

Inspectors Report – Appendix

The following appendix sets out the proposed modifications to the Local Plan. The Inspectors Final Report has concluded that these modifications are necessary to ensure the Plan is sound.

For the avoidance of doubt, the proposed modifications are the same as those consulted upon in spring 2017.

With regards Para 3 of the Inspectors report, please note that where a modification is referenced as LP/MOD.1, that this should be read in the same way as if it were referenced as MM1 etc.

Schedule of proposed modifications – Local Plan

The tables below lists both the minor and main modifications that have been undertaken upon the Coventry Local Plan and the City Centre AAP for varying reasons. Please note that only specific alterations have been listed, and changes to the formatting/layout or grammatical corrections have been considered as a single reference number – see LP/MOD.A and LP.MOD.B and AAP/MOD.A and AAP.MOD.B.

The tables are presented in the following order:

1. **Local Plan Minor Modifications** – these relate to changes that are not necessary to support matters of soundness and largely relate to matters of factual correction, presentation and/or grammatical considerations.
2. **Local Plan Main Modifications** – these relate to changes that are deemed necessary to support the soundness of the Plan. They predominantly relate to policies or supporting text and respond to the Inspectors Action Points.
3. **City Centre AAP – Minor Modifications**
4. **City Centre AAP – Main modifications**

Modification Reference Number	Page Number / Policy Reference	Proposed Amendment	Justification and Reasoning
LOCAL PLAN MINOR MODIFICATIONS			
LP/MOD.A	Throughout LP Document	All figure numbers in the LP policies, introductory/supporting text and figure/table captions themselves, have been amended so that they are referenced accurately and consistently, and tables and figures are presented in numerical order. Where appropriate figure/table numbers have been changed to reflect this.	To ensure accuracy throughout the Plan.
LP/MOD.B	Throughout LP Document	The document has been reviewed in its entirety in order to ensure it is consistently formatted and presents correct grammar throughout. This includes minor changes such as spelling and grammatical corrections.	To ensure accuracy throughout the Plan.
LP/MOD.1	p.3, List of Key Abbreviations	SUDS - Sustainable Urban Drainage Systems	Correction to acronym.
LP/MOD.2	p.3, List of Key Abbreviations	Additional abbreviation – PHE – Public Health England	Additional abbreviation and acronym.

LP/MOD.4	p.5, Purpose and Role of the Draft Local Plan – introductory text	The Local Plan is currently at 'publication stage' meaning this is the version of the Plan the Council believes is suitable to submit for public examination. It has been prepared under the Planning and Compulsory Purchase Act (2004) meaning the Council is seeking representations on the "soundness" and "legal compliance" of these proposals under regulations 19 and 20 of and the Town and Country Planning Regulations (2012). Subject to this final stage of statutory engagement and the representations received by the Council, the Local Plan will be submitted to the Secretary of State for public examination by an independent inspector.	To prepare the document for conversion from 'Proposed Draft' to 'ready for adoption' stage.
LP/MOD.5	p.6, Background – How the Plan has been Developed – introductory text	The existing <u>previous</u> Coventry Development Plan was adopted in 2001, with the Regional Strategy adopted in 2004. The table below sets out the range of engagement activity that has been undertaken over the course of the last 10 years. <u>supported the development of this Plan.</u>	To prepare the document for conversion from 'Proposed Draft' to 'ready for adoption' stage.
LP/MOD.6	p.6, Table 1	<u>March 2017 - New Local Plan – Proposed Modifications</u>	To prepare the document for conversion from 'Proposed Draft' to 'ready for adoption' stage.
LP/MOD.7	p.6, Key Date and Engagement Events – introductory text	<u>The Local Plan is also supported by a Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA), a Habitat Regulations Assessment (HRA) and Health Impact Assessment (HIA).</u>	Additional paragraph to add clarity to introductory text by making explicit reference to specific documents in the evidence base.
LP/MOD.8	p. 7, Key Dates and Engagement Events – introductory text	As such, the housing needs of the HMA have been established through a range of research <u>largely</u> completed by the 6 Local Planning Authorities and GL Hearn planning consultants between 2013 and 201 <u>6</u> 5 .	Additional wording to improve accuracy of text + Change of date to acknowledge progression of time.
LP/MOD.9	p.8, The Duty to Cooperate – introductory text	<u>Agreed Memorandum of Understanding across Coventry and Warwickshire relating to housing requirements and employment land (2015 and 2016);</u>	Additional bullet point to add clarity to introductory text and ensure the most up to date documentation is referenced.
LP/MOD.10	p.8, The Duty to Cooperate – introductory text	Establishment of a Coventry and Warwickshire and South East Leicestershire Shadow Economic Prosperity Board <u>Joint Committee</u> for council leaders and the LEP;	Alteration to reflect the change of name.

LP/MOD.11	p.9, The Duty to Cooperate – introductory text	<p><u>Establishment of the West Midlands Combined Authority;</u> + Subsequent references to the WMCA.</p>	Additional bullet point to acknowledge the formation of the WMCA during the LP process.
LP/MOD.17	p.13, Community and Stakeholder Engagement	<p>Community and Stakeholder Engagement</p> <p>As set out above this Plan contains a suite of policies the Council feels are sound, legally compliant, and suitable to submit to the Secretary of State for public examination. The Council does however recognise the statutory need to engage with local communities and stakeholders to test its views and proposed policies prior to submission.</p> <p>This statutory process will commence on the 18th January 2016 and run for 6 weeks until 29th February 2016.</p> <p>As part of the process specific events will be held across the city with local communities and key stakeholders to help the Council understand areas of support and challenge.</p> <p>A Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA) has been undertaken at each stage of the Plan and used to help shape policies and proposals, including within this Publication Draft. The final version of the SA/SEA is available to view as part of the supporting documents released by the Council that relate to this period of engagement on the new Local Plan.</p> <p>The Local Plan is also supported by a Habitat Regulations Assessment (HRA) and Health Impact Assessment (HIA).</p> <p>All responses should be submitted to the Council by 5pm on 29th February 2016 and should preferably be submitted via email to: localplan@coventry.gov.uk</p> <p>Alternatively responses can be submitted to the following address: Coventry City Council Planning Policy Department Floor 3, Civic Centre 4 Mush Park Street, Coventry CV1 2PY</p>	Complete deletion of sub-section to prepare the document for conversion from 'Proposed Draft' to 'ready for adoption' stage.

		Or, handed in at any one of the city's Libraries, so long as they are clearly marked for the attention of the Council's Planning Policy department (as above).															
LP/MOD.23	p.19, Retail Floor Space Needs – introductory text	Within its boundaries Coventry contains a wide range of designated centres of varying sizes and scales which support the city centre at the top of the <u>retail centres</u> hierarchy. The council's new <u>retail town centre</u> policies have been informed by a range of evidence documents, but most importantly the update to the Shopping and Centres Study completed by Nathaniel Litchfield and Partners in 2014 ⁵ . This study undertook an assessment of the city's retail <u>based</u> needs, looking at 2 levels of population growth linked to capacity and needs.	Alteration of wording to improve accuracy of text + Change of date to acknowledge progression of time.														
LP/MOD.29a	p.23, Policy DS2 – supporting text	<u>Highways England</u>	Insertion of public body to correct a previous omission.														
LP/MOD.41	p.46, Table 3.1	<table border="1"> <thead> <tr> <th><u>Supply Components</u></th> <th><u>Site Size (Ha)</u></th> </tr> </thead> <tbody> <tr> <td><u>Completions 2011-2016 (includes Ryton, Ansty & within Coventry)</u></td> <td><u>70.3</u></td> </tr> <tr> <td><u>Under Constructions in Coventry (excluding proposed allocations)</u></td> <td><u>3.1</u></td> </tr> <tr> <td><u>Extant Permissions in Coventry (excluding proposed allocations)</u></td> <td><u>14</u></td> </tr> <tr> <td><u>Extant Permissions and under constructions at Ryton & Ansty</u></td> <td><u>53.4</u></td> </tr> <tr> <td><u>Proposed Site Allocations*</u></td> <td><u>107</u></td> </tr> <tr> <td><u>Total**</u></td> <td><u>247.8</u></td> </tr> </tbody> </table> <p>*57.73ha of land within proposed allocated sites already benefits from planning</p>	<u>Supply Components</u>	<u>Site Size (Ha)</u>	<u>Completions 2011-2016 (includes Ryton, Ansty & within Coventry)</u>	<u>70.3</u>	<u>Under Constructions in Coventry (excluding proposed allocations)</u>	<u>3.1</u>	<u>Extant Permissions in Coventry (excluding proposed allocations)</u>	<u>14</u>	<u>Extant Permissions and under constructions at Ryton & Ansty</u>	<u>53.4</u>	<u>Proposed Site Allocations*</u>	<u>107</u>	<u>Total**</u>	<u>247.8</u>	Deletion of previous version of table, and insertion of new table which displays the same information as preceding copy, although presented in slightly different format, + Includes updated figures to reflect date changes associated with progression of plan
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		<p>permission for employment development.</p> <p><u>** 4.5ha of the allocated allowance at Lyons Park has been completed in 2015/16 monitoring year. This is captured in the completions row of the above table. The allocations row is reduced accordingly to avoid double counting</u></p>	
LP/MOD.50	p.60, Policy H1 – supporting text	<p>Through the housing trajectory though, the requirement will be stepped is however proposed to be phased to allow for the necessary step change in housing delivery to be managed in a sustainable and appropriate way... Policy H1 sets out the proposed phasing-stepped trajectory of the requirements.</p>	Alteration of wording to reflect change to Policy H1 – see LP/MOD.49
LP/MOD.64	p.75	Amend reference to policy H6 – should be to H7 instead.	Factual correction.
LP/MOD.71	p.83, Policy H11 – supporting text	In parallel with the performance of local centres and services, concentrations of HiMO's <u>(small and large)</u> , shared accommodation and the private rented sector in general will be monitored closely as part of implementing this Local Plan and supporting the Housing Strategy.	Provision of further clarity in supporting text.
LP/MOD.72	p.85, Retail and Town Centre Uses	Coventry's Retail <u>Based</u> Needs	Change reflects action taken to satisfy Inspector Action Point 25 of Hearing Session 16.
LP/MOD.79	p.91	Amend reference to Policy JE8 – should reference JE6.	Factual correction.
LP/MOD.88	p.108, Policy CO3 – supporting text	Coventry has threetwo Parish Councils at Keresley, <u>Finham</u> and Allesley and a further emerging Parish Council at Finham , which have the autonomy to prepare either a Parish Plan or Neighbourhood Plan.	To reflect the situation change as the plan process has progressed since draft document was published.
LP/MOD.103	p.125, Policy GE3 – supporting text	In order to restore good levels of biodiversity across the Warwickshire, Coventry and Solihull sub-region, it is important to have urban areas that are permeable for wildlife, with havens for wildlife through the city conurbation and connected corridors linking sites.	Change of wording to add clarity to supporting text.
LP/MOD.120	p.146 1 st main para.	All The initial scenarios have been run on a 'worst-case' basis to understand the potential impacts from additional vehicular traffic.	To add clarity to supporting text.
LP/MOD.123	p.156, Policy AC5 – introductory text	Options are also being considered for improved public transport connectivity to proposed HS2 interchange and the UK Central proposal in Solihull <u>through the HS2 Connectivity Package</u> .	Additional wording to add clarity to introductory text.

LP/MOD.125	p.159, Policy AC6, para. 4	Further details are set out in the Coventry Connected SPD and Coventry Rail Investment Strategy <u>and the West Midlands Strategic Transport Plan</u> .	To acknowledge the publication of a new document subsequent to publication of draft Local Plan.
LP/MOD.141	P. 177 and 178	References within the supporting text to EM7 are amended to EM8.	To ensure consistency with new policy numbering.

LOCAL PLAN MAIN MODIFICATIONS			
LP/MOD.3	p.5, Introduction	It also allows for the city to maximise the benefits and connectivity to the proposed HS2 interchange and supporting development at UK Central as well as continued job creation at Ansty Park, Ryton, ProLogis Keresley, University of Warwick and the planned Coventry and Warwick Gateway <u>(including the JLR proposals at Whitley South)</u> .	Additional wording to add clarity to introductory text.
LP/MOD.12	p.10, Issues and Opportunities table	<u>Balance the needs of public transport, cycling and walking with those of the car</u>	Additional wording to acknowledge a required balance between sustainable transport modes and private methods.
LP/MOD.13	p.11 (point 1) + 12 (point 4), Vision Strategy and Objectives table	<u>Build on the universities as an engine for research, innovation and culture in the city.</u> <u>Support the city's two world class universities as they continue to strengthen their national and global reputation.</u>	Additional bullet points to ensure explicit reference is made to the progression of the cities two universities across the plan period.
LP/MOD.14	p.11 (point 2), Vision and Objectives table	Making the city more accessible for business, visitors and local people through better road, rail, <u>bus, Rapid Transit</u> and digital connections.	Additional wording to make explicit reference to Rapid Transit and to correct the omission of bus as a means of transportation. + To reflect the inclusion of bus and rapid transit provision included through; <i>Inspector Action Point 7 of Hearing Session 10 and Inspector Action Point 17 of Hearing Session 12.</i>

LP/MOD.15	p.11 (point 4) + 12 (point 7), Vision and Strategy Objectives table	<p><u>Provide a high quality public transport network which integrates with walking and cycling routes</u></p> <p><u>Ensure all housing is accessible by sustainable modes of transport</u></p>	Additional bullet point to ensure explicit reference is made to the improvement of the cities' public transport system and its aim of providing a balanced offering of transport modes across the plan period.
LP/MOD.16	p.10 (point 1) + 11 (point 2 and 3) + 13 (point 9), Vision and Strategy Objectives table	<p>Additional reference added to Policy DS4 to all listed points.</p> <p>Reference added to Policy H2 in relation to point 2 only.</p>	Reflects the introduction of new Policy DS4 and updates to infrastructure requirements.
LP/MOD.18	p.15, Policy DS1, Introduction – introductory text	<p><u>As part of the Local Plans public examination a detailed review of the 2014 based sub-national population projections (ONS), the respective household projections (DCLG) and the 2015 mid-year population estimates was undertaken. This reflected the timely release of this data during the examination process. The information was reviewed as part of a joint Coventry and Warwickshire commission and showed a continued growth in housing need in Coventry. This growth was however offset by a decrease in growth projections for Warwickshire meaning the overall needs of the Coventry and Warwickshire Housing Market Area are actually projected to decrease by 35 homes a year. For the avoidance of doubt this assessment highlights the city's population to grow by in excess of 100,000 people with a revised housing need of 47,320. Again, though this additional growth is to be offset by a decline in growth pressure within Warwickshire. As such, the updated information has very little impact on the ability of the: Local Plans for Coventry and Warwickshire to meet the needs of the HMA in accordance with national guidance. For this reason no adjustment was made to the policy structure of this Plan. Should the situation change in future years however then the Plan will be reviewed in accordance with Policy DS.1</u></p>	Additional paragraph to add clarity to introductory text. This also helps respond to the Inspectors Action Point 1 of Hearing Session 14.

LP/MOD.19	p.16, Housing Needs - introductory text	<u>As set out above, although the 2014 based data suggests an increase in the OAN for the city it also shows that this is more than offset by a decrease in OAN across Warwickshire. As such, the housing needs of the HMA remain stable. In this context though the city's OAN will continue to be considered as a minimum level of provision for the purposes of this Plan.</u>	Additional wording to clarify the housing OAN following the release of updated data in 2016. To partly satisfy Inspector Action Point 1 of Hearing Session 14.
LP/MOD.20	p.16, Housing Need - introductory text	As a result, the Council have worked openly and constructively with its neighbouring authorities, particularly over the last 18 months to agree a Joint Memorandum of Understanding (MoU) on housing delivery (2015) to support all Local Plans for Coventry and Warwickshire. <u>This MOU is unchanged following the 2014 based data as the overall needs of the HMA remain stable and continued to be planned for in a positive way.</u>	Deletion of unnecessary wording, + Likewise to LP/MOD.17, additional text to clarify the Council's position on the OAN updated figures for housing.
LP/MOD.21	p.17, Employment Land Needs – introductory text	Coventry and Warwickshire Gateway (including Whitley Business Park <u>and Whitley South</u>) – Significant investment in advanced manufacturing, logistics, and hi-tech research and development opportunities to the south and south east sides of the city <u>supported by the global headquarters of JLR;</u>	Additional wording ensure explicit reference is made to Whitley South and JLR regarding the support of economic growth projects.
LP/MOD.22	p.19, Employment Land Needs – introductory text	<u>This redistribution has been agreed through a Coventry and Warwickshire Employment Land MOU (2016). The MOU has also agreed the site opportunities referenced above, and although 2016 monitoring suggests a slight improvement in the city's employment land position, there remains a significant shortfall against the overall requirement and an on-going need for deliverable employment land across the sub-region. This also reflects the minimum nature of the requirement identified in Policy DS1.</u>	Additional wording to paragraph which reflects changed to policy DS1.
LP/MOD.24	p.20, Retail Floor Space Needs – introductory text	Having regard to the city's position at the heart of the sub-region, the regeneration opportunities within the city centre and the identification of much of Warwickshire within the Coventry retail catchment area, the Local Plan makes provisions for the city's full retail <u>based</u> needs. In this context a total need of 843,952sq.m <u>843,952</u> sq.m of comparison retail floor space is required (A1-A5 including bulky goods retail) and a further 21,882sq.m of convenience retail floor space. This totals approximately 1076,000sq.m of retail <u>based</u> floor space. In delivering this floor space it is expected that around 20,200sq.m of comparison space will be reoccupied through existing vacant units leaving a further 865,800sq.m <u>865,800</u> sq.m to be planned for.	Alteration of figures, and deletion of wording to improve accuracy of introductory text.

LP/MOD.25	p.20, Policy DS1, para. 1a + b.	<p><u>A minimum of</u> 24,600 additional homes.</p> <p><u>A minimum of</u> 128ha of employment land within the city's administrative boundary</p> <p>Where necessary the phrase: <u>at least</u>, has been inserted prior to the respective housing figures respectively throughout the document.</p>	To satisfy Inspector Action Point 2 of Hearing Session 2.
LP/MOD.26	p.20, Policy DS1, para. 1c	<p>84,900sq.m gross comparison-retail <u>based</u> floor space <u>(across use classes A1-A5 (including bulky goods))</u> and 21,900sq.m gross convenience floor space by 2031, of which at least 70,000sq.m is to be allocated to Coventry city centre.</p>	To satisfy Inspector Action Point 1 of Hearing Session 7(b). + Addition and deletion of text and figures to ensue factual accuracy.
LP/MOD.27	p.21, Policy DS1, para. 3	<p><u>The Council will undertake a comprehensive review of national policy, the regional context, updates to the evidence base and monitoring data before 31st March 2021 to assess whether a full or partial review of the Plan is required. In the event that a review is required, work on it will commence immediately.</u></p> <p><u>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: -</u></p> <ul style="list-style-type: none"> <u>a) Through the Duty to Co-operate, the unmet housing and employment needs of the city are proven to be undeliverable within the Local Plans of Warwickshire authorities;</u> <u>b) Updated evidence or changes to national policy suggest that the overall development strategy should be significantly changed;</u> <u>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;</u> <u>d) Any other reasons that render the Plan, or part of it, significantly out of date.</u> 	To satisfy Inspector Action Point 2 of Hearing Session 1.
LP/MOD.28	p.21, Policy DS1 – supporting text	<p><u>Local Plan Review</u></p> <p><u>In the event that the Plan as a whole or a key part of it becomes out of date, it will be necessary to undertake a full or partial review of the Plan. Further to part 3 of Policy DS1 there are a number of factors that could render the Plan out of date:</u></p>	To satisfy Inspector Action Point 2 of Hearing Session 1.

a) Should one or more of the City's Warwickshire neighbours be unable to deliver the relevant proportion of the city's unmet development needs (for housing and employment as appropriate) as informed by the relevant MOU's then the city will explore all options to review its Local Plan. A failure to deliver the development needs in accordance with existing MOU's however should be evidenced by a public examination and subsequent adoption of the relevant Local Plan and have full regard to the Duty to Cooperate process.

b) The Coventry and Warwickshire Memorandum of Understanding (MOU) may need to be updated to reflect changing circumstances and evidence. In the event that a new or revised Memorandum of Understanding would require substantive revisions to the Local Plan proposals, then a partial or full review is likely to be necessary. However a new or revised MOU will not necessarily require a review of the Plan where the changes can be accommodated within the Plan's existing strategy.

c) National planning guidance is clear that updated evidence (such as new ONS population and respective household projections) will not necessarily render the Plan out of date. However where evidence signals a substantial and sustained change (either up or down) to the context of the Local Plan, this will trigger a review (partial or whole) of it.

d) The delivery of the Local Plan's objectives, including the overall annual housing requirement will be closely monitored. Where the Plan's proposals and policies are clearly failing to deliver the Plan's overall strategy and objectives, the Plan will require a review.

To ensure the Plan remains up to date and relevant, the Council is also committed to undertaking a comprehensive review of national policy, the regional context, updated evidence and monitoring data. The outcomes of this review will be reported to the Council before the end of March 2021 with a clearly justified recommendation as to whether a partial or comprehensive review of the Plan is required.

During this period to 2021, the Council will also continue to work with the CWLEP

		<u>and its Warwickshire neighbours to consider whether a statutory Single Spatial Strategy should be prepared to cover the HMA or part of it. In the event that the Council takes part in preparing a statutory Single Spatial Strategy, this will constitute a review of the Local Plan in accordance with this Policy.</u>	
LP/MOD.29b	p.25, Policy DS3, para. 1.	a) access to a variety of high quality green and blue <u>infrastructure spaces</u> ; e) low and, wherever possible, zero carbon homes;	To satisfy Inspector Action Point 4 of Hearing Session 9 and Inspector Action Point 14 of Hearing Session 3.
LP/MOD.30	p.24, Policy DS2, para. 6	<u>6. Of particular relevance to parts 4 and 5 of this policy are the continued growth and expansion of:</u> <u>a. Jaguar Land Rover at Whitley;</u> <u>b. the University of Warwick;</u> <u>c. The wider Coventry Gateway proposals;</u> <u>d. Ansty Park;</u> <u>e. Pro-Logis Park at Keresley; and</u> <u>f. Proposed residential developments to the south of the city's administrative boundary.</u>	<i>To satisfy Inspector Action Point 3 of Hearing Session 7(a).</i>
LP/MOD.31	p.25-31, Policy DS4 and supporting text	New Policy (DS4) with associated supporting text which sets out the Master-planning principles for general development (part A) and with a specific focus on the proposed developments at Whitley (Part B) and the 2 SUE's (Part C and D).	<i>To satisfy Inspector Action Point; 6 of Hearing Session 3, 4 of Hearing Session 7(a), 10 of Hearing Session 8, 3 of Hearing Session 10, 4 of Hearing Session 15, and 7 of Hearing Session 16.</i>
LP/MOD.32	p.35, Policy HW1 – supporting text	<u>These guidelines will form a platform to support the Council's HIA SPD.</u>	Additional wording to aid clarity of supporting text.
LP/MOD.33	p.35 + p.36, Policy HW1 – supporting text (part 1)	<u>To support this process the Council will develop a HIA SPD. This will also build upon the current Health Impacts Tool Kit being developed by Birmingham City Council and which is expected to be rolled out across the WMCA in 2017. The development of this toolkit to date has involved partnership working with representatives from the development industry and Public Health England (PHE). Once launched it is expected to carry with it an associated accreditation supported by PHE. In the event that this tool kit is not rolled out across the WMCA or the toolkit is shown to be inappropriate for a specific development proposal, the HIA</u>	<i>To satisfy Inspector Action Point 12 of Hearing Session 3.</i> + Addition of wording to improve clarity of text and ensure the proposed approach is more reflective of national guidance and the local context.

		<u>SPD will provide guidance as to alternative tool kits that will support health considerations in new developments across Coventry.</u>	
LP/MOD.34	p.36, Policy HW1 – supporting text (part 2)	<p>(c) all forms of residential development where:</p> <p>(i) the number of homes to be provided is 150+0 or more; or</p> <p>(ii) the site area is 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i);</p> <p>d) all forms of urban commercial development (<u>not involving housing</u>) where:</p> <p>(i) the <u>area of development exceeds 1ha</u>floor space to be created by the development is 1,000 square metres or more; or</p> <p>(ii) <u>in the case of industrial estate development exceeds 5ha</u>the site area is 1 hectare or more.</p> <p><u>Notwithstanding the identified thresholds, all developments, including those below them, will be encouraged and recommended to complete the toolkit identified above and/or have full regard to how health benefits can be realised through development as part of the design process. By considering the use of this toolkit for sites below the threshold this could carry added benefit, especially within some of the city's more deprived areas where health and wellbeing concerns are more concentrated and in areas where issues are more isolated and/or related specifically to the proposed development or location of development. This process will also help in the consideration of the Local Plans policies on air quality, green spaces and active travel. Any consideration of benefits or impacts should have full regard to both the existing and new population that may live and/or work in or around the proposed site.</u></p>	<p>To satisfy Inspector Action Point 12 of Hearing Session 3.</p> <p>+ Deletion/addition of wording to improve clarity of text and ensure the proposed approach is more reflective of national guidance.</p>
LP/MOD.35	p.38, Jobs and Economy – introductory text	<ul style="list-style-type: none"> • <u>Financial, Legal and Business Support Services – 311,1200 FTE jobs;</u> • <u>Education – 23,8600 FTE jobs;</u> • <u>Health – 3,800 FTE jobs;</u> • <u>Retail Trade – 2,0800 FTE jobs;</u> • <u>Construction – 2,700 FTE jobs;</u> • <u>Wholesale Trade – 24,4600 FTE jobs; and</u> • <u>Architectural and Engineering Services – 2,000 FTE jobs.</u> • Health – 1,400 FTE jobs; • Water, Sewerage and Waste – 1,200 FTE jobs; and • Residential and Social Care – 1,200 FTE jobs. 	<p>Additional information to add clarity to supporting text. Also to satisfy Inspector Action Point 2 of Hearing Session 7 (part A – employment).</p>

LP/MOD.36	p.39. Jobs and Economy – introductory text	<p><u>In particular, Jaguar Land Rover has established itself as a global business and is the UK’s largest automotive employer, creating both direct and indirect jobs across the city, sub-region and UK as a whole. Jaguar Land Rover’s existing site at Whitley Business Park is home to its global headquarters and is an advance engineer’s facility, as well as the Jaguar Design department. The site currently employs in excess of 5,200 people with this figure expected to grow substantially in the coming years as Jaguar Land Rover continues to push forward with its own expansion plans. The City Council is committed to working jointly with Jaguar Land Rover and Warwick District Council in particular to help support the planned growth of Jaguar Land Rover in the most appropriate way. This includes the City Council’s commitment to supporting the Whitley South proposals in Warwick District but also the allocation of land adjacent to Whitley Business Park at Baginton Fields. This site will help to create an employment hub for the south east corner of Coventry which could help support the longer term expansion of Jaguar Land Rover at Whitley, support the sustainable growth of its supply chain or provide a stand-alone inward investment opportunity.</u></p>	To strengthen the reference to JLR as a significant part of the city’s economy and job creation.
LP/MOD.37	p.41, Policy JE1, para. e	Support companies, <u>including Jaguar Land Rover</u> , in retaining, expanding and/or relocating their headquarters operations within the city <u>and support the provision of new infrastructure that encourages these companies to grow.</u>	Additional wording in policy to specifically acknowledge JLR in terms of the role they play within Coventry’s economy and employment base as requested by JLR.
LP/MOD.38	p.41, Policy JE1, para. i	i) <u>Support the continued growth of the city’s two universities and in doing so maximise the economic development and other community benefits associated with them.</u>	Additional paragraph in policy to make explicit reference of the universities roles in Coventry’s economy and employment base as requested by UoW and CU.
LP/MOD.39	p.44 + 45, Provision of Employment Land – introductory text	<p>These comprise firstly completions to date during the early part of the plan period during the financial years of 2011/2012 to 20154/20165. Such completions include those at the Ansty <u>Park</u> and Pro-logis Ryton sites within Rugby Borough Council’s administrative area because these sites lie adjacent to the city’s boundary and are therefore considered to form part of the city’s employment land supply.</p> <p>Employment land completions for this period total <u>a little over 70ha</u>57ha comprising <u>2615ha</u> of completions on land within the city’s administrative area,</p>	<p>Updated dates to indicate the progression of time since submission of draft Local Plan, consequently with updated figures to reflect this,</p> <p>+ Addition to, and deletion of, wording to clarify supporting text.</p>

30ha at Pro-logis Ryton and ~~1412~~ha at Ansty.

The next supply components ~~s~~ comprises ~~e~~ extant planning permissions for employment development and sites under construction. ~~Some Certain~~ of the proposed employment allocations in Policy JE2 (or part there of) also benefit from extant permissions and therefore these have been excluded from these ~~se extant permissions~~ components to avoid double counting as allocations also form part of the city's employment land supply. Bearing in mind the above, land with extant permission for B class employment uses totals ~~7058~~ha comprising ~~11ha-17ha~~ of land within the city's administrative boundary, 27ha at Pro-logis Ryton and ~~260~~ha at Ansty.

Bearing in mind all of the above it proposed to allocate 8 sites for employment development which in total amount to ~~1074~~ha.

The ~~2316.5~~ha previously developed Lyons Park site at Coundon Wedge Drive in the north west of the city is allocated for a mix of B1, B2 and B8 uses in accordance with the extant planning permission covering this site. Construction ~~is currently nearing completion on~~ of 5 industrial/warehouse units on ~~4.5~~ha of the site has now been completed. The remaining ~~19ha~~ of the site ~~either currently~~ remains undeveloped or has commenced development in early 2017 so is subject to the allocation figure in Policy JE2.

~~3026.5~~ha of greenfield land at Whitley Business Park in the south east of the city are also allocated for a mix of research and development, industrial and storage/distribution uses (B1, B2 and B8) in accordance with previous planning approvals for employment development on this site.

Detailed planning approval has recently been granted for a large B8 unit on ~~128~~ha of the site with a further 9ha of the site expected to contribute towards the growth aspirations of JLR in association with the land at Whitley South (in Warwick District)~~and another planning application has recently been submitted for an industrial/warehouse unit (B1/B2/B8) on a further 3ha.~~

LP/MOD.40	p.46, Provision of Employment Land - introductory text	It can be seen that the supply components total 248.6 ha which <u>relate positively towards the identified needs</u> broadly aligns with the employment need of around 215ha suggested by GL Hearn for the Plan period. <u>This level of provision both within and adjacent to Coventry also supports the Coventry and Warwickshire employment Land MOU and the aspirations of the LEP and its Strategic Economic Plan.</u>					Alteration to wording in order to provide an accurate reflection of changes to Table 3.1 – see LP/MOD.41
LP/MOD.42	p.47, Policy JE2, para. 1	JE2:2	Lyons Park	Bablake	19.6.5	B1, B2 & B8	Correction to figures in order to ensure factual accuracy.
		JE2:3	Whitley Business Park	Cheylesmore	30.26.5	B1b&c, B2 & B8	
LP/MOD.43	p.47, Policy JE2, para. 1 + 2	JE2:8	Former Electric Power Station Land off <u>at Aldermans Green Road and Sutton Stop</u> (part of mixed use site)	Longford	1.5	B1c & B8	To satisfy Inspector Action Point 5 of Hearing Session 7(a), + To satisfy Inspector Action Point 6 of Hearing Session 7(a).
		The Friargate, A45 Eastern Green, Whitmore Park, and Durbar Avenue <u>and Alderman's Green Road and Sutton Stop</u> employment allocations are to be progressed as part of wider mixed-use re-development schemes and should be supported by comprehensive Masterplans.					

LP/MOD.44	p.54, Accessibility to Employment Opportunities – introductory text	<p><u>Within the West Midlands Integrated Transport Authority's Strategic Transport Plan, there are a number of policies promoting 'Economic Growth and Economic Inclusion'. These promote improvements in transport infrastructure including Rapid Transit, improved bus services and enhanced walking and cycling measures, alongside policies to improve junction pinch points. Investments in such infrastructure are considered throughout this Plan and will serve new employment sites, to enable new travel demands to be met successfully through sustainable forms of travel. As such, new development must be well designed to accommodate the needs of all transport modes and must be fully integrated with existing transport networks. Sustainable travel improvements will then allow employment sites to be developed, enabling new travel demand to be met by sustainable forms of travel.</u></p>	Additional paragraph added to provide stringer links to the Strategic Transport Plan and its link to sustainable access to jobs in order to support economic growth.
LP/MOD.45	p.54, Policy JE7, para. b	<p><u>Developments must be well designed to accommodate the needs of all transport modes and must be fully integrated with existing transport networks.</u></p>	Additional paragraph to enhance the clarification of the policy.
LP/MOD.46	p.56 + 57, Delivering Coventry's Housing Needs – introductory text	<p>Since 2006 however the annual average has dropped to approximately 85<u>79</u> dwellings.</p> <p>The level of urban regeneration proposed by this Local Plan will see a continuation of demolition, especially within the areas of Wood End, Henley Green, Manor Farm and Canley, with at least 350<u>300</u> further homes expected to be cleared up to 2031.</p> <p>Notwithstanding this reduction, there remain approximately 1,100<u>300</u> long-term vacant properties within the city, which with intervention could be brought back into use, helping to meet local housing needs.</p>	Alteration to figures to ensure they display factually correct information.
LP/MOD.47	p.59, Scale of Housing Development – introductory text	<p>As previously highlighted in earlier sections of this plan however, <u>the cities OAN needs to be considered in the context of its HMA as</u> not all of these homes can be delivered within the city's boundaries. Following a thorough consideration of sustainable development principles, the constraints identified in the NPPF and a thorough assessment of land options through the Council's updated SHLAA 2015, a capacity of approximately up to 25,000 homes has been identified.</p>	Addition and alteration of wording to add clarity to introductory text.
LP/MOD.48	p.59, Table 4.1	<p>Table 4.1: Components of housing supply 2011 to 2031</p>	To satisfy Inspector Action Point 2 of hearing Session 3.

Housing Land Supply Components	Number of Homes (net)
Past Net Completions*	4,114
Sites With Planning Permission*	5,419
Sites Under Construction*	1,126
SHLAA Sites	3,767
Proposed Site Allocations (Local Plan)*	8,915
Proposed Site Allocations (City Centre AAP)	1,330
Small Site Windfall Allowance	352
Total	25,023

<u>Housing Land Supply Components</u>	<u>Number of Homes</u>
<u>Past Net Completions*</u>	<u>5,550</u>
<u>Sites With Planning Permission*</u>	<u>5,900</u>
<u>Sites Under Construction*</u>	<u>945</u>
<u>SHLAA Sites</u>	<u>3,058</u>
<u>Proposed Site Allocations (Local Plan)*</u>	<u>8,920</u>
<u>Proposed Site Allocations (City Centre AAP)**</u>	<u>649</u>
<u>Small Site Windfall Allowance</u>	<u>350</u>

		<u>Total</u>	<u>25,372</u>	
		<p>* In addition to the number of homes under the Proposed Site Allocations (Local Plan), 169,406 dwellings have been completed <u>as of April 1st 2016</u> in 2014/15 and 962,033 homes have planning permission or are already under construction (at April 1st 201<u>6</u>). These are included in the relevant headings in the table and are not double counted.</p>		
LP/MOD.49	p.60, Policy H1, para. 2	<p><u>As part of the housing trajectory (Appendix 1),</u> this requirement is to be steppedphased in the following way:</p>		To satisfy Inspector Action Point 4 of Hearing Session 3.
LP/MOD.50	p.60, Policy H1 – supporting text	<p><u>Through the housing trajectory though,</u> the requirement will be stepped is however proposed to be phased to allow for the necessary step change in housing delivery to be managed in a sustainable and appropriate way... Policy H1 sets out the proposed phasingstepped trajectory of the requirements.</p>		Alteration of wording to reflect change to Policy H1 – see LP/MOD.49
LP/MOD.51	p.60, Policy H1 – supporting text	<p>for 2 successive years. As such, the land supply position</p>		Deletion of text which reflects the changes to trigger points throughout the LP.
LP/MOD.52	p.60, Policy H1 – supporting text	<p><u>To ensure a robust assessment of land supply is undertaken monitoring will consider the Sedgfield approach and factor in a 5% supply buffer as standard unless there is evidence of persistent under delivery against the housing trajectory which supports Policy H1 of this plan. Through the AMR, land supply will also be assessed against a 20% buffer and give consideration to the Liverpool approach. This additional sensitivity monitoring will also be utilised as an early warning mechanism to identify any potential need for an early review of the SHLAA or early preparation of the ‘Supporting Housing Delivery DPD. This monitoring approach.....</u></p>		To satisfy Inspector Action Point 1 of Hearing Session 3.
LP/MOD.53	p.61, Policy H1 – supporting text	<p>Through its AMR monitoring process the Council will therefore <u>monitor closely the proportion of development on brownfield sites. This is with a view to encouraging and supporting</u>seek to achieve a majority of annual completions on brownfield sites. Should this fail to materialise for 2 consecutive monitoring years then the Council will consider this a secondary trigger in the delivery of its ‘Supporting Housing Delivery Development Plan Document’. <u>Such monitoring data would not in itself however constitute a reason for refusing a greenfield development proposal.</u></p>		To satisfy Inspector Action Point 11 of Hearing Session 16.

LP/MOD.54	p.61-64, Table 4.2	Various changes to 'Essential Site Specific Requirements and Other Uses' column. This relates to sites at Keresley, Eastern Green, Walsgrave Hill Farm, Whitmore Park, Browns Lane, Sutton Stop, Cromwell Lane, London Road / Allard Way and Grange Farm. This also results in some small adjustments to the site boundaries which are outlined in the supporting documentation (where appropriate).	To add clarity and certainty to the information relating to proposed site allocations for housing.
LP/MOD.55	p.64, NB to Table 4.2	<i>Site capacities have been rounded and add up to 96 dwellings more than the figures in Table 4.1, which reflects permissions and phasing to date.</i>	Factual correction to figure.
LP/MOD.56	p.63 and 65.	<p><u>In order to support the sustainable access to the sites identified above a number of cases are envisaged whereby local transport infrastructure will require either partial or entire construction upon land that will remain within the Green Belt. Paragraph 90 of the NPPF states "Certain other forms of development are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. Para 90 goes on to clarify that this includes "local transport infrastructure which can demonstrate a requirement for a Green Belt location".</u></p> <p><u>Having regard to national policy alongside the essential requirements outlined in Policy H2, the Master planning principles outlined in policy DS4 and the proposed Green Belt boundaries in policy GB1 the following sites will require local transport infrastructure that clearly demonstrates a requirement for a Green Belt location.</u></p> <ul style="list-style-type: none"> • <u>Keresley SUE – Highway proposals associated with the Link Road between Winding House Lane and Long Lane</u> • <u>Eastern Green SUE – The new junction from the A45 will require land to the north of the A45 to ensure traffic flows on the road are not compromised</u> • <u>Walsgrave Hill Farm – highway proposals associated with the new junction at the A46 and the blue light access</u> • <u>Sutton Stop – junction improvements to Alderman's Green Road</u> • <u>The Grange Children's home, Waste Lane – possible access improvements at Waste Lane and/or Brownhill Green Road</u> <p><u>In the case of land at Eastern Green and Sutton Stop this will also relate to policy JE2 should the employment elements of the site be brought forward separately.</u></p>	<i>To partly satisfy Inspector Action Point 4 of Hearing Session 15, + 2 of Hearing Session 5.</i>
LP/MOD.57	p.65, Policy H3, para. 4	<u>Wherever possible n</u> New developments should also be:	<i>To satisfy Inspector Action Point 7 of 3.</i>

LP/MOD.58	p.66, Policy H3, para. 6	<u>Sustainable transport provision and the infrastructure required to support housing development must be considered from the onset, to ensure all sites have easy access to high quality public transport and walking and cycling routes</u>	<i>Additional paragraph to add clarity to policy.</i>
LP/MOD.59	p.66, Policy H3, para. 7	Developer Contributions via Community Infrastructure Levy and/or Section 106 Obligations may be required to address any deficiency.	<i>To partly satisfy Inspector Action Point 8 of Hearing Session 3. See LP/MOD.60.</i>
LP/MOD.60	p.66, Policy H3 – supporting text	<u>Should development come forward that is deficient against the criteria in policy H3 then the site specific circumstances will be considered to understand the extent to which the criteria are not met. Should it be deemed appropriate and justified without excessively impacting on development viability, developer contributions will be required via a Section 106 agreement and/or CIL. This will be managed through Policy IM1.</u>	<i>To partly satisfy Inspector Action Point 8 of Hearing Session 3. See LP/MOD.59.</i>
LP/MOD.61	p.66, Policy H3 – supporting text	<p>When considering public transport options in particular new homes should <u>comply with the TfWM's access standards of 400m to a bus stop and</u> seek to maximise connectivity to the existing network and facilitate extensions to this network where practicable. <u>This should include new and improved bus connections with good service frequency to serve new larger sites where appropriate and practical.</u></p> <p>In responding to Government objectives of facilitating the delivery of self-build homes and starter homes the Council have considered that some limited provision of these could, <u>in accordance with national Green Belt policy,</u> represent acceptable development within the Green Belt, but only where they represent limited infill opportunities within existing ribbon developments and complement the existing street scene.</p>	<i>Additional wording to paragraph to add clarity to supporting text.</i>
LP/MOD.62	p.68, Policy H4, para. 2	In assessing the housing mix in residential schemes the Council may take into account the following circumstances where it may not be appropriate to provide the full range of housing types and sizes in accordance with the latest Strategic Housing Market Assessment:	<i>To satisfy Inspector Action Point 9 of Hearing Session 3.</i>
LP/MOD.63	p.72, Policy H6, para. 5	Where the specified level of affordable housing cannot be provided, <u>including for reasons of viability,</u> robust evidence must be presented to justify a reduced or alternative form of contribution.	<i>To satisfy Inspector Action Point 3 of Hearing Session 2.</i>

LP/MOD.65	p. 76, Policy H7 – supporting text	Should on-going monitoring identify a continuation of recent trends and demonstrate that this is not a short term deviation then the council will <u>consider the need for a targeted review of this Local Plan in accordance with Policy DS1 and the monitoring framework which supports this Plan.</u> bring forward allocated sites as part of its 'Supporting Housing Delivery Development Plan Document'.	<i>To satisfy Inspector Action Point 2 of Hearing Session 1.</i>
LP/MOD.66	p.76, Policy H7 – supporting text	By way of reasonable travelling distance, national guidance likens <u>draws some similarities between</u> sites for Gypsy and Travellers and to sites for general bricks and mortar housing. As such, the standards set out in policy H3 should be considered when determining applications for Gypsy and Traveller sites.	<i><u>To support the Policy position and help clarify the land supply approach for Gypsy and Traveller sites</u></i>
LP/MOD.67	p.77m Policy H8 – introductory text	To support future housing pathways, <u>opportunities for new Extra Care provision at least 10% of new homes built</u> within the Urban Extensions at Keresley and Eastern Green should <u>be considered at the Master planning stage.</u> therefore be provided to support Extra Care provision. Within the urban extensions and through city wide development in general whilst further opportunities should be taken to focus <u>make</u> new provisions around designated centres, with the recent development at the Butts a prime example of what can be achieved across the city	<i>To satisfy Inspector Action Point 4 of Hearing Session 2.</i>
LP/MOD.68	p.78, Policy H8 – supporting text	New dwellings should however also be built to, or be easily adaptable to Lifetime standards. Lifetime homes incorporate features, which make the dwellings easily adaptable to changing family needs, and enable everyone to live independently.	<i>To satisfy Inspector Action Point 15 of Hearing Session 3.</i>
LP/MOD.69	p.80, Policy H10 – introductory text	The supplementary evidence has identified the continuation of this trend, with in excess of 3,500 <u>2,500</u> bed spaces currently with extant planning permission.	Updated figures which reflect a progression in time as the document has progressed.
LP/MOD.70	p. 83, Policy H11, para. d	<u>The amenity value and living standards of future occupants of the property, having specific regard to internal space, garden/amenity space and</u>	Additional paragraph to enhance clarity of policy.
LP/MOD.73	p.86, Retail and Town Centre Uses: Coventry's Retail Based Need – introductory text	The allocation of <u>convenience floor space, A2 provision and</u> retail warehouse need towards the city centre reflects the recommendations <u>and overarching principles</u> of the Shopping and Centres Study and the need to consider such provisions sequentially through the hierarchy. As such, new retail warehouse opportunities should be provided within the Primary Shopping Area or wider city centre wherever possible <u>to meet these needs unless otherwise identified in Policy R1. If this does not prove possible through the Sequential Assessment process then provisions should be focused towards the other centres within the hierarchy as appropriate.</u>	<i>To partly satisfy Inspector Action Point 3 of Hearing Session 7, along with LP/MOD.74.</i>

LP/MOD.74	p.86, Table 5.1	<table border="1"> <thead> <tr> <th></th> <th>Convenience</th> <th>Comparison*</th> <th>A2</th> <th>A3-A5</th> <th>Retail Warehouse</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>City Centre</td> <td>10,000</td> <td>27,667</td> <td>8,700</td> <td>10,009</td> <td>21,758</td> <td>78,134</td> </tr> <tr> <td>Rest of City</td> <td>11,881</td> <td>13,175</td> <td>0</td> <td>2,630</td> <td>0</td> <td>27,686</td> </tr> <tr> <td>Total</td> <td>2</td> <td>2</td> <td>---</td> <td>2-3</td> <td>2-5</td> <td>5-2</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th colspan="5"><u>to 2-3</u></th> </tr> <tr> <th><u>Convenience</u></th> <th><u>Comparison (A)*</u></th> <th><u>A2</u></th> <th><u>A3-A5</u></th> <th><u>Retail Warehouse</u></th> </tr> </thead> <tbody> <tr> <td><u>City Centre</u></td> <td rowspan="2"><u>21,882</u></td> <td><u>27,667</u></td> <td rowspan="2"><u>9,712</u></td> <td><u>10,010</u></td> <td rowspan="2"><u>21,758</u></td> </tr> <tr> <td><u>Rest of City</u></td> <td><u>13,175</u></td> <td><u>2,630</u></td> </tr> <tr> <td>Total</td> <td>2-2</td> <td>---</td> <td>---</td> <td>2</td> <td>2-5</td> </tr> </tbody> </table> <p>* <u>An allowance for at least 10,000sq.m of new retail floor space at City Centre South has been added into the short term projection.</u> <u>NB: all figures are for gross floor space</u> <u>NB: Source: Coventry Shopping and Centres Study (2014)</u></p>		Convenience	Comparison*	A2	A3-A5	Retail Warehouse	Total	City Centre	10,000	27,667	8,700	10,009	21,758	78,134	Rest of City	11,881	13,175	0	2,630	0	27,686	Total	2	2	---	2-3	2-5	5-2		<u>to 2-3</u>					<u>Convenience</u>	<u>Comparison (A)*</u>	<u>A2</u>	<u>A3-A5</u>	<u>Retail Warehouse</u>	<u>City Centre</u>	<u>21,882</u>	<u>27,667</u>	<u>9,712</u>	<u>10,010</u>	<u>21,758</u>	<u>Rest of City</u>	<u>13,175</u>	<u>2,630</u>	Total	2-2	---	---	2	2-5	To partly satisfy Inspector Action Point 3 of Hearing Session 7b, along with LP/MOD.73.
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Total retail floor space (all forms)	34,077	71,743	105,920
% pre 2021	32%	68%	100%

=	<u>To 2021</u>	<u>2021-2031</u>	<u>Total 2011-2031</u>
<u>Total Convenience Retail floor space</u>	<u>8,090</u>	<u>13,792</u>	<u>21,882</u>
<u>Total Comparison Retail floor space (A1)*</u>	<u>14,191</u>	<u>26,651</u>	<u>40,842</u>
<u>Total A2 floor space</u>	<u>3,189</u>	<u>6,523</u>	<u>9,712</u>
<u>Total A3-A5 floor space</u>	<u>7,183</u>	<u>5,457</u>	<u>12,640</u>
<u>Total Retail Warehousing floor space</u>	<u>2,425</u>	<u>19,333</u>	<u>21,758</u>
<u>Total</u>	<u>35,078</u>	<u>71,756</u>	<u>106,834</u>

* An allowance for at least 10,000sq.m of new retail floor space at City Centre South has been added into the short term projection.

NB: all figures are for gross floor space

NB: Source: Coventry Shopping and Centres Study (2014)

LP/MOD.76

p.88, Table 5.3

Retail Floor Space Supply Components	Gross Retail floor space (sq.m)	
	Convenience	Comparison-Other
Sites With Planning Permission	1,725	2,502
Sites Under Construction	287	1,430
Occupation of vacant premises (outside of city centre)	0	10,600
Proposed Site Allocations (city centre)*	10,000	60,100
Proposed Site Allocations (wider city)*	10,200	10,000
total	---	---

Retail Floor Space Supply Components	Gross Retail floor space (sq.m)		
	Convenience	Comparison A	Other Retail based - A - A5
<u>Completion since Study (2015-2016)*</u>	<u>125</u>	<u>1,430</u>	<u>0</u>
<u>Sites With Planning Permission</u>	<u>1,813</u>	<u>1,491</u>	<u>490</u>
<u>Sites Under Construction</u>	<u>818</u>	<u>0</u>	<u>0</u>
<u>Occupation of vacant premises (outside of city centre)</u>	<u>0</u>	<u>10,600</u>	
<u>Proposed Site Allocations (city centre)**</u>	<u>10,000</u>	<u>60,100</u>	
<u>Proposed Site Allocations (wider city)**</u>	<u>10,200</u>	<u>10,000</u>	
total	<u>5</u>	<u>---</u>	

Alteration to table to increase breakdown of figures given which reflect the changes made in LP/MOD.74.

		<p><u>* Completions since study refers to the level of completed floor space in Coventry since the completion of the NLP Study in 2014. This study identified the level of need which has informed the Local Plan.</u></p> <p><u>** Allocations within the city centre include 33,825,181sq.m of retail floor space (use class A1-A5) with planning permission or under construction. Allocations within the wider city Include 1,843sq.m of floor space with planning permission or under construction.</u></p>	
LP/MOD.77	p.90, Policy R1, para. 3	<p>Further retail provision at Arena Park Major District Centre will not be supported during the plan period unless it is demonstrated that it will not <u>have a significant adverse impact</u> directly impact on the city centre or is an essential element of supporting the wider parks tourism functions.</p>	<i>To satisfy Inspector Action Point 4 of Hearing Session 7b.</i>
LP/MOD.78	p.90 + 91, Policy R1 – supporting text	<p>Like other centres across the city, this provides a focus on smaller units with an average floor space of <u>115,113</u>sq.m and no single units larger than <u>457,450</u>sq.m.</p> <p>When defining small scale local provisions evidence identifies that such units within similar Coventry centres would be between <u>3635</u>sq.m and <u>780,700</u>sq.m, although the upper limit is influenced by a small number of larger units which are largely utilised for convenience goods.</p> <p>The new small scale provisions referred to in Policy R1 should therefor reflect this range of unit sizes, with no one unit exceeding <u>800,700</u>sq.m.</p>	Updated figures to improve accuracy.
LP/MOD.80	p.93, Policy R2, para. j + n +p	<p><u>j. Provide a high quality public transport system that benefits from seamless integration and is well connected to existing and new infrastructure.</u></p> <p>n. Continuing to <u>support greater integration of the university within the wider city centre in accordance with the policies in the Area Action Plan;</u> generate a balance and integration of the university with the wider city centre; and</p> <p><u>p. Supporting the reintroduction of green and blue infrastructure throughout the city centre, including opportunities for deculverting wherever possible.</u></p>	<i>To satisfy Inspector Action Point 4 of Hearing Session 12.</i>

LP/MOD.81	p. 95, Policy R3, para. 1	These Centres will be the preferred locations for new shops, and other Main Town Centre and community facility uses which do not serve a city-wide catchment and are not more appropriately sited in the city centre.	<i>To satisfy Inspector Action Point 6 of Hearing Session 7b.</i>
LP/MOD.82	p.95, Policy R3, para. 3-5	<p>They will complement but not compete with the city centre and will contain a scale of development which is demonstrated to not impact negatively on the city centre and supports the needs of their part of the city (around a 3km radius) for:</p> <p>They will contain a scale of development which is demonstrated to not impact negatively on higher order centres and supports the needs of their district of the city (a 2km radius) for bulk convenience shopping as well as an element of comparison shopping, service and catering uses.</p> <p>They will contain an appropriate scale of development which is demonstrated to not impact negatively on higher order centres and supports their immediate locality (a 1km radius) for day-to-day convenience shopping and also some service and restaurant uses; and social, community and leisure uses.</p>	<i>To satisfy Inspector Action Point 7 of Hearing Session 7b.</i>
LP/MOD.83	p. 97 + 98, Policy R4 – introductory text	<p>The Council's monitoring has identified an average unit size across all centres of 362267sq.m, although this does decrease to 220196sq.m when the city centre is excluded. In turn the average unit size within the city centre is 457381sq.m.</p> <p><u>Notwithstanding, the city's out of centre retail parks, which would be the most likely focus for out of centre proposals, contain units which average around 900-1,200sq.m in size.</u> As such, the evidence base suggests that on balance a threshold of <u>1,000</u>sq.m would be appropriate to apply for impact tests across Coventry.</p> <p><i>All references to an Impact Assessment made throughout the document have subsequently been altered from 400sq.m. to 1000sq.m where necessary.</i></p>	<i>To satisfy Inspector Action Point 5 of Hearing Session 7b.</i>
LP/MOD.84	p. 98, Policy R4, para. 2c and part 3	<p>Only where parts 2 a) and b) of this policy are satisfied the Sequential Assessment should have regard to:</p> <ul style="list-style-type: none"> I. Vacant units within the city's out of centre retail warehouse parks; and II. Local shopping parades, where the proposal is appropriate in terms of scale. 	<i>To satisfy Inspector Action Point 8 of Hearing Session 7.</i>

		Part 3 – adjust 400sq.m to be 1,000sq.m	
LP/MOD.85		<p>In addition to the centres hierarchy, Coventry hosts a range of out of centre retail warehouse parks, which provide a range of larger bulky goods retail units. Although these locations do not reflect the overall service offer or connectivity to justify being defined centres, they do support the city's overall retail and service offer, often drawing trade from city wide or sub-regional catchments. Furthermore, the city also includes a large array of well established local shopping parades, which serve the needs of the immediate locality, but often lack the quantum and diversity of offer to justify being a defined centre. They generally serve, primarily for "top up" convenience shopping, limited services and limited small scale food and drink uses and often contain at least 4 existing units.</p> <p>The Council considers however that where it has been demonstrated that sequentially preferable opportunities within defined centres cannot be identified that such sites do offer a sequentially preferable option compared to an isolated or standalone provision. This is reflected in Policy R4 and provides additional flexibility to the centres hierarchy. It also supports a more sustainable option giving greater opportunities for linked trips and economies of scale.</p> <p>⁺ For the purpose of Policy R4, Coventry's out of centre retail parks include: Alvis Retail Park, Airport Retail Park, Central 6 Shopping Park and, Gallagher Retail Park.</p>	Deletion of wording to reflect changes made in LP/MOD.84.
LP/MOD.86	p.99, Policy R4 – supporting text	<u>= These will be considered on a site by site basis having regard to the location, size, scale and intended customer base of the proposal.</u>	Additional wording to add clarity to supporting text.
LP/MOD.87	p. 100, Policy R4 – supporting text	<p>As a starting point the Council will consider the initial catchment areas of its centre hierarchy (as set out in policy R3), which include a city wide catchment for the city centre. These should be considered through the Sequential Assessment and Impact Test where they overlap with the site proposal. Further consideration can however be given to the scale and type of the proposal, its intended market area, drive time and access to both the highway and public transport.</p>	Deletions to wording which reflect changes made in LP/MOD.84 + LP/MOD.85.
LP/MOD.89	p.110, Green Belt and Green Environment – introductory text	<p>Coventry's <u>Exceptional</u> Very Special Circumstances</p> <p><i>Accordingly, wherever 'very special' was used has been changed to 'exceptional' throughout the document as necessary and appropriate.</i></p>	<i>To satisfy Inspector Action Point 5 of Hearing Session 8.</i>

LP/MOD.90	p.111, Policy GB1, para. 2b	<u>Within areas designated as Local Green Space the erection of small buildings and structures which are ancillary to the primary use of the land may be acceptable. Other development will not be permitted unless very special circumstances are demonstrated.</u>	To clarify the policy position around the new Local Green Space designation. This will provide a local policy platform to compliment the NPPF.
LP/MOD.91	p. 112, Policy GB1, para. 4 + 4d	The following areas will be removed from the Green Belt and re-designated as Local Urban Green Space and are shown on the Policies Map: Toc ss il Wood Brook Stray	Change of designated name, + Correction of spelling to satisfy Inspector Action Point 3 of Hearing Session 8.
LP/MOD.92	P.113, Policy GB1, para. 7	In addition to appropriate development in the Green Belt identified in the NPPF, limited infill development amongst existing ribbon developments would be considered appropriate where provisions for starter homes and self build properties are proposed.	<i>To satisfy Inspector Action Point 4 of Hearing Session 8.</i>
LP/MOD.93	p.113, Policy GB1 – supporting text	<u>Furthermore, it is important to highlight that section 3 and 7 of policy GB1 sit in part at least alongside section 9 of the NPPF by considering appropriate and inappropriate development within the Green Belt. In this context it is important to draw links to the supporting text of Policy H2 in this Local Plan in so far as it relates to the appropriate delivery of local transport infrastructure within a Green Belt location.</u>	<i>Additional paragraph to add clarity to supporting text and cross reference NPPF.</i>
LP/MOD.94	p.114, Policy GB1 – supporting text	<u>This approach will also be taken forward in relation to the land at around Charterhouse Heritage Park (policy HE3), the employment allocations at Whitley Business Park and Baginton Fields (Policy JE2) and the housing allocation at London Road / Allard Way (Policy H2:9).</u> <u>National Guidance requires development proposals within areas designated as Local Green Space to be considered against local policies which are consistent with policy for Green Belts. This principle is broadly accepted through Policy GB1, however it is important to consider the context of Green Belt policy against that of Local Green Spaces. Any development within Local Green Spaces should for example not impact on the initial purpose of land being considered as a locally important green space or impact negatively on criteria set out in Paragraph 77 of the NPPF. Of particular importance is land used for recreational and leisure use, especially sports pitches. It is acknowledged that some developments may be</u>	Additional paragraphs to enhance clarity of supporting text around the new Local Green Space designation..

		<p><u>required to support the continued use of sites as high quality sports pitches (e.g. buildings for changing facilities and related teaching or training provisions) and this would be supported in principle. Other acceptable examples will include the provision of:</u></p> <ul style="list-style-type: none"> <u>• new play equipment within parks and public spaces;</u> <u>• appropriate and suitable parking facilities at parks and public spaces;</u> <u>• appropriate lighting (in terms of scale and surrounding uses) to support sports facilities; and</u> <u>• the provision of appropriate and suitable footpaths and cycle ways to enhance accessibility to high quality green spaces.</u> <p><u>In all cases development should be ancillary to the primary purpose of the Local Green Space. Should development prevent the continued use of land for sports pitches, or other forms of Local Green Space (as appropriate) however, this will not be supported.”</u></p>	
LP/MOD.95	p.115, Policy GB2 – introductory text	<p>Reserved Safeguarded Land in the Green Belt</p> <p><i>Accordingly, wherever ‘reserved land’ was used has been changed to ‘safeguarded land’ throughout the document as necessary.</i></p> <p>When considered alongside development options within Warwick District however the land could provide longer term possibilities for the release of land from the Green Belt to support cross boundary development <u>proposals</u> in Warwick District. <u>Given the nature of the areas involved though, the retention and delivery of infrastructure, most notably for highways, education or green spaces would be the main focus. This reflects the existing nature of these sites which largely comprise existing low density homes, existing education provisions or ancient woodland.</u></p> <p>It can however put a mechanism in place that responds to potential longer term development options meaning its own Plan <u>remains flexible and</u> retains a strong degree of flexibility and is able to respond to emerging circumstances in neighbouring areas.</p>	<i>To satisfy Inspector Action Point 6 of Hearing Session 8.</i>

		<p>Land along the southern boundary of Coventry is therefore intended to be <u>designated as safeguarded land for consideration as part of the next Local Plan review. This will 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' and therefore render the Green Belt policy designations in these areas inappropriate. In this context, these sites are safeguarded in so far as their long term designation as 'Green Belt' is dependent upon the development of adjoining land in a neighbouring local authority. As already highlighted, the sites themselves are largely utilised for a small number of low density homes, education provisions or undevelopable due to the presence of ancient woodlands.</u></p> <p><u>Should such development proposals not materialise within Warwick District however these sites will be considered for a formal return to the Green Belt due to the issues raised above.</u></p> <p>reserved for consideration for development as part of a delivery mechanism being triggered through the DtC with Warwick District Council or at the time of a subsequent Plan review.</p>	
LP/MOD.96	p.116, Policy GB2, para. 1	<p>Land south of Gretna Road;</p> <p><u>Any development of these sites will be subject to consideration through a full or partial review of this Local Plan having explicit regard to development proposals in Warwick District.</u></p> <p>The land identified above will only be released from the Green Belt for development during this plan period where it forms an integral part of a comprehensive development scheme that involves both the Reserved Land within Coventry and the adjoining land in Warwick District — this could involve a range of development (including infrastructure). It would be with a view to delivering the wider development needs of the city and Housing Market Area. Until such time as the trigger set out above is enacted the land will continue to remain within the Green Belt and will be subject to the associated policies within the Local Plan.</p> <p>Any development within the reserved areas that would prejudice future</p>	Alteration to policy in response to Inspector Action Point 6 of Hearing Session 8.

		<p>comprehensive development as described above will not be permitted.</p> <p>Upon enactment of this policy the Council may review its Local Development Scheme in accordance with Policy DS2 to support the development of cross boundary evidence or development plan documents (as appropriate).</p>	
LP/MOD.97	p.116, Policy GB2 – supporting text	<p>Para 85 of the NPPF expressly mentions the opportunity to safeguard land within the Green Belt <u>as part of a Local Plan. It is not however allocated for development at the present time and is instead identified for consideration through future Plan reviews. As such, planning permission for the permanent development of safeguarded land will only be granted following a Local Plan review which proposes the development. In this context, should cross boundary development proposals within Warwick District include the wider development of any of these areas as part of a comprehensive development proposal then the Council will consider the significance of this in relation to the sites and the wider proposals. The Council will then determine if a need exists to undertake a targeted review of its Local Plan in this regard. This would be in accordance with Policy DS1 of this Plan. Such an event would also trigger the review of the Council's Local Development Scheme with a view to supporting the delivery of cross boundary evidence or development plan documents (as appropriate) in accordance with Policy DS2.</u></p> <p><u>Of particular relevance is the existing use and purpose of these sites. In this context the future review of these safeguarded areas is unlikely to trigger the comprehensive development or redevelopment of these areas. Instead it will respond to changes in Green Belt policy and seek to remove any cases of Green Belt islands having been created by adjoining development in Warwick District. This especially relates to the education facilities at Bishop Ullathorne and Finham Park (primary and secondary). In such cases development proposals must ensure that the city's education requirements continue to be met and where appropriate support sustainable accessibility to school places for residents of new homes.</u></p> <p>There is potential however for the land identified in this policy to be brought forward during this plan period, but this is dependent on development proposals in Warwick</p>	Change of wording in supporting text which reflects changes made in LP/MOD.95 and 96.

		<p>District. Consequently, it is not possible to identify areas as formally 'Safeguarded Land' as these would need to be set aside to meet potential long term development requirements in the next plan period. In addition release of the land would require a formal review of the city's development plan. To take this approach would therefore conflict with the NPPF and the potential outcomes of on going work with Warwick District Council through the DtC.</p> <p>The land in question is therefore reserved for future development but retained in the Green Belt until such time as the delivery mechanism is activated through the adoption of a Warwick District Council Local Plan that:</p> <ul style="list-style-type: none"> • specifically allocates land for development that is adjacent to these sites within the Coventry boundary; • which in doing so highlights the land within the Coventry boundary as being required to contribute towards a comprehensive development; and • would render the retention of land within the Coventry boundary as Green Belt inappropriate as it would create a 'Green Belt island' and mean the land no longer served the purposes of Green Belt. 	
LP/MOD.98	p.119, Policy GE1, para. 5 + 6	<p>De culverting in the city centre should be considered, wherever possible, in accordance with the specific policies, set out in the City Centre Area Action Plan. <u>Where a development proposal lies adjacent to a river corridor or tributary, a natural sinuous river channel should be retained or, where possible, re-instated. Culverts should be removed unless it can be demonstrated that it is impractical to do so.</u></p> <p><u>d) Improving its functionality, quality, connectivity and accessibility;</u></p> <p><u>e) Ensuring that a key aim of green infrastructure is the maintenance and improvement and expansion of biodiversity;</u></p> <p><u>f) Integrating proposals to improve green infrastructure in the delivery of new developments, particularly through area based regeneration initiatives and major proposals and schemes; and</u></p> <p><u>g) Flood risk management and improving surface water quality.</u></p>	Deletion and additional wording to add clarity to policy.
LP/MOD.99	p.123, Policy GE2	Add "or" after parts 1a and 1b of the policy.	To satisfy Inspector Action Point 8 of Hearing Session 8.

LP/MOD.100	p.124, Policy GE3, para. 1d	<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.</u>	<i>To satisfy Inspector Action Point 6 of Hearing Session 9.</i>
LP/MOD.101	p.125, Policy GE3, para. 2	If mitigation measures are not possible on site, then compensatory measures involving biodiversity offsetting will be considered, <u>but only in exceptional circumstances.</u>	<i>To partly satisfy Inspector Action Point 5 of Hearing Session 9. See also LP/MOD.104.</i>
LP/MOD.102	p.125, Policy GE3, para. 3	Identified important landscape features, including Historic Environment assets, trees protected by preservation orders, individual and groups of ancient trees, <u>ancient and newly-planted</u> and woodlands, ancient hedgerows <u>and heritage assets,</u> historic environmental assets and archaeological remains of value to the locality, will be protected against loss or damage. <u>In and, in</u> the case of archaeological remains, all practical measures must be taken for their assessment and recording <u>in accordance with Policy HE2.</u>	<i>To satisfy Inspector Action Point 2 of Hearing Session 9.</i>
LP/MOD.104	p.126, Policy GE3 – supporting text	Where this is not possible, mitigation measures should be identified, if these are not possible on site, then these should be offset elsewhere as a compensatory measure, <u>but only in exceptional circumstances. Such circumstances may include the comprehensive delivery of a planned strategic allocation in accordance with a Council approved Masterplan. In all such cases though, compensatory provisions should be made as close to the original site as possible.</u>	<i>To partly satisfy Inspector Action Point 5 of Hearing Session 9. See also LP/MOD.101.</i>
LP/MOD.105	p.126, Policy GE4, para. 1b + supporting text	trees not to be retained as a result of the development are replaced within <u>with new trees as part of</u> a well-designed landscape scheme; Should loss be unavoidable, compensatory provision <u>of new trees</u> should be proposed <u>as part of</u> within a well-designed landscape scheme or within other areas of green space within the local community. This will ideally be within 400m of the site to reflect the minimum distance recommended within the Green Space Strategy. <u>All replacement trees should also be of an appropriate type and status to reflect those which have been lost.</u>	<i>To satisfy Inspector Action Point 7 of Hearing Session 9.</i>
LP/MOD.106	p.129, Policy DE1, para. 3o	<u>o) Support the integration of through routes for public transport and incorporate suitable bus priority measures as appropriate;</u>	<i>Additional wording which provides enhanced clarity to policy.</i>
LP/MOD.107	p.131, Heritage: Conservation Areas –	Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a duty on local planning authorities to designate as Conservation Areas any 'areas of special architectural or historic interest the character and appearance	<i>To ensure supporting text is consistent with amended Policy HE2.</i>

	introductory text	of which it is desirable to conserve preserve or enhance’.	
LP/MOD.108	p.133, Policy HE2 – introductory text	In addition over 280 500 buildings have been selected by the Council for Local Listing due to their importance to Coventry. The city also has 16 Conservation Areas (plus a further two proposed through this plan), 20 Scheduled Ancient Monuments, 4 Registered Parks and Gardens and thousands of other archaeological sites, historic structures and features recorded on the Coventry Historic Environment Record.	Alteration of figures to provide accurate information, + correction of terminology.
LP/MOD.109	p.133, Policy HE2, para. 1 + 7	In order to help sustain the historic character, sense of place, environmental quality and local distinctiveness of Coventry, development proposals will be supported where they conserve preserve and, where appropriate, enhance those aspects of the historic environment which are recognised as being of special historic, archaeological, architectural, artistic, landscape or townscape significance. All proposals should aim to sustain and reinforce the special character and conserve preserve the following distinctive historic elements of Coventry:	<i>To satisfy Inspector Action Point 1 of Hearing Session 9.</i>
LP/MOD.110	p.134, Policy HE2, para. 7d	Buildings associated with the city’s industrial heritage; ribbon weaving, watch making, cycle making, motor car manufacturing, brick making, coal mining, synthetic textiles, munitions, aeronautical engineering, canals and railways;	<i>Additional wording to correct previous omission.</i>
LP/MOD.111	p.135 + 136, Policy HE3 – introductory text	Through the Local Plan and partnership working with Historic England and the Historic Coventry Charitable Trust, the Council are promoting through this Local Plan the creation of a City Heritage Park in the <u>Sherbourne Valley and the</u> grounds of the Charterhouse and London Road Cemetery. These should include a riverside walkway along the exposed section of the River Sherbourne, connecting Far Gosford Street with Charterhouse along <u>the west side of the river crossing Gulson Road</u> Harper Road and Humber Avenue. These enhancements in connectivity and green infrastructure could may also facilitate comprehensive regeneration development opportunities <u>of brownfield land along the River Sherbourne, most notably between Gulson Road and Gosford Street and in Harper Road</u> within these areas that will complement this part of the city.	To reflect and support the changes made in LP/MOD.112.

		<p>In addition, opportunities should be taken to improve the setting of the Charterhouse, <u>the naturalisation of the river valley and the views through to the viaduct.</u> A pPrime examples <u>include land</u> is around Blue Coat School, where: land is to be removed from the Green Belt to support the expansion of the school's facilities on the basis that</p> <ul style="list-style-type: none"> • <u>the existing car park is to be removed from the area of the Charterhouse Scheduled Ancient Monument;</u> and • <u>The all-weather sports and playground facilities are to be relocated away from the riverside in an appropriate and sustainable way.</u> <p><u>These 2 areas should then be proactively re-naturalised or appropriately landscaped, adding to the Heritage Park where appropriate and supporting an extension to the current Local Green Space designation that is proposed for the land west of the river. The extension of the Local Green Space designation should be supported by new defensible boundary lines created as part of the Master planning process and brought forward in partnership with the local community, the school and the Charterhouse Trust.</u> in an appropriate way.</p> <p><u>To ensure Bluecoats school continue to offer a high quality education offer to the city however, these facilities will then be relocated onto former allotment land to the east of the river, which will be removed from the Green Belt providing a firm boundary for future school expansion.</u></p>	
LP/MOD.112	p.136 + 137, Policy HE3 – para. 2 + 3	<p>Land at Blue Coat School is to be removed from the Green Belt in accordance with policy <u>GBE1</u> to support the expansion of school facilities on condition that the existing school car park is removed from the area of the Charterhouse Scheduled Ancient Monument. <u>In addition, the expansion of the school should also support the appropriate relocation of the all-weather sports facilities and playground areas to secure the enhancement of the riverside area. This should facilitate the and proactively re-naturalisation of the area</u> ed in an appropriate way in order to enhance the setting of the Charterhouse, and its precinct <u>and the Heritage Park as a whole.</u></p> <p><u>The creation of the Heritage Park and expansion of Blue Coat School should be guided by a comprehensive Master plan, which reflects the policies of this Plan (including Appendix 4).</u></p>	<i>To satisfy Inspector Action Point 3 of Hearing Session 9.</i>

LP/MOD.113	p.138, + 139, Accessibility: Relevant Evidence Base + Introduction – introductory text	<ul style="list-style-type: none"> • Coventry Area Strategic Model (CASM) – WSP (2015 <u>and 2016</u>) • <u>Working towards achieving current road casualty reduction targets and making our roads safer for all.</u> 	To acknowledge updated publication of document to support the plan, + Additional bullet point to enhance clarity of introductory text.
LP/MOD.114	p.139, Accessibility: Public Health and Air Quality – introductory text	<u>The Cycle Coventry Programme also helps support cycle infrastructure improvements and supporting Smarter Choice modes together with the TfWM's Strategic Transport Plan where it includes developing a metropolitan strategic cycle network to ensure seamless travel.</u>	<i>To partly satisfy Inspector Action Point 7 of Hearing Session 10.</i>
LP/MOD.115	p.140, Accessibility: Strategic Connectivity – introductory text	<u>The approved Strategic Transport Plan for the West Midlands Metropolitan Area "Movement for Growth" sets out the overarching transport strategy for the West Midlands Metropolitan area. The plan's approach of a metropolitan tier with a metropolitan rail and rapid transit network, key route network and metropolitan strategic cycle network will help deliver a transport system which boosts our economy and improves the environment.</u>	<i>Additional paragraph to provide further clarity to introductory text and strengthen links to Strategic Transport Plan.</i>
LP/MOD.116	p. 141 + 142, Policy AC1 – introductory text	<p>This can only be achieved if the transport network offers a wide choice of convenient, <u>affordable</u> and reliable transport modes which meet the needs of the varying types of trips which people need to make.</p> <p>Help to focus development towards accessible locations making it easier for local people to access employment, <u>education and skills</u>, shops and leisure facilities and reduce the distance people need to travel;</p> <p>It will be important that everyone in the city has a good level of access to major public transport hubs such as Coventry Station <u>and Pool Meadow Bus Station</u> to boost the attractiveness of public transport services.</p>	Additional wording to add clarity to introductory text.
LP/MOD.117	p.144, Policy AC2 – introductory text	<u>The emerging Key Route Network as highlighted in the West Midlands Strategic Transport Plan will be made up of main metropolitan roads - operating at agreed performance standards. This network will serve the main strategic demand flows of people and freight across the metropolitan area, and provide connections to the national strategic road network. It will also serve large local flows which use main roads and provide good access for businesses reliant on road based transport and will use highway capacity effectively to cater for movement by rapid transit and core bus routes, the Metropolitan Cycle Network, Heavy/Light Goods vehicles and private cars to support growth on key corridors.</u>	<i>Additional paragraph to provide further clarity to introductory text and strengthen links to Strategic Transport Plan.</i>

LP/MOD.118	p.145	<u>The model was also run to consider the total impacts of the growth planned within this Local Plan (by location) having specific regard to the impacts of the proposed SUE's. Finally, the The model has also been used to test the impact of potential growth in other local authority areas adjacent to the city, primarily in Warwickshire and Solihull and the impact this could have on the city's highways.</u>	<i>Reflects new evidence developed in support of the hearings.</i>
LP/MOD.119	p.146 – new bullet point 3	<u>Highway improvements at the A45, A46 and A444 to support improved access to Whitley Business Park. This will also include a new road bridge across the A45 to support access to the Whitley South development site (in Warwick District):</u>	<i>To reinforce the importance of strategic highway infrastructure supporting the wider Whitley development sites.</i>
LP/MOD.121	p.46 – text in support of Table 10.1	The <u>further modelling work which takes account of all Local Plan growth proposals and planned do something package of road infrastructure measures reduces delay in the network to 33%by 14% in the AM peak and 28%10% in the PM peak. This equates to a reduction of over 20%</u> when compared to only the do minimum scenario. Although total vehicle kilometres increase, the overall uplift in journey making is indicative of the improved connectivity across Coventry which will support increased economic growth and activity	<i>Reflects new evidence developed in support of the hearings.</i>
LP/MOD.122	p.150, Policy AC3 – introductory text	<u>Travel Plan support can be provided by the City Council and TfWM on the cheapest and most sustainable ways to travel including journey planning, ticket advice and any travel support.</u>	<i>Additional paragraph to add clarity to introductory text.</i>
LP/MOD.123	p.151, Policy AC3, para. 4	New development proposals which require changes to the highway network will be required to integrate with any existing UTMC and ITS infrastructure and strategy <u>and development of the Key Route Network</u>	<i>Additional wording to add clarity to policy.</i>
LP/MOD.124	p.152, Policy AC4 – introductory text	<u>The West Midlands Cycle Charter also aims to raise cycling levels, and deliver change. The charter sees cycling as playing an important role in addressing the challenges the West Midlands face, which include reducing congestion, carbon and pollution, supporting economic growth and employment, tackling obesity and creating places where people want to live, work, learn, shop and do business.</u> <u>The Cycle Charter also supports a Metropolitan Cycle Network which will be integrated with local cycle networks.</u> <u>High quality cycle parking should also be provided at new sites and along the wider</u>	<i>To satisfy Inspector Action Point 15 of Hearing Session 12.</i>

		<u>public transport network at interchanges and stations.</u>	
LP/MOD.125	p.155, Policy AC5 – introductory text	<p><u>Coventry's Bus Network Development Plan and bus policies as highlighted in the Strategic Transport Plan demonstrate the importance of a partnership approach with TfWM. This will be vital in providing high quality bus services to new developments.</u></p> <p>To ensure bus travel is an attractive and convenient option, new development <u>must comply with TfWM access standards and</u> will in most circumstances be expected to have access to a bus stop within 400m of the development site, with a regular service patterns of at least two buses per hour serving the city centre. It is accepted that this may not be practicable for small scale development proposals in more remote parts of the city <u>but developers will be encouraged to liaise with the Council and TfWM to ensure access standards are fully met.</u> For larger development sites, in particular those in more peripheral locations, it will be important that bus services are fully integrated into the <u>whole sites footprint</u> with provision made to accommodate appropriate bus infrastructure including bus shelters and passenger information. <u>Through routes for buses along with suitable bus priority measures should also be provided wherever possible and</u> Tthe Council will work in consultation with developers, bus operators, <u>TfWM</u> and the Passenger Transport Executive to achieve this.</p>	<i>To partly satisfy Inspector Action Point 7 of Hearing Session 10.</i>
LP/MOD.126	p.155, 156 + Figure 10.4, Policy AC5 – introductory text	<p>The West Midlands Strategic Transport Plan sets out a strategy for a core bus network which is closely integrated with a high frequency rail and Sprint rapid transit network to enhance connectivity to other strategic centres across the conurbation <u>West Midlands.</u></p> <p>The West Midlands Strategic Transport Plan sets out comprehensive network of SPRINT <u>rail and</u> rapid transit routes across the Metropolitan area including a SPRINT <u>new Rapid Transit</u> network for the Coventry area.</p>	Alteration of wording to correct terminology and provide clarity to introductory text.
LP/MOD.127	p.157, Policy AC5, para. 1-3	<p>New major development proposals should have safe and convenient access to the existing bus network <u>and comply with the TfWM access standards.</u></p> <p>The development of a mass rapid transit network will be supported to improve accessibility to existing and new major trip attractors.</p>	<i>To partly satisfy Inspector Action Point 7 of Hearing Session 10.</i>

		Further details will be set out in the Coventry Connected SPD, and the West Midlands Strategic Transport Plan <u>and Coventry's Bus Network Development Plan.</u>	
LP/MOD.128	p.159, Policy AC6 part 4	Further details are set out in the Coventry Connected SPD, and Coventry Rail Investment Strategy <u>and the West Midlands Strategic Transport Plan.</u>	Strengthens reference and links to the Strategic Transport Plan
LP/MOD.129	p.163, Policy EM1, para. f	<u>f. seek opportunities to make space for water and develop new blue infrastructure to accommodate climate change.</u>	Additional point added to policy to add further clarity and respond to SOCG with the Environment Agency
LP/MOD.130	p.163, Policy EM2, para. 1	New development should be designed and constructed to meet the relevant Building Regulations, as a minimum, <u>with a view to:</u> and to sustainability standards which: <ul style="list-style-type: none"> a) Maximising energy efficiency and the use of low carbon energy; b) Conserving water and minimising flood risk including flood resilient construction; c) Considering the type and source of the materials used; d) Minimising waste and maximising recycling during construction and operation; e) Being <u>Are</u> flexible and adaptable to future occupier needs; and f) Incorporating measures to enhance biodiversity value. 	<i>To satisfy Inspector Action Point 13 of Hearing Session 3, + Minor grammatical corrections.</i>
LP/MOD.131	p.164 + 165, Policy EM2, para. 3 and supporting text.	A Sustainable Buildings Statement should demonstrate how the requirements of Climate Change policies in this Plan and any other relevant local climate change strategies have been met, <u>and consider any potential coal mining legacy issues including land stability.</u> <u>Consideration of the city's coal mining legacy should also be included within the Sustainable Building Statement having regard to maps and information published by the Coal Authority.</u>	<i>To satisfy Inspector Action Point 2 of Hearing Session 11.</i>
LP/MOD.132	p.165, Policy EM3 – supporting text	<u>As such Policy EM3 does not apply to any proposals for wind turbines or wind farms. Instead any such proposals will be considered in accordance with the most up to date national policy.</u>	<i>To satisfy Inspector Action Point 10 of Hearing Session 9.</i>

LP/MOD.133	p.166-168, Policy EM4	Fundamental alterations to policy in order for it to align with SOCG signed with the Environment Agency, most notably new parts 2, 3 and 4 with amendments to parts 1, 7 and 8. This responds to updates in national guidance since the Local Plan was published	<i>To satisfy Inspector Action Point 9 of Hearing Session 9.</i>
LP/MOD.134	p.168, Policy EM4 – supporting text	The Environment Agency has produced indicative flood zone maps for local and other watercourses, as well as surface water. The Council has undertaken a Stage-level one and Stage-level two Strategic Flood Risk Assessment (2015), which has provided the evidence to directly inform the allocation of land for new development over the plan period.	Deletion of text to improve clarity of supporting text, + Change of wording to correct terminology.
LP/MOD.135	p.169, Policy EM5, para. 1	All development must apply SuDS unless it can be clearly demonstrated there are practical reasons for not doing so and should ensure that surface water runoff is managed as close to its source as possible.	<i>To satisfy Inspector Action Point 11 of Hearing Session 9.</i>
LP/MOD.136	p.170, Policy EM5 – supporting text	In addition, the LLFA is a statutory consultee on all major planning applications and <u>a consultee on a non-statutory basis on all minor applications whilst also advising and advises</u> on the approval of all sustainable drainage and related systems, surface flooding and ground water for all planning applications.	Additional wording to add clarity to supporting text.
LP/MOD.137	p.170 + 171, Policy EM6 + supporting text	New Policy and associated supporting text which has been created to provide a focussed policy grouped around waste water and previously developed land. This responds to the SOCG with the Environment Agency and responds to updates in national guidance since the Local Plan was published.	<i>To satisfy Inspector Action Point 8 of Hearing Session 9.</i>
LP/MOD.138	p.172, Policy EM7, para. 1 + introductory text	<u>This is alongside the emerging 'West Midlands Metropolitan Transport Emissions Framework' which sets out transports role in tackling air quality issues and has proposed a range of policies.</u> Funded through the DEFRA Air Quality Grant, the aims of the LETCP <u>and West Midlands Transport Emissions Framework</u> are to: NB: Policy has been renumbered from EM6 to EM7 to accommodate new Policy. 1. Major development schemes should promote a shift to the use of sustainable low emission transport (electric vehicles and vehicles that use biofuels) to minimise the impact of vehicle emissions on air quality. Development will be located where it is accessible to support the use of public transport, walking and cycling. All major development proposals should be suitably planned to design out any adverse impact on air quality <u>and be in accordance with the West Midlands Transport</u>	<i>Additional wording to add clarity to both policy and associated supporting text, following the publication of a new guidance</i>

		<u>Emissions Framework and associated policies.</u>	
LP/MOD.139	p.175, Policy EM8, Part 1, para. D	NB: Policy has been renumbered from Policy EM7 to EM8 to accommodate new Policy EM6 d) a requirement for development proposals to incorporate adequate storage for waste and recycling services along with safe access for collection vehicles; and	<i>To satisfy Inspector Action Point 1 of Hearing Session 11.</i>
LP/MOD.140	p.175, Policy EM8, para. e + f	<u>e) Existing waste management facilities 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; an</u> <u>f) Proposals for waste management facilities only being permitted where they would not have an unacceptable impact on the quantity or quality of surface or groundwater resources.</u>	Additional wording to provide further clarity to policy.
LP/MOD.142	p.179, Policy EM9	Policy EM7 has been renumbered having previously been EM8.	This is to accommodate the new Policy EM6.
LP/MOP.143	p.179, Policy EM9 – supporting text	<u>The Council will continue to proactively work with its neighbours through joint working and collaborative efforts via the West Midlands Aggregate Working Party.</u>	To satisfy Inspector Action Point 3 of Hearing Session 11.
LP/MOD.144	p.179 + 180, New Policy EM10 + supporting text	<u>Policy EM10 Non Mineral Development in Mineral Safeguarding Areas</u> <u>All non-mineral development proposals in the designated Mineral Safeguarding Areas should assess and evaluate the legacy of past mining heritage and should consider this in accordance with Policy EM2. It should also ensure that development does not entirely sterilise any potential future mineral extraction should this become viable and desirable. This should be considered in partnership with the Coal Authority.</u> Supporting Text: <u>The policy aims to take a balanced approach to protecting minerals resources in Coventry against the need to attract investment and urban regeneration to a primarily built up area.</u> <u>This policy ensures that all proposals for non-mineral working within the designated MSAs are properly considered and evaluated in partnership with the Coal Authority. The Policy also aims to ensure that development proposals within the Plan are</u>	<i>To satisfy Inspector Action Point 4 of Hearing Session 11.</i>

		<u>deliverable without complete sterilisation due primarily to the extensive deep cast coal reserves to the West and North West of the city. Within this location this has been further emphasised by the closure, and planned redevelopment of the Daw Mill Colliery, which would have provided the primary access point for the extraction of such reserves. Development identified within policies H2 and/or JE2 would not therefore be subject to this policy.</u>	
LP/MOD.145	p.187, Policy IM1 – introductory text	<u>Cycling and walking routes</u>	Additional wording to reflect other proposed changes.
LP/MOD.146	p.188, Policy IM1 – introductory text	<u>In addition, the City's IDP will be managed to reflect strategic cross boundary infrastructure that is to be delivered within Warwickshire but with a view to supporting the growth of the City (in part at least) and the delivery of the homes and employment land that have been redistributed through the Housing and Employment MOU's. This reflects the strategic importance of such infrastructure and the Councils on-going commitment to its Duty to Cooperate responsibilities with its neighbouring authorities.</u>	<i>Additional paragraph to add clarity to introductory text.</i>
LP/MOD.147	p.188, Policy IM1, para. 4	<u>This will focus primarily on category 1 infrastructure as identified in the IDP and/or Regulation 123 list.</u>	<i>To satisfy Inspector Action Point 10 of Hearing Session 3.</i>
LP/MOD.148	p.190, Implementation – supporting text	The Councils current 5 year housing land supply comprises 63 <u>75</u> % of homes which already have planning consent or have started construction (at April 201 <u>6</u> 5). In addition, a further <u>15</u> 22 % is covered by sites allocated under policy H2, adding further certainty to the delivery of these schemes and their supporting infrastructure. The remaining <u>10</u> 45 % comprises sites within the SHLAA that are predominantly smaller sites within the existing urban area and which will have a lesser impact on infrastructure needs, with greater opportunity to access and utilise existing provisions.	Update of figures to include most recent data.
LP/MOD.149	p.192, Local and National Grant Funding – supporting text	<u>Indeed, the City Council are already progressing plans to invest money secured through the Devolution Deal as part of the West Midlands Combined Authority, including significant contributions towards rail and highway infrastructure.</u>	<i>Additional wording to include information which wasn't available at the time of publication of the draft document.</i>
LP/MOD.150	p.193, Duty to Cooperate – supporting text	<u>The County Council are also coordinating a compendium of infrastructure Plans across the sub-region to support the alignment of strategic growth areas and infrastructure provisions. This will be supported by the regular updating of the City Councils live IDP which will identify key cross boundary schemes linked to the</u>	<i>To satisfy Inspector Action Point 11 of Hearing Session 3.</i>

		<u>delivery of the city's unmet needs within Warwickshire.</u>	
LP/MOD.151	p.194, Monitoring and Performance – supporting text	<u>The Monitoring Framework will therefore be regularly reviewed and kept up to date. It will also be an integral evidence platform for determining the need to review the Plan, either in full or part, in accordance with Policy DS1.</u>	<i>To satisfy Inspector Action Point 5 of Hearing Session 16.</i>