

Appendix 7.a

Defra Planning Health Framework

The following appendix provides details of the assessments made against the Defra Planning Health Framework.

Issue	Summary of Issues Health Check Concern	Position, Gaps and Comment	Action Required?
<p><u>A. Municipal Waste Management Strategy</u></p>	<p>A1) Is there an up-to-date and policy-compliant MWMS that supports the residual waste treatment proposed in the reference case?</p> <p>A2) If applicable, detail any restrictions suggested by the MWMS on the residual waste treatment technologies that might be acceptable.</p> <p>A3) Was the local community actively engaged in the development of the MWMS?</p> <p>A4) Was the MWMS accompanied by a Strategic Environmental Assessment that informed the approach in the adopted strategy?</p>	<p>Coventry has prepared its MWMS which went out for public consultation in August 2008. Whilst seeking an overall reduction in the amount of waste going to its existing EfW facility, it states that the existing EfW facility will continue to be an integral element of the strategy for dealing with residual waste over the majority of the strategy's lifetime (to 2020). It states that it is timely to begin to consider options for its eventual replacement and confirms that Coventry is actively working in partnership with Solihull Metropolitan Borough Council and Warwickshire County Council as part of a sub-regional approach to sustainable waste management. An SEA will accompany the completed strategy.</p> <p>The Warwickshire Waste Management Strategy was adopted in 2005. It supports non landfill waste treatment through energy from waste and thermal treatment schemes. Its solution to dealing with residual waste includes using existing capacity and the Coventry and Solihull EfW facility is referenced in this context. Key stakeholders and the public were consulted at stages during the development of the Strategy. The MWMS was not accompanied by a SEA as it was started and completed outside of the dates specified in the SEA Directive. The document has been subject to an SA undertaken by Forum for the Future in September 2005</p> <p>The Solihull Municipal Waste Management Strategy was adopted in 2004 and the Council encourages the reduction of landfill waste by committing to waste energy incineration at the existing Coventry and Solihull Waste to Energy Plant.</p> <p>Communication plans have been developed with the Government, key stakeholders, partners and the wider community keeping them involved at</p>	<p>Monitor Coventry MWMS and the views expressed as part of the community consultation.</p>

		<p>every stage of the process. The MWMS was not accompanied by a SEA as it was started and completed outside of the dates specified in the SEA Directive.</p>	
<p>B. Development Plan Regional Spatial Strategy (RSS)</p> <p>Saved Development Plans / Adopted Local Development Framework and Development Planning Document (DPD)</p>	<p>B1) Has the authority cross-checked policy in the RSS to be sure that procurement proposals are consistent with regional policy?</p> <p>There is no question B2</p> <p>B3) Is the authority engaging (has the authority engaged) with the development of the RSS to seek to secure a supportive planning framework at the regional level?</p>	<p>Revisions to the 2004 RSS are currently out to consultation until December 2008 and are concerned with updating the housing requirements and also cover waste. The draft revision directs regional or sub-regional waste management facilities to Main Urban Areas (MUAs) and Coventry is identified as a MUA.</p> <p>RSS provides support for a sub-regional (multi authority) approach and Draft RSS (policy W3) supports a potential sub-regional facility in Coventry</p>	<p>The authorities will engage in the RSS consultation prior December 2008 to ensure that a sub-regional approach to waste management is supported and that strategic facilities are directed towards the MUAs. The authorities will also monitor the RSS with regard to housing requirements and any implications these may have on waste arisings forecasts.</p>
	<p>B5) Are the proposals consistent with any saved policies in a development plan?</p> <p>B6) Are the proposed sites allocated for waste management purposes in any saved statutory plan?</p> <p>B7) Is there an adopted Core Strategy and other DPD covering waste?</p> <p>B8) If so, are the proposals consistent with the Core Strategy and other DPD?</p> <p>B9) If so, are the proposed sites allocated in the adopted DPD?</p> <p>B10) Are the site allocations suitable for the intended use(s) by the procurement project?</p>	<p>The proposal meets the waste hierarchy Policy EM9 in the adopted Coventry Development Plan 2001. The site is not allocated for EfW use in any saved statutory plan.</p> <p>Policy GE6 of the adopted Coventry Development Plan 2001 deals with development in the Green Belt. The Council has indicated that there may be exceptional circumstances to justify resolving to grant planning permission. Green Belt boundaries are also being reviewed as part of the new LDF.</p> <p>The site is suitable for the proposed use and infrastructure is already in place associated with the existing facility – for example the ability to utilise CHP.</p>	<p>Engage with LPA on the Green Belt review consultation as part of the Core Strategy process.</p> <p>LPA has stated that there should be opportunities to amend the Green belt at this location.</p>

<p>Emerging Local Development Framework and DPD</p>	<p>B12) Is there an emerging Core Strategy and/or DPD covering waste?</p> <p>B13) If so, are the proposals consistent with the emerging Core Strategy and/or DPD?</p> <p>B14) If so, are proposed sites and use allocated in the emerging Waste DPD, or have representations been made to seek to secure those allocations?</p> <p>B15) Has appropriate input been made on behalf of the WDA to inform the development of the DPD and to ensure that the emerging DPD is informed by the MWMS?</p> <p>B16) Detail any known objections (formal or otherwise) to the proposed allocations.</p> <p>B17) (i) Will planning permissions for the proposed sites be sought in advance of the adoption of the DPD including the allocation?</p> <p>(ii) If so, has the potential objection of prematurity been considered? For example, are there sites proposed for allocation of which one or more of the chosen sites is/are not one?</p>	<p>Coventry Core strategy at an early stage - issues and options completed and preferred options expected in the next 2-3 months. The proposal is consistent with the emerging Core Strategy option which identifies that it may be better to share waste facilities with a wider area – as proposed by the authorities.</p> <p>Council currently developing evidence base to support consultation spatial options in late 2008. This will consider the need to revise green belt boundaries given the total development demands (including waste) of the City</p> <p>Site allocations DPD to follow about 12 months after core strategy. Should the Core Strategy allocate strategic sites (as is now possible following introduction of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008) then there will be an earlier opportunity to secure a site allocation. Prematurity should not now constitute grounds for refusal. An emerging strategic site allocation will strengthen the policy arguments in favour of the proposals.</p>	<p>Authorities to make submission in respect of Coventry site and promote it through the Coventry core strategy and beyond.</p> <p>Engage in Coventry Green Belt review to remove the land from the Green Belt.</p> <p>Engage in Warwickshire Waste DPD preferred options prior to publication in December and respond to the consultation as necessary to ensure support for sub-regional approach and utilising capacity at Coventry EfW and replacement.</p> <p>Engage in Solihull Issues and Options expected soon.</p>
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<p><u>C. Sites</u></p>	<p>C1) Do the sites have planning permissions for the intended use contemplated by the project?</p> <p>C2) Are the sites allocated in an adopted statutory plan for the intended use contemplated by the project?</p> <p>If not yet consented or allocated:</p> <p>C3) Are there any adopted development plan policies that favour the proposed use of the sites?</p> <p>C4) Are there any adopted development plan policies that prejudice the proposed use of the sites?</p> <p>C5) How do the sites perform against policy expectation in PPS10?</p> <p>C6) Please detail any relevant history of uses, planning permissions or planning refusals on the sites.</p> <p>If not already consented:</p> <p>C7) What response has been made by the planning and infrastructure stakeholders to initial consultations with them in respect of the proposed use of the sites?</p> <p>C8) Have desktop studies or a series of such studies been undertaken to identify suitable sites and justify the selection of the chosen sites?</p> <p>C9) Have baseline studies been carried out for all significant environmental aspects identified in the Environmental Impact Assessment (EIA) Regulations?</p> <p>C10) Please describe any issues suggested by those studies that will be difficult or impracticable to overcome.</p>	<p>The site does not have the benefit of any permission or allocation for its intended use.</p> <p>It is located within the Green Belt and the land is designated as a local nature conservation site (disused allotments). Land that is now the civic amenity site was removed from the Green belt so there is precedent.</p> <p>Site performs well against PPS10 particularly as there are opportunities for the co-location of facilities – the existing site includes the EfW and the civic amenity site. The site is located near the principal source of arisings and draft RSS directs sub-regional waste facilities to the Main Urban Areas of which Coventry is one.</p> <p>The site has been used as allotments in the past but the majority are disused.</p> <p>There has been a detailed alternative site assessment completed across the Project Transform area which led to selection of the chosen site.</p> <p>LPA have been receptive to the proposals. The ecological value of the site, flooding issues, land quality and how the development might serve to protect and enhance the function of the Green Belt will be addressed in the design.</p> <p>Opportunities have also been identified to provide environmental enhancements associated with the restoration of the existing EfW.</p> <p>Further environmental scoping, land quality and flood studies are scheduled together with air quality and visual assessments.</p>	<p>Policy framework presents an opportunity rather than direct support. Engagement underway to secure removal of site from Green Belt. This is required in the next 2 months and then response to Coventry's preferred options early in the New Year.</p> <p>Engage in Warwickshire Waste DPD preferred options prior to publication in December and respond to the consultation as necessary to ensure support for sub-regional approach and utilising capacity at Coventry EfW and replacement.</p> <p>Engage in Solihull Issues and Options expected soon.</p> <p>Commence scoping and other environmental work. Schedule surveys.</p>
<p><u>D. Community Consultation</u></p>	<p>D1) Has the local community been engaged in regard to the proposed use of the sites, for example, by the use of leaflets and/or exhibitions? Have there been any broader community consultation processes, such as SEA or sustainability appraisal in the context of the preparation of a Local Development Framework and/or Waste DPD that made specific proposals for the sites (please give, or refer to, some indicative statistics to support your response, e.g., level of consultation as a proportion of the affected population)?</p>	<p>The local community will be engaged in relation to the Core Strategy preferred options which will be subject to a sustainability appraisal.</p> <p>Coventry's draft MWMS is out to consultation which does indicate that the intention is to replace the existing EfW facility.</p> <p>.</p>	<p>Full engagement in the preferred options stage of the Core Strategy.</p> <p>Review consultations on Coventry's MWMS Gauge the extent to which responses</p>

	<p>D2) Did the consultation involve specific types of technology and/or visual representations of the facilities?</p> <p>D3) What was the scale and nature of the response?</p> <p>D4) What issues were raised?</p> <p>D5) Can these be overcome?</p> <p>D6) Have WDA members considered the response to consultation in endorsing the OBC (i.e., has a report been put to members on the results of consultation, and have they decided that the balance is in favour of proceeding)? In situations where sites are not yet secured, please reflect any consultations that have been completed in regard to the proposed sites as part of the Development Plan processes.</p>		endorse the OBC.
<p><u>E. Site Acquisition</u></p>	<p>E1) Are the sites already owned by the Council?</p> <p>E2) Have options been taken on the sites?</p> <p>E3) What time constraints are imposed by the options?</p> <p>E4) Have discussions been held with landowners with a view to acquisition?</p> <p>E5) What response has been made?</p> <p>E6) In the absence of ownership or a secured option, what is the WDA's strategy for acquiring the sites?</p>	Site and all land required for access is owned by the Council	None
<p><u>F. Way Forward</u></p>	<p>F1) How does the WDA intend to deal with any potential policy conflicts with the current or emerging development plan within the timetable for the procurement?</p> <p>F2) How will the WDA monitor and respond to the emerging DPD with regard to waste?</p> <p>F3) When will any outstanding environmental monitoring and other studies be completed?</p> <p>F4) How will the results of all discussions, consultations and site studies be made available to bidders?</p> <p>F4) What is the strategy for submitting planning applications (e.g., securing allocations in a statutory plan and applications being made by contractor or by WDA (in responding to this question WDA's are specifically referred to Annex 1 of the WIDP Planning Systems Guidance))?</p> <p>F5) If the WDA is to make applications, are internal and/or external resources available to support this?</p>	<p>First stage is the Coventry Core Strategy and Green Belt review. Review is expected around Christmas 2008 and will be published as part of the Preferred options Evidence Base. Submission Document of the Core Strategy may not be published prior to making the application but should be prior to determination.</p> <p>LPA has provided dedicated officer who will provide the link into the plan making process.</p> <p>Alternative site assessment will be made available to bidders.</p> <p>Strategy is for the authorities to submit an outline application to secure the principal of developing the site whilst at the same time securing removal of the land from Green belt through Coventry's Core Strategy. It is envisaged that the Preferred Bidder will discharge reserved matters and secure permit.</p>	<p>Authorities to make submission in respect of Coventry site and promote it through the Coventry core strategy and beyond.</p> <p>Engage in Coventry Green Belt review to remove the land from the Green Belt.</p> <p>Engage in Warwickshire Waste DPD preferred options prior to publication in December and respond to the consultation as necessary to ensure support for sub-regional approach and utilising</p>

		<p>The authorities are engaging consultant support to prepare the application, site design and Environmental Statement.</p>	<p>capacity at Coventry EfW and replacement. Engage in Solihull Issues and Options expected soon. Engage consultants to commence initial environmental work.</p>
<p><u>F. Way Forward continued</u></p>	<p>F5) How can bidders add value by their track record and approach to consulting the community?</p> <p>F6) How/when will the WDA establish whether the bidders intend to use the identified sites?</p> <p>F7) If bidders offer their own sites, does the procurement programme provide adequate time for the development and processing of corresponding planning applications on an equal basis as for the WDA's own offered sites?</p> <p>F8) How will the WDA complete the acquisition of the sites?</p>	<p>Community engagement is critical to the application process from scoping through to design and prior to submission. Limited scope for involvement of bidders at outline application stage but may need to consult when dealing with reserved matters or discharging conditions which involve further design work and environmental assessment.</p> <p>The proposed site is within the ownership of Coventry City Council. It was presented to bidders at the bidders day on 8 September 2008 and the feedback was positive in terms of the advantages it can offer.</p> <p>Alternative sites will be considered on their merits.</p> <p>The programme provides flexibility for the preferred bidder to submit either reserved matters or a "slot-in" application if required.</p>	