statement of Community Involvement recommends six weeks.
- 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 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 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 internal guidance although no external responses were received on the matter.

4 Timetable for implementing this decision

4.1 The SPD can be adopted as soon as practicable.

5 Comments from the Director of Finance and the Director of Law and Governance

5.1 Financial implications

There are no financial implications associated with this report.

5.2 Legal implications

5.1 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 by creating an attractive, cleaner and greener city and enhancing the quality of public 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

The nature of SPD is inherently environmental. The promotion of biodiversity and enforcement of long term, significant biodiversity net gain will enhance the prioritisation of green spaces and the natural environment. The enhancement of green spaces will have numerous environmental benefits that reduce the impacts of climate change, such

as improving drainage and reducing flood risk, air pollution and the urban heat island effect.

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 biodiversity net gain.

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www.coventry.gov.uk/councilmeetings

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Coventry City Council
Biodiversity Net Gain
Supplementary Planning Document
December 2022

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Executive summary

This document is Coventry City Council's Biodiversity Net Gain Supplementary Planning Document (SPD)

The purpose of this SPD is to give more detailed guidance on Local Plan Policy GE3: Biodiversity, Geological, Landscape and Archaeological Conservation and its aims to:

- a. lead to a net gain of biodiversity, where appropriate, by means of an approved ecological assessment of existing site features and of the impacts of development;
- 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.

Biodiversity Net Gain is an approach to development that aims to leave the natural environment in a measurably better state than it was beforehand. From 2023, the Environment Act 2021 will require a minimum of 10% gain as a result of all developments, managed for a minimum of 30 years.

By providing more details around Policy GE3 and the Environment Act 2021, this SPD will help protect and enhance biodiversity in the city by giving clear and understandable advice to people who want to develop in Coventry, which could otherwise reduce the city's biodiversity.

This detail includes a more specific breakdown of how different developments can avoid biodiversity loss where possible, and then offset other losses either on or off site.

The document cannot establish new planning policy relating to improving biodiversity in the city, but the document is intended to be used by developers to make it easier for them to protect the green environment. This will help improve biodiversity throughout the city and contribute to reversing biodiversity loss

1 Introduction

Purpose

- 1.1 Supplementary Planning Documents (“SPDs”) add further detail to policies contained within the development plan and are used to provide guidance on specific sites or particular issues. SPDs do not form part of the adopted development plan but they are a material planning consideration in decision taking.

Aims and objectives

- 1.2 This SPD provides guidance on achieving Biodiversity Net Gain (BNG) from any new development. BNG is achieved when a development leads to an overall increase biodiversity relative to the site beforehand. This Biodiversity Net Gain SPD sets out how this can be achieved in Coventry using established methods.
- 1.3 The purpose of this SPD is to provide information regarding how developers are able to deliver BNG and what contributions may be required. The circumstances and mechanisms for providing BNG are set out including how any financial contribution will be agreed and appropriate projects delivered.
- 1.4 This SPD is designed to assist prospective developers and applicants by providing guidance on how proposals can demonstrate they have met the requirements of planning policy related to biodiversity net gain in Coventry. By providing this information upfront Coventry City Council intends to provide additional clarity in the development process and ensure negotiating obligations is based on a clear and consistent approach.

2 Context

Biodiversity

- 2.1 “Biodiversity is the variety of all life on Earth. It includes all species of animals and plants, and the natural systems that support them. Biodiversity matters because it supports the vital benefits we get from the natural environment. It contributes to our economy, our health and wellbeing, and it enriches our lives”¹
- 2.2 Across the country Biodiversity is being lost and it is accepted that this loss must be reversed before the impact becomes unsustainable².
- 2.3 Coventry is a largely urban area but does include a number of significant wildlife sites. Community surveys in Birmingham city have found over 2,300³ species of plants and animals (iNaturalist, June 2022) and the total number is likely to be significantly higher. Whilst Coventry has less volume of community biodiversity surveys than Birmingham currently, it is reasonable to assume that it will have similar biodiversity.

¹ UK Biodiversity Indicators 2021 Revised, DEFRA, 2021

² Biodiversity 2020: A strategy for England’s wildlife and ecosystem services, DEFRA, 2011

³ https://uk.inaturalist.org/observations?place_id=53760

Biodiversity net gain

- 2.4 Biodiversity Net Gain delivers measurable improvements for biodiversity by creating or enhancing habitats in association with development. Biodiversity net gain can be achieved on-site, off-site or through a combination of on-site and off-site measures. The delivery of on-site measures, made accessible to existing and new residents, is the Council's preferred outcome.
- 2.5 Developments may deliver biodiversity gain by
- a. Providing enhancements to habitats and wildlife on site
 - b. Providing enhancements to agreed sites elsewhere
 - c. Purchasing biodiversity credits
- 2.6 The required gain in the Environment Act is a minimum of 10%⁴ with sites managed for a period of not less than 30 years. Research has shown that in practice biodiversity will continue to decrease unless development provides significantly greater gain and that sites managed for longer periods⁵. Coventry is developing a network of different biodiversity offset sites where net gain can be achieved cost-effectively (Appendix 3). The network will be extended as further opportunities arise.

3 Relevant Policy and legislation

National Policy Context

- 3.1 Section 40 of the Natural Environment and Rural Communities Act 2006 includes a requirement for local authorities regarding biodiversity (the Biodiversity Duty). The Environment Act 2021 (Section 102) includes a revision such that there is a new requirement to enhance biodiversity in all activities.
- 3.2 The Government's National Planning Policy Framework⁶ has at its heart the core principle of sustainable development and set out a number of requirements related to the securing of biodiversity net gain through the planning system. The key sections of the NPPF that are relevant to biodiversity are:
- a. Section 8: healthy and safe communities
 - b. Section 15: conserving and enhancing the natural environment.
- 3.3 These sections contain important policy requirements; the following paragraphs are notable:
- 3.4 Paragraph 8c sets out that sustainable development has an environmental objective –
- “to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*

⁴ Environment Bill 2021

⁵ Implementation Gap between the Theory and Practice of Biodiversity Offset Multipliers, Bull, J.W. et al, Conservation Letters, 2017

⁶ Ministry of Housing, Communities and Local Government, July 2021

- 3.5 Paragraph 102 refers to Local Green Space, areas of land with particular importance including “richness of wildlife”. Related policies should be consistent with policies for the Green Belt
- 3.6 Paragraph 174 states that through planning policy and planning decisions, the natural environment should be enhanced by *‘minimising impacts on and providing net gains for biodiversity including by establishing coherent ecological networks that are more resilient to current and future pressures’*
- 3.7 Paragraph 179 provides specific advice on habitats and biodiversity. Section b) states that development plans should *‘identify and pursue opportunities for securing measurable net gains for biodiversity’*.
- 3.8 Paragraph 180 relates to determining planning applications. Section a) establishes the principle that Local Authorities should refuse permission if significant harm to biodiversity cannot be avoided or properly mitigated.

National Planning Practice Guidance

- 3.9 The Government’s National Planning Policy Guidance⁷ explains the key issues in implementing the natural environment policies. The PPG provides advice on what ecological information should be included in an application and the use of planning conditions (Paragraph 018 Reference ID: 8-018-20190721). The guidance provides a definition of net gain (Paragraph: 020 Reference ID: 8-020-20190721) and how this can be achieved (023 Reference ID: 8-023-20190721)

Local Plan policy Coventry Local Plan (2017)

3.10 **Policy DS4 (Part A): General Masterplan principles:**

- 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

3.11 **Policy GE1: Green Infrastructure:**

- 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
- Ensuring that a key aim of green infrastructure is the maintenance and improvement and expansion of biodiversity

3.12 **Policy GE3: Biodiversity, Geological, Landscape and Archaeological Conservation** (See Appendix 1)

⁷ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities & Local Government, July 2019

- 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

4 Achieving Biodiversity Net Gain

Background

- 4.1 The delivery of biodiversity net gain requires that any development delivers more and better-quality biodiversity than would exist without development taking place. Applicants are expected to demonstrate how their proposals meet the policy requirements of the Local Plan by providing clear information that sets out how biodiversity will be improved.
- 4.2 To demonstrate how proposals meet policy requirements applicants should:
- Undertake an ecological assessment of the habitat and key biodiversity features of the site;
 - Use a recognised metric (see paragraph 4.12) to assess the biodiversity value of the site and the impact of the proposed development; and
 - Agree appropriate mitigation for any impact of the development by ensuring that overall, the number of biodiversity units is increased.
- 4.3 All planning applications will be required to submit a biodiversity gain plan which provides information on the site and details how biodiversity will be enhanced. The required amount of information submitted with the application will vary according to the application, see Table 1.

Table 1: Biodiversity enhancement information required by applications

Type of application	Required information
Householder and Minor	Information may be requested on a case-by-case basis.
Pre-Application	Basic site information required; any further details are encouraged.
Major outline and full	Ecological survey of the site with a Biodiversity Impact Assessment using the DEFRA metric, this could be supported by the submission of a Landscape Management Plan.
Reserved Matters	Revised Biodiversity Impact Assessment that reflects any changes made following the Outline Application.

Ecology information regarding net gain is independent of any information regarding legally protected species. All developments which may adversely impact on protected species (e.g., bats, badgers, great crested newts) are required to submit appropriate information with the application.

Ecological surveys

- 4.4 To inform the net gain calculations ecological surveys should be undertaken at the appropriate time of year (see Appendix 2). The following survey information and assessment is required to complete the calculation:
- a. Area of each habitat and length of each linear feature present within the red line of the application;
 - b. Habitat type according to the UK Habitat Classification⁸ or other nationally recognised classification, including indicator species (with reference to the guidance provided by Warwickshire Habitat Biodiversity Audit);
 - c. Habitat condition;
 - d. Impact from development based upon current planning layout, both directly onsite, and indirectly offsite; and
 - e. Onsite biodiversity mitigation and compensation measures.
- 4.5 The survey should include the whole of the development boundary (red line) . On a case-by-case basis, applicants may be requested to undertake surveys of adjacent habitats, such as Local Wildlife Sites, where direct impacts are anticipated.
- 4.6 The evaluation of habitats recorded on site should be undertaken with reference to the Warwickshire and Coventry Local Wildlife Site selection criteria. Habitats that meet the selection criteria thresholds should normally be of 'County' value and of 'High or Very High distinctiveness'.
- 4.7 Habitat Condition should be assessed in accordance with the guidance provided with the relevant metric or subsequent guidelines. When assessing any habitats not covered by this guidance, developers and their advisors will be expected to apply evidence based professional judgement and submit any assessment in a written form.
- 4.8 If the biodiversity value of a site has been lowered by any activity after 30th January 2020⁹ (other than with planning permission) with the resulting loss of habitats in advance of a biodiversity metric calculation being undertaken the baseline for the metric is to be taken as the habitats present prior to site clearance. The biodiversity value of the habitats lost is to be estimated based upon a desk-based assessment and professional judgement. The precautionary principle¹⁰ is to be applied where the distinctiveness or condition of the habitats lost is uncertain.

⁸ UK Habitat Classification <https://ukhab.org/>

⁹ Environment Act 2021 Schedule 14 Part 1, 6a

¹⁰ "Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation" Rio Declaration on Environment and Development 1992

Biodiversity Impact Assessment

- 4.9 The Warwickshire Biodiversity Impact Calculator has been in established use in Coventry for a number of years. The metric has been used for a large number of developments and led to successful biodiversity mitigation projects. The DEFRA metric is more recent and will fully replace the Warwickshire BIA and a separate version is available for small-scale developments. All new applications will use the most recent DEFRA metric. Coventry CC will accept the Warwickshire metric where this is a revision of the BIA originally submitted for a development prior to the adoption of this SPD. See Appendix 4 for further details of the available metrics.

Irreplaceable habitat

- 4.10 Sites which include areas of irreplaceable habitat are exempted from the BNG policies and are unable to use any metric to assess the biodiversity value of these areas. If a site does include areas of such habitat and development were acceptable a bespoke agreement with the Council regarding appropriate mitigation would be required. Any site which includes both irreplaceable habitat and other wildlife habitats should use the metric on the other habitats. The DEFRA list of irreplaceable habitats will be used.

Sites with low biodiversity

- 4.11 Certain habitats (e.g., buildings and hardstanding) are considered to have zero biodiversity value. Such sites will be expected to demonstrate an overall improvement in biodiversity in order to meet relevant Council Local Plan policies (Policy GE3). Applicants should note that brownfield sites are capable of having a biodiversity value and this should be assessed as part of the application process.
- 4.12 The Council will advise on any requirement for ecological survey and agree appropriate biodiversity enhancement sufficient to provide an overall net gain. Features such as green walls, green roofs, hedgehog-friendly fencing, hibernacula, containers, and bird/bat boxes will provide appropriate benefits.

Agreeing mitigation

- 4.13 If an impact on an ecological asset is identified, applicants must propose how that impact will be avoided, mitigated, or compensated for in accordance with the mitigation hierarchy.
- 4.14 Where mitigation or compensation is proposed, habitat creation proposals, both on and offsite, should avoid 'down trading' of habitat value by proposing to create habitats of lower distinctiveness than those lost. Any proposed change in habitat must be agreed beforehand, applicants are encouraged to discuss provision of alternative habitats with the Council at the earliest opportunity. It is accepted that in within the urban area of Coventry habitats such as biodiverse roofs, green walls or wildlife-friendly landscaping may provide significant benefits particularly when these are associated with other existing or planned schemes.

- 4.15 Habitat creation proposals must be additional to any existing obligations and not deliver something that would occur anyway (for example through an existing planning permission, Forestry Commission grant or Environmental Stewardship scheme).
- 4.16 All proposals to deliver Biodiversity Net Gain through on-site and off-site habitat creation must be:
- a. In compliance with forthcoming British Standard BS 8683 (Process for designing and implementing Biodiversity Net Gain) (<https://shop.bsigroup.com/products/process-for-designing-and-implementing-biodiversity-net-gain-specification>);
 - b. Agreed in advance with the LPA;
 - c. Evaluated through the use of the Biodiversity Metric;
 - d. Secured by an appropriate agreement to ensure long term management;
 - e. Be supported by a monitoring and management plan (adaptive management plan);
 - f. Included on an offset register; and
 - g. Monitored and reviewed.

Provision of BNG

- 4.17 Coventry City Council has sufficient biodiversity offset sites to meet the expected demand in coming years. Sites have been identified in all parts of the city and provide for the long-term creation and management of a range of different habitats. These sites will be added to the Biodiversity gain site register when this is available (anticipated Spring 2023). Developments will normally be expected to contribute any offsite mitigation required within this scheme by way of a Section 106 contribution. Alternative methods of providing adequate offset through third party schemes or the purchase of Biodiversity Credits will also be considered acceptable in principle. However, each case will be looked at and assessed on its individual merits as to the level of off-setting which will be required and accepted by the LPA.
- 4.18 In order to establish that it is feasible for on and/or off-site habitat creation/enhancement proposals to deliver a net gain for biodiversity developers will be expected to submit detailed, worked up proposals, with the expectation that sites provided within the boundary of the City.
- 4.19 Details of the design, location and extent of any habitat creation proposed will be required. Where offsite habitat creation is proposed it is particularly important that sufficient detail is submitted to reassure the Council that it is feasible that suitable provision can be delivered and maintained in the long term. Developers are encouraged to seek independent professional advice to ensure their proposals meet this requirement and are strongly recommended to make use of

Coventry City Councils' Pre-application service. Any offsite mitigation would be secured by a Section 106 agreement, see Appendix 5.

- 4.20 Where compensation is targeted at a specific species, off site compensation must be delivered in an area where this species is known to occur. Desk and field-based assessments may be required to establish this.
- 4.21 Where off-site habitat provision is necessary, this should be directed to the following areas, as close to the original site as possible:
- a. areas identified by the Ecological Network Map as delivering the most benefit for biodiversity (Core Areas, Corridors and Steppingstone, Restoration areas)
 - b. any designated Wildlife Corridors shown in neighbourhood plans
 - c. areas identified in Local Nature Recovery Strategies.
- 4.22 Habitat creation in these strategically important sites will deliver a greater benefit for biodiversity and so potentially less habitat creation will be required to achieve the same biodiversity benefits.
- 4.23 There is no requirement for compensatory habitats to be subject to public access. However public access is encouraged where this can occur without being detrimental to the value of the habitats created. All of the offset sites within the Coventry scheme include appropriate access and promote community involvement in the sites.

Habitat Banking

- 4.24 If a developer wishes to rely on habitat created by a Habitat Bank, this habitat would usually be in place in advance of a planning application being submitted. Habitat banking is an instrument that can be used to deliver compensation by implementing and pooling compensatory measures in advance of a development, enabling developers to purchase credits from established compensation schemes (habitat banks) to offset their impacts. Credits in the context may be earned through measures to conserve both habitats and species.
- 4.25 Any application which provides an excess of biodiversity units within a development may use these to offset any future projects within Coventry within a two-year period. Any such approach must be agreed beforehand with the LPA with information regarding future development projects provided. Future developments would need to provide an appropriate impact assessment and offset any excess biodiversity loss. Developments are not able to use potential future projects to offset current proposals.

Biodiversity Net Gain and stacking/additionality

- 4.26 Where biodiversity enhancements are required for other purposes (e.g., protected species schemes) these projects will not contribute to BNG offset. For such projects to contribute to BNG they will have to demonstrate additional benefits which are above and beyond any required by other schemes.

Appendix 1: Local Plan policy GE3

1.1 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; and
 - 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.

- 1.2 Planning legislation places a biodiversity duty of care on all local and public authorities, emphasising that development plan policies and planning decisions should be based upon up-to-date information about the environmental characteristics of their area. These characteristics include the relevant biodiversity and geological resources of the area. In reviewing environmental characteristics, the Council will continue to assess the potential to sustain and enhance these resources.
- 1.3 Connectivity between sites and buildings, and resilient and robust ecosystems, which are adaptable to change, are essential to ensure retention of existing levels of biodiversity and to enable these to be enhanced wherever possible. As part of new developments this could be achieved through well designed gardens, green roofs, or landscape features. Resilient and functioning ecosystems support

a range of human population needs, including flood management, control of atmospheric pollution, and access to green space.

- 1.4 In order to restore good levels of biodiversity across the Warwickshire, Coventry, and Solihull sub-region, it is important to have urban areas that are permeable for wildlife, with havens for wildlife through the city and connected corridors linking sites. Green infrastructure planning and implementation can contribute strongly to fulfilling this. Biodiversity will be promoted as a core component of sustainable development and landscapes for living, underpinning social, health, environmental and economic benefits, together with community well-being and local quality of life.
- 1.5 All development proposals will be expected to avoid negative impacts on existing biodiversity. Where this is not possible, mitigation measures should be identified, if these are not possible on site, then these should be offset elsewhere as a compensatory measure, but only in exceptional circumstances. Such circumstances may include the comprehensive delivery of a planned strategic allocation in accordance with a Council approved Masterplan. In all such cases though, compensatory provisions should be made as close to the original site as possible. In this instance development proposals should be guided by the Council's approach to biodiversity offsetting as set out in the Green Infrastructure Strategy, or any subsequent update to this document and national policy. In all instances, the long-term management and maintenance of ecological features must be demonstrated. In order to assist in ecological assessments, the Warwickshire Biological Records Centre should be consulted.

Appendix 2: Survey Season

Table derived from 'Protected species and development: advice for local planning authorities' from Natural England and Department for Environment, Food & Rural Affairs

Key survey period	
Other survey period	

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	
Badgers													
Bats					foraging/commuting								
								swarming					
		hibernation roosts									hibernation roosts		
		preliminary roost assessment											
						summer roosts							
Birds			breeding										
			migration					migration					
		winter behaviour								winter behaviour			
Dormice													
Great-Crested Newts			terrestrial										
		aquatic											
Invertebrates													
Otters													
Reptiles													
Water Voles													
White-Clawed Crayfish													

Appendix 3: Coventry Offset sites

The table below shows sites that have already been identified as providing opportunity for biodiversity enhancement and where potential projects have been identified.

Additional sites will continue to be added where the location is appropriate and site management allows an increase in biodiversity value, these may include smaller areas within existing open spaces.

The DEFRA metric will be used to assess the value of any site prior to any biodiversity projects to ensure that there is an overall net gain.

Offset opportunity	Area (ha)	Notes
Habitat creation sites		
Elm Farm	9.45	Agricultural site, opportunity for woodland, meadow, and other habitats
Habitat enhancement sites		
Leaf Lane	10.44	Meadow
Sherbourne	5.70	Woodland and meadow
Sowe	12.25	Wet woodland, scrub, marsh grassland, river corridor
Leaf Lane2	0.54	Meadow
Caludon	8.11	
Palmer Lane	0.07	Urban habitat
West Academy	3.59	Woodland and ponds (great crested newt)
Longford	4.94	Woodland, marsh, wetland
Bell Green	9.65	Meadow

Appendix 4 – Biodiversity metric

- 1.1 The change in biodiversity due to development is calculated using the most recent version of the DEFRA metric. The Warwickshire Metric will be accepted for older applications where this metric was submitted.

DEFRA metric

- 1.2 ‘Biodiversity Metric 3.0 can be used or specified by any development project, consenting body or landowner that needs to calculate biodiversity losses and gains for terrestrial and/or intertidal habitats. It will be this metric that underpins the Environment Bill’s provisions for mandatory biodiversity net gain in England, subject to any necessary adjustments for application to major infrastructure projects.’
- 1.3 The metric provides a value for the biodiversity value of a site before development and the result of habitats lost and created during development. The metric shows what areas of replacement habitat must be created to offset any loss and considers the location of any offset. The metric does not include any financial estimates
- 1.4 The metric can be freely downloaded (current version 3.1, April 2022):
<http://publications.naturalengland.org.uk/file/6242570327031808>

Appendix 5: Example Section 106 agreement

Biodiversity Contribution: means the sum of [£XXXX] payable to the Council towards the enhancement of biodiversity within the area ecologically connected to the Development;

Commencement of Development: means the carrying out in relation to the Development of any material operation as defined by section 56(4) of the Act (and the phrase “**Commence Development**” shall be construed accordingly) [but disregarding for the purposes of this deed and for no other purpose, the following operations: site clearance; ground investigations; site survey works; temporary access construction works; archaeological investigation; and erection of any fences and hoardings around the Land];

1. Biodiversity Contribution

- a. The Owner covenants to pay to the Council the Biodiversity Contribution on or before Commencement of Development.
- b. The Owner will not Commence Development until the Biodiversity Contribution has been paid to the Council.

Example biodiversity loss schedule

Biodiversity Impact Assessment: Means the use of the most current and locally adopted Defra Biodiversity Offsetting Metric to calculate the biodiversity impact of the scheme measured in Biodiversity Units;

Biodiversity Loss: Means a negative Biodiversity Unit score;

Biodiversity Offsetting Scheme: Means a scheme which will deliver biodiversity enhancements which shall not be less than the Biodiversity Impact Assessment score;

Biodiversity Unit: Means the product of the size of an area, and the distinctiveness and condition of the habitat it comprises to provide a measure of ecological value;

Defra Biodiversity Offsetting Metric: Means the Defra mechanism to quantify impacts on biodiversity that allows biodiversity losses and gains affecting different habitats to be compared and ensure

offsets were sufficient to compensate for residual losses of biodiversity;

Ecology Contribution:

Means the sum payable in accordance with Schedule 1;

1 ECOLOGY CONTRIBUTION

The Owner covenants as follows;

- 1.1 The approved application shall not result in a Biodiversity Impact Assessment score greater than – (xx) Biodiversity Units or such other number as may be agreed with the Council.
- 1.2 Prior to the Commencement of Development, the Owner shall submit a Biodiversity Offsetting Scheme to the Council for its approval in writing.
- 1.3 The Owner shall not Commence Development until a Biodiversity Offsetting Scheme has been submitted to and approved in writing by the Council.
- 1.4 The Biodiversity Offsetting Scheme shall be approved by the Council with the purpose of ensuring that the Development does not result in a Biodiversity Loss in accordance with the National Planning Policy Framework.
- 1.5 The Scheme shall include a management plan for the provision and maintenance of offsetting features on the Land for not less than 30 years from the date of implementation. Where the offsetting features do not fully offset the (-xx) Biodiversity Units the residual loss shall be offset by a fixed sum contribution to the Council assessed using an agreed Biodiversity Impact Assessment metric.
- 1.6 The Biodiversity Offsetting Scheme shall provide for one of the following:
 - 1.6.1 Confirmation that an area of land has been made available to offset a maximum of -xx Biodiversity Units of Biodiversity Loss on the Land; or
 - 1.6.2 Where no land has been made available, provide for a fixed sum contribution to be paid to the Council. The sum shall not exceed £(xx.xx) and the Council will use the contribution to enhance and secure the long-term management of biodiversity of sites within the [DETAILS OF AREA WITHIN WHICH THE CONTRIBUTION IS TO BE USED]. or
 - 1.6.3 The required number of Biodiversity Credits have been purchased.
- 1.7 Once the Biodiversity Offsetting Scheme has been implemented, the Owner shall not carry out any changes to the Biodiversity Offsetting Scheme without the written consent of the Council.

Coventry Biodiversity Net Gain SPD Consultation Summary

Comment Reference	Respondent	Page/Para reference	Consultation Response (Summary)	Officer Response	Proposed Change
BNG1	Coventry Society	Para 3.9, 4.1, 4.3	The SPD should clarify whether BNG requirements are established at Outline or Full application stage.	Comment noted. The SPD, within Section 4, will be amended to specify that how BNG is outlined in the planning application process. This amendment will note that this is an established system which allows for flexibility and recognises that proposals will evolve through the design stage and accordingly mitigation or compensation mechanisms will also need to evolve.	Add a paragraph specifying the application process and BNG requirements within this.
BNG2	Coventry Society	Para 2.3	The SPD should illustrate the Coventry Offset sites, perhaps with a map.	Appendix 3: Coventry Offset sites 1.1, shows a list of sites that have already been identified, however work is underway on a more comprehensive list of sites.	None.
BNG3	Coventry Society	Para 2.4 Appendix 1: Local Plan policy GE3	The SPD should prioritise BNG on-site or within a very short distance.	The SPD states 'The delivery of on-site measures, made accessible to existing and new residents, is the Council's preferred outcome.' However, to clarify this, Para 4.20 will be changed from 'Where off-site habitat provision is necessary, this should be directed to the following areas:' to 'Where off-site habitat provision is necessary, this should be directed to the following areas as close to the original site as possible:'	Adjust 4.20 as outlined.
BNG4	Coventry Society	Para 2.6, 4.18	SPD should clarify how a 30-year management requirement will be enforced.	The SPD states 'Where offsite habitat creation is proposed it is particularly important that sufficient detail is submitted to reassure the Council that it is feasible that suitable provision can be delivered and maintained in the long term'. In addition, section 1.5 in Appendix 5, further ensures this management in a legally enforced 106 Agreement.	None.

Coventry Biodiversity Net Gain SPD Consultation Summary

BNG5	Historic England	-	No Comment	-	None.
BNG6	Claremont	Para 2.6, 4.1	SPD should acknowledge that the 10% minimum net gain requirement from the Environment Act, is not required to be delivered on every site until November 2023 and therefore identify transitional arrangements.	The SPD references the Environment Act within its footnotes so that any clarification required upon reading may be found within the Act document. The SPD does not specify this requirement as one that is currently enforced, instead stating 'The delivery of biodiversity net gain requires that any development delivers more and better-quality biodiversity than would exist without development taking place.'	None.
BNG7	Claremont	Para 3.9, 4.1, 4.3, 4.18	SPD should clarify whether discussions of habitat mitigation and compensation should take place as part of pre-application discussions or take place during the planning application process. If the Council intends for discussions around habitat mitigation and compensation to be undertaken at the pre-application stage, this should be clarified within the SPD but recognising that this should not be a mandatory requirement as these can also be agreed as part of the determination of the planning application. The SPD must ensure that planning permissions provide the opportunity to secure the necessary compensation but adopt a flexible approach as the principle and mechanism will need to be secured at outline stage, but with recognition that proposals will evolve through the design stage and accordingly mitigation or compensation mechanisms will also need to evolve.	Comment noted. Para 4.18 states that the planning pre-application service is strongly recommended to meet the habitat creation requirements, but this is not a mandatory requirement. To clarify this, 4.18 will be adjusted from 'the planning Pre-application Service' to 'Coventry City Councils' Pre-Application Service'.	Adjust 4.18 as outlined.
BNG 8	Claremont	Para 4.15	The SPD should note that including developments on an 'offset register' are only required through the Environment Act where there is off-site delivery and that there is no requirement to record on-site net gain delivery, despite this being an ambition of Natural England.	Comment noted. To get the best information regarding BNG throughout Coventry, the Council and SPD will align with Natural England's' ambition and incorporate on-site net gain into its recordings.	None.

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BNG9	Claremont	Para 4.12 – 4.20 Appendix 3 1.1.	The SPD should not be published until the 'offset register' is produced as the Council will be unable to provide an up-to-date record of offset sites.	Comment noted. Appendix 3: Coventry Offset sites 1.1, shows a list of sites that have already been identified, there is no requirement to add a more comprehensive list within this SPD. Any future lists will be a dynamic and evolving register.	None.
BNG10	Claremont	Para 4.16	The SPD should clarify how 'expected demand' has been estimated, whether it has just accounted for allocated sites, or whether any allowance has been made for windfall developments additionally.	Demand has been assessed through the 2017 Local Plan.	None.
BNG11	Claremont	Para 4.16	The SPD should clarify how the Council has calculated the need for offsetting, as some sites will be able to deliver BNG onsite, but there is a risk that the Council could be over-reliant on this. The Council must recognise the importance of maintaining an adequate supply of sites for off-setting to ensure that this will not delay potential developments.	While the SPD states that the Council has sufficient sites for future demand, the SPD also states that there are alternative methods of offsetting including through third party schemes or the purchase of Biodiversity Credits, and therefore should land become an issue, alternatives will be made available to support development demand.	None.
BNG12	Savills	Para 2.6	The SPD should more clearly state that it is only seeking for developments to achieve 'net gains' in accordance with the Local Plan, NPPF and PPG, not the 10% gain as stated in the Environment Act.	The SPD references the Environment Act within the footnotes, any clarification upon reading may be found within the Act document. The SPD does not specify this requirement as one that is currently enforced, instead stating 'The delivery of biodiversity net gain requires that any development delivers more and better-quality biodiversity than would exist without development taking place.' Therefore, should a developer wish to achieve the 10% gain which will soon be compulsory under the Environment Act then they are welcome to, the only requirement is that 'any development delivers more and better-quality biodiversity than would exist without development taking place.'	None.
BNG13	Savills	Para 4.3	The SPD references several proposals within the Environment Act which have not yet been confirmed by	Regarding the first point, in Paragraph 4.3 the SPD states 'All planning applications will be	None.

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			<p>DEFRA, including the requirement that planning applications should be supported by Biodiversity Gain and for the biodiversity value of a site to be measured by activity before 30th January 2020 if it has been lowered since that date, and the Council should clarify whether these are a requirement of BNG.</p>	<p>required to submit a biodiversity gain plan which provides information on the site and details how biodiversity will be enhanced.’ Regarding the latter, in paragraph 4.8 the SPD clarifies that ‘If the biodiversity value of a site has been lowered by any activity after 30th January 2020 (other than with planning permission) with the resulting loss of habitats in advance of a biodiversity metric calculation being undertaken the baseline for the metric is to be taken as the habitats present prior to site clearance. The biodiversity value of the habitats lost is to be estimated based upon a desk-based assessment and professional judgement. The precautionary principle is to be applied where the distinctiveness or condition of the habitats lost is uncertain.’</p>	
BNG14	Savills	Para 4.5	<p>The SPD states that ecological surveys ‘should include the whole of the development boundary (red line) and adjacent land where direct or indirect impacts upon adjacent habitats are anticipated’. It is not normal practice for ecological surveys for all sites to include land outside of the red-line boundary particularly where this is in third party ownership. We therefore consider that this paragraph should be reworded to ‘surveys should include the whole of the development boundary (red line)’.</p>	<p>Comment noted. However, the SPD specifies that adjacent land should only be surveyed where it may be impacted by said development. To clarify this Para 4.5 will be amended from ‘The survey should include the whole of the development boundary (red line) and adjacent land where direct or indirect impacts upon adjacent habitats are anticipated.’ To ‘The survey should include the whole of the development boundary (red line) and adjacent land where direct or indirect impacts upon adjacent habitats are anticipated. On a case-by-case basis, applicants may be requested to undertake surveys of adjacent habitats, such as Local Wildlife Sites, where direct impacts are anticipated.’ This is essential to prevent unrecorded and unaccounted for biodiversity loss.</p>	Amend 4.5 as outlined.

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BNG15	Savills	Para 4.20	The SPD states that there is a preference for net gain to be achieved on site and sets specific requirements for what off-site mitigation will be accepted. The DEFRA 'Consultation on Biodiversity Net Gain Regulations and Implementation' document (January 2022) did not propose such restrictive off-site requirements (pdf page 55 of the consultation document). The SPD should not be proposing any requirement over the provisions already set out in the adopted Local Plan and NPPF. Additionally, off-site land identified by a developer that is considered to be in proximity to the development site and / or is evidenced as being able to deliver the required BNG should be considered acceptable by the Council. The SPD should be amended to remove the specific off-site requirements listed.	Comment noted. Paragraph 4.20 states that off-site habitat provision should be 'directed' to a list of areas. This does not suggest a compulsory requirement, just a preference to maximise BNG. Off-site land identified by the developer, and 'alternative methods of providing adequate offset through third party schemes or the purchase of Biodiversity Credits will also be considered acceptable in principle' as stated in Paragraph 4.16.	None.
BNG16	Savills	Para 4.9	The SPD is proposing to start using the DEFRA metric as opposed to the Warwickshire metric, additional information is required to justify why the DEFRA model should be used.	Warwickshire County Council, who initiated the Warwickshire metric no longer use it, and the DEFRA metric has been promoted as a national tool.	None.
BNG17	National Highways	-	No comment	-	None.
BNG18	Resident	Para 1.2-1.4	The document should be retitled to 'Nature Recovery and Biodiversity Net Gain Supplementary Planning Document' as this would widen its remit and provide an opportunity to cover all the aspects which impact on the planning process e.g., protected species. This could also be emphasised in the 'Aims and Objectives' section potentially, statement with a commitment to a 'biodiversity first' approach to policies where sites of low biodiversity are earmarked first for development would be useful especially if it could refer to the avoidance of discrimination against urban wastelands. At the moment, the SPD focuses on one aspect, biodiversity net gain, and does not take account of requirements for protected species. Yet, there are	Comment noted. The scope of this SPD is specifically, to clarify the impact of the new BNG principle outlined in the Environment Act and its impacts on the planning process for developers and planning officers.	None.

Coventry Biodiversity Net Gain SPD Consultation Summary

			<p>crossovers in requirements for ecological surveys and information on protected species should be used to inform onsite biodiversity mitigation and compensation measures. A document which encompasses both would be less confusing for applicants and better serve the purpose of BNG which is to restore nature and halt the decline in species abundance.</p>		
BNG19	Resident	Para 3.1-3.12	<p>This title could be changed to 'relevant policy, legislation, guidance and best practice' to allow references to best practice examples and guidance within documents such as the Biodiversity Code of Practice for Planning and Development (BS 42020:2013). This Code of Practice should be acknowledged within this section in addition to a discussion of benchmarks such as the 'Building with Nature Standards Framework'. The use of best practice, standards and benchmarks could help streamline the planning process and ensure that all developments across the City are following the same principles, protecting against building-in new or adding to existing environmental inequalities. This section should signpost readers to further ecological resources and those relevant to development such as SuDS and the impacts of building materials. There should also be a section which highlights a requirement to use appropriately qualified and experienced ecologists.</p>	<p>Comment noted. The Council understands that there needs to be more guidance regarding best practises for nature conservation and future strategy, and this is within discussion. However, outlining the relationships between environmental protection, development and inequality is outside of the scope of this SPD. The Council will review our webpages to see if there is an opportunity to provide a more flexible list of resources.</p>	None.
BNG20	Resident	Para 4.4 – 4.11	<p>The SPD should outline the circumstances where a soil resource survey and plan are required and when soil should be covered within the site waste management plan as soils are an important aspect of sustainability but seem rarely to be considered especially in terms of biodiversity, so it is important to highlight the Government's code of practice for the sustainable use of soils on construction sites.</p>	<p>Comment noted. The SPD reflects the requirements of the Environment Act in reference to BNG, of which soil management is not mentioned.</p>	None.

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BNG21	Resident	Para 4.3 Table 1	The wording 'no information required' could cause confusion as ecological surveys may be required under certain circumstances e.g., if a householder's application were to disturb a Badger sett, a bat roost, House Martin nests, etc. without ecological surveys, the appropriate level of mitigation is unlikely to have been considered effectively for protected species either at the planning application stage for individual sites or earlier on when creating policies for strategic allocations or neighbourhood plans.	This section refers specifically to biodiversity offsetting and does not preclude the requirement for specific ecological consideration, which is enforced in other key pieces of legislation. This is specified in the SPD in Para 4.3 where it says 'All planning applications will be required to submit a biodiversity gain plan which provides information on the site and details how biodiversity will be enhanced. The required amount of information submitted with the application will vary according to the application, see Table 1'. However, this can be clarified by changing 'Table 1: Information required by applications' to 'Table 1: Biodiversity enhancement information required by applications'	Amend Table 1 label as outlined.
BNG22	Resident	Para 4.4 – 4.8	Within section 4, there should be an additional paragraph referring to Natural England's standing advice for protected species.	Within the SPD below Table 1, it is stated that 'Ecology information regarding net gain is independent of any information regarding legally protected species. All developments which may adversely impact on protected species (e.g., bats, badgers, great crested newts) are required to submit appropriate information with the application.'	None.
BNG23	Resident	Para 4.4	Outlining expectations for ecological surveys as early as possible in the process is essential as some surveys must be done at specific times of the year or over a prolonged period. Highlighting requirements early on helps to streamline the process and avoid delays later. In terms of strategic allocations in local plans, it would be useful if ecological surveys for protected species were conducted at the earliest possible opportunity so that their results could inform policies for sites and nature recovery more widely.	As noted above within this document, the place in which BNG is required within the planning system will be clarified, and this will outline the requirements suggested.	None.

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BNG24	Resident	Para 4.4-4.8	There should also be a reference in this section to how long EclAs (including data searches) and ecological surveys will remain valid for and when they should be updated. This is essential for considering new biological records, legislation and guidance as well as changes within the conditions of a site itself. A section on the role of Warwickshire Biological Records Centre (WBRC) should also be included with details on how to obtain data searches through them. A requirement to submit the results of surveys to the WBRC within a specific timescale should also be outlined.	Due to the private nature of WRBC it is not universally accessible and therefore will not be referenced in the SPD.	None.
BNG25	Resident	Para 4.12	Due to the limitations of data searches, it is important to outline what should happen if evidence of protected species comes to light during the consultation process or later when clearance/construction is taking place on the site. For example, outlining the process for investigating evidence of protected species provided by residents.	The SPD states in Paragraph 4.12 'If an impact on an ecological asset is identified, applicants must propose how that impact will be avoided, mitigated, or compensated for in accordance with the mitigation hierarchy'. This SPD does not have the scope to outline the separate national frameworks for each relevant protected species.	None.
BNG26	Resident	Para 4.4	In addition to the BIA, there should be separate sections outlining when an EclA, CEMP and BEMP are required. CIEEM provide guidelines for EclAs which are regularly updated and so could be sign-posted within the SPD. The aims of the CEMP and BEMP/LEMP are to protect, enhance and increase the biodiversity value of a site post development and to provide evidence to support the BIA and associated calculations. They can be provided as part of the EclA or secured through planning conditions or obligations. However, it makes sense for these documents to be provided at the earliest possible opportunity within the planning application process.	Comment noted. However, the SPD does not have the scope to outline all methods and requirements of ecological surveying. The appropriate surveys will be requested on a case-by-case basis as needed.	None.
BNG27	Resident	Para 4.3, 4.11	Features such as hedgehog-friendly fencing and hibernacula, for insects and herptiles, should be added to the list in the last sentence. Expectations for commercial buildings in terms of providing	Comment noted. Table 1 Householder required information will be amended from 'Any mitigation is likely to be provided onsite through enhancements such as bat boxes, swift	Amend Table 1 and Para 4.11 as outlined.

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			nesting/roosting sites for birds and bats should also be outlined. Where the nature of construction or use of materials and lighting makes inclusion of these features within a building problematic, employment sites should be required to have wildlife towers. The wording of this section should be amended to make it clearer to applicants that protected species, which roost or nest in buildings, are considered and biodiversity enhancements for net gain would be in addition to any avoidance, mitigation and compensation measures.	bricks and wildlife-friendly planting' to 'Any mitigation is likely to be provided onsite through enhancements such as bird/bat boxes, hedgehog-friendly fences, hibernacula, swift bricks and wildlife-friendly planting'. Paragraph 4.11 will be amended from 'Features such as green walls, green roofs, containers and bird/bat boxes will provide appropriate benefits' to 'Features such as green walls, green roofs, hedgehog-friendly fencing, hibernacula, containers and bird/bat boxes will provide appropriate benefits'.	
BNG28	Resident	Para 4.11	This section should include information on brownfield sites as there are often misconceptions about them which can lead to negative impacts on biodiversity particularly in areas of deprivation.	Comment noted. As noted in the NPPF, we recognise that brownfield sites have biodiversity value and Para 4.11 will be amended to reflect this.	Amend 4.11 as outlined.
BNG29	Resident	Para 4.17	Is the phrase '...within the boundary of the City' both too wide and too narrow? Policy GE3 states that, '...compensatory provisions should be made as close to the original site as possible.' This principle should be incorporated within the SPD itself. If the purpose of BNG is for nature recovery, surely its use should always result in a net gain within a neighbourhood. However, uncontrolled, there is a real danger that biodiversity offsetting could become biodiversity asset stripping.	In Paragraph 2.4 the SPD states 'The delivery of on-site measures, made accessible to existing and new residents, is the Council's preferred outcome.' This should ensure that where possible neighbourhood biodiversity levels are not degraded over time. However, to clarify this, Para 4.20 will be changed from 'Where off-site habitat provision is necessary, this should be directed to the following areas:' to 'Where off-site habitat provision is necessary, this should be directed to the following areas as close to the original site as possible:'	Adjust 4.20 as outlined.
BNG30	Resident	Para 4.17	To fulfil the principles of section 1.4, within the Local Plan Policy GE3, an additional area should be added to the list to ensure that neighbourhoods which have the least green space and poorest levels of biodiversity within the City are prioritised over others e.g., <i>areas which have a quantity of green space per 1,000 population lower than the City's average (3.05 hectares</i>	Due to the nature of the SPD, it cannot introduce new policy such as this.	None.

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			<p><i>per 1,000 population) will be prioritised.</i> This would help protect deprived areas from environmental inequalities being exacerbated by biodiversity offsetting. Maximising benefits for biodiversity will always need to be weighed against social, health and wellbeing outcomes for communities. It might be useful to also have a separate statement about this within Appendix 3 along with referencing the Sub-Regional Green Infrastructure Strategy 'Warwickshire, Coventry and Solihull Green Infrastructure Map' when wildlife corridors are mentioned.</p>		
BNG 31	Resident	Appendix 2: Survey Season	<p>To ensure consistency in approach, the diagram in Appendix 2 should follow the survey timetable (Table 2) as outlined in Natural England's standing advice for protected species. There are sections missing such as 'birds (migration)' and 'bats (foraging or commuting)'. As part of Appendix 2, there should be a reference to dependency on weather conditions when conducting surveys, otherwise, it could undermine the validity of the applicant's EclA, etc.</p>	<p>Comment noted. Appendix 2 will be amended to show the updated information provided by Natural England.</p>	<p>Amend Appendix 2 to include everything covered in Table 2 on the following link https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications#when-to-survey</p>
BNG 32	Resident	-	<p>Opportunities for BNG may be hiding within the landscape and the use of historical maps could help reveal them. This is a relatively new concept but should be included within the SPD particularly to support the identification of appropriate onsite mitigation, compensation measures and potential offset habitat creation sites. In a similar way, historic maps should be used to identify ghost ponds and, if possible, they should</p>	<p>Comment noted. However, as discussed above the scope of this SPD is just to clarify the impact of the new BNG principle outlined in the Environment Act and its impacts on the planning process for developers and planning officers.</p>	<p>None.</p>

Coventry Biodiversity Net Gain SPD Consultation Summary

			be restored using the sediment from their original location. Historic maps should also be reviewed for locations where there was once woodland, orchards, woodland pasture, deer parks or pleasure gardens as it is possible that they may be suitable for tree planting schemes. The National Library of Scotland has a side-by-side georeferenced maps feature which allows you to look at a modern map/satellite image and historical maps at the same time.		
BNG 33	Resident	Para 2.1-2.3	Alongside woodland, the importance of soils, grassland, orchards and hedgerows in terms of carbon storage and sequestration also need to be highlighted within the SPD.	Comment noted. As discussed above in reference to the need for soil surveys, the importance of various ecosystem types to wider ecosystem functions than biodiversity is of the utmost importance to the Council, however, will need to be fully outlined by broader legislation as it is outside the scope of this SPD.	None.
BNG 34	Resident	Para 2.4, Para 4.20	Should the SPD outline the categories of land use which are excluded from biodiversity calculations due to their maintenance requirements? For example, should road verges and path edges, roundabouts, curtilage of commercial buildings and parking areas or space underneath electricity pylons, where there would be limitations on planting schemes and their management due to measures required for access, safety, security, visibility and/or operational requirements, be excluded? Some types of land use, such as B8, have requirements which would reduce opportunities for biodiversity net gain and this should be considered when assessing whether it is an appropriate land use for the site, whether a proposed floorspace within a masterplan is sustainable and making biodiversity calculations.	Comment noted. The SPD follows national policy and DEFRA's guidelines in reference to the land use categories suitable for biodiversity net gain. At the moment, this guidance is that anything larger than 1m2 should be required to provide gain, therefore this is the stance the SPD takes.	None.
BNG 35	Resident	Para 2.4 - 2.6	Other aspects which need to be accommodated such as air quality and climate change can also have an impact on BNG. Whether this is positive or negative depends upon how mitigations and compensatory measures are	Comment noted. As discussed above this is outside the scope of the SPD and broader interrelations between environmental issues	None.

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			<p>selected and implemented. Guidelines for developers should be provided so that urban form has a positive impact on the heat island effect, air quality and biodiversity. As part of this, the selection of plant species needs careful consideration as some species can create issues due to the biogenic volatile organic compounds and pollen they emit. Lighting schemes, building design and use of materials are also factors which could affect biodiversity.</p>	<p>will be discussed in length in future policy documents.</p>	
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**Strategic Environmental Assessment of the Biodiversity Net
Gain Supplementary Planning Document**

Coventry City Council

**Strategic Environmental Assessment Screening Opinion for
consultation**

March 2022

1. Introduction

- 1.1 This screening report has been produced to consider whether the Biodiversity Net Gain 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 Biodiversity Net Gain SPD: Context

- 2.1 The Draft Biodiversity Net Gain SPD sets out further detail on existing policies contained within the adopted Coventry City Council Local Plan, in particular Policy GE1 (Green Infrastructure), Policy GE3 (Biodiversity, Geological, Landscape and Archaeological Conservation) and Policy DS4 (Part A: General Masterplan principles) 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 Policies GE1, GE3 and DS4 of the adopted Coventry Local Plan as set out above.
- 2.3 The SPD is designed to assist prospective developers and applicants by providing guidance on how proposals can demonstrate they have met the requirements of planning policy related to biodiversity net gain in Coventry. By providing this information upfront Coventry City Council intends to provide additional clarity in the development process and ensure that negotiating obligations is based on a clear and consistent approach.

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

¹ Reference ID: 11-008-20140306

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

whether the SPD is likely to have a significant effect on the environment, using criteria drawn from Schedule 1 of the SEA Regulations.

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</p>	<p>No this does not apply.</p>

<p>effect on sites, has been determined to require an assessment pursuant to Article 6 or 7 of the Habitats Directive.</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—</p> <p>(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</p> <p>(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 biodiversity net gain 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></p> <p>9.—(1) The responsible authority shall determine whether or not a plan, programme or modification of a description referred to in—</p> <p>(a)paragraph (4)(a) and (b) of regulation 5;</p> <p>(b)paragraph (6)(a) of that regulation; or</p> <p>(c)paragraph (6)(b) of that regulation, is likely to have significant environmental effects.</p> <p>(2) Before making a determination under paragraph (1) the responsible authority shall—</p> <p>(a)take into account the criteria specified in Schedule 1 to these Regulations; and</p> <p>(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 in itself 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 biodiversity policies 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—	

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

<p>(a) the probability, duration, frequency and reversibility of the effects;</p>	<p>The SPD is not allocating sites for development. The SPD is to provide guidance for the application and implementation of the policies in the adopted Local Plan and is not expected to give rise to any significant environmental effects.</p>
<p>(b) the cumulative nature of the effects;</p>	<p>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.</p>
<p>(c) the transboundary nature of the effects;</p>	<p>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.</p>
<p>d) the risks to human health or the environment (for example, due to accidents);</p>	<p>The SPD poses no risk to human health.</p>
<p>(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);</p>	<p>The SPD relates to Coventry City Council's administrative area only.</p>
<p>(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;</p>	<p>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.</p>
<p>(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.</p>	<p>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.</p>

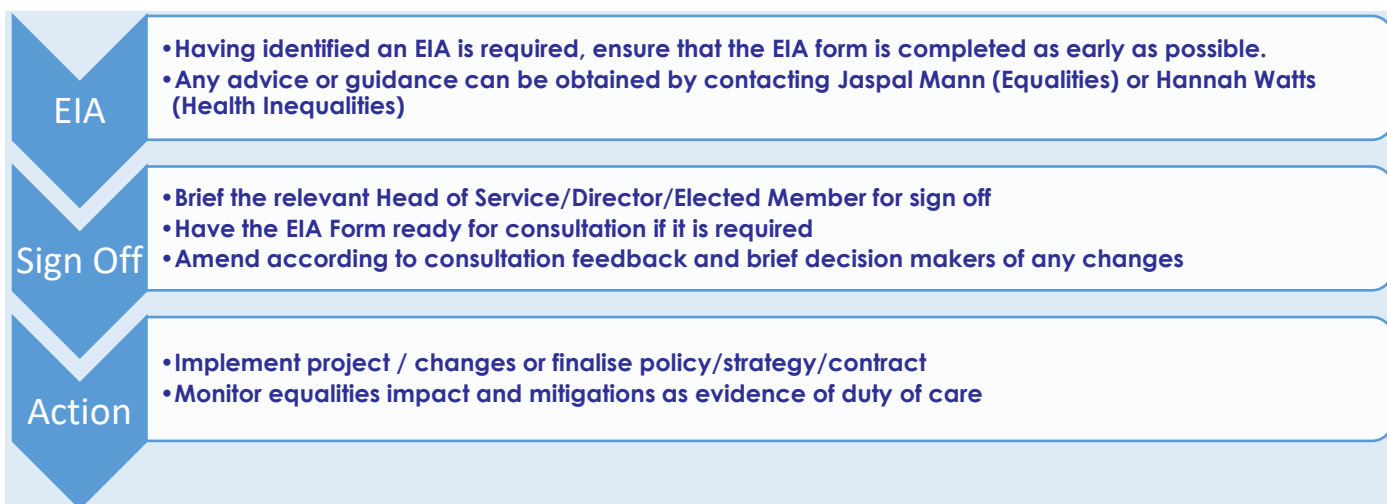
4. Conclusion and Screening Recommendation

- 4.1 This screening opinion identifies that the SPD will provide guidance to support the biodiversity policies 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.

EQUALITY IMPACT ASSESSMENT (EIA)



Title of EIA	EIA Biodiversity Net Gain SPD	
EIA Author	Name	Clare Eggington
	Position	Principal Town Planner (Planning Policy)
	Date of completion	10/11/2022
Head of Service	Name	David Butler
	Position	Head of Planning Policy and Environment
Cabinet Member	Name	Councillor David Welsh
	Portfolio	Housing and Communities



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 Biodiversity Net Gain*

EQUALITY IMPACT ASSESSMENT (EIA)



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

The Biodiversity Net Gain Supplementary 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 Biodiversity Net Gain SPD is to set out the Council's approach towards achieving Biodiversity Net Gain (BNG) from any new development. BNG is achieved when a development leads to an overall increase biodiversity relative to the site beforehand. The Biodiversity Net Gain SPD sets out how this can be achieved in Coventry using established methods. It supplements Policy GE1 (Green Infrastructure), Policy GE3 (Biodiversity, Geological, Landscape and Archaeological Conservation) and Policy DS4 (Part A: General Masterplan principles) of the adopted Coventry Local Plan.

The additional guidance provided within the SPD aims to provide guidance for developers on how proposals can demonstrate they have met the requirements of planning policy related to biodiversity net gain in Coventry. By providing this information upfront Coventry City Council intends to provide additional clarity in the development process and ensure that negotiating obligations is based on a clear and consistent approach.

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

Developers who are required to deliver biodiversity gain as part of their proposals, those who deliver and maintain the resultant projects, and those members of the community who will benefit from more biodiversity in their local area.

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

EQUALITY IMPACT ASSESSMENT (EIA)



- 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 a range of ecological studies and mapping. 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: how developers should calculate how much biodiversity they need to deliver, and the appropriate mechanism for doing this.

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 and nature 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 levels of biodiversity as part of a wider network of open spaces is essential.

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

EQUALITY IMPACT ASSESSMENT (EIA)



Age 19-64	P	Access to open space and nature is a fundamental need for health and wellbeing. Biodiversity is an essential part of any sustainable community. 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 good design which incorporates biodiversity as part of a wider network of open spaces.
Age 65+	P	Access to open space and nature is a fundamental need for health and wellbeing. Biodiversity is an essential part of any sustainable community. 13.5% of Coventry City Council's residents are aged 65 and over and will benefit from the provision of good design which incorporates biodiversity as part of a wider network of open spaces.
Disability	P	Access to open space and nature is a fundamental need for health and wellbeing. Biodiversity is an essential part of any sustainable community. 17.7% of Coventry City Council's residents have a limiting long term health problem or disability and will benefit from the provision of good design which incorporates biodiversity as part of a wider network of open spaces.
Gender reassignment	P	Individuals will benefit from safe and well designed open space provision which incorporates biodiversity.
Marriage and Civil Partnership	P	Individuals will benefit from safe and well designed open space provision which incorporates biodiversity.
Pregnancy and maternity	P	Individuals will benefit from safe and well designed open space provision which incorporates biodiversity..
Race (Including: colour, nationality, citizenship ethnic or national origins)	P	Individuals will benefit from safe and well designed open space provision which incorporates biodiversity.
Religion and belief	P	Individuals will benefit from safe and well designed open space provision which incorporates biodiversity.
Sex	P	Individuals will benefit from safe and well designed open space provision which incorporates biodiversity.
Sexual orientation	P	Individuals will benefit from safe and well designed open space provision which incorporates biodiversity.



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

Response:

The Biodiversity Net Gain 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

EQUALITY IMPACT ASSESSMENT (EIA)



<p>2.3b How might your work affect HI (positively or negatively).</p> <p>How might your work address the needs of different groups that share protected characteristics</p>	<p>Consider and answer below:</p> <ul style="list-style-type: none"> ● 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 																											
<p>Response:</p> <p style="margin-left: 40px;">a. Potential outcomes including impact based on socio-economic status or geographical deprivation</p> <p>The Health Impact Assessment SPD referred to above includes the following:</p> <p style="text-align: center;">Category 3: Access to open space and nature</p> <p>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.</p> <p>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.</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th style="width: 25%;">Considerations</th> <th style="width: 25%;">Negative effects</th> <th style="width: 25%;">Positive Effects</th> <th style="width: 25%;">Relevant Local Plan Policies and Supplementary Planning Documents</th> </tr> </thead> <tbody> <tr> <td rowspan="3" style="vertical-align: top;"> <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 </td> <td style="vertical-align: top;">Failing to protect local green spaces and playing fields near to communities can limit opportunities for physical activity.</td> <td style="vertical-align: top;">The provision of publicly accessible blue space, green spaces and play spaces can encourage physical activity and maintain or improve mental health</td> <td rowspan="3" style="vertical-align: top;"> <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 </td> </tr> <tr> <td style="vertical-align: top;">Green spaces that are of poor quality, feel unsafe, or are inaccessible will discourage physical activity and social interaction</td> <td style="vertical-align: top;">A growing population, particularly an increase in children will require a range of formal and informal play spaces and equipment</td> </tr> <tr> <td style="vertical-align: top;">Failing to provide a range of different types of open and play spaces may place pressure on</td> <td style="vertical-align: top;">Natural spaces and tree cover provide areas of shade and can improve air quality in urban areas</td> </tr> </tbody> </table> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tbody> <tr> <td style="width: 25%; vertical-align: top;"> <ul style="list-style-type: none"> ● Maximising green infrastructure in urban environments (including green roof systems and gardens and green walls) </td> <td style="width: 25%; vertical-align: top;">existing spaces where formal and informal activities may conflict with each other</td> <td style="width: 25%; vertical-align: top;"></td> <td style="width: 25%; vertical-align: top;"> <ul style="list-style-type: none"> ● R2: Coventry City Centre – Development Strategy ● Community Infrastructure Levy </td> </tr> <tr> <td></td> <td></td> <td style="vertical-align: top;">There may be opportunities to integrate play spaces with other related health and environmental programmes such as food growing and increasing biodiversity</td> <td></td> </tr> <tr> <td></td> <td></td> <td style="vertical-align: top;">Green walls can also provide insulation or shading and cooling</td> <td></td> </tr> <tr> <td></td> <td></td> <td style="vertical-align: top;">Green infrastructure can reduce flood risk</td> <td></td> </tr> </tbody> </table>	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		<ul style="list-style-type: none"> ● R2: Coventry City Centre – Development Strategy ● Community Infrastructure Levy 			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	
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EQUALITY IMPACT ASSESSMENT (EIA)



- 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.

Ensuring access to a range of suitable open spaces which incorporate biodiversity 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.

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 the Green Environment for example 'designing new development to accommodate wildlife'.

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:

Age:

Female	
Male	

EQUALITY IMPACT ASSESSMENT (EIA)



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:
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EQUALITY IMPACT ASSESSMENT (EIA)



Name of Director:	Date sent to Director:
Name of Lead Elected Member:	Date sent to Councillor:

Email completed EIA to equality@coventry.gov.uk