

Coventry Local Plan Review Examination

Schedule of Main Modifications V8 (16 July 2026)

This schedule sets out potential Main Modifications to the Regulation 19 (Proposed Submission) Plan [CD1]. Version 8 includes all of the main modifications proposed in response to the Inspectors' preliminary [IN2], further preliminary [IN2.1], supplementary questions [IN2.2], matters, issues and questions [IN3], supplementary question 1.6 [IN4], action points from week one hearing sessions [IN7], actions points from week two hearing sessions [IN10], action points from week three hearing sessions [IN12], further action points published on 11th May 2026 [IN13], and action points from 9 June 2026 hearing session [IN15].

References to paragraph or page numbers relate to the Coventry Local Plan Review submitted for examination on 9 September 2025 [CD1]. The modifications are described in words and / or indicated as follows:

- Strikethrough (deleted text)
- **Bold underline** (new or amended text)"

The submitted Plan included Appendices 1 to 9f [CD1a]. All of those appendices are to be deleted from the Plan with the exception of Appendix 2 (marketing guidance) and Appendix 3 (housing trajectory, in a modified form). Where relevant, the content of some of the other Appendices is included as proposed changes to the policies map

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 policy or para.	Main modification	Reason for modification
Chapter 1: Introduction			
MM1	Paras 1.8, 1.9, 1.13 and 1.14	1.8 As this is a review and not a new Local Plan it is important that matters are kept proportionate. To ensure clarity and to avoid unnecessary duplication the Council is proposing to merge the Local Plan and the Area Action Plan into a single document. 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. 1.9 To help understand which policies have changed and why, the Council has produced a summary matrix to sit alongside this document. This shows the current adopted policy, proposed changes to the policy, any deleted or new policies and a short explanation. More detail is contained in a series of topic-based background papers. A Proposals Map has also been produced which shows how the current adopted Policies Map will change. A log of all reviewed policies from the Local Plan and Area Action Plan can be found in Appendix 1. 1.13 Once this draft plan (the Regulation 19 Plan), along with its accompanying documents set out in paragraph 1.12, has been consulted on, it will be submitted for Examination in Public by an independent Planning Inspector who will take account of the comments received ('representations') as well as the evidence provided. More detail can be found here in terms of the process which must be followed. 1.14 The current Local Plan runs up until 2031. The reviewed Local Plan will run up until 2041 as Local Plans need to cover at least a 15-year time period. <u>The policies in this Plan supersede all of the policies in the Coventry City Local Plan (adopted 2017) and all of the policies in the Coventry City Centre Area Action Plan (adopted 2017). As required by national policy, the Plan includes strategic policies, that look ahead to 2042 (15 years following adoption), and</u>	Response to PQ5 in IN2. 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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		<u>non-strategic policies. Where relevant, the geographical application of the policies are illustrated on the policies map which the Council adopted alongside the Plan.</u>	
MM2	Para. 1.11	1.11 Current legislation, The Duty to Co-operate (DtC), which was introduced through the Localism Act 2011 also requires the council to work closely and constructively with neighbouring authorities and a range of other organisations in addressing strategic issues. Paragraph 1.11 is proposed to be deleted.	Response to Q1.8 d) in IN3. To ensure consistency with the Levelling Up and Regeneration Act 2023 and regulations.
Chapter 3: Overall levels of Growth & the Duty to Co-operate			
MM3	Chapter 3 Headline	Overall Levels of Growth and the Duty to Co-operate	Response to Q1.8 d) in IN3. To ensure consistency with the Levelling Up

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			and Regeneration Act 2023 and regulations.
MM4	Para.3.9	3.9 <u>Through the process of the examination of the Local Plan</u> the Local Housing Need for Coventry for the period 2021-2041 <u>2024-2042</u> is therefore 29,100 <u>has been determined to be a minimum of 26,046 net additional homes</u> (1,455 <u>1,447</u> per annum). <u>Table 6.1 identifies a housing land supply with capacity for 22,014 net additional homes. In addition, a significant number of new homes are expected to be delivered in the Northern Regeneration Area from the mid 2030s in accordance with policy CC1 part E. The land supply in the Plan is therefore expected to be sufficient to meet needs until the late 2030s. Housing delivery will be monitored and the Plan will be replaced as necessary to ensure that housing needs can continue to be met in the City.</u> and this will be delivered fully within Coventry's administrative boundary through an urban and brownfield focused strategy of allocations, and densification as set out in the Housing chapter of this reviewed plan.	Response to AP76 in IN15 which supersedes earlier response to AP48 in IN13. To reflect an updated plan period and discussion through the hearings.
MM5	New para. 3.10	<u>3.10 In terms of Gypsy and Traveller need, this is determined by the Gypsy and Traveller Accommodation Assessment (GTAA) (2023) and identifies a need of 18 pitches between 2022 and 2042 to be accommodated on existing sites as set out in Policy H7.</u> NB New paragraph inserted before the Employment Land Needs section of reasoned justification	Response to AP48 in IN13. To reflect the evidence base (GTAA) and to provide clarity for policy DS1.
MM6	Employment Land Needs	3.10 In terms of employment, the HEDNA provides the starting point for the overall amount of employment which is needed over the plan period and this covers the Coventry and Warwickshire area.	Response to AP72 in IN15. To accurately

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	Reasoned Justification	3.11 However alongside this, work has been undertaken across the wider West Midlands region to understand the needs of large scale warehousing and logistics industries, the 'big box' units which are an increasing part of the economy both locally and nationally and which need sites of 25 hectares and above to function effectively (subject also to locational requirements). The West Midlands Strategic Employment Sites Study (WMSESS) 2024 has therefore been jointly produced by several Local Authorities across this area to guide this work. 3.12 Because the HEDNA was produced before the WMSESS, the Coventry and Warwickshire authorities jointly commissioned an 'Alignment Paper' (September 2024) to ensure all evidence was consistent, and up to date in terms of need, supply and any residual need (ie any remaining need which each of the Coventry and Warwickshire authorities would need to plan for). 3.13 Further detailed evidence has been prepared in terms of the Employment Land Review (ELR) and Office Market Addendum in terms of how employment need should be planned for, and this includes allocations and the identification of key sites as set out in the Employment chapter. Office needs have been assessed to understand further detail about the quantum needed and changing demand for space and flexibility, given altered patterns of working especially post pandemic where hybrid working and use of technology is now commonplace. 3.14 In terms of office need, Coventry City Council is able to accommodate this, primarily but not exclusively within a revised Friargate allocation. In regard to local employment need (use classes E(g) (iii), B2 and B8), the City Council is able to accommodate 60 hectares of employment need, with a remaining shortfall of 45 ha which it is not able to accommodate within its own boundaries. 3.15 The above is for local need. In terms of a contribution to the wider strategic need, one allocation meets this, Baginton Fields, which is 25 hectares in size. Ongoing work is continuing with partners under the Duty to Co-operate to work collaboratively and constructively to address strategic need as, being a constrained area, no further opportunities are available in Coventry.	reflect the changes to employment land needs that have emerged through examination. This supersedes previous modifications to these paragraphs.

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		<u>3.11 The evidence for employment land needs is set out in the Coventry and Warwickshire Housing and Economic Development Needs Assessment 2022 (HEDNA), the West Midlands Strategic Employment Sites Study 2024, and the Strategic Employment Sites Study and HEDNA Alignment Papers 2024 and 2025. That evidence identifies a local need for at least 96 hectares of land for industrial and storage / distribution development in the period 2024 to 2042 based on gross completions trends on non-strategic sites in the City over the 2011-24 period.</u> <u>3.12 In addition to that local need, the evidence indicates a significant need for land in the Coventry and Warwickshire functional economic area to accommodate large scale developments (units of at least 9,000 sqm) on sites over 25 hectares well related to the strategic road network as these are expected to continue play an important economic role both sub regionally and nationally.</u> <u>3.13 Table 5.1 identifies a total employment land supply of 38.77 hectares. There is, therefore, a shortfall of at least 57.23 hectares against the minimum requirement for 96 hectares to meet local needs. The only allocation that is considered potentially suitable for accommodating a unit of 9,000 sqm well related to the strategic road network is JE2.3 Baginton Fields.</u> <u>3.14 Delivery against the requirement for at least 96 hectares to meet local needs and associated extent of the shortfall will be monitored and reported through the Council's Annual Monitoring Report (AMR). The AMR will record the amount of employment development (hectares and sqm of floorspace) including development on windfall sites - a strong historic track record of which is shown through the Windfall evidence paper (November 2025). The AMR will also record contributions from the FEMA authorities in terms of sites allocated to help address the shortfall. Whilst it will be for those authorities to monitor progress</u>	

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		<u>on sites within their own administrative areas, the Coventry AMR will provide an annual update on progress.</u> <u>3.15 The Employment Land Review (ELR) and Office Market Addendum identify a requirement for 43,046 sqm of additional office floorspace between 2024 and 2042. 27,100 sqm will be provided within the Friargate allocation as set out in policy JE2. The rest of the need is expected to be met through the approach set out in policy JE4.</u> <u>3.16 In terms of retail need, this has been informed by the Retail and Centres Study 2024 and through the process of the Local Plan Examination. It has been determined that a ten year period (2024 – 2034) is appropriate for determining retail requirements of 3,844 sqm (net sales area) of additional convenience retail floorspace and 8,155 sqm (net sales area) of additional comparison retail floorspace.</u> <u>The needs will be met through development in the town centre network set out in Policy R3 and the allocations in Policy R1.</u>	
MM7	Para 3.16	3.16 The Duty to Co-operate (DtC) is a legal test that requires co-operation between local planning authorities and other public bodies to maximise effectiveness of policies for strategic matters in Local Plans. It was created by the Localism Act 2011. Further details are set out in the Duty to Co-operate Paper. Paragraph 3.16 is proposed to be deleted in its entirety.	Response to Q1.8 d) in IN3. To ensure consistency with the Levelling Up and Regeneration

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			Act 2023 and regulations.
MM8	Policy DS1 Part 1	1. Over the Plan period 2021-2044 significant levels of housing and employment will be planned for and provided along with supporting infrastructure and environmental enhancements. <u>The following minimum amounts of development are required to meet the city's identified needs:</u> a. A minimum of 29,100 <u>26,046</u> additional homes <u>between 2024 and 2042.</u> <u>b. 18 additional pitches for Gypsy and Traveller accommodation between 2022 and 2042</u> c. A minimum of 60 <u>96</u> ha of employment land <u>land for industrial and storage / distribution development between 2024 and 2042</u> to meet local needs within the city's administrative boundary, including: i. The continued expansion of Whitley Business Park; and ii. 15 ha strategic allocation adjoining the A45 as part of the Eastern Green sustainable urban extension (SUE). d. 25 ha, to be provided at Baginton Fields, to contribute to sub regional need in Coventry and Warwickshire. <u>e.d. 3,844 sqm (net sales area) of additional convenience retail floorspace between 2024 and 2034.</u> <u>f.e. 8,155 sqm (net sales area) of additional comparison retail floorspace between 2024 and 2034.</u>	Response to AP47 in IN13 to clearly set out the minimum requirement for different types of development, to ensure the policy is effective and consistent with national policy and the evidence base including a revised plan period. Updated to include the response to AP73 in IN15. Supersedes the earlier modification

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			proposed in response to FPQ18.1 [IN2.1].
MM9	Policy DS1 Part 2	2. A minimum <u>need</u> of 41,200 40,800 <u>43,046</u> sqm overall <u>additional</u> office <u>floorspace</u> <u>between 2024 and 2042</u> provision to include 39,549 <u>27,100</u> sqm of office floor space at Friargate in compliance with Friargate Allocation JE2:1 with the remainder <u>of 15,946 sqm</u> delivered in compliance with the criteria set out in Policy JE4.	Response to AP47 [IN13]. Supersedes the earlier modification proposed in response to Q2.10 in IN3. To ensure the policy is clear and in line with the evidence base set out in the HEDNA [EB8] and in the Office Market Addendum to the Employment Land Review August 2024 [EB13D] and

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			takes account of a revised plan period.
MM10	Policy DS1 Part 3	3. Notwithstanding the above, Coventry's employment need for the period 2021 to 2041 is for 105 ha of employment land (including qualitative replacements). It is not possible to deliver all of this additional development land within the city boundary. As such, the Council will continue to work proactively with neighbouring Councils through the Duty to Co-operate to ensure that appropriate provision is made elsewhere within the Functional Economic Market Area. Policy DS1 Part 3 is proposed to be deleted in its entirety.	Response to AP49 [IN13]. Supersedes the earlier modification proposed in response to Q1.8 d) [IN3]. To ensure consistency with the Levelling Up and Regeneration Act 2023 and regulations.
MM11	Policy DS1 Part 4	4. 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 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. Furthermore, the Plan will be reviewed (either wholly or partially) prior to the end of the Plan period in the event of one or more of the following circumstances arising:— a. Through the Duty to Co-operate, the unmet employment needs of the city are proven to be undeliverable within the Local Plans of Warwickshire authorities;	Response to AP74 in IN15 – delete policy in its entirety along with reasoned justification.

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		b. Updated evidence or changes to national policy suggest that the overall development strategy should be significantly changed; c. The monitoring of the Local Plan (in line with the Plan's Monitoring Framework having particular regard to the monitoring of housing delivery) demonstrates that the overall development strategy or the policies are not delivering the Local Plan's objectives and requirements; d. Any other reasons that render the Plan, or part of it, significantly out of date.	Supersedes the earlier modifications proposed. To ensure consistency with national policy and legislation.
MM12	Para 3.16	The Duty to Co-operate 3.16 The Duty to Co-operate (DtC) is a legal test that requires co-operation between local planning authorities and other public bodies to maximise effectiveness of policies for strategic matters in Local Plans. It was created by the Localism Act 2011. Further details are set out in the Duty to Co-operate paper. Paragraph 3.16 is proposed to be deleted in its entirety	Response to AP75 in IN15 which proposed to delete the entire section of reasoned justification for deleted Policy DS2 (see below).
MM13	Policy DS2	STRATEGIC POLICY Policy DS2: The Duty to Co-operate and partnership working 1. Coventry City Council will work with neighbouring authorities within its Housing Market Area to support the delivery of the development needs identified in Policy DS1 that originate from the city. 2. In order to ensure the affordable housing needs of the city are met, the Council will work with its neighbouring authorities to secure opportunities for Coventry citizens to	Response to AP75 in IN15. Deletion of entire policy and reasoned justification. To ensure

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		access affordable homes within Warwickshire where they are delivered as part of the city's wider housing needs being met. 3. The Council will support the preparation of joint strategic evidence which will enable the successful delivery of regeneration and economic growth across the sub-region. The Council will continue to be proactive in this regard and will seek to cooperate with all partners on an ongoing basis across all topic areas including housing, infrastructure, economy and jobs, transport, health and the environment. 4. Should the need arise and should it be considered appropriate the Council is committed to working with partners on preparing joint development plan documents, Supplementary Planning Documents (SPD) and design guides to help deliver new sustainable development that may straddle or adjoin the city's administrative boundary. 5. Where sites cross or are adjacent to administrative boundaries and are not subject to joint development plan documents, the Council will continue to work proactively and on an on-going basis with all relevant partners to enable the delivery of new development on these sites. 6. Of particular relevance to parts 4 and 5 of this policy is the continued support for and recognition of the contribution which the following sites make to the sub regional economy: a. Jaguar Land Rover at Whitley; b. The University of Warwick; c. The wider Coventry Gateway proposals; d. Ansty Park; 19 e. Pro-Logis Park at Keresley; and f. Proposed residential developments to the south of the city's administrative boundary. 7. The Council is committed to supporting the economic growth objectives of the sub-region and, in partnership will continue to work pro-actively with all partners to deliver economic growth and prosperity across Coventry and Warwickshire. Policy DS2 is proposed to be deleted in its entirety.	consistency with national policy and legislation. Supersedes previous modifications.
MM14	Policy DS3	Policy DS3: Sustainable Development Policy 1. When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). It will work proactively with applicants to	Response to PQ15 and Q1.9 [IN3].

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		find solutions to enable proposals to be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area, taking into account the ambitions of the One Coventry Plan and the Climate Change Strategy and including: a. access to a variety of high quality green and blue infrastructure; b. access to job opportunities; c. use of low carbon, renewable and energy efficient technologies; d. the creation of mixed sustainable communities through a variety of dwelling types, sizes, tenures and range of community facilities e. increased health, wellbeing and quality of life; f. measures to adapt to the impacts of climate change; g. access to sustainable modes of transport; 20 h. preservation and enhancement of the historic environment; and i. sustainable waste management. 2. Planning applications that accord with the policies in the Coventry Local Plan (and, where relevant, with policies in supporting plans) will be approved without delay, unless material considerations indicate otherwise. 3. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise. 4. This will take into account: a. Any adverse impacts of granting permission that would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or b. Specific policies in that Framework that indicate that development should be restricted Policy DS3 is proposed to be deleted in its entirety.	To ensure that the Plan is consistent with national planning policy. Delete policy in its entirety.
MM15	Supporting text to Policy DS3 (paras	Policy DS3 is proposed to be deleted along with supporting text: Delivering Sustainable Development 3.17 The Government expects the planning system to actively encourage growth, giving local people the opportunity to shape communities, whilst providing sufficient	Response to PQ15 and AP1 in IN7 to ensure that the Plan is

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	3.17 & 3.18)	housing to meet local need and support economic activity. This approach is entirely consistent with the Council's vision and aspirations for Coventry. In this context, it is important that the planning system does everything possible to support economic growth and sustainable development. 3.18 The NPPF sets out the presumption in favour of sustainable development and the need for sustainable economic growth. Local Plans should reflect this presumption within their own policy base to promote sustainable development at the local level.	consistent with national policy.
MM16	Policy DS4 Part B	Policy DS4 (Part B) – Whitley Specific Masterplan Principles <u>This policy applies to Allocations JE2.3 Whitley Business Park and JE2.4 Land at Baginton Fields.</u> In addition to the general principles outlined in Policy DS4 (Part A) of this policy, development proposals which relate to this area should also have regard to the relevant requirements below:	Response to Q6.9 in IN3. To clarify which sites the principles in this policy are expected to apply to.
MM17	Policy DS4 Part C	Policy DS4 (part C) Keresley SUE Specific Masterplan Principles In addition to the general principles outlined in Policy DS4 (Part A) of this policy, development proposals which relate to this area should also have regard to the relevant requirements below: i) Incorporate the recommendations of the Council's SUE Design Guidance <u>The Council's Urban Extension Design Guide SPD (2019) and specifically Appendix1 Indicative Keresley Masterplan;</u> ii) Ensure that the planned Local Centre is in accordance with Policy R1; iii) Ensure the new defensible boundaries to the Green Belt are clearly supported on the western side of the site to Tamworth Road and to the north around Thompsons Lane; iv) Establish a comprehensive green and blue infrastructure corridor focused around the Ancient Woodlands, Hounds Hill and the Hall Brook. This corridor should run north-	To accord with the Erratum Statement [CD1b], as set out in IN7, AP2. Updated to include the further modifications proposed in response to AP84, AP83 and AP82 in

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		south between the Burrow Hill Fort to the north and the Jubilee Woodland to the south east; and v) Identify clear access points to the site and make appropriate provisions for new transport infrastructure and highway improvements to support the comprehensive delivery of the site. This should include: a. The provision of a new Link Road in accordance with Policy H2. The Link Road should be operational to traffic prior to the full completion of all development components within the SUE; b. The delivery of the Link Road should not be to the detriment of ProLogis Park; and c. The management of the existing highway junctions at Bennetts Road, Tamworth Road, Fivefield Road, Sandpits Lane, Thompsons Lane, Long Lane and Watery Lane to ensure they continue to operate in a safe and appropriate way.	IN15 and AP30 in IN12.
MM18	Policy DS4 Part D point i and addition of new point xi	i: Incorporate the recommendations of the Council's SUE Design Guidance SPD <u>The Council's Urban Extension Design Guide SPD (2019);</u> vii Westridge <u>Woodridge</u> Avenue <u>xi: Creation of a new high quality town centre in accordance with Policy R1.</u>	Point i change in Response to AP31 in IN12. Point vii correction of typo. New point xi in response to AP26 in IN10 to ensure consistency with Policy R1.
MM19	New policy DS4 Part	<u>Policy DS4 Part E – Brickhill Lane Employment Allocation</u>	Response to AP67 in IN15 to provide the

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	E – Brickhill Lane Employment Allocation	<u>In addition to the policies of this plan, including the general master planning principles outlined in Policy DS4 (Part A), development proposals which relate to this area should also meet the requirements below:</u> • <u>New provision should be primarily focused within ‘B class’ uses unless they are shown to be ancillary and supportive to the overall provision.</u> • <u>Provide a suitable vehicular access from the existing A45 Pickford Gate roundabout to the south</u> • <u>Avoid locating any built development in Flood Zones 2 or 3.</u> • <u>Establish a green and blue infrastructure corridor focused along the Pickford Brook and its tributary.</u> • <u>Incorporate an appropriate landscaped buffer to protect the amenity of neighbouring residential properties, appropriately mitigating issues of noise, light and air quality alongside minimising visual impact to the surrounding landscape.</u> • <u>Retain existing mature hedgerows and trees located on site and to the site's periphery.</u> • <u>In addition to the clear boundaries of the A45, Brick Hill Lane and Oak Tree Lane, the site design must incorporate clear defensible boundaries to the whole of the surrounding Green Belt, having regard to their intended permanence in the long term, so they can endure beyond the plan period.</u> • <u>Ensure the retention of a public right of way crossing the site, located to deliver an attractive and safe route for users.</u> • <u>Respect ancient woodland buffers to Pinkett's Wood.</u> • <u>The development should meet the highest viable BREEAM standards, aiming to achieve Excellent/Outstanding certification, incorporating substantial habitat creation, biodiversity enhancement, sustainable drainage systems, and on-site renewable energy generation. These</u>	policy context for the new employment allocation.

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		<u>measures directly support national and local planning policy objectives relating to climate resilience, biodiversity recovery, and sustainable development.</u> • <u>Avoid harm to Harvest Hill Daffodil Meadow LWS, Pinkett's Wood LWS or Pinkett's Farm Ponds LWS, maintaining an appropriate buffer. The Development of the site should be inclusive of green infrastructure which enhance ecological connectivity of the Local Wildlife Sites.</u> • <u>Provide a material palette to both built form and hard landscape, which minimizes the visual impact upon the surrounding landscape, including the use of green walling and green parking areas.</u> • <u>Built form to reduce in scale to the Northern, Eastern and Western site perimeters, resulting in an appropriate scale relationship to surrounding properties.</u> • <u>Built form should be delivered as a collection of visual elements, incorporating rooflines which respect the surrounding landscape character.</u> • <u>Undertake a Landscape Visual Impact Assessment (LVIA) to ensure the impact of development upon the surrounding landscape is fully considered.</u> • <u>Ensure design and layout is informed by an understanding and analysis of the archaeological context of the site. Proposals must be accompanied by an appropriate archaeological assessment that must include the following:</u> • <u>Information identifying the likely nature, location and extent of remains.</u> • <u>An assessment of the significance of remains; and</u> • <u>Consideration of how the remains may be affected by any proposed development.</u>	

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		• <u>Ensure that the development provides access to local employment opportunities in line with the requirements of policy JE7.</u> • <u>Fully integrate Sustainable transport, in accordance with the requirements of the Accessibility policies of the Local Plan, including the provision of a Travel Plan.</u>	
Chapter 4: Health & Wellbeing			
MM20	Para. 4.9	4.9 An updated Health SPD will be produced which <u>The Councils HIA SPD and /or Council guidance</u> provides guidance on <u>the framework for the consideration of health impacts in relation to development proposals</u> producing Health Impact Assessments, for major applications and a checklist to assist in factoring in health considerations for smaller applications, ensuring that matters addressed are proportionate to the nature and scale of the proposal.	Response to SQ1.6 in IN4. To reflect new legislation meaning that Supplementary Planning Documents cannot be adopted after 30 June 2026.
MM21	Policy HW1 Parts 1, 2 and 4	1. All major development proposals <u>(as defined in paragraph 4.10)</u> will be required to demonstrate that they would have an acceptable impact on health and wellbeing. This should be demonstrated through a: a. HIA where significant impacts on health and wellbeing would arise from that proposal; or b. HIA screening report which demonstrates that the proposed development would not overall give rise to negative impacts in respect of health and wellbeing.	Response to PQ14 in IN2, Q8.1 and 8.2 in IN3 and SQ1.6 in IN4. To improve the terminology for clarity, to

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		2. All HIAs shall be undertaken in accordance with <u>having regard to</u> the Council's HIA Supplementary Planning Document <u>and / or Council guidance</u> any future equivalent. 3. Where a development has significant negative or positive impacts on health and wellbeing the Council may require applicants to provide for the mitigation or provision of such impacts through planning conditions and/or financial/other developer contributions 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 in line with principles contained in an updated <u>the Health HIA SPD and / or Council guidance.</u>	ensure that the policy is justified and effective. To reflect new legislation meaning that Supplementary Planning Documents cannot be adopted after 30 June 2026.
Chapter 5: Jobs & Economy			
MM22	Policy JE1 Parts 1i and new part k	In this regard the Council will <u>have regard to the following criteria when considering development proposals:</u> i Support the continued growth of the benefits associated with the city's two universities and in doing so maximise the economic development and other community benefits associated with them <u>having regard to the University of Warwick SPD.</u> <u>k. Support the modernisation and redevelopment of existing employment stock to support the local economy.</u>	Response to AP20 in IN10 and response to Q6.1 in M6 [IN3]. To clarify the wording to ensure that Policy JE1 is justified and effective.

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MM23	Paras. 5.14 and 5.15	Insert new para. prior to para. 5.14 <u>The quantum of Local Employment need is set out in the Reasoned Justification to Policy DS1 along with a summary of supply and the resultant shortfall. Table 5.1 sets out the components of the supply in relation to local need, which includes the employment allocations in Policy JE2 (the remaining capacity of those sites from the plan start date). The supply also includes 4.68 ha of existing commitments on non allocated sites. It does not include the allocation for Baginton Fields (JE2.4) as this is identified to meet strategic need.</u> 5.14 The HEDNA (2022) along with the subsequent Alignment Paper (2024) sets out that for Coventry between 2021 and 2041 105 hectares of employment land (use Classes B2 and B8) is required. This does not include the strategic ‘big box’ need which is set out in the alignment paper as between 136 – 311 ha across the Coventry and Warwickshire sub region. <u>The HEDNA (2022) along with subsequent Alignment Papers (2024 and 2025) indicate that there is a need for additional strategic employment sites in the Coventry and Warwickshire functional economic area, including in the M6 / A45 / A46 / M45 Coventry and Rugby area, principally to accommodate large scale units of at least 9,000 sqm on sites which are well related to the strategic road network.</u> <u>That need for strategic sites in the wider area is in addition to the need for at least 96 hectares to meet Coventry’s local employment land needs. The only allocation in the Plan that could contribute to meeting those wider strategic needs, linked to the wider West Midlands Investment Zone, is JE2.4 Baginton Fields (9.8 hectares).</u> 5.15 In addition the ELR Office Market Addendum (2024) <u>and consideration through the Local Plan examination</u> establishes an indicative minimum need of 41,200 <u>43,046</u>	Responses to AP54 & AP57 [IN13] (supersedes earlier modification proposed in response to Q2.10 in IN3). To reflect the evidence, a revised plan period and discussions through hearings. Updated to include response to AP71 in IN15 which updates the supply figure for existing commitments on non-allocated sites.

Ref	Plan policy or para.	Main modification	Reason for modification														
		sq.m. office floorspace provision between 2024 and 2042 with a recommendation for flexibility to allow for the ability to respond to changing markets.															
MM24	Table 5.1	Table 5.1 – Class B2 and B8 local employment land supply components for Coventry <table><tr><th><u>Supply components</u></th><th><u>Site Size (Ha)</u></th></tr><tr><td><u>Completions 2021-2024*</u></td><td><u>25.4</u></td></tr><tr><td><u>Committed supply</u></td><td><u>6.2</u></td></tr><tr><td><u>Remaining allocations from adopted 2017 Local Plan carried forward (where not included above)**</u></td><td><u>28.6</u></td></tr><tr><td><u>Total</u></td><td><u>60.2</u></td></tr></table> *data up to 31 March 2024 ** Includes 1.2ha at Austin Drive HELAA site. Excludes 25ha at Baginton Fields which is for strategic B8 Replace Table 5.1 as follows: <table><tr><th><u>Local Need supply components (April 2024)</u></th><th><u>Supply (hectares)</u></th></tr><tr><td></td><td></td></tr></table>	<u>Supply components</u>	<u>Site Size (Ha)</u>	<u>Completions 2021-2024*</u>	<u>25.4</u>	<u>Committed supply</u>	<u>6.2</u>	<u>Remaining allocations from adopted 2017 Local Plan carried forward (where not included above)**</u>	<u>28.6</u>	<u>Total</u>	<u>60.2</u>	<u>Local Need supply components (April 2024)</u>	<u>Supply (hectares)</u>			Response to AP57 (a) [IN13]. To ensure that the employment land supply is clearly summarised in line with the evidence and a revised plan period. Updated to include response to AP70 in IN15 which amends the figures for local employment land supply.
<u>Supply components</u>	<u>Site Size (Ha)</u>																
<u>Completions 2021-2024*</u>	<u>25.4</u>																
<u>Committed supply</u>	<u>6.2</u>																
<u>Remaining allocations from adopted 2017 Local Plan carried forward (where not included above)**</u>	<u>28.6</u>																
<u>Total</u>	<u>60.2</u>																
<u>Local Need supply components (April 2024)</u>	<u>Supply (hectares)</u>																

Ref	Plan policy or para.	Main modification		Reason for modification
		<u>Committed supply (non allocated sites with planning permission)</u>	<u>4.68</u>	
		<u>Allocations remaining capacity (Policy JE2)*</u>	<u>34.09</u>	
		<u>Total local supply</u>	<u>38.77</u>	
		<u>*Excludes Baginton Fields which is identified to meet strategic need</u>		
MM25	Table 5.2	Table 5.2 – office supply components for Coventry		Response to AP57 (a) [IN13]. To ensure that the office land supply is clearly summarised in line with the evidence and a revised plan period.
		Supply components	Site size (sq.m)	
		Completions 2021-2024	22,299	
		Committed supply	24,940	
		Allocations from adopted 2017 Local Plan carried forward (where not included above)*	27,100	
		Total	74,339 <u>27,100</u>	
MM26	Paras 5.18 – 5.21	5.18 In terms of <u>meeting the identified need for additional office floorspace</u> office allocations Coventry is able to meet its own need, through a majority of provision through a reviewed Friargate allocation. Since 2021, Friargate has delivered 12,449 sq.m floor space at Friargate 2 (Friargate One was delivered prior to the start of the		Response to AP54 and AP57 [IN13] (supersedes

Ref	Plan policy or para.	Main modification	Reason for modification
		plan review period), and a further 27,100 sq.m will be provided as part of the Friargate <u>mixed use</u> allocation. This totals 39,549 sq.m delivery at Friargate over the plan period, leaving a residual amount of around 1,650 1,251 This leaves 15,946 sqm to be delivered in line with the approach set out in Policy JE4. 5.19 In terms of remaining local employment needs excluding office provision 60 hectares for local need can be accommodated taking into account supply, 32 completions and allocations, leaving a residual need of 45 hectares. The city is unable to meet its need in full which has already been highlighted through Policy DS1 and reflects the importance of the Duty to Co-operate in ensuring the employment land needs of the sub region are met. 5.20 In terms of strategic employment the Baginton Fields (Policy JE2:4) allocation meets the 25 hectares and above criterion and is to be retained as an allocation to contribute to the wider strategic needs of the sub-region, and again the Council will work with partners to ensure strategic needs are met. 5.21 The Employment Land Review assessed Coventry's <u>existing</u> employment sites and concluded that a number of these were particularly important in maintaining a resilient and varied employment stock: these are designated as Key Employment Sites. <u>Employment sites are shown on the Policies Map.</u>	the earlier modification proposed in response to Q2.10 in IN3). To reflect the evidence, a revised plan period and discussion through hearings.
MM27	Policy JE2 Part 1	1. A total of 52 ha of land is allocated for employment development within the city's administrative area, plus 27,100 sq m remaining floorspace at Friargate as part of a wider mixed use allocation. The allocations are as specified below together with details of the type of employment development that will be promoted on each of these sites. <u>The following sites are allocated for industrial and storage / distribution development between 2024 and 2042:</u>	Response to AP51 and AP52 [IN13]. To reflect discussion through the hearings and

Ref	Plan policy or para.	Main modification						Reason for modification
		Site ref	Site	Ward	Overall allocated Site Area (as allocated (ha) in 2017 adopted plan)	Allocation (local Plan review) – area remaining (ha unless specified otherwise)	Comments	to reflect a revised plan period. Updated to include response to AP69 in IN15 where allocation areas have been amended.
		JE2:1	Friargate (part of mixed use scheme)	St Michael s	7	27,100sqm office floorspace (part of mixed use development)	6.52ha remaining overall site area. Friargate 1 and 2 delivered.	
		JE2:2	Lyons Park	Bablake	19	0	Delivered	
		JE2:3	Whitley Business Park	Cheyles more	30	6.46 2.9	Part delivered	
		JE2:4	Land at Baginton Fields and South East of Whitley Business Park	Cheyles more	25 9.8	25 9.8	Application awaited	
		JE2:5	A45 Eastern Green (part of mixed use site)	Bablake	15	15	Outline application received Under construction	

Ref	Plan policy or para.	Main modification						Reason for modification
		JE2:6	Whitmore Park (part of mixed use site)	Holbrook	8	2.89	Part delivered	
		JE2:7	Durbar Avenue (part of mixed use site)	Foleshill	1.5	1.5	Application awaited	
		JE2:8	Land at Aldermans Green Road and Sutton Stop (part of mixed use site)	Longford	1.5.	1.5	Application awaited	
		<u>JE2:9</u>	<u>Land north of A45 west of Brickhill Lane</u>	<u>Bablake</u>	<u>11.8</u>	<u>11.8</u>	<u>Application awaited</u>	
			Total		407ha <u>76.1</u>	52.35 (excludes Friargate office floorspace figure) <u>43.89</u>		
MM28	Policy JE2 Parts 2, 4 and 5	2. The Friargate, A45 Eastern Green, Whitmore Park, Durbar Avenue and Alderman's Green Road and Sutton Stop employment allocations are to be progressed as part of wider mixed-use re-development schemes and should be supported by comprehensive Masterplans. JE2.1 Land at Friargate is allocated for around 27,100 sqm of additional office floorspace between 2024 and 2042 as part of a mixed use development (H2.38).						Response to Response to SPQ5 IN2.2 And AP52 [IN13]. To reflect the evidence, a revised plan

Ref	Plan policy or para.	Main modification	Reason for modification
		3. A balanced portfolio of employment land supply offering a choice of sites will be maintained, with details of need and supply set out in the Annual Monitoring Report (AMR) and informed by the Employment Land Review which will be updated on a five yearly basis. 4. The following sites, shown on the policies map at Appendix 9a and listed in bullet point 5 are designated as Key Employment Sites which will be protected for employment use. Alternative uses will not be considered acceptable unless exceptional circumstances demonstrate otherwise. In such cases it must be demonstrated that delivery of mixed use including retention of employment has been considered on the site. Only where this has been evidenced not to be viable or appropriate will policy JE3 and associated Appendix 2 be applicable. 5. Key Employment Sites are shown on the policies map at Appendix 9a and are: • Binley Business Park • Coventry Business Park • Cyan Park • Lyons Park • Swallowgate Business Park • University of Warwick Science Park • Whitley Business Park	period and discussion through the hearings. To clarify that the information is shown on the Policies Map to ensure that the policy is justified and effective.
MM29	Policy JE3 Part 2	2. Proposals for the redevelopment in whole or in part of <u>the existing employment sites designated on the policies map, and other land and buildings in employment use</u>, employment land for non-employment purposes will not be permitted unless it can be demonstrated that the part(s) of the site where non employment development is proposed are:	Response to AP21 in IN10. To improve terminology and include on policies map to ensure that the policy is justified and effective.

Ref	Plan policy or para.	Main modification	Reason for modification
MM30	Policy JE4 Part 5	5. Proposals for new office development outside of Defined Centres shall be accompanied by a Sequential Assessment <u>Test</u> .	Response to Q6.16 in M6 [IN3]. To ensure policy is justified and consistent with national policy.
MM31	Policy JE5 Parts 1, 2 and 4	1. The Council's preferred location for new industrial and storage/distribution development are the sites allocated for such purposes under Policy JE2. <u>Proposals for industrial or storage/distribution development on the allocations and Key Employment Sites listed in policy JE2 and existing employment sites designated on the policies map will be supported.</u> 2. Proposals for new industrial and storage/distribution development (including changes of use and the expansion of existing operations) on sites not allocated under Policy JE2, will be permitted provided that they are <u>Proposals for industrial or storage / distribution uses (including changes of use and expansion of existing uses) elsewhere will be supported if they meet all of the following criteria:</u> a. Accessible by a choice of means of transport or will be made accessible by a choice of means of transport as a consequence of planning permission being granted for the development; b. Have good access to a primary route on the highway network and an acceptable impact on the capacity of that network; c. Would not significantly compromise the viability or deliverability of land <u>land</u> allocated in this Plan for employment development; <u>or the viability and operation of existing employment generating uses on a site;</u>	Response to Q14.1 in IN3 and AP23 in IN10. To improve terminology for clarity. To ensure the policy is justified and effective.

Ref	Plan policy or para.	Main modification	Reason for modification
		d. Would be compatible with other Plan Policies. 3. In addition to the above, proposals for new general industrial and storage/distribution development (including changes of use and the expansion of existing operations) on all sites (including those allocated under Policy JE2) will also be required to demonstrate that the proposed development would not result in significant harm to the amenities of persons occupying nearby residential property or other land occupied by uses sensitive to environmental pollution. 4. In addition to the above, where B8 uses will include HGV parking and overnight facilities, <u>the provision of</u> electric vehicle charging and consolidation facilities. <u>will be required</u>	
MM32	Policy JE8 Parts 1 and 2	1. The Council's preferred location for new Research and Development (R&D) are the sites allocated for such purposes under Policy JE2. <u>Proposals for new Research and Development uses on the allocations and Key Employment Sites listed in Policy JE2 and existing employment sites designated on the policies map will be supported.</u> 2. However, proposals for new R&D, (including changes of use and the expansion of existing operations) on sites not allocated under Policy JE2, will be permitted provided that they are: <u>Proposals for new Research and Development uses (including changes of use and expansion of existing uses) elsewhere will be supported if they meet all of the following criteria:</u> a. Accessible by a choice of means of transport or will be made accessible by a choice of means of transport as a consequence of planning permission being granted for the development; b. Have good access to a primary route on the highway network and an acceptable impact on the capacity of that network;	Response to AP24 in IN10. To improve terminology for clarity. To ensure the policy is justified and effective.

Ref	Plan policy or para.	Main modification	Reason for modification
		c. The proposal would not significantly compromise the viability or deliverability of land allocated in this Plan for employment development; d. The development is compatible with other Plan Policies.	
Chapter 6: Delivering Coventry's Housing Needs			
MM33	Para. 6.1	6.1 Since 2011, the Authority's Annual Monitoring Reports show strong performance overall of housing delivery against the Local Plan requirement. The 2022/3 monitoring year showed cumulative delivery of 24.6% above the Local Plan requirement of 14,200 at this stage in the projection. Paragraph 6.1 is proposed to be deleted in its entirety.	Response to AP78 in IN15 which supersedes the earlier response to AP61 [IN13]. To reflect discussion through hearings.
MM34	Para. 6.10	6.10 The HEDNA identifies a local housing need of 1,455 per annum over the plan period. <u>The latest affordability data was released by ONS in March 2025 and relates to 2024. This provided an affordability ratio of 5.86 which if applied to the HEDNA demographic projections (see 2024 Review of Coventry's Housing Need Table 5.3) would generate a need for 1,447 dpa, or 29,100 26,046</u> in total <u>across the plan period</u>. Following a thorough consideration of <u>extant planning permissions</u>, sustainable development principles and in accordance with the NPPF, an assessment of land options through the Call for Sites, and the HELAA and a density study informing a strategy of increased densification, a capacity <u>supply</u> of around 31,954 <u>22,014</u>	Response to AP61 [IN13] to provide clarity on need and supply.

Ref	Plan policy or para.	Main modification	Reason for modification																		
		homes has been identified, which provides a degree of flexibility above the local need figure of 29,100. Table 6.1 below identifies the Council's housing land supply and sets out how the requirement will be met.																			
MM35	Table 6.1	<table><tr><td colspan="2">Table 6.1 Components of housing supply 2021-2041 <u>2024-2042</u></td></tr><tr><td>Housing land supply components (data to 30/09/24 <u>01st April 2025</u>)</td><td>Number of homes</td></tr><tr><td>Past net completions <u>1 April 2024 - 31 March 2025</u></td><td>7,666 <u>805</u></td></tr><tr><td>Committed supply</td><td>13,9975</td></tr><tr><td>Remaining allocations (2017 Local Plan) <u>Allocations remaining capacity at 1 April 2025</u></td><td>2,733 <u>14,415</u></td></tr><tr><td>Proposed new site allocations (local plan review)</td><td>3,503</td></tr><tr><td>Other identified sites (HELAA)</td><td>816</td></tr><tr><td><u>Capacity on sites with planning permission at 1 April 2025 not allocated</u></td><td><u>3,994</u></td></tr><tr><td>Windfall Allowance</td><td>2,800</td></tr></table>	Table 6.1 Components of housing supply 2021-2041 <u>2024-2042</u>		Housing land supply components (data to 30/09/24 <u>01st April 2025</u>)	Number of homes	Past net completions <u>1 April 2024 - 31 March 2025</u>	7,666 <u>805</u>	Committed supply	13,9975	Remaining allocations (2017 Local Plan) <u>Allocations remaining capacity at 1 April 2025</u>	2,733 <u>14,415</u>	Proposed new site allocations (local plan review)	3,503	Other identified sites (HELAA)	816	<u>Capacity on sites with planning permission at 1 April 2025 not allocated</u>	<u>3,994</u>	Windfall Allowance	2,800	Response to AP61 in [IN13]. To summarise the housing land supply for the modified plan period of 2024 – 2042.
Table 6.1 Components of housing supply 2021-2041 <u>2024-2042</u>																					
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Windfall Allowance	2,800																				

Ref	Plan policy or para.	Main modification		Reason for modification
		Total	31,493 <u>22,014</u>	
MM36	Paragraph 6.11	6.11 The trajectory contained in Appendix 3 shows how development will be delivered over the plan period. <u>The five year requirement following adoption (ie for the period 1 April 2027 to 31 March 2032) is 8,621 net additional dwellings. That is based on the following calculation:</u> • <u>1,447 x 5 = 7,235</u> • <u>Actual shortfall in completions 2024/5 = 642</u> • <u>Trajected “surplus” over completions 2025-27 = 40</u> • <u>642 – 40 = 602</u> • <u>7,235 + 602 = 7,837</u> • <u>7,837 x 10% buffer = 784</u> • <u>7,837 + 784 = 8,621</u> <u>A supply of 8,397 homes has been identified over the period April 2027 to March 2032 resulting in an anticipated supply of 4.87 years on adoption. It should be noted that this position reflects the forecast supply as of 1st April 2025 and does not take account of any permissions or reserved matters approvals since that date. The 2025-27 position is a forecast for future supply up to the intended date of adoption where it is expected that 2026/27 completions will offset shortfalls recorded in 2024/25 and 2025/26 monitoring which reflect a downward fluctuation of development activity in these years.</u>		In response to AP62 in IN13 to reflect a revised plan period and updated trajectory. See Annex 1 to this schedule for the modified trajectory which is to be inserted as an appendix to the Plan
MM37	Policy H1 Part 3	3. <u>The principle of developing land identified for housing in the Local Plan will be supported</u> Housing land will be released in order to maintain a continuous 5 year supply. of housing land in order to support <u>The varied nature of the component sites in Table 6.1 will encourage the</u> and flexible land supply to support housing delivery and of sustainable development. This will be monitored through the Council’s Annual Monitoring Report		Response to PQ36 in IN2. To improve the terminology for clarity, to

Ref	Plan policy or para.	Main modification	Reason for modification
			ensure that the policy is justified and effective.
MM38	Policy H2 Part 2	2. The urban extension proposals at Keresley and Eastern Green are to be brought forward in full accordance with comprehensive Masterplans and in accordance with <u>must have regard to</u> the Council's Urban Extension Design Guidance SPD.	Response to PQ14 in IN2. To improve terminology for clarity, to ensure that the policy is justified and effective.
MM39	Para 6.12	6.12 The identified land supply will offer flexibility and choice across the city. The following policy, accompanied by Table 6.2 sets out the allocations referred to in the Components of Housing Supply Table 6.1 above. As this is a review of the adopted 2017 Local Plan a commentary is also provided so it can be seen where the 2017 Local Plan allocations are underway or where they have been delivered, and those allocation reference numbers remain unchanged for clarity. New / amended allocation maps are at Appendix 9b. <u>The column headed 'Indicative Capacity' is based on an initial assessment of the site including consideration of local constraints and the application of the density assumptions in line with Policy H9. The actual number will be determined by masterplanning and/or planning applications through a design-led approach to optimise capacity and meet relevant policy requirements in the Plan.</u>	Response to AP7 in IN7. To improve the terminology for clarity to ensure the policy is justified and effective.

Ref	Plan policy or para.	Main modification	Reason for modification
MM40	Policy H2 Table 6.2	Modify Table 6.2 as set out in the attached Annex 2 to this schedule.	See reasoning in Annex 2.
MM41	Policy H3 Parts 1b, 4e and 6	1. 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: b. comply with have regard to internal and external standards set out in the Design Guide for New Residential Developments SPD, Householder Design Guide SPD and Open Space SPD; 4. 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: a. local medical services; b. convenient shopping facilities; c. primary school; d. sustainable transport modes; and e. high quality publicly accessible green space that can be used for a range of leisure and sporting activities, in line with and must have regard to the Open Space SPD. 6. Sustainable transport provision and the infrastructure required to support housing development must be considered from the onset and conform have regard to the City Council's adopted Transport Strategy to ensure all sites have easy access to high quality public transport and walking and cycling routes.	Response to PQ14 in IN2 and Q5.1e in IN3. To improve terminology for clarity, to ensure that the policy is justified and effective.

Ref	Plan policy or para.	Main modification	Reason for modification
MM42	Policy H5 Part 3	3. The conversion of existing dwellings to uses other than primary residential will be resisted, unless <u>it can be</u> very special circumstances can be demonstrated including why the non- primary residential use would better meet the need of the local area and the aims of the Local Plan. than the existing dwellings.	Response to Q5.9 in IN3. To improve the terminology for clarity and consistency, to ensure the policy is justified and effective.
MM43	New para (to follow para 6.30)	<u>The Coventry Local Plan Viability Report October 2024 indicated that the provision of affordable housing in the central parts of the city is likely to be challenging without public subsidy. Planning applications for residential development in the area identified as ‘area applicable to policy H6 part 4’ on the policies map which propose a lower level of Affordable Housing provision due to development viability, should therefore be supported by evidence of approaches to grant funding bodies, demonstrating as a minimum the outcome of grant pre-application assessments.</u> (Insert new paragraph above after para 6.30 immediately before Policy H6).	Response to AP44 in IN12 which supersedes the earlier modification proposed in response to AP14 in IN10. To ensure that the policy is justified and effective.
MM44	Policy H6 Part 1	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 should be in accordance with <u>must have regard to</u> the Council’s Affordable Housing SPD.	Response to PQ14 in IN2. To improve terminology

Ref	Plan policy or para.	Main modification	Reason for modification
			for clarity, to ensure that the policy is justified and effective.
MM45	Policy H6 Parts 3 & 4	3. New residential developments of 10 or more dwellings (gross) <u>or sites of 0.5 hectares (gross)</u> located within the area identified at Appendix 9(c) on individual sites, or on sites of more than 1ha will be required to provide 25% of all dwellings as affordable homes. This excludes Purpose Built Student Accommodation, co-living accommodation and Build to Rent accommodation, where the affordable housing provision is set out in points 5, 6 and 7 of this policy. 4. Sites located within the area identified on the policies map identified as 'area applicable to policy H6 part 4' will be expected to demonstrate that grant funding opportunities to support the provision of Affordable Housing are not available prior to agreeing a lower level of provision. <u>New residential developments of 10 or more dwellings (gross) or sites of 0.5 hectares (gross) within Use Class C3 in the "area applicable to policy H6 part 4" identified on the policies map should include the maximum amount of affordable housing that can be viably delivered including through the use of grant funding where necessary.</u>	Response to AP79 in IN15 which supersedes earlier responses to AP43 in IN12, AP14 in IN10, SPQ5 in IN2.2 and Q5.4b in IN3. To clarify that the information is shown on the Policies Map to ensure that the policy is justified and effective. To ensure that the size of site is consistent

Ref	Plan policy or para.	Main modification	Reason for modification
			with that contained in national policy.
MM46	Policy H6 Part 5	5. On sites providing 25 bed spaces or more of Purpose Built Student Accommodation (PBSA) outside of Campus <u>(or on land immediately adjacent to the Campus)</u> as defined at policy H10, a commuted sum will be required in lieu of on-site 20% affordable housing provision	Response to Q14.1 in M14 [IN3]. To improve the terminology for clarity.
MM47	Policy H6 Parts 8 and 9	8. The affordable housing tenure and mix will be <u>determined in accordance with current national policy</u> based on the <u>local</u> need highlighted in the latest HEDNA <u>(or equivalent)</u> supplemented with Homefinder (or equivalent data). On this basis the Council will expect to seek: a. a tenure split of 60% social/affordable rent and 40% intermediate provision, b. of the social and affordable rent provision a minimum of half should be for social rent; and c. Accounting for any nationally set contribution for intermediate home ownership products, the remainder of the affordable home ownership is to be delivered as other intermediate home ownership products. 9. Proposals must meet national policy requirements to affordable home ownership initiatives and local eligibility criteria, and where these are updated or altered, the latest requirements will be applicable.	Response to AP16 in IN10. To ensure that the policy reflects the evidence of need and current national planning policy.
MM48	Policy H6 Part 10	10. The expected mix for affordable housing provision will initially be guided by the HEDNA, however, through engagement with the Council and Registered Providers,	Response to SQ1.6 in IN4.

Ref	Plan policy or para.	Main modification	Reason for modification
		positive weight will be given to a housing mix that is also informed by the latest Homefinder data (or future equivalent) to ensure the deliver reflects the most up to date need and circumstances. The affordable housing mix should reflect the overall mix and type of housing proposed across the application site guided by <u>the an updated affordable housing SPD and / or Council guidance.</u>	To reflect new legislation meaning that Supplementary Planning Documents cannot be adopted after 30 June 2026.
MM49	Policy H6 Part 12	12. A reduction in the requirements of policy EM11 part 4 may be presented for assessment in order to maximise Affordable Housing delivery.	Response to Q13.6 in IN3. To ensure that the policy is justified and effective.
MM50	Policy H6 Part 14	14. Affordable housing proposals must be in accordance with have regard to 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. To improve terminology for clarity, to ensure that the policy is justified and effective.
MM51	Para. 6.31	6.31 A Gypsy and Traveller Accommodation Assessment (GTAA) was completed in February 2023. This concludes that there <u>is a need for 18 pitches between 2022 and 2041. 12 pitches have been provided since 2022 at the Siskin Drive site and as</u>	Response to AP17 in IN10.

Ref	Plan policy or para.	Main modification	Reason for modification
		<u>shown in the GTAA there is capacity to accommodate up to 6 additional pitches at the Burbages Lane site. Both sites are identified on the Policies Map.</u> are currently 5 authorised pitches on Burbages Lane and an expected supply of 12 pitches following the redevelopment of the Siskin Drive site. This is able to cater for the assessed need (15 pitches) over the short term 2022/23 to 2026/27. Over the longer plan period to 2041 the GTAA concludes there will be a shortfall of 6 pitches but that these could potentially be accommodated at Burbages Lane.	To improve terminology referencing for clarity, to ensure that the policy is justified and effective.
MM52	Policy H7 Part 1	1. Provision will be made for at least 6 18 permanent pitches for Gypsies and Travellers. <u>These will be met through:</u> <u>a) 12 pitches at the Siskin Drive site as identified on the Policies Map</u> <u>b) An additional 6 pitches at the Burbages Lane site as identified on the Policies Map</u>	Response to AP17 in IN10. To improve terminology and referencing for clarity, to ensure that the policy is justified and effective.
MM53	Para. 6.41	6.41 It is important that density policies are applied in tandem with other policies of the plan and related SPDs to ensure appropriate levels of amenity space, landscaping and other onsite infrastructure. As such the Council's policy is set in the context of net densities that seek to maintain: • At least 20% of gross site area to remain undeveloped on sites in excess of 2ha; • At least 15% of gross site area to remain undeveloped on sites below 2 ha; • At least 10% of gross site area to remain undeveloped on sites within the transition zone • At least 5% of gross site area to remain undeveloped on sites within the city centre	Response to AP18 in IN10. To improve terminology and referencing for clarity to ensure that the policy is

Ref	Plan policy or para.	Main modification	Reason for modification
		<u>6.41 In applying the residential density policy, applicants should carefully consider local character by undertaking a contextual analysis which should be submitted within application Design and Access Statements. Regard should be given to Local Authority guidance including the New Residential Development Design Guide SPD, Design Codes and where relevant Conservation Area Appraisals.</u>	justified and effective..
MM54	Policy H9 Parts 2 and 3	2. Proposed development density should be informed by a <u>The density of residential development should be informed by a design-led approach that makes efficient use of land and achieves high quality development that reflects the</u> site's local character and context. in alignment with other plan policies 3. To ensure that the most effective use of land, new developments, with relevant consideration to Part 2 of this policy, should seek to deliver the following densities: • Greenfield sites – 35 dwellings per hectare (net). • Brownfield sites 45 dwellings per hectare (net). • Sites <u>wholly</u> within the City Centre Transition Zone* <u>(as shown on the policies map)</u> 125 dwellings per hectare (net). • Development within the defined City Centre boundary** <u>(as shown on the policies map)</u> 250 dwellings per hectare (net). *City Centre Transition Zone as shown at Appendix 9(d) **City Centre boundary as shown at Appendix 9(d)	Response to Q5.3b in IN3 and AP18 in IN10. To improve terminology and referencing for clarity to ensure that the policy is justified and effective.
MM55	Para 6.47	<u>6.47 For the purposes of 'Campus' within policy H10, the areas are as per the adopted Warwick University SPD, and the University and Enterprise Area of the City Centre, or future adopted university masterplan Supplementary Planning Document. The term 'immediately adjacent' refers to those sites that physically share a common border with / adjoin the campuses.</u>	Response to Q14.1 [IN3]. To improve terminology for clarity to ensure that

Ref	Plan policy or para.	Main modification	Reason for modification
			the policy is justified and effective.
MM56	Policy H10 Parts 2, 3, 4, 5 and 6	2. Purpose Built Student Accommodation (PBSA), proposed outside of the areas identified in point 1, whether new build or conversions, will be delivered in line with the Council's PBSA monitor and manage approach and will only be considered appropriate where: a. <u>applicants can demonstrate that a significant change in market circumstance has occurred that evidences a need for additional student accommodation.</u> The PBSA monitor and manage approach demonstrates evidence of need for additional student accommodation; or b. There is support from one of the City's universities that evidences a need for additional student accommodation. 3. Proposals <u>outside the University of Warwick campus as defined on the policies map</u> must provide evidence to show adaptability to other uses by being designed in such a way that it can be capable of being re-configured through internal alterations to meet NDSS standards to meet general housing needs in the future. 4. Developments that comprise a predominantly studio ratio will be considered in line with the most up to date available evidence. 5. Proposals should comprise predominantly cluster units of no more than 8 units per cluster. <u>Development must comprise predominantly cluster units providing high quality accommodation with communal areas for cooking, eating and socialising suitable for the number of units. Proposals for studio flats will be considered having regard to the latest evidence of need.</u>	Response to Q5.5b [IN3], AP19 [IN10] (supersedes the response to Q5.3d in IN3) and PQ14 in IN2 (Updated to include response to Q5.5f in IN3). To improve terminology and referencing for clarity to ensure that the policy is justified and effective.

Ref	Plan policy or para.	Main modification	Reason for modification
		6. Design innovation will be encouraged within the PBSA sector, particularly in high quality affordable products, in line with having regard to the design standards set out in the Residential Design Guide SPD.	
MM57	Para 6.62	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 in line with and must have regard to the Council's New Residential Development Design Guide SPD, including good levels of natural light, outlook, privacy and ventilation.	Response to PQ14 in IN2.To improve the terminology and referencing for clarity, to ensure that the plan is justified and effective.
MM58	Para 6.68	6.68 Co-living schemes should include adequate onsite communal outdoor amenity space in line with and must have regard to 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.To improve the terminology and referencing for clarity, to ensure that the policy is justified and effective.

Ref	Plan policy or para.	Main modification			Reason for modification
Chapter 7: Retail and Centres					
MM59	Policy R1 (table)	Site	Proposed floor space (sq.m gross)	Details	Response to AP25 and AP26 in IN10. To provide greater clarity to ensure that the policy is justified and effective. To delete text which was erroneously included in this section.
		New Eastern Green District Centre	Up to 10,000 sqm	To include a range of retail and leisure uses. <u>A sustainable high quality town centre will be provided. This will comprise a variety of main town centre uses in units of different sizes with attractive public realm, good access by walking, cycling and public transport and limited car parking provision.</u>	
		New Eastern Green Local Centre	Up to 1000 sqm	1.To include a range of small scale units providing a range of local community uses and top up provisions. 2.The comprehensive redevelopment of the Riley Square element of Bell Green District Centre will be supported in accordance with an overarching Masterplan for the area. 3. Further retail, leisure and other town centre uses at Arena Park and Brandon Park Major District Centres will not be supported during the plan period unless it is demonstrated that it will not have a	

Ref	Plan policy or para.	Main modification			Reason for modification
				significant adverse impact on the city centre or is an essential element of supported the wider tourism functions.	
		New Keresley Local Centre (South)	Up to 1,500 sgm	Local centre to include a range of small scale units providing a range of local community uses and top up provisions.	
MM60	Policy R2	Delete in its entirety Policy R2: Coventry City Centre — Development Strategy 1. The city centre will continue to be developed and regenerated to ensure it is a truly world class city centre, leading in design, sustainability and culture. This will be achieved by: a. Enhancement of its position as a focus for the entire sub-region and as a national and international destination to live, work and play; b. Enhancement of its retail and leisure offer to strengthen the city's sub-regional role; c. Provision of high quality office space; d. Becoming a hub for education; e. Including a variety of places to live which cater for different needs; f. Preserving or enhancing the character and setting of the historic built landscape and the archaeological environment; g. A connected public realm including public squares and green spaces, easily accessible through the creation of desirable and legible pedestrian routes; h. Accessible for all;			Response to PQ46 [IN2] to avoid duplication with CC1A

Ref	Plan policy or para.	Main modification	Reason for modification
		i. Providing an attractive and safe environment for pedestrians, cyclists and motorists; j. Provide a high-quality public transport system that benefits from seamless integration and is well connected to existing and new infrastructure; k. High quality sustainable built design; l. Continuing to develop a vibrant and attractive night time economy; m. Providing opportunities to improve health and wellbeing; 75 n. Continuing to support greater integration of the university within the wider city centre in accordance with the City Centre policies of this plan; o. Recognising and preserving key views to the iconic three spires of St Michaels, Holy Trinity and Christchurch; p. Supporting the reintroduction of green and blue infrastructure throughout the city centre, including opportunities for de-culverting wherever possible.	
MM61	Policy R3 Parts 2, 3 and 4	2. Centre boundaries and Primary Shopping Areas (PSA) for the following Major District Centres are shown on the Policies Map at: a. Arena Park; b. Cannon Park; c. Brandon Road. They will complement but not compete with the city centre and <u>will be of a scale and function appropriate to their role in the retail hierarchy as defined in the evidence base</u> contain a scale of development which is demonstrated to not impact negatively on the city centre and support the needs of their part of the city. <u>PSAs within the above centres should be the focus for Class E(a) activities at ground floor level.</u> 3. Centre boundaries and Primary Shopping Areas for the following District Centres are shown on the Policies Map at: a. Ball Hill;	Response to AP45 in IN12 which supersedes responses to AP27 and AP28 in IN10 and Q7.4 a) [IN3]. To improve terminology and referencing for clarity to ensure that the policy is

Ref	Plan policy or para.	Main modification	Reason for modification
		b. Bell Green; c. Brade Drive; d. Daventry Road; e. Earlsdon; f. Eastern Green* g. Foleshill; h. Jardine Crescent; i. Jubilee Crescent. They will <u>be of a scale and function appropriate to their role in the retail hierarchy as defined in the evidence base</u> contain a scale of development which is demonstrated to not impact negatively on higher order centres and <u>will support</u> supports the needs of their district of the city for bulk convenience shopping as well as an element of comparison shopping, service and catering uses. Social, community, leisure and small scale office uses will also be acceptable. <u>PSAs within the above centres should be the focus for Class E(a) activities at ground floor level.</u> 4 Centre boundaries for the following Local Centres are shown on the Policies Map at: a. Acorn Street; b. Ansty Road; c. Baginton Road; d. Bannerbrook; e. Barkers Butts Lane; f. Binley Road; g. Birmingham Road; h. Broad Park Road; i. Charter Avenue;	justified and effective.

Ref	Plan policy or para.	Main modification	Reason for modification
		j. Eastern Green* k. Far Gosford Street; l. Green Lane; m. Hillfields; n. Holbrook Lane; o. Holyhead Road; p. Keresley Road; q. Keresley South;* r. Longford; s. Quorn Way; t. Radford Road; u. Station Avenue; v. Walsgrave Road; w. Willenhall; x. Winsford Avenue. They will <u>be of a scale and function appropriate to their role in the retail hierarchy as defined in the evidence base</u> contain an appropriate scale of development which is demonstrated to not impact negatively on higher order centres and <u>will support</u> supports their immediate locality for day-to-day convenience shopping and also some service and restaurant uses; and social, community and leisure uses. Small scale office uses will also be acceptable. *Eastern Green District and Local Centres and Keresley South Local Centre are identified as broad locations due to the sites not yet being built out.	
MM62	Policy R4 Parts 2a,	1. Proposals for retail and other Main Town Centre uses (including proposals for the expansion or re-configuration of existing uses and the variation of existing conditions)	Response to PQ51 and PQ52 in IN2

Ref	Plan policy or para.	Main modification	Reason for modification
	b, c and Part 3	will not be permitted in out-of-centre locations unless they satisfy the Sequential Assessment and the Impact Test (where appropriate). 2. Sequential Assessment Test a. A Sequential Assessment Test will be required for all Main Town Centre use proposals or any other use within use class E and F (or subsequent equivalent of these use classes), outside a defined centre and should be prepared in accordance with national guidance. This should have regard to the centres hierarchy set out in policy R3. b. Where in-centre options are exhausted, the sequential-assessment test will be applied to edge of centre locations as follows... • Where there is a defined Primary Shopping Area within a centre, retail proposals which are within 300m of a defined Primary Shopping Area boundary as follows: i. Arena Park; ii. Cannon Park; iii. Brandon Road. iv. Ball Hill; v. Bell Green; vi. Brade Drive; vii. Daventry Road; viii. Earlsdon; ix. Foleshill; x. Jardine Crescent; xi. Jubilee Crescent. • Other Main Town Centre use proposals within 300m of a defined centre boundary	Response to Q7.5 b and c [IN3]. To ensure consistency of terminology in line with national policy. To avoid duplication.

Ref	Plan policy or para.	Main modification	Reason for modification
		e. Retail proposals close to centres which do not have a defined PSA. 3. Impact Test <u>Assessment</u> An Impact Test <u>Assessment</u> will be required for all retail and <u>leisure</u> other Main Town Centre use proposals outside a defined centre that exceed: • 1,000 sqm gross for schemes expected to impact on, or have the potential to impact on Coventry City Centre; • 500 sqm gross for schemes expected to impact on, or have the potential to impact on the Major District Centres; and • 250 sqm gross for schemes expected to impact on, or have the potential to impact on the District Centres. 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). Centres to be considered when undertaking sequential assessments <u>tests</u> and impact tests <u>assessments</u> will be considered on a case-by-case basis.	
MM63	Policy R5 Part 2	Proposals should seek to actively enhance the frontage of a unit within a defined centre in accordance with <u>and must have regard to</u> the Design Guidance for Shopfronts SPD	Response to PQ14 in IN2. To improve the terminology for clarity, to ensure that the policy is

Ref	Plan policy or para.	Main modification	Reason for modification
			justified and effective.
MM64	Policy R6 Part 2c	Proposals within defined centres will be permitted provided they: e. are in accordance with have regard to the emerging Adopted Hot Food Takeaway Supplementary Planning Document and any subsequent replacement	Response to PQ14 in IN2 and response to Q7.4 b) in IN3. To improve the terminology for clarity, to ensure that the policy is justified and effective.
Chapter 9: Green Belt & Green Environment			
MM65	Paras 9.3-9.8	9.3 The NPPF sets the approach to defining the Green Belt boundaries. Its purpose is to help ensure that the Green Belt (as defined in this Plan) endures beyond the Plan period and that defensible boundaries are maintained. 9.4 Through the 2017 Local Plan the Council put a mechanism in place that responded to potential longer term development options in Warwick District meaning its own Plan remained flexible and was able to respond to emerging circumstances in neighbouring areas.	Response to AP81 in IN15 which supersedes the earlier response to AP32 in IN12.

Ref	Plan policy or para.	Main modification	Reason for modification
		9.5 Land along the southern boundary of Coventry was therefore designated as safeguarded land for consideration as part of the 'next Local Plan review', i.e. the review now taking place. This safeguarding would have explicit regard to development proposals within Warwick District, that if brought forward for development over the course of this Plan period would create Green Belt policy 'islands' which would not meet the five tests of Green Belt set out in the NPPF. 9.6 In this context, these sites were safeguarded as their long term designation as 'Green Belt' is dependent upon the development of adjoining land in a neighbouring local authority. The sites themselves are largely utilised for a small number of low density homes, education provisions or are undevelopable due to the presence of ancient woodlands. 9.7 The 2017 Coventry Local Plan stated that should such development proposals not materialise within Warwick District these sites would be considered for a formal return to the Green Belt due to the issues raised above. 9.8 At the time of writing, proposals are being considered for this neighbouring area through the emerging South Warwickshire Local Plan (SWLP), which is being produced jointly by Warwick and Stratford on Avon District Councils. As the SWLP has not yet reached an advanced stage the land will need to remain safeguarded for the reasons set out in the preceding paragraphs, and its future designation will need to be considered through a future Local Plan update. <u>9.3 Four parcels of land along the southern boundary of Coventry are designated as safeguarded land in the Green Belt. This is to allow proper regard to be had to established allocations and established areas of safeguarded land within Warwick District which have not yet been developed.</u> <u>9.4 These sites in Coventry have been safeguarded as, notwithstanding the national policy expectation that Green Belts should be permanent and that their boundaries should endure beyond the plan period, the designation of these sites</u>	Reasoned justification to give clarity to the context of safeguarded land and its status.

Ref	Plan policy or para.	Main modification	Reason for modification
		<u>as Green Belt is contextually dependent on the development of adjoining land in Warwick District.</u> <u>9.5 Such development in Warwick District may mean that some of the Safeguarded Land within the Green Belt in Coventry may no longer serve Green Belt purposes and may therefore become suitable for residential development.</u> <u>9.6 The Council is committed to working proactively and on an ongoing basis with all relevant partners to enable the delivery of housing where sites are adjacent to or cross administrative boundaries.</u>	
MM66	Policy GB3 Part 2	2. Inappropriate development will not be permitted unless very special circumstances exist. Development proposals, including those involving previously developed land and buildings, on Local Green Space will be assessed in relation to the relevant national planning policy.	Response to AP33 in IN12. To improve terminology for clarity, effectiveness and consistency with national policy.
MM67	Para 9.10	9.10 <u>For the purposes of this plan the term 'Green and Blue Infrastructure' is to be applied in accordance with the definition of Green Infrastructure contained in the NPPF.</u> For the purposes of this plan, the term 'Green Infrastructure' also includes what is sometimes called 'blue infrastructure', that is, various water bodies such as canals and rivers for example. A sustainable growth strategy relies on protecting and improving the quality of the environment. Future development must be located to maximise the efficient use of land, well integrated with existing development, and well related to public transport and other existing and planned Green Infrastructure, so promoting sustainable development.	Response to Q9.8 in M9 [IN3]. To ensure that Policy GE1 is effective and consistent with national policy.

Ref	Plan policy or para.	Main modification	Reason for modification
MM68	Policy GE1 Part 1	1. The Council will protect and enhance green and blue infrastructure based on an analysis of existing assets, informed by and contributing to the delivery of the Local Nature Recovery Strategy and the <u>Green Space Strategy until its replacement by the</u> Green and Blue Infrastructure Strategy and Action Plan or its future equivalent.	Response to Q9.8 in IN3. To improve terminology and referencing for clarity, to ensure the policy is justified and effective.
MM69	Paragrap 9.19	9.19 <u>In assessing value, alongside site specific assessments</u> the Council will <u>have regard to the</u> has adopted a Green Space Strategy <u>and adopted Open Space SPD</u> , which sets out the minimum local standards for <u>open and</u> green space provision. These documents <u>These documents</u> sets out the provision standards for the various categories of open space looking at quantity, quality and accessibility. There is also a set of quality standards for each of the provision standard categories. The same green space can sometimes contribute to more than category in the standards. This <u>These documents</u> will ultimately be superseded by the emerging Green and Blue Infrastructure Strategy and Action Plan for Coventry.	Response to AP34 in IN12. To improve terminology and referencing for clarity to ensure the policy is justified and effective.
MM70	Policy GE2 Part 3	3. To support the proposed allocations at H2:19 and JE2:4 <u>the existing playing field land (and ancillary facilities) will be replaced by</u> the following sites are allocated for the provision of new sports pitches: <u>equivalent, or better standards in terms of both quantity and quality in a suitable location</u> a. Land at Charter Avenue (former Alderman Harris School site)	Proposed modification which supersedes the earlier

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		b. Land east of Coundon Wedge Road	response to Q14.1 in M14 [IN3]. To improve terminology and referencing for clarity and reflect agreement with Sport England.
MM71	Para 9.16	9.16 In 2021, the Environment Act came into force requiring the development and implementation of Local Nature Recovery Strategies (LNRS), with the LNRS regulations following in April 2023. The boundary for the emerging West Midlands LNRS includes Coventry, Birmingham and the Black Country and this work is being led by the West Midlands Combined Authority (WMCA). <u>The LNRS will inform the assessments of applications alongside the Green Environment Policies of this plan, including the incorporation of measures within development to support priority species.</u>	To provide update to the context in the reasoned justification.
MM72	Para 9.25	9.25 Through site selection and layout, developers should avoid or reduce any negative impact on biodiversity. They must deliver at least 10% BNG, as measured by the statutory biodiversity metric. There are 3 ways a developer can achieve BNG. They can create biodiversity on-site (within the red line boundary of a development site). If they cannot achieve all of their BNG on-site, they can deliver a mixture of on-site and off-site. If neither can be achieved then as a last resort they can buy statutory	Response to SQ1.6 in IN4. To reflect new legislation meaning that Supplementar

Ref	Plan policy or para.	Main modification	Reason for modification
		biodiversity credits from the government. The steps must be followed in order. Further information can be found on the government website, and local guidance is contained in the Biodiversity SPD which will be updated <u>and / or Council guidance.</u>	y Planning Documents cannot be adopted after 30 June 2026.
MM73	Policy GE3	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: <u>2. Proposals for development on other sites will be supported where they:</u> a. lead to a minimum 10% net gain of biodiversity, by means of an approved ecological assessment of existing site features and development impacts, and the creation or enhancement of habitats, urban greening features such as green walls and roofs, and/or the implementation of species specific features such as bird and bat boxes; <u>undertaken prior to development. Appropriate habitats should be created and enhanced in accordance with the statutory biodiversity metric, leading to a positive impact on biodiversity.</u> b. protect or enhance biodiversity assets and secure their long term management and maintenance; <u>Implement biodiversity features for priority species identified in the LNRs</u> c. avoid negative impacts on existing biodiversity;	Response to AP35 in IN12. To clarify which elements relate to statutory Biodiversity Net Gain, and to clarify the hierarchy of onsite vs off-site delivery of BNG. Superse des all previous modifications. Response to SQ1.6 in IN4. To reflect new legislation

Ref	Plan policy or para.	Main modification	Reason for modification
		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. 95 3. Where this it is demonstrated that it is not possible to meet part 2 of this policy, then the biodiversity gain hierarchy is to be followed, these steps are: not possible, the net gain must be delivered off site. Only if evidence demonstrates that insufficient gains cannot be made to meet the 10% requirement will statutory credits be allowed to be purchased. a. <u>Deliver habitat creation enhancements within the red line boundary to offset the impacts of the development</u> b. <u>Deliver through a mixture of on-site and off-site biodiversity, or through a financial contribution via S106 or the purchase of biodiversity units within the Local Authority Area.</u> c. <u>Only where developments cannot achieve on-site or off-site biodiversity net gain utilising parts A and B, will the purchase of statutory biodiversity credits be allowed.</u> 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. 3 4. 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, contributing to the delivery of the Local Nature Recovery Strategy and the Green and Blue Infrastructure Strategy and Action Plan or its future equivalent. Protected Species, and species and habitats identified in the Local Biodiversity Action Plan, will be protected and conserved through a buffer or movement to alternative habitat. Identified important landscape features, including Historic Environment assets,	meaning that Supplementary Planning Documents cannot be adopted after 30 June 2026.

Ref	Plan policy or para.	Main modification	Reason for modification
		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. Further detail will be provided <u>in Council guidance to accompany the</u> an updated Biodiversity SPD. In the case of archaeological remains, all practical measures must be taken for their assessment and recording.	
MM74	Para 9.27	Trees that are already subject to protection either as part of an Ancient Woodland (as shown <u>on the policies map</u> in Appendix 4)	Response to SPQ5 IN2.2 To clarify that the information is shown on the Policies Map to ensure that the plan is justified and effective.
Chapter 10: Design			
MM75	Para 10.6	10.6 Policy DE1 requires development proposals to create safe and attractive streets and public spaces, which reduce crime and the fear of crime. <u>Developments should consider how they would meet the relevant ‘Secured By Design’ and ‘Park Mark’ principles.</u> As well as considering the impact of development proposals on public safety and the incidences of anti-social behaviour, the reference to safety in the Policy also relates to creating buildings and places that are better protected from terrorist attack, this reflects the Government’s strategy for countering terrorism. Applications for	Response to AP36 in IN12 which supersedes the earlier modification proposed in

Ref	Plan policy or para.	Main modification	Reason for modification
		development which affect higher risk buildings or spaces such as those that could attract crowds of people, should always fully consider the advice provided by National Counter Terrorism Security Office (NaCTSO) or future equivalent.	response to Q14.1 in M14 [IN3]. For clarity to ensure that the policy is effective.
MM76	Policy DE1 Part 1d	d. All development proposals, <u>both those for new buildings and new landscaped spaces</u> , should follow a design-led approach to deliver sustainable, high quality placemaking. Development should contribute positively to the <u>City's rich story of Architectural Innovation, the</u> wellbeing of existing and new communities, the quality of the surrounding built and natural environment, and should be planned and designed with reference to the climate change strategy and the adaptation and resilience strategy.	Response to Q10.1 in M10 [IN3]. To improve terminology for clarity and ensure that the policy is effective and positively prepared.
MM77	Policy DE1 Part 3	3. Where buildings in excess of 20m in height are proposed, these must be informed by <u>have regard to</u> the guidance of the Tall Buildings SPD.	Response to PQ14 in IN2 and response to Q10.2 in IN3. To improve the terminology for clarity, to ensure that the policy is

Ref	Plan policy or para.	Main modification	Reason for modification
			justified and effective.
MM78	Policy DE1 Part 5b	b. consider the local distinctiveness and identity of the site but also have regard to opportunities to enhance the local built and natural environment through new development and enhanced design <u>using local building materials where appropriate</u>	Response to Q14.1 in M14 [IN3] to provide additional clarity.
MM79	Policy DE2 Part 2d	d. Where public art is provided, contributions and commuted maintenance sums for up to 10 years will be required <u>where justified and appropriate</u> , and include the cost of decommissioning where appropriate.	Response to Q10.3 in IN3. To improve the terminology for clarity, to ensure that the policy is effective.
Chapter 11: Heritage			
MM80	Policy HE2 Part 4	4. The sympathetic and creative re-use of heritage assets will be encouraged, <u>in accordance with national policy</u> , especially for heritage that is considered to be at risk, so long as it is not damaging to the significance of the heritage asset. <u>where harm to the significance is assessed as being less than substantial</u> . The embodied energy present in historic buildings contributes to sustainability.	Response to AP37 in IN12 and response to Q11.3 in M11 [IN3].

Ref	Plan policy or para.	Main modification	Reason for modification
			To improve the terminology for clarity and to ensure consistency with national policy.
MM81	Paras 11.9 – 11.10	11.9 Through the Local Plan and partnership working, the Council are maintaining and further promoting the creation of a City Heritage Park in the Sherbourne Valley and the grounds of the Charterhouse and London Road Cemetery. The designation reflects the historic significance of the two sites as well as their scale and strategic proximity to the city centre. There is also wider connectivity opportunities associated with the River Sherbourne. Proposals which positively contribute to the park will be supported, along with measures to improve linkages to the area and improve accessibility between the city centre and the Charterhouse grounds. These may include a riverside walkway along the exposed section of the River Sherbourne, connecting Far Gosford Street with Charterhouse along the west side of the river crossing Gulson Road and Humber Avenue, alongside a footpath and cycle route along the former Coventry loop line railway and a new pedestrian crossing on the London Road. These enhancements, in connectivity and green infrastructure, could facilitate comprehensive regeneration opportunities of brownfield land along the River Sherbourne, most notably between Gulson Road and Gosford Street and in Harper Road that will complement this part of the city. The City Heritage Park and its key routes and linkages are <u>shown on the policies map</u> identified on the inset map at Appendix 5. The wider area will be supported by a Masterplan.	Response to SPQ5 IN2.2 in relation to para 11.9. To clarify referencing to the Policies Map. Para 11.10 Agreed through the Statement of Common Ground with Historic England. To ensure clear reasoned justification to Policy HE3.

Ref	Plan policy or para.	Main modification	Reason for modification
		11.10 In addition, opportunities should be taken to improve the setting of the Charterhouse, the naturalisation of the river valley <u>where this does not conflict with its heritage significance</u> and the views through to the viaduct	
MM82	Para 11.14	11.14 In considering proposals for development, <u>and in line with para 11.13 above,</u> the City Council's the vValidation eChecklist will set out what is will usually be required including: a) an initial assessment establishing the archaeological significance of the site to be submitted as part of any planning application. b) where appropriate an archaeological <u>investigation may be required</u> evaluation and subsequent publication of results to be carried out prior to commencement, where, as a result of the initial assessment, important archaeological remains are likely to be present. c) preservation in situ to be the preferred approach <u>c) justification together with appropriate mitigation before allowing any harm to, or loss of, the significance of a heritage asset.</u> <u>11.15 Following archaeological investigation, where important archaeological remains are likely to be present, publication of results may be required prior to the grant of planning permission. Preservation in situ is usually the preferred approach.</u>	Agreed through the Statement of Common Ground with Historic England to ensure clear reasoned justification to Policy HE4.
Chapter 12: Accessibility			
MM83	Policy AC1 Part 1	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 dependence on the private car in accordance with <u>with regard to</u> the National Design Guide, National Model Design Code, Transport	Response to PQ14 in IN2 and response to Q12.2 in M12 [IN3].

Ref	Plan policy or para.	Main modification	Reason for modification
		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.
MM84	Policy AC3	1. Transport Assessments will be required for developments which generate significant additional trips on the transport network. Thresholds for their requirement will be based on locally determined criteria set out in the Coventry Connected SPD <u>and / or Council guidance</u>. 2. Travel Plans will be required for new developments which generate significant additional traffic movements. Detailed guidance on the requirement for Travel Plans will be <u>is</u> set out in the Coventry Connected SPD <u>and / or Council guidance</u>. 3. Proposals for the provision of car parking associated with new development will be assessed <u>having regard to the standards set out in Council guidance</u> on the basis of parking standards set out in Appendix 6 with active and sustainable travel modes factored into the delivery of any new parking provision. 4. Development proposals which result in significant changes to the location or supply of public car parking spaces will be required to address any associated necessary changes to associated car park signing and management systems. In regard to development proposals in the city centre:	Response to SQ1.6 in IN4. To reflect new legislation meaning that Supplementary Planning Documents cannot be adopted after 30 June 2026. Response to AP39 in IN12. For clarification to ensure the policy is effective.

Ref	Plan policy or para.	Main modification	Reason for modification
		• this should include clear justification as part of an on-going strategic review process and shown to have an acceptable impact on the performance and accessibility of the city centre and overall car parking provision. • The redevelopment and improvement of surface level car parks will be prioritised. • The provision of new surface level car parking will not be supported within the city centre unless its provision is to support the implementation of longer term regeneration schemes. In such cases surface level provision will only be allowed on a temporary basis. • New car parking should be accommodated in a multi-storey format. • Proposals for multi storey car parks should respect the charter and scale of the surrounding environment and maximise opportunities for high quality aesthetics. • Parking needs and the role of the car will also be balanced with promoting the use of public transport, cycling and walking. 5. Proposals will be required to encourage and incentivise sustainable travel, such as through the provision <u>or funding</u> of Mobility Credits. 6. New development proposals which require changes to the highway network will be required to integrate with any existing Urban Traffic Management Control (UTMC) and Intelligent Transport Systems (ITS) infrastructure and strategy and development of the Key Route Network. 7. Further guidance will be <u>is</u> contained in an updated <u>the</u> Coventry Connected SPD <u>and / or Council guidance</u>.	

Ref	Plan policy or para.	Main modification	Reason for modification
MM85	Policy AC4 Part 1c	c. High quality cycle parking ... storage <u>having regard to the standards set out in Council guidance</u> in line with the cycle parking standards set out in Appendix 6.	To reflect new legislation meaning that Supplementary Planning Documents cannot be adopted after 30 June 2026.
MM86	Para 12.43	12.43 One of the major barriers to encouraging public transport is the need to interchange between different modes and services, often paying separately each time at the point of use, and often with inadequate prior knowledge of when and where the next service will be. A step change is required in the quality of public transport provision which will require complementary measures to: • Improve the ease of access to interchange facilities and to the quality of the waiting environment within them; • Provide quality and timely information, both at bus stops and remotely via mobile devices, that can reduce uncertainty for travellers; • Make payment quick and convenient through the introduction of integrated ticketing systems and cashless smart payment methods which work across all modes and services; • <u>Support the development of Mobility Hubs / Local Travel Points, i.e. locations with access to a range of transport options and community services in one place.</u>	Response to Q12.4 [IN3]. Reasoned justification to ensure clarity and effectiveness of Policy AC5
MM87	Policy AC5 Part 5	5. Further details will be are set out in the Coventry Connected SPD <u>and / or Council guidance</u> , the TfWM LTP <u>Local Transport Plan</u> and TfWM Bus Service Improvement Plan.	Response to AP40 in IN12. For clarity and

Ref	Plan policy or para.	Main modification	Reason for modification
			To reflect new legislation meaning that Supplementary Planning Documents cannot be adopted after 30 June 2026.
MM88	Policy AC6 Part 2	2. Measures which support the delivery of objectives in the West Midlands Rail Executive Rail Investment Strategy, and Midland Connect Strategic Transport Plan, <u>West Midlands Strategic Advice 2022 and relevant emerging local studies</u> for improved rail connectivity will be supported. This includes measures which facilitate improved rail services and supporting rail infrastructure, including further electrification of the rail network, on the Coventry north-south corridor between Leamington, Kenilworth, Coventry, Bedworth and Nuneaton and on routes to Leicestershire and the East Midlands. <u>Transport priorities may change in the future, therefore this list is non-exhaustive.</u>	Response to Q12.5 in M12 [IN3]. To ensure the policy is justified and effective.
Chapter 13: Environmental Management			
MM89	Policy EM4 Parts 1 and 2	1. All developments must be assessed in respect of the level of flood risk from all sources, taking into account current and future impacts of climate change. Where development in areas at risk of flooding is the only option following the application of the sequential test, it will only be permitted where all of the following criteria are met:	Response to Q13.1 in M13 [IN3].

Ref	Plan policy or para.	Main modification	Reason for modification
		a. the type of development is appropriate to the level of flood risk associated with its location in reference to Coventry's SFRA flood zone maps and advice on appropriate uses within these zones from the Environment Agency and Lead Local Flood Authority (LLFA); b. it is provided with the appropriate minimum standard of flood defence and resilience to aid recovery (including suitable warning and evacuation procedures) which can be maintained for the lifetime of the development; c. it does not impede flood flows, does not increase the flood risk on site or elsewhere or result in a loss of floodplain storage capacity. <u>An assessment of the ability of development to provide additional flood storage capacity and improve flow paths must be undertaken;</u> d. in the case of dwellings, it is evident that as a minimum, safe, dry pedestrian access would be available to land not at high risk <u>outside of the 1 in 100 year plus climate change flood event based on an assessment of hazard risk (see DEFRA Hazard rating)</u>, and; e. in the case of essential infrastructure, access must be guaranteed and must be capable of remaining operational during all flooding events. 2. All opportunities to reduce flood risk in the surrounding area must be taken, including creating additional flood storage and exploring areas for natural flood management. In this instance, reference should be made to the Councils IDP. In order to achieve this: a. the functional floodplain (Flood Zone 3b) should be protected from development and reinstated in brownfield areas wherever possible; b. single storey buildings, basements and buildings on stilts will not be acceptable in Flood Zones 2 and 3;	To improve the terminology for clarity and ensure the policy is effective.

Ref	Plan policy or para.	Main modification	Reason for modification
		c. all opportunities to undertake river restoration and enhancement including de-culverting, removing unnecessary structures and reinstating a natural, sinuous watercourse will be encouraged <u>All development must undertake an assessment and implementation plan on what Environmental and Flood Risk Betterment can be provided by the proposals. The assessment should include but not be limited to, River Restoration, enhancement including de-culverting, removing unnecessary structures and reinstating a natural, sinuous watercourse and creation of flood alleviation measures</u> d. unless shown to be acceptable through exceptional circumstances, development should be set back at least 8m (from the top of bank or top of a flood defence, <u>in certain areas this may be increased to 20m</u>) of Main Rivers and 5m from Ordinary watercourses for maintenance access, <u>the creation of space for future flood risk management measures and to create habitat corridors</u>. This <u>easement</u> includes existing culverted watercourses. <u>This is required regardless of the extent and location of the floodplain and should be taken into account when considering the developable area.</u> e. finished floor levels must be set a minimum of 300mm above the pluvial 1% Annual Exceedance Probability (AEP) (1 in 100 year) plus climate change and 600mm above the fluvial 0.1% AEP (1 in 1000 year) plus climate change flood level.	
MM90	Para 13.18	13.18 In respect of SuDS, it is important to emphasise the need for a management train where drainage techniques can be used in series to change the flow and quality characteristics of the runoff in stages. For a management train to work effectively the train must contain the right type of SuDS. The detail for this would be set out in the SPD <u>will be set out in Council guidance</u>, but all consideration should be given to the principle by ensuring developments implement source controls as part of the management train. In environmental terms this approach is good for water quality. With respect to future maintenance, it places the responsibility with the development owner	Response to SQ1.6 in IN4. To reflect new legislation meaning that Supplementary Planning Documents

Ref	Plan policy or para.	Main modification	Reason for modification
		and reduces or eliminates runoff from the small rainfall events which constitute the majority of rain events.	cannot be adopted after 30 June 2026.and to ensure consistency with Policy EM5.
MM91	Title of section that begins on page 138.	Previously Developed Land <u>Water Resources</u>	Response to AP41 in IN12. To ensure the title accurately reflects the content of this section and for consistency with Policy EM6.
MM92	Policy EM6 Title	Policy EM6 Redevelopment of Previously Developed Land <u>Water Resources</u>	Response to AP41 in IN12. To ensure the title of the policy accurately reflects the content.

Ref	Plan policy or para.	Main modification	Reason for modification
MM93	After para 13.30 add in new paras	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. <u>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> <u>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 funded through a combination of council tax and, where viable, developer contributions.</u> <u>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</u>	Response to SPQ 56.1 in IN2.2. To ensure that the plan is consistent with national policy requirements relating to waste management.

Ref	Plan policy or para.	Main modification	Reason for modification
		<u>Heatline network. These improvements result in the city being able to process 315,000 tonnes of waste annually</u> <u>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>	
MM94	Policy EM7 Part 3	This policy will be applied in line with <u>having regard to</u> the Air Quality SPD.	Response to PQ14 in IN2. To improve the terminology for clarity, to ensure that the policy is justified and effective.
MM95	Policy EM8 parts 1 and 1e	1. <u>In accordance with national policy on waste management and the waste hierarchy</u>, the Council <u>and its partners'</u> Waste Management Strategy <u>needs assessments and strategies</u> will be supported through..... <u>1e</u> Existing <u>or proposed</u> waste management facilities <u>and</u> or 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. To ensure that the plan is consistent with national policy requirements relating to

Ref	Plan policy or para.	Main modification	Reason for modification
			waste management.
MM96	After Para 13.36 add in a new para.	<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>	Response to SPQ 56.2 in IN2.2 To ensure that the Local Aggregate Assessment is referenced.
MM97	Policy EM12 Part 1a	1. Building Efficiency Part L % improvement a. % improvement on Part L 2021 TER (or equivalent reduction on future Part L updates), through on-site measures as follows: - Offices: ≥25% - Schools: ≥35% - Industrial buildings: ≥45% - Hotels (C2, C5), PBSA and residential institutions (C2, C2a): ≥10% - Other non-residential buildings: ≥35% <u>where feasible and viable</u>	Response to AP42 in IN12. To ensure the policy is justified, clear and effective.
MM98	Policy EM14 Part 1a	a. All major new residential (10 dwellings or more) and non-residential (1000 m² floorspace or more) developments are required to complete a whole-life carbon assessment in accordance with Royal Institution of Chartered Surveyors (RICS) Whole Life Carbon Assessment guidance, <u>or its future equivalent</u> .	Response to Q13.8 in IN3. To improve the terminology for clarity, to ensure that the policy is

Ref	Plan policy or para.	Main modification	Reason for modification
			justified and effective.
Chapter 14: Coventry City Centre			
MM99	Policy CC1(A)	Respecting key views to the iconic three spires of St. Michaels, Holy Trinity and Christchurch in line with <u>having regard to</u> the Tall Buildings Design Guide and View Management Framework SPD	Response to PQ14 in IN2. To improve the terminology for clarity, to ensure that the policy is justified and effective.
MM100	Policy CC1(C) Part b	b. When development occurs, a Flood Risk Assessment will need to be produced to appropriately consider the risk of flooding from all sources. Delete Part b	Response to Q7.8 in M7 [IN3]. To ensure the policy is justified and avoid duplication with Policy EM4.

Ref	Plan policy or para.	Main modification	Reason for modification
	Introductory para to 'City Centre Character Areas' (P167)	Part E relates to a series of City Centre Areas which are distinct in terms of their character, both in terms of reflecting the current situation, and in terms of changes to character which will continue to take place during the forward plan period such as the recently consented City Centre South regeneration scheme. The character areas have been defined to reflect forthcoming expected change in the City 168 Centre. Additionally the nature of uses in the City Centre has undergone significant evolution in the last plan period as the economics of City Centres continues to evolve on a national level, therefore the character areas reflect their existing and foreseeable urban character. The Character Areas are <u>shown on the policies map.</u> mapped in Appendix 9(f).	Response to SPQ5 IN2.2 To clarify that the information is shown on the Policies Map.
MM101	Policy CC1 (E)	Northern Regeneration Area a. Proposals supporting the aims of mixed use redevelopment of the Area <u>opportunity for transformational placemaking through comprehensive masterplanning and a design-led approach</u> will be encouraged, <u>having regard to the West Midlands Growth Plan 2025 and in accordance with other parts of this Plan.</u> b. <u>In addition to the housing allocations in Policy H2 which fall within this area,</u> the area will be primarily promoted for new residential development in a range of types and tenures <u>a significant number of new homes will be provided from the mid 2030s onwards as part of mixed use regeneration proposals.</u> although a range of other uses will be acceptable subject to conformity with other parts of this AAP. These include: • Office; • Retail and commercial; • Social, community and leisure uses; • Education uses (including those linked to the university); Such uses should contribute towards active frontages at ground floor level. c. Green and blue infrastructure should form an integral part of all development proposals within the area. This should include the consideration of deculverting	Response to AP29 in IN10. To ensure the policy is justified and effective.

Ref	Plan policy or para.	Main modification	Reason for modification
		where possible and viable. <u>The Northern Regeneration Area will seek to enhance the quality of publicly accessible spaces, introduce urban wildlife habitats, take opportunities for de-culverting of the River Sherbourne and seek to enhance the setting of heritage assets</u> d. New development opportunities should not conflict with any other policies within this Local Plan. e. Swanswell Pool is of historic importance to the local area and the city centre as a whole. Opportunities to expand the park and enhance its quality will be supported. This should include opportunities to improve its linkages to the wider city centre. f. Proposals for the redevelopment of White Street Coach Park will be encouraged, where they are linked to appropriate amendments to Ring Road junction 2	
Chapter 15: Infrastructure Delivery, Implementation and Monitoring			
MM102	Policy IM1 Part 4	Developer contributions will contribute towards strategic infrastructure required to support the overall development in the Plan as defined in <u>having regard to</u> the Infrastructure Delivery Plan.	Response to Q1.12 in M1 [IN3]. To clarify that the IDP is not part of the Plan and give it appropriate

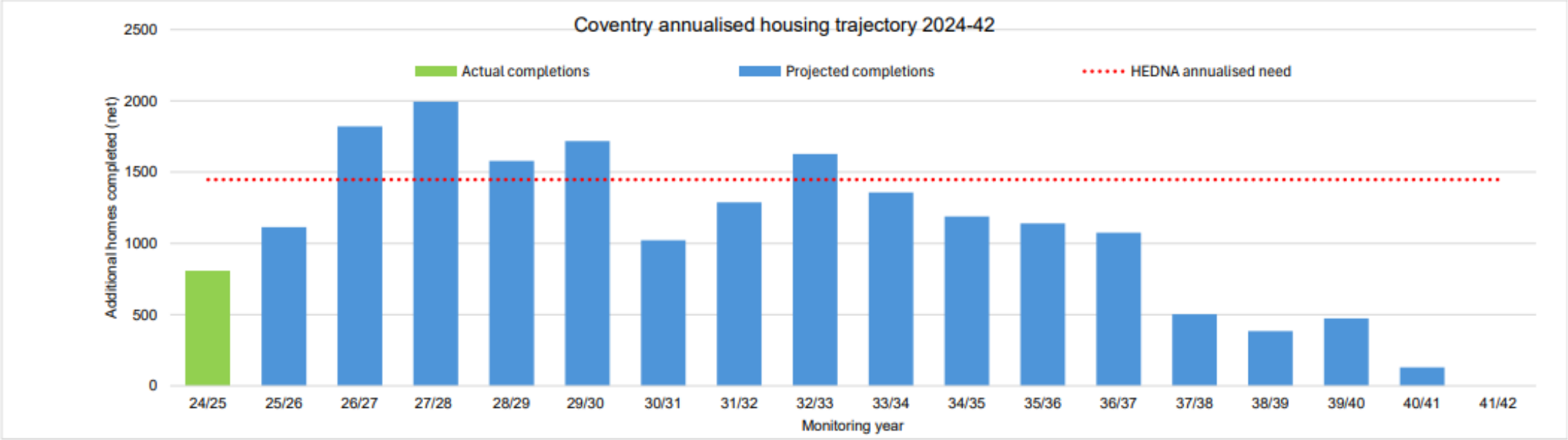
Ref	Plan policy or para.	Main modification	Reason for modification
			weight in decision making.
Appendices			
MM103	Appendices.	All of the appendices 1 to 9f [CD1a] are to be deleted from the Plan with the exception of Appendix 2 (marketing guidance) and Appendix 3 (housing trajectory, in a modified form, see below).	Response to PQ5 in IN2
MM104	Appendix 3	To be replaced in its entirety by the trajectory provided in response to IN15 AP77 as agreed through the hearings. See Annex 1 to these Main Modifications.	See response to AP77 in IN15. Supersedes previous modifications to the trajectory.

Main Modifications Annex 1

Replace Appendix 3 of the Plan with the following trajectory.

Coventry housing trajectory 2024-42

				1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Housing supply type	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41	41/42
Past completions	805	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Gross new build	749	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Net conversions & change of use	203	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Demolitions	-147	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Extant planning permissions	0	1,114	1,820	1,846	1,419	1,717	968	551	759	612	571	417	385	217	217	224	30	0
Under construction	0	1,245	1,624	1,497	632	566	379	30	0	0	0	0	0	0	0	0	0	0
Detailed consent	0	27	276	299	675	1,000	235	182	247	50	38	0	0	0	0	0	0	0
Outline consent	0	0	0	50	112	151	354	339	512	562	533	417	385	217	217	224	30	0
Permitted development	0	-158	-80	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Identified indicative capacity (without consent)	0	0	0	148	159	0	53	736	868	745	617	723	690	285	168	250	100	0
Adopted Allocations	0	0	0	0	0	0	110	171	343	243	230	175	150	125	45	130	0	0
Proposed Allocations	0	0	0	148	159	0	-57	565	525	502	387	548	540	160	123	120	100	0
Total annual completions	805	1,114	1,820	1,994	1,778	1,917	1,221	1,487	1,827	1,557	1,388	1,340	1,275	702	585	674	330	200
Actual net completions	805	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Forecasted net completions	0	1,114	1,820	1,994	1,578	1,717	1,021	1,287	1,627	1,357	1,188	1,140	1,075	502	385	474	130	0
Windfall allowance	0	0	0	0	200	200	200	200	200	200	200	200	200	200	200	200	200	200
Total cumulative completions	805	1,919	3,739	5,733	7,511	9,428	10,649	12,136	13,963	15,520	16,908	18,248	19,523	20,225	20,810	21,484	21,814	22,014



Annex 2: Proposed Modifications to Table 6.2

Table 6.2 - Site Allocations for Housing

Site Ref	Site	Ward	Total Dwellings <u>Indicative capacity</u>	GF / PDL	Essential Site Specific Requirements and Other Uses	HELAA Ref.	<u>Reason(s)</u>
H2:1	Keresley SUE	Bablake	3,100	GF	Retail space within a local centre in the south of the site (policy R1). Distributor link road connecting Long Lane and Winding House Lane to be fully operational prior to the full completion of the SUE. Surrounding junction improvements as appropriate and identified through a robust TA. Provision of 2FE primary school and contributions towards a 8FE secondary school. Retention of medieval fishponds, ancient woodlands, important (ancient) hedgerows. Creation of publicly accessible green corridor along the Hall Brook and enhanced connectivity between the ancient woodlands. Protection of Jubilee Woodland. Inclusion of appropriate screening to existing residential areas.		
H2:2	Eastern Green SUE	Bablake	2,250	GF	15ha of employment land adjacent to the A45 (policy JE2), which is to be developed in tandem with the residential development. The provision of a new Major District Centre and a Local Centre (policy R1). Provision of 2FE primary school. New grade separated junction from the A45 to provide primary site access with surrounding junction improvements as appropriate. The new A45 junction should be fully operational prior to the occupation of the employment land and the Major		

					District Centre, whilst no more than 250 homes should be occupied prior to this junction being fully operational (in accordance with Policy DS4D). Creation of publicly accessible green corridors along the Pickford Brook and its tributaries. Retention of medieval moat at Pond Farm and retention of important hedgerows. Inclusion of appropriate screening to existing residential areas. Buffering and screening at Pickford Green to protect the transition of land use into the wider Green Belt.		
H2:3	Walsgrave Hill Farm	Henley and Wyken	900 700	GF	Retention and enhanced setting of listed buildings at Hungerley Hall Farm. Site to incorporate blue light access linking the A46 to the University Hospital. Facilitate and work with Highways England on highways proposals linked to a new Grade Separated junction at Clifford Bridge. Provision of essential drainage and flood risk infrastructure.	HE002-24	Response to Q3.26 in M3 [IN3]. To reflect the agreed new indicative capacity of 700 dwellings for Allocation H2:3. AP8 (a) in IN7.
H2:4	Land at Whitmore Park, Holbrook Lane	Holbrook	730	PDL	As part of mixed-use scheme to deliver 8ha of redeveloped employment land (policy JE2). The retention of the sports field fronting Beake Avenue. Highway works to open up Swallow Road to public traffic as appropriate. Retention of locally listed building facades and boundary walls.		
H2:5	Paragon Park	Foleshill	700	PDL	2017 Local Plan allocation, now delivered.		Response to Q3.3 in M3 [IN3]. Deletion of allocations that were completed by 31 March 2025.

H2:6	Land at Browns Lane	Bablake	475	GF	Retention of important trees and hedgerows. Need to focus primary access to Coundon Wedge Drive.		
H2:7	Land at Sutton Stop	Longford	285	GF	Total Allocation is linked to extant permission (FUL/2013/0727) and should also include a 225 berth marina and ancillary provisions (as appropriate) and 1.5ha of employment land (policy JE2). The site should also incorporate in excess of 5ha publicly accessible green space and the inclusion of appropriate screening to existing residential areas. Development will need to ensure that highways access and provisions are adequate and suitable for the site. This could include remodelling of the junction at Sutton Stop and Grange Road and at Alderman's Green Road.		
H2:8	Land West of Cromwell Lane	Westwood	240	GF	Creation of woodland area to the western boundary of the site to reflect Ancient Arden landscape characteristics and ensure defensible boundary to the wider Green Belt. Retain and enhance the setting of Westwood Farm and other listed buildings within and adjacent to the site. Inclusion of appropriate screening to existing residential areas. Explore opportunities to introduce residents parking schemes on site and along adjoining streets with surrounding junction improvements as appropriate.		
H2:9	Land at London Road/ Allard Way	Binley and Willenhall	200 293	GF	Retention and reuse of locally listed pumping station and lodge. Retention of important hedgerows and management of biodiversity/ ecology impacts. The provision of at least 2.5ha of publicly accessible green space as part of the development.		Dwelling number changed to reflect the latest planning permissions for Allocation H2:9. AP8 (b) in IN7.

H2:10	Former Lyng Hall playing fields	Upper Stoke	185	mix	Provision of 1ha of publicly accessible green space as part of development. 2017 Local Plan allocation, now delivered.		Response to Q3.3 in M3 [IN3]. Deletion of allocations that were completed by 31 March 2025.
H2:11	Elms Farm	Henley	150	GF	Creation of publicly accessible green space along eastern boundary of site.		Response to Q3.35 and Q3.42 in M3 [IN3] and AP8 in IN7. Deletion of allocations that were completed by 31 March 2025.
H2:12	Site of LTI Factory, Holyhead Road	Sherbourne	110	PDL			
H2:13	Grange Farm	Longford	105	GF	Retention of important hedgerows. Highway improvements to Grange Road. 2017 Local Plan allocation, now delivered.		Response to Q3.3 in M3 [IN3]. Deletion of allocations that were completed by 31 March 2025.
H2:14	Former Transco site, Abbots Lane	Sherbourne	400 <u>690</u>	PDL	Retention of sandstone boundary walls.		Response to Q3.32 in M3 [IN3]. To reflect that planning permission for 690 dwellings has been granted for Allocation H2:14.
H2:15	Land at Sandy Lane	Radford	250	PDL	Retention of the Daimler Office building on Sandy Lane. <u>Powerhouse Locally Listed building within the newly proposed Northern element of the allocation and consideration of the setting of the Daimler</u>	R004-24	Response to Q3.52 in M3 [IN3] and Q3.53 in M3 [IN3]. To ensure the site-specific requirements for Allocation H2:15

					<u>Office Locally Listed building on Sandy Lane.</u>		are justified, effective and in line with national policy. To ensure that heritage considerations are appropriately addressed.
H2:16	Land at Carlton Road / Old Church Road	Foleshill	85	PDL	Retention of chimney, art deco façade and railings of former weaving mill.		Response to AP58 [IN13]. No reasonable prospect of development by 2042.
H2:17	Nursery Sites, Browns Lane	Bablake	80	GF	2017 Local Plan allocation, now delivered.		Response to Q3.3 in M3 [IN3]. Deletion of allocations that were completed by 31 March 2025.
H2:18	Former Mercia sports field	Foleshill	75	GF/ PDL	Provision of 0.5ha of publicly accessible green space as part of development. 2017 Local Plan allocation, now delivered.		Response to Q3.3 in M3 [IN3]. Deletion of allocations that were completed by 31 March 2025.
H2:19	Land at Mitchell Avenue	Wainbody	50	GF	Existing sports facilities <u>playing field land (and ancillary facilities)</u> are to be re-provided at the site of the former Alderman Harris School at Charter Avenue or an appropriate alternative site within the local area as part of this development (in accordance with policy GE2).		Response to AP10 in IN7 to reflect agreement with Sport England.
H2:20	Land at Durbar Avenue	Foleshill	45	PDL	As part of mixed use scheme to deliver 1.5ha of redeveloped employment land (policy JE2).		Response to AP59 [IN13]. No reasonable prospect of development by 2042.

H2:21	Woodfield school site, Stoneleigh Road	Wainbody	30 24	mix	New homes to link in with new railway station to be delivered as part of the wider NUCKLE project (policy AC6).	Response to Q3.40 in M3 [IN3]. To reflect that planning permission for 24 dwellings has been granted for Allocation H2:21.
H2:22	Land at the Junction of Jardine Crescent and Jobs Lane	Woodlands	25	PDL	Retail space within extended district centre (policy R1).	Response to Q3.78 in M3 [IN3]. To reflect the findings of the Retail and Centres Study 2024 [EB27] which determined that new retail development is not required.
H2:23	Land west of Cryfield Heights, Gibbet Hill	Wainbody	20	GF	2017 Local Plan allocation, now delivered.	Response to Q3.3 in M3 [IN3]. Deletion of allocations that were completed by 31 March 2025.
H2:24	Land West of Cheltenham Croft	Henley	15	GF		Response to Q3.35 and Q3.42 in M3 [IN3] and AP8 in IN7. Deletion of allocations that were completed by 31 March 2025.
H2:25	The Grange Children's Home, Waste Lane	Bablake	15	PDL/ GF	Locally Listed buildings to be retained and converted with limited new build allowed to support a comprehensive scheme. Dense tree boundaries to be retained to protect wider Green Belt setting.	Response to Q3.79 in M3 [IN3]. To reflect that Allocation H2:25 has received planning permission for

							non-residential use.
H2:26	Coventry Central Police Station, Little Park Street	St Michael's	600	PDL	Development needs to be sensitive to View Cones 8: Mile Lane and 10: Quinton Rd, as defined in the Tall Buildings Design Guide and the Three Spires View Management Framework SPD. <u>A Heritage Impact Assessment will be required at the Planning Application stage.</u>	STM009-24	Agreed through the Statement of Common Ground with Historic England.
H2:27	New Union Street Car Park	St Michael's	170	PDL	Development needs to be sensitive to View Cone 9: Mile Lane (Christ Church) as defined in the Tall Buildings Design Guide and the Three Spires View Management Framework SPD. <u>A Heritage Impact Assessment and an Archaeological Assessment should be required at planning application stage and green space should be incorporated into the southern-most area of the site.</u>	STM011-24	Agreed through the Statement of Common Ground with Historic England.
H2:28	New Gate Court Business Park, Paradise Street	St Michael's	303	PDL	Consented application for mixed use commercial and high rise flatted (C3) development FUL/2022/2635. Site to retain and enhance the Old City Wall Scheduled Ancient Monument (SAM) and may be required to divert a gas pipeline running through it.	STM001-23	
H2:29	Former Vintage House, St Nicolas Street / Leicester Row	Radford	100	PDL	Development needs to be sensitive to the character of the Coventry Canal Conservation Area that it is located in.	R003-23	
H2:30	Whitefriars Street Car Park	St Michael's	185	PDL	Development needs to be sensitive to View Cone 7: Parkside, as defined in the Tall Buildings Design Guide and the Three Spires View Management Framework SPD.	STM012-24	Historic England maintains its objection to the inclusion of the

					<u>The design, layout, scale and site capacity of development proposals must be informed by, and responsive to, preliminary archaeological site investigation such that the significance of the Carmelite Friary is sustained.</u> <u>Development design proposals should seek to minimise harm to archaeological remains that contribute to the understanding and significance of Whitefriars and its designated heritage assets.</u> <u>Development must provide a landscaped separation to Whitefriars Lane to deliver a high-quality pedestrian route.</u> <u>Proposals must include assessment of impacts upon view cones 6 and 7 of the CCC View Management SPD and local views from designated Heritage Assets, inclusive of the supply of verified Townscape Visual Impact Assessments (TVIA's).</u>		site allocation. The modified policy wording has been agreed through the Statement of Common Ground with Historic England, in the event that the site remains in the plan in its proposed form. The first point of the modification has been amended through the examination process in response to AP9 in IN7.
H2:31	Paybody Building, Stoney Stanton Road	Foleshill	280	PDL	Existing NHS health facility within the city centre boundary that is likely to become available for residential or healthcare-based use or mix of both.	F008-24	Response to Q3.51 and Q3.79 in M3 [IN3]. Deletion of allocations no longer being promoted for residential use or which have received planning permission for non-residential use.
H2:32	Dale Buildings, Tower Street	St Michael's	200	PDL	Enhancement of listed medieval wall and Cook Street gate scheduled monuments and adjacent conservation area and Registered Park and Garden. Development needs to be sensitive to Archaeological Constraint Aea and View Cone 1: Foleshill Rd, as	STM013-24	Agreed through the Statement of Common Ground with Historic England.

					defined in the Tall Buildings Design Guide and the Three Spires View Management Framework SPD. <u>Development within the setting of Cook Street Gate and other nearby heritage assets must make a positive contribution to their setting, that seeks to sustain and enhance their significance.</u> <u>Development must deliver passive surveillance onto Cook Street Gate and its surroundings.</u> <u>Development must respect View Cone One of the CCC View Management framework and deliver massing responsive to retaining views to Holy Trinity and St Michaels spires.</u>		
H2:33	The Allesley Hotel, Birmingham Road	Bablake	48	PDL	Retention and enhancement of adjacent listed buildings and heritage assets and the Allesley Village Conservation Area that the site is within. Consideration needed of the Allesley Bypass dual carriageway that runs along the south of the site. <u>Due to the site's positive contribution to the Conservation Area a Heritage Impact Assessment should be required with any application.</u>	Bab001-23	Agreed through the Statement of Common Ground with Historic England.
H2:34	Former Chace School, Chace Avenue	Binley and Willenhall	60	PDL		BW001-23	
H2:35	Former School Site, New Century Park – Land to the South of	Lower Stoke	93	PDL	Site was formally earmarked as a location for a primary school, but it has been determined that this is no longer needed.	LS001-23	

	Isadora Lea						
H2:36	Land at Spon End	Sherbourne	750 <u>297 (net)</u>	PDL	Site part of Citizen Housing regeneration portfolio. Enhancement and improvement to the River Sherbourne and consideration given to the associated floodplain. Majority of the site is in Flood Zone 2 and part with Flood Zone 3. <u>A Heritage Impact Assessment should be required alongside a masterplan.</u>	SH004-24	Agreed through the Statement of Common Ground with Historic England. Dwelling number changed at to reflect the latest planning permission see AP8 in IN7.
H2:37	City Centre South	St Michael's	1,575	PDL	Total allocation is linked to extant Outline and Reserved Matters permissions: OUT/2020/2876 and PL/2023/0002533/RESM to provide a high-density mixed-use development that provides commercial and learning and community uses, and public realm works. Retention and Enhancement of heritage assets, <u>in particular the Grade II listed Three Tuns mural by William Mitchell and for the permanent re-siting of the mural to be in a position visible to the general public. Recordings of the William Mitchell mural currently located within Hertford House will also be required to be undertaken along with an assessment of the feasibility for relocating it, unless removal is proven to be unfeasible; details of any temporary and final re-siting should be provided and a method statement for the removal and reinstallation should also be provided.</u>	STM18-24	Response to Q3.12c in IN3. To improve the terminology for clarity, to ensure that the site-specific requirements are justified and effective.
H2:38	Friargate – Land bounded by Railway,	St Michael's	1,350	PDL	Total allocation linked to extant permission OUT/2011/0036 for a mixed-use development that includes office, residential, leisure	STM014-24	

	Grosvenor Road, Manor Road and including Greyfriars Green and Station Square				and retail development. Retention and enhancement of listed Coventry Railway Station and Greyfriars Green Conservation Area and adjacent listed buildings. Development needs to be sensitive to View Cone 12, Spencer Park and Footbridge as outlined in the Tall Buildings Design Guide and the Three Spires View Management Framework.		
H2:39	<u>Land at Park Hill Lane</u>	<u>Bablake</u>	<u>5</u>	<u>GF</u>	<u>Development will need to ensure that highways access and provisions are adequate and suitable for the site and that noise and pollution from the A45 can be satisfactory mitigated. Retention of important trees and hedgerows.</u>	<u>BAB-023-24</u>	Response to AP5 in IN7 Action points from week one hearing sessions to include the “identified HELAA sites” that are assumed to contribute to the housing land supply summarized in the November 2025 trajectory [PS5] in Table 6.2 as individual allocations.
H2:40	<u>Wisteria Lodge</u>	<u>Earlsdon</u>	<u>8</u>	<u>PDL</u>	<u>Development will need to respond appropriately to the heritage setting within the Kenilworth Road Conservation Area and to the proximity to a Local Wildlife Site and to the large-plot residential character of the surrounding area.</u>	<u>EAR-001-24</u>	
H2:41	<u>Former CovRad Sir Henry Parkes Rd</u>	<u>Earlsdon</u>	<u>190</u>	<u>PDL</u>	<u>Former industrial site where development would be delivering a brownfield first approach.</u>	<u>EAR-002-24</u>	
H2:42	<u>146-164 Lockhurst Lane / Livingstone Road</u>	<u>Foleshill</u>	<u>45</u>	<u>PDL</u>		<u>FOL-001-24</u>	
H2:43	<u>Burbidge and Son South Side of Awson Street</u>	<u>Foleshill</u>	<u>63</u>	<u>PDL</u>		<u>FOL-002-24</u>	

<u>H2:44</u>	<u>Silverton Road</u>	<u>Foleshill</u>	<u>3</u>	<u>GF</u>		<u>FOL-003-24</u>
<u>H2:45</u>	<u>2 Lewis Road</u>	<u>Foleshill</u>	<u>4</u>	<u>PDL</u>	<u>Development needs to be sensitive to the character of the Coventry Canal Conservation Area, to consider potential contamination / UXO, and to safeguard access arrangements along the existing right-of-way.</u>	<u>FOL-006-24</u>
<u>H2:46</u>	<u>Newfield House, Kingfield Road</u>	<u>Foleshill</u>	<u>50</u>	<u>PDL</u>	<u>Development to be sensitive to the onsite locally listed building and to the setting of the Coventry Canal Conservation Area.</u>	<u>FOL-007-24</u>
<u>H2:47</u>	<u>Bridge Street</u>	<u>Foleshill</u>	<u>4</u>	<u>GF</u>		<u>FOL-009-24</u>
<u>H2:48</u>	<u>Land at Caradoc Close, Henley, Coventry</u>	<u>Henley</u>	<u>30</u>	<u>GF</u>		<u>HEN-001-23</u>
<u>H2:49</u>	<u>Land at Halford Lane</u>	<u>Holbrooks</u>	<u>10</u>	<u>GF</u>		<u>HOL-004-24</u>
<u>H2:50</u>	<u>Land off Longford Road, CV6 6BH</u>	<u>Longford</u>	<u>20</u>	<u>PDL</u>	<u>Development should enhance the setting of the Coventry Canal Conservation Area.</u>	<u>LON-001-23</u>
<u>H2:51</u>	<u>Land at Roseberry Avenue</u>	<u>Longford</u>	<u>10</u>	<u>GF</u>		<u>LON-002-24</u>
<u>H2:52</u>	<u>St Nicholas Church, Radford, Sherwood Jones Close</u>	<u>Radford</u>	<u>20</u>	<u>PDL</u>		<u>RAD-001-23</u>

<u>H2:53</u>	<u>Lansdowne Street</u>	<u>St Michael's</u>	<u>8</u>	<u>PDL</u>		<u>STM-006-24</u>
<u>H2:54</u>	<u>Bishop Street / Tower Street</u>	<u>St Michael's</u>	<u>129</u>	<u>PDL</u>	<u>A sustainable city centre site that could support higher density development.</u>	<u>STM-017-24</u>
<u>H2:55</u>	<u>Land at Nickson Road</u>	<u>Westwood</u>	<u>10</u>	<u>GF</u>	<u>Development to consider the site's typology context, which comprises adjacent Ancient Woodland, a Local Wildlife Site, Local Nature Reserve, Local Green Space, Mineral Safeguarding Area and Archaeological Constraint Area.</u>	<u>WES-009-24</u>
<u>H2:56</u>	<u>Former Faseman House, Faseman Avenue</u>	<u>Woodlands</u>	<u>50</u>	<u>PDL</u>		<u>WOO-001-23</u>
<u>H2:57</u>	<u>Land at Ferrers Close</u>	<u>Woodlands</u>	<u>(49)</u>	<u>PDL</u>		<u>WOO-002-24</u>
<u>H2:58</u>	<u>Land at Attoxball Road</u>	<u>Wyken</u>	<u>(193)</u>	<u>PDL</u>		<u>WYK-002-24</u>