

## Coventry Local Plan Review Examination

### Schedule of Main Modifications V1 (8 January 2026)

This schedule sets out potential Main Modifications to the Regulation 19 (Proposed Submission) Plan [CD1]. Version 1 includes all of the main modifications proposed in response to the Inspectors' preliminary [IN2], further preliminary [IN2.1] and supplementary questions [IN2.2].

In so far as they represent main modifications to the Plan, amendments to the Plan's Appendices [CD1a] are referenced within this document.

Proposed changes to the Submission Policies Map [CD2] are set out in a separate schedule.

| Ref                        | Plan location<br>(policy/<br>paragraph /<br>page) | Proposed changes<br><del>Strikethrough</del> (deleted text)<br><b><u>Bold underline</u></b> (new or amended text)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Reason(s) for change                                                                                                                                                                                                                                                                 |
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| Chapter 1:<br>Introduction |                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                      |
|                            | Paragraph 1.8                                     | <del>As this is a review and not a new Local Plan it is important that matters are kept proportionate.</del> To ensure clarity and to avoid unnecessary duplication the Council is proposing to merge <b><u>merging</u></b> the Local Plan and the Area Action Plan into a single document. <b><u>This Plan supersedes the 2017 adopted Local Plan and Coventry City Area Action Plan in their entirety. Appendix 1 sets out the superseded, deleted and new policies.</u></b> In line with national legislation, some policies have now been identified as Strategic Policies: as set out in Planning Practice Guidance (March 2019) these are the ones that address the priorities for an area. Non-strategic policies deal with more detailed matters. | Response to PQ5 in IN2.<br><br>To clarify that the Plan supersedes the adopted Local Plan and the Area Action Plan in their entirety in accordance with the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012. |

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| Chapter 2: The Vision                                        |                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                         |
|                                                              |                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                         |
| Chapter 3: Overall levels of Growth & the Duty to Co-operate |                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                         |
|                                                              | Policy DS1<br>Part 4                              | <b><u>In accordance with national policy</u></b> the Council will undertake a comprehensive review of national policy, the regional context, updates to the evidence base and monitoring data within 5 years of the date of adoption of the plan. <del>to assess whether a full or partial review of the Plan is required. In the event that a review is required, work on that review will commence immediately.</del> | Response to PQ13 in IN2.<br><br>To ensure consistency with Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012. |
| Chapter 4: Health & Wellbeing                                |                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                         |
|                                                              | Policy HW1<br>Part 2                              | All HIAs shall be undertaken in accordance with <b><u>having regard to</u></b> the Council's HIA Supplementary Planning Document or any future equivalent.                                                                                                                                                                                                                                                              | Response to PQ14 in IN2.<br><br>To improve the terminology for clarity, to ensure that the policy is justified and effective.                           |

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|                                                         | Policy HW1<br>Part 4                              | Where the threshold has not been met for requiring a full HIA, for major applications of 10 dwellings or more, applicants will be required to demonstrate through their Design and Access Statements how they have taken health matters into account <del>in line with</del> <b><u>having regard to</u></b> principles contained in an updated Health SPD. | Response to PQ14 in IN2.<br><br>To improve the terminology for clarity, to ensure that the policy is justified and effective.                    |
| Chapter 5:<br>Jobs &<br>Economy                         |                                                   |                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                  |
|                                                         | Policy JE2<br>Parts 4 and 5                       | 4. The following sites, <b><u>shown on the policies map</u></b> at Appendix 9a and listed in bullet point 5.....<br>5. Key Employment Sites are shown <b><u>on the policies map</u></b> at Appendix 9a and are:                                                                                                                                            | Response to SPQ5 IN2.2<br><br>To clarify that the information is shown on the Policies Map to ensure that the policy is justified and effective. |
| Chapter 6:<br>Delivering<br>Coventry's<br>Housing Needs |                                                   |                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                  |
|                                                         | Policy H1 Part<br>3                               | 3. <b><u>The principle of developing land identified for housing in the Local Plan will be supported</u></b> <del>Housing land will be released in order to maintain a continuous 5 year supply. of housing land in order to support</del> The varied <b><u>nature of the component sites in Table 6.1 will encourage the</u></b> and                      | Response to PQ36 in IN2.<br><br>To improve the terminology for clarity, to ensure that the                                                       |

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|     |                                                   | <del>flexible land supply to support</del><br>housing delivery <del>and</del> <b><u>of</u></b> sustainable development. This will be monitored through the Council's Annual Monitoring Report                                                                                                                                                                                                                                                                                                                                            | policy is justified and effective.                                                                                            |
|     | Policy H2 Part 1                                  | The urban extension proposals at Keresley and Eastern Green are to be brought forward in full accordance with comprehensive Masterplans and <del>in accordance with</del> <b><u>must have regard to</u></b> the Council's Urban Extension Design Guidance SPD.                                                                                                                                                                                                                                                                           | Response to PQ14 in IN2.<br><br>To improve the terminology for clarity, to ensure that the policy is justified and effective. |
|     | Policy H3 Part 1b                                 | New residential development, both open market and affordable housing and including the conversion of buildings from non-residential to residential use and which provides opportunities for self-build homes and community led housing, must provide a high-quality residential environment that ensures all new dwellings:<br>b. <del>comply with</del> <b><u>have regard to</u></b> internal and external standards set out in the Design Guide for New Residential Developments SPD, Householder Design Guide SPD and Open Space SPD; | Response to PQ14 in IN2.<br><br>To improve the terminology for clarity, to ensure that the policy is justified and effective. |
|     | Policy H3 Part 4e                                 | New developments should provide sustainable and liveable neighbourhoods, have consideration to the accessibility mapping as set out in the Council's Transport strategy and where possible have convenient, reasonable and practicable access that can be accessed safely and by all abilities to:                                                                                                                                                                                                                                       | Response to PQ14 in IN2.<br><br>To improve the terminology for clarity, to ensure that the policy is justified and effective. |

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|     |                                                   | e. high quality publicly accessible green space that can be used for a range of leisure and sporting activities, <del>in line with</del> <b><u>and must have regard to</u></b> the Open Space SPD.                                                                                                              |                                                                                                                                                  |
|     | Policy H6 Part 1                                  | The Council will seek to maximise the delivery of affordable housing across the city, in accordance with the high level of need set out in the HEDNA. Affordable housing delivery <del>should be in accordance with</del> <b><u>must have regard to</u></b> the Council's Affordable Housing SPD.               | Response to PQ14 in IN2.<br><br>To improve the terminology for clarity, to ensure that the policy is justified and effective.                    |
|     | Policy H6 Part 3                                  | New residential developments of 10 or more dwellings (gross) located within the area identified <b><u>on the Policies Map</u></b> <del>at Appendix 9(c)</del>                                                                                                                                                   | Response to SPQ5 IN2.2<br><br>To clarify that the information is shown on the Policies Map to ensure that the policy is justified and effective. |
|     | Policy H6 Part 14                                 | Affordable housing proposals must <del>be in accordance with</del> <b><u>have regard to</u></b> the design principles set out in Policy H3, including NDSS standards and the internal and external standards set out in the Design Guide for New Residential Developments SPD and Householder Design Guide SPD. | Response to PQ14 in IN2.<br><br>To improve the terminology for clarity, to ensure that the policy is justified and effective.                    |
|     | Policy H10 Part 6                                 | Design innovation will be encouraged within the sector, particularly in high quality affordable products, <del>in line with</del> <b><u>and</u></b>                                                                                                                                                             | Response to PQ14 in IN2.                                                                                                                         |

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|                                     |                                                   | <b><u>must have regard to</u></b> the design standards set out in the Residential Design Guide SPD.                                                                                                                                                                                                                                                                                                                                                                           | To improve the terminology for clarity, to ensure that the policy is justified and effective.                               |
|                                     | Paragraph 6.62                                    | Private rooms should include an ensuite, seating, desk space for home workings and sufficient storage space for clothes, luggage cases, bathroom items, laundry, general and recyclable waste and for other possessions. It should also provide a good living environment <del>in line with</del> <b><u>and must have regard to</u></b> the Council's New Residential Development Design Guide SPD, including good levels of natural light, outlook, privacy and ventilation. | Response to PQ14 in IN2.<br><br>To improve the terminology for clarity, to ensure that the plan is justified and effective. |
|                                     | Paragraph 6.68                                    | Co-living schemes should include adequate onsite communal outdoor amenity space <del>in line with</del> <b><u>and must have regard to</u></b> the Council's New Residential Development Design Guide SPD and Open Space SPD and is designed and managed in a way that fosters social interaction and encourages engagement between people.                                                                                                                                    | Response to PQ14 in IN2.<br><br>To improve the terminology for clarity, to ensure that the plan is justified and effective. |
| Chapter 7:<br>Retail and<br>Centres |                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                             |
|                                     | Policy R4 Part 2                                  | 2. Sequential <del>Assessment</del> <b><u>Test</u></b><br>a. A Sequential <del>Assessment</del> <b><u>Test</u></b> will be required for all Main Town Centre use proposals <del>or any other use within use class E and F (or subsequent equivalent of these use classes)</del> , outside a                                                                                                                                                                                   | Response to PQ51 in IN2                                                                                                     |

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|     |                                                   | defined centre and should be prepared in accordance with national guidance. This should have regard to the centres hierarchy set out in policy R3.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | To ensure consistency of terminology in line with national policy.                                       |
|     | R4 Part 3                                         | <p>3. Impact <del>Test</del> <b><u>Assessment</u></b><br/> An Impact <del>Test</del> <b><u>Assessment</u></b> will be required for all retail and <b><u>leisure</u></b> <del>other Main Town Centre use proposals</del> outside a defined centre that exceed:</p> <ul style="list-style-type: none"> <li>• 1,000 sqm gross for schemes expected to impact on, or have the potential to impact on Coventry City Centre;</li> <li>• 500 sqm gross for schemes expected to impact on, or have the potential to impact on the Major District Centres; and</li> <li>• 250 sqm gross for schemes expected to impact on, or have the potential to impact on the District Centres.</li> </ul> <p>The Assessment of Impact should be prepared in accordance with national guidance and consider the potential impact on the vitality, viability, role and character of a defined centre(s) within the centres hierarchy (as set out in policy R3).</p> <p>Centres to be considered when undertaking sequential <del>assessments</del> <b><u>tests</u></b> and impact <del>tests</del> <b><u>assessments</u></b> will be considered on a case-by-case basis.</p> | <p>Response to PQ52 in IN2</p> <p>To ensure consistency of terminology in line with national policy.</p> |

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|                                                    | Policy R5 Part 2                                  | Proposals should seek to actively enhance the frontage of a unit within a defined centre <del>in accordance with</del> <b><u>and must have regard to</u></b> the Design Guidance for Shopfronts SPD                                              | Response to PQ14 in IN2.<br><br>To improve the terminology for clarity, to ensure that the policy is justified and effective. |
|                                                    | Policy R6 Part 2c                                 | Proposals within defined centres will be permitted provided they:<br><br>c. <del>are in accordance with</del> <b><u>have regard to</u></b> the emerging Adopted Hot Food Takeaway Supplementary Planning Document and any subsequent replacement | Response to PQ14 in IN2.<br><br>To improve the terminology for clarity, to ensure that the policy is justified and effective. |
| Chapter 8:<br>Communities                          |                                                   |                                                                                                                                                                                                                                                  |                                                                                                                               |
| Chapter 9:<br>Green Belt &<br>Green<br>Environment |                                                   |                                                                                                                                                                                                                                                  |                                                                                                                               |
|                                                    | Paragraph 9.27                                    | Trees that are already subject to protection either as part of an Ancient Woodland (as shown <b><u>on the policies map</u></b> <del>in Appendix 4</del> )                                                                                        | Response to SPQ5 IN2.2<br><br>To clarify that the information is shown on the Policies Map to ensure that                     |

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|                              |                                                   |                                                                                                                                                                                         | the plan is justified and effective.                                                                                                           |
| Chapter 10:<br>Design        |                                                   |                                                                                                                                                                                         |                                                                                                                                                |
|                              | Policy DE1<br>Part 3                              | Where buildings in excess of 20m in height are proposed, these must <del>be informed by</del> <b><u>have regard to</u></b> the guidance of the Tall Buildings SPD.                      | Response to PQ14 in IN2.<br><br>To improve the terminology for clarity, to ensure that the policy is justified and effective.                  |
| Chapter 11:<br>Heritage      |                                                   |                                                                                                                                                                                         |                                                                                                                                                |
|                              | Paragraph<br>11.9                                 | The City Heritage Park and its key routes and linkages are <b><u>shown on the policies map</u></b> <del>identified on the inset map at Appendix 5.</del>                                | Response to SPQ5 IN2.2<br><br>To clarify that the information is shown on the Policies Map to ensure that the plan is justified and effective. |
| Chapter 12:<br>Accessibility |                                                   |                                                                                                                                                                                         |                                                                                                                                                |
|                              | Policy AC1<br>Part 1                              | The Council will encourage proposals that minimise the need to travel, maximise trips made by sustainable transport modes, incorporate liveable neighbourhood principles and reduce the | Response to PQ14 in IN2.                                                                                                                       |

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|                                            |                                                                                                                     | dependence on the private car <del>in accordance with</del> <b><u>with regard to</u></b> the National Design Guide, National Model Design Code, Transport for West Midlands (TfWM) Local Transport Plan (LTP) and the Council's Transport Strategy and Coventry Connected SPD.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | To improve the terminology for clarity, to ensure that the policy is justified and effective.                                               |
| Chapter 13:<br>Environmental<br>Management |                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                             |
|                                            | After paragraphs 13.30 add in new paragraphs 13.31 – 13.34.<br><br>All subsequent paragraphs will need renumbering. | 13.30 The Council recognises the importance of sustainable waste management both locally and in cooperation with its neighbours to ensure that all the waste management needs of the area are met. The key challenges for future growth in waste will be balancing economic prosperity and associated growth with the financial strains of providing necessary infrastructure. Waste policy of the Local Plan is applied in accordance with the Council's Waste Strategy.<br><br><b><u>13.31 The predominant residual municipal waste treatment method within Coventry is Energy from Waste (EfW). The facility saw expansion and improvement in 2020. Therefore, the land identified for the expansion of this facility has now been delivered as intended.</u></b><br><b><u>13.32 On-going assessment of the needs and costs of both domestic and commercial refuse collection will continue to be assessed in detail to support the monitoring of the IDP. The supply of new domestic waste storage and disposal facilities will be required for all new properties and will be</u></b> | Response to SPQ 56.1 in IN2.2.<br><br>To ensure that the plan is consistent with national policy requirements relating to waste management. |

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|     |                                                   | <p><b><u>funded through a combination of council tax and, where viable, developer contributions.</u></b></p> <p><b><u>13.33 The West Midlands Residual Waste Study (2025) provides an overview of current and anticipated residual non-hazardous waste management capacity in the West Midlands. Appendix 2 of this study provides details of how the waste capacity requirements for the city have been calculated. Significant investment has been made in waste processing in the city. This includes a new materials recycling facility that will expand local recycling capacity to enable the city to process 175,000 tonnes of mainly domestic recycling annually. The majority of Coventry's non-recyclable waste is incinerated; however, improvements have been made the city's incinerator facility to improve efficiency through generating power and more recently heat, which supplies several key buildings in the city via the Heatline network. These improvements result in the city being able to process 315,000 tonnes of waste annually</u></b></p> <p><b><u>13.34 In accordance with the Statement of Common Ground, the Council will continue to work with its partners on the West Midlands Technical Advisory Body (WMRTAB) in addressing waste matters</u></b></p> |                      |

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|     | Policy EM7<br>Part 3                                  | This policy will be applied <del>in line with</del> <b><u>having regard to</u></b> the Air Quality SPD.                                                                                                                                                                                                                                                                                                                                                                                                                                              | Response to PQ14 in IN2.<br><br>To improve the terminology for clarity, to ensure that the policy is justified and effective.               |
|     | Policy EM8<br>parts 1 and 1e                          | 1. <b><u>In accordance with national policy on waste management and the waste hierarchy</u></b> , the Council <b><u>and its partners'</u></b> Waste Management Strategy <b><u>needs assessments and strategies</u></b> will be supported through.....<br><b><u>1e</u></b> Existing <b><u>or proposed</u></b> waste management facilities <b><u>and</u></b> <del>or</del> land allocated for waste management uses being protected from encroachment by incompatible land uses that are more sensitive to odour, noise, dust and pest impacts; and... | Response to SPQ 56.1 in IN2.2.<br><br>To ensure that the plan is consistent with national policy requirements relating to waste management. |
|     | After<br>Paragraph<br>13.36 add in a<br>new paragraph | <b><u>The 2025 West Midlands Metropolitan Area (WMMA) Local Aggregate Assessment (LAA) provides the evidence for planning a steady and adequate supply of aggregates. This is achieved by forecasting future demand based on recent sales data, analysing current and future supply options, and assessing the balance between them. The WMLAA informs how Coventry will manage supply to meet the demand from construction and infrastructure projects.</u></b>                                                                                     | Response to SPQ 56.2 in IN2.2<br><br>To ensure that the Local Aggregate Assessment is referenced.                                           |

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| Chapter 14:<br>Coventry City<br>Centre     |                                                                                                                                                                         |                                                                                                                                                                                                                         |                                                                                                                                              |
|                                            | Policy CC1<br>Part a                                                                                                                                                    | Respecting key views to the iconic three spires of St. Michaels, Holy Trinity and Christchurch <del>in line with</del> <b><u>having regard to</u></b> the Tall Buildings Design Guide and View Management Framework SPD | Response to PQ14 in IN2.<br><br>To improve the terminology for clarity, to ensure that the policy is justified and effective.                |
|                                            | Last sentence of the first paragraph under 'City Centre Character Areas' explaining Policy CC1 part E. (page 168) – all paragraphs will need numbering in this section. | The Character Areas are <b><u>shown on the policies map.</u></b> <del>mapped in Appendix 9(f).</del>                                                                                                                    | Response to SPQ5 IN2.2<br><br>To clarify that the information is shown on the Policies Map to show that the plan is justified and effective. |
| Chapter 15:<br>Infrastructure<br>Delivery, |                                                                                                                                                                         |                                                                                                                                                                                                                         |                                                                                                                                              |

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| Implementation<br>and Monitoring |                                                   |                                                                                                                   |                      |
|                                  |                                                   |                                                                                                                   |                      |
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