



Communities and Neighbourhoods Scrutiny Board (4)

Time and Date

10.00 am on Thursday, 6th October, 2022

Place

Committee Room 3 - Council House

1. **Apologies and Substitutions**
2. **Declarations of Interest**
3. **Minutes** (Pages 3 - 8)
 - a) To agree the Minutes of the previous meeting held on 7 July, 2022
 - b) Matters arising
4. **Houses in Multiple Occupancy (HMO) Development Plan Document (DPD) and Article 4 Direction Public Consultations** (Pages 9 - 44)

Briefing Note of the Head of Planning Policy and Environment
5. **Local Listings** (Pages 45 - 50)

Briefing Note of the Head of Planning Policy and Environment
6. **Tall Building and View Management Framework Supplementary Planning Document (SPD) Public Consultation** (Pages 51 - 82)

Briefing Note of the Head of Planning Policy and Environment
7. **Work Programme and Outstanding Issues 2022/23** (Pages 83 - 86)

Briefing Note of the Director of Law and Governance
8. **Any other items of public business which the Chair decides to take as matters of urgency because of the special circumstances involved**

Julie Newman, Director of Law and Governance, Council House, Coventry

Wednesday, 28 September 2022

Note: The person to contact about the agenda and documents for this meeting is Suzanne Bennett, Email: suzanne.bennett@coventry.gov.uk

Membership: Councillors S Agboola, R Bailey, L Bigham (Chair), G Hayre, M Heaven, A Hopkins, T Khan, R Singh and R Thay

By invitation: Councillor D Welsh (Cabinet Member for Housing and Communities)

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Suzanne Bennett,

Email: suzanne.bennett@coventry.gov.uk

3. Highways Asset Management Programme - Scheme Assessment Process

The Cabinet Member for City Services introduced the item.

In response to a number of enquiries from ward Councillors, the Leader referred an item to the Communities and Neighbourhoods Scrutiny Board to demonstrate and clarify the process for Highway Maintenance scheme selection. The Scrutiny Board considered a Briefing Note the Highways Asset Management Programme. At the meeting the Director of Transportation and Highways highlighted the following:-

- In January 2016, Cabinet approved the Council's Highways Asset Management Policy and Strategy documents. These documents set out at a strategic level the approach the Council takes to its provision of Highway Maintenance.
- The use of asset management principles had been applied for many years in Coventry to ensure appropriate investment with longer term planning and this process was set out in detail within the Highways Infrastructure Asset Management Plan which was published in 2016.
- Every year during December and January the Council's Highway Maintenance Technical Services engineers, working with the Asset Management Engineer prepare a draft programme of schemes for approval at Cabinet. The schemes are presented as part of the Transportation and Highway Maintenance Capital Programme in March each year.
- The Asset Management Engineer maintains a Forward Works Programme (FWP) holding information against every road and pavement in Coventry regardless of current need for treatment.
- The Forward Works Programme was a key tool in managing the process.
- There was no legal threshold regarding the maintenance of the highway. Local thresholds had been agreed based on case law and claims against Local Authorities.
- The priority was to ensure the highway was safe for all users.
- There were two programmes of work; preventative maintenance and planned maintenance.
- Preventative maintenance, which involved a thin surface overlay was not always the most aesthetically pleasing option but can provide a cost effective way to extend the life of the highway.
- All local authorities faced a challenge to maintain pavements. The cost per square meter of maintenance was significantly higher than carriage way works due to the work generally needing to be done by hand.
- A JCB pothole probe was being used on highways to free up staff to work on the pavements. Officers were monitoring and evaluating the performance of the JCB pothole probe.
- The Government had tested and rated the Council's approach to asset management and had recognised the approach as good and the Council had received the full amount of incentive funding.
- The Council would need to consider how to prioritise pavement repairs within the priorities.
- There were around 600 miles of road and 1000 miles of pavement in the City. Coventry had an unusually high number of concrete flagstone pavements at around 40%. These flagstones were not designed to take the

weight of vehicles crossing them which happens frequently in some areas to either to access gardens for parking or due to two wheeled on street parking in narrow roads.

- It was important to maintain footpaths as they supported the Council's objective to get people active across the City.

The Scrutiny Board asked questions and received responses on a number of issues, including:-

- Where concrete flagstones were like to be driven on, flagstones were replaced by tarmac, but it would not be financially viable to replace all the flagstones across the City. In some areas, where cars park two wheels on the pavement, the row of flagstones nearest the kerb had been replaced with tarmac.
- Root encroachment was an issue in some areas. The team worked with the tree inspector to see if the roots could be removed. Sometimes a kerb lift would be installed around tree roots to future proof the work. In other cases, areas around the tree were left open or tarmaced, or a resin based solution, which were flexible and could accommodate the growth of the roots were used.
- In terms of safety, the system used to prioritise the work is objective and based on the data collected.
- Different areas of the City look different dependent on when the neighbourhoods were built. In terms of making neighbourhoods more liveable, then one would need to look at other parameters as well regarding maintenance work.
- Most of Coventry's evolved roads are built on a poor subbase. If they fail, they need to be reconstructed which involves taking the ground back down by around 1 meter. A full reconstruction of a short road in the City would use 20% of the annual maintenance budget.
- The strategy is to do repairs as efficiently as possible.
- Concerns were raised about the quality to reinstatement works by utility companies.
- Notifications from Councillors and the public inform the data on which repairs and maintenance are prioritised and as a result Highways Inspectors visit sites when concerns are raised about defects.
- Unadopted roads are not the Council's responsibility. There were processes where the owners can be force to do the work or where by the Council could undertake the works and recharge for them.
- People illegally driving over pavements without a dropped kerb was managed by an enforcement officer.
- Work was being done to see how people could be encouraged to install dropped kerbs. Where there were schemes being delivered in areas, residents were contacted and offered a discount on the work whilst teams were in the area.
- The Council work with Legal to enforce illegal pavement crossings - however- people do have a common law right of access to their property so cannot unreasonably refuse. As a last resort the Council could do the crossing and then recharge occupant. Bollards have only been used where access was unsafe.

- The policy limits the width of a dropped kerb to 2.7m. which can go up to 3.6m where street narrow.
- Concerns were raised about the impact of reduced parking on streets where too many people drop their kerbs.
- Drives need to be permeable and the drainage system maintained.

The Scrutiny Board welcomed all the work undertaken in this regard.

RESOLVED that the Communities and Neighbourhoods Scrutiny Board (4):-

1) Note the Briefing Note and appendices

2) Recommend that the Cabinet Member for City Services be requested to explore options to review dropped kerb pavement crossings. This is to include working with to make the application process easier and the works cost effective when timed with scheduled works in the programme.

4. Consultations on Supplementary Planning Documents - i) Draft Biodiversity Net Gain ii) New Residential Buildings Design Guide

The Cabinet Member for Housing and Communities introduced the item.

The Scrutiny Board considered a Briefing Note and presentation which outlined the consultation on i) Draft Biodiversity Net Gain Supplementary Planning Document (SPD) ii) New Residential Buildings Design Guide Supplementary Planning Document (SPD) introduced by the Cabinet Member. Officers were looking to identify more sites in the City with significant biodiversity and a report will go back to the Cabinet Member meeting.

Issues covered in the presentation included:-

- The definition of an SPD
- A summary of biodiversity net gain (BNG) which was introduced in the Environment Act 2021.
- The biodiversity value of sites would be established using a recognised metric.
- Enhancement should be provided on-site but where this is was impracticable off-site projects were required.
- The SPD provided details of how the Council would require all developments to deliver BNG
- Contributions for off-site projects would be used to directly benefit Coventry sites
- An increasing network of suitable sites was being established within the city
- Sites would be managed for a minimum of 30 years and would be accessible to the public
- If the BNG mechanism and network of sites was not agreed future resources were likely to be lost to Coventry
- Design Guidance for New Residential Developments was outlined and superseded the 1991 residential design guide.

- It brought together where applicable principles of design guidance for Sustainable Urban Extension (SUE) sites and the Ancient Arden Design Guidance, in order to deliver consistent standard of design guidance across the city for new residential proposals.
- It would introduce a requirement for applicants of schemes over 50 units to articulate the design process to embed and ensure contextual responsiveness
- Example key themes included:
 - Bringing into residential policy an expectation to meet national space standards throughout
 - The introduction of an expectation of private external amenity space provision in new build apartment schemes where possible.
 - The introduction of new principles of delivering positive frontages to waterways and green space.
 - Provided guidance in the accommodation of cycle and refuse/recycling storage in new build development.

The Scrutiny Board asked questions and received responses on a number of issues, including:-

- The onsite delivery of BNG was the preference. However, if this could not be delivered on site, the development of a biodiversity plan would give the City Council control as to where the offset was delivered. It was important to get the plan in place as one of the proposals within the Environment Act was that biodiversity credits could be spent anywhere across the Country.
- BNG mechanism seeks to ensure not an overall lost of wildlife from Coventry or Warwickshire. There was an intention to use upcoming legislation and an incoming local nature recovery strategy to create a new green infrastructure for Coventry which provides sites across the whole of the City.
- It was suggested that Councillors and members of the public be encourage to record with Warwickshire Records office what biodiversity there is in the City. There could also be a call out of potential biodiversity sites.
- Green routes and walls could contribute to the biodiversity figures.
- The wording of some of the principles in the Design Guidance for New Residential Development SPD had been amended at the Cabinet Member for Housing and Communities meeting.
- Concerns were raised that some of the wording in the principles was ambiguous and would enable developers to minimise their contributions. Members asked that it was made clear that full details in relation to some of the principles were available in other documents.
- The ratio of open space to development was covered in the Open Spaces SPD.

RESOLVED that the Communities and Neighbourhoods Scrutiny Board (4):-

- 1) Note the presentation at Appendix 1**
- 2) Note the draft SPDs at Appendix 2: and**
- 3) Identify the following comments for inclusion with the consultation responses:**

- **Biodiversity Net Gain**
 - **Green space should be maximised within developments**
 - **The public and Councillors should be encouraged and enabled to report areas and pockets of biodiversity are in the City.**
 - **Developers should be encouraged to protect biodiversity on development sites where possible**
 - **Green walls and green roofs should be considered as options to increase biodiversity in areas where there is limited floor space**

New Residential Buildings Design Guide

- **On Principle 6 – ensure that housing need in an area, in terms of size of properties, is also taken into account rather than “highest density possible”**
- **On Principle 6 – “generous green infrastructure” needs to be cross-referenced to the green space SPD so it is clear what is required.**
- **On Principle 7 – this needs to be more specific and clarify that mix of uses means including local centres in large developments**

5. Work Programme and Outstanding Issues 2022/23

The Scrutiny Board considered the Work Programme for 2022/23.

RESOLVED that a date be scheduled to considered residents parking schemes and that dropped kerb applications be added to the Work Programme.

6. Any other items of Urgent Public Business

There were no other items of urgent public business.

(Meeting closed at 12.10 pm)



Coventry City Council

Briefing note

To: Communities and Neighbourhoods Scrutiny Board (4)

Date: 06 October, 2022

Subject: Houses in Multiple Occupancy (HMO) Development Plan Document (DPD) and Article 4 Direction public consultations

1 Purpose of the Note

- 1.1 To inform the Communities and Neighbourhoods Scrutiny Board (4) of the HMO DPD and Article 4 Direction consultations and for the Board to make representations to those consultations.

2 Recommendations

- 2.1 The Communities and Neighbourhoods Scrutiny Board (4) are recommended to:
 - 1) Consider the content of the reports, appendices and presentation provided at the meeting
 - 2) Identify any representations for either of the consultations

3 Background and Information

- 3.1 Houses in Multiple Occupancy (HMOs) are dwellings where unconnected individuals live with communal facilities. As a Council we already administer an additional licencing regime for HMOs which sits separate and distinct to the planning system.
- 3.2 Policy H11 of the Local Plan 2017 addresses 'large' HMOs i.e., those for seven unconnected people or more. However, smaller HMOs do not require planning permission as conversion from a dwellinghouse to a small HMO is a Permitted Development right.
- 3.3 HMOs offer a valuable source of housing to many in the city, often the most vulnerable residents. However, where HMOs predominate in an area there are a number of issues that this can bring. These issues are identified in the draft HMO DPD (Appendix 1) along with draft policy responses to these issues. The intent is not to stop the development of HMOs but to ensure that they integrate well with the existing environment.
- 3.4 The consultation is a "Regulation 18" consultation, where we ask the public to consider the issues identified and for their views on whether any issues have been

overlooked. We then propose policy responses to the identified issues, and again ask members of the public for their views on these policies.

- 3.5 In order to make sure that this change of policy can be applied to all HMOs a draft Article 4 Direction is being consulted upon at the same time as the HMO DPD, acknowledging that many consultees will want to comment on both simultaneously. (Appendix 2)
- 3.6 In drawing the boundaries of the Article 4 Direction area officers have been cognisant of the requirements of the National Planning Policy Framework (NPPF) paragraph 53 for making sure the area is as based on robust evidence and applies to the smallest geographical area possible, whilst also considering the likely impacts on similar dwelling typologies.
- 3.7 As such the area is drawn to cover all major clusters of existing HMOs and the areas where there is further HMO growth potential and is supported by a technical evidence document.
- 3.8 It is also a legal requirement, as set out in the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations), to consider whether or not Strategic Environmental Assessment (SEA) of the DPD should be undertaken. The process for determining whether or not an SEA is required is called screening. This is to determine whether a plan will have significant environmental effects. This concludes that no SEA is needed for the DPD. This screening report must be consulted on so that three statutory bodies (Historic England, Natural England and the Environment Agency) can respond. It makes sense to make the screening report publicly available for comment at the same time as the DPD is being consulted on
- 3.9 Finally, an Equalities Impact Assessment (EqIA) has been undertaken and will also form part of the public consultation: see also paragraph 6.4 of this report.
- 3.10 On 15 February 2022 Cabinet adopted a new Local Development Scheme that set out a timetable for the HMO DPD and Article 4 Direction

	2022				2023			
	Q1 (Jan-Mar)	Q2 (Apr-Jun)	Q3 (July-Sept)	Q4 (Oct-Dec)	Q1 (Jan-Mar)	Q2 (Apr-Jun)	Q3 (July-Sept)	Q4 (Oct-Dec)
HMO DPD			C*		P	E	A	
Article 4 Direction			C				A	

C – Consult C* - Consultation (Regulation 18)
P – Publication (Regulation 19) E – Examination in Public
A - Adopt

- 3.11 Consultation on the draft documents was endorsed by Cabinet on 30 August and approved by Council on 06 September. Both consultations were launched on 20 October and will last eight weeks, and includes 11 drop-in sessions for members of the public in the wards effected by the draft Article 4 Direction.
- 3.12 Following consultation there will be a period of analysis with the intention of moving to the next stage – a ‘Regulation 19’ publication and consultation in the first quarter of 2023, with eventual progression to an Examination in Public later in 2023.

3.13 When consulting on a draft Article 4 Direction we are required to state the date that the Direction will come into force, if ratified by the Council. This date has been set one year from the date of consultation to ensure that it is brought into effect as soon as possible but without creating potential compensation liability for the Authority.

Appendices

Appendix 1 – Draft HMO DPD

Appendix 2 – Draft Article 4 direction

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Coventry City Council

Homes in Multiple Occupation (HMO)

Development Plan Document (DPD)

Regulation 18: Issues and Preferred Option

Consultation Document

July 2022

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1. Executive Summary

What is a HMO?

A HMO is defined as a property rented to at least three people who are not from one 'household' (e.g. a family) but share facilities such as a bathroom and kitchen. Planning use classes distinguish between 'small' HMOs of up to six people (C4 use class), and 'large' HMOs of seven or more occupants which are Sui Generis (of their own use class). Some HMOs are purpose-built, e.g. student accommodation, but many are created through the conversion of buildings, both in residential and other uses, which often have the potential to initiate physical and social changes to an area.

Why now?

With the city's growing population, there is a need to ensure that new development supports successful communities by ensuring the right mix of housing types in an area, securing appropriate design and supporting well managed properties. Homes in Multiple Occupation (HMOs) provide an important contribution to peoples housing choice, but can have significant impacts on existing residents. At present, Coventry has a population growth rate faster than the national and regional average. Migration flows into the city have driven population growth particularly within the 'young professional' demographic. Residents of Coventry aged between 16-24 make up 14.7% of the city's total population. This also reflects the growth of the city's further/higher education institutions including the two universities, Coventry University and the University of Warwick.

These demographic changes coupled with economic factors which have made it increasingly difficult for younger people and those on lower incomes to finance permanent home ownership, have consequentially underpinned the growth of the private and social rented sectors. Consequently, for communities where HMO concentration has been most noticeable, there are increasing concerns about the changing nature of their communities and neighbourhoods, and the impacts that this has.

The Councils preferred option within this Development Plan Document (DPD) aims to ensure that such development also preserves the residential amenity and character of an area, and that any potential harmful concentrations do not arise and are managed as far as reasonably possible through the local planning regime. However, while this document sets the preferred

approach, we are seeking views and any input on any alternative approaches that you may want to put forward supported by robust and strong evidence.

What stage are we at?

This HMO Development Plan Document (DPD) will, once adopted, form part of the formal Development Plan for Coventry City Council. It is being produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. This 'Consultation Draft' forms part of the statutory consultation required under Regulation 18 of the 2012 Regulations (as amended).

The primary purpose of this HMO DPD is to set out the detailed policy framework that will be used for the determination of HMO planning applications in Coventry. The policies contained within the DPD provide further detail to the strategic policies set out in the Council's Local Plan and City Centre Area Action Plan.

Draft policy approaches contained within this Consultation Draft DPD are intended to further the aims and objectives of both the NPPF and the Coventry Local Plan. They are aimed at guiding both decision-makers and applicants to achieve the highest possible standards of development for HMO proposals in Coventry.

Comments must be received no later than **xx** 2022 and should be submitted online via: <https://coventrycitycouncil.inconsult.uk/system/home>

2. Introduction

2.1 Houses of Multiple Occupation (HMOs) are properties rented to at least 3 people who are not from one household (for example, a family) but share facilities like a bathroom or kitchen. As at 2022, planning permission is only required for HMOs which will provide a home for 7 or more people.

2.2 HMOs meet a variety of needs for private rented housing, ranging from young professional 'house-shares' and students wanting to live off campus, as well as providing a vital source of housing supply for people on lower incomes. For many people, HMOs provide a practical and affordable housing option that meets their housing needs. There are, however, significant housing needs that HMOs cannot meet and indeed can impact upon, such as the provision of affordable housing stock for families



2.3 Evidence shows that there has been an increase in HMO development in Coventry over recent years to meet demand. This has resulted in concentrations of HMOs in particular parts of the city which has compounded the associated issues for the neighbouring properties and the wider community. These issues mainly relate to increased parking pressures, noise, management of waste and recycling and anti-social behaviour. This document aims to provide a policy approach to HMOs, housing diversity, residential amenity and parking standards in order to ensure that new HMO developments meet the requirements of our policies in terms of impact on the surrounding areas.

2.4 This will help us to provide much needed new housing options whilst ensuring that new development does not have a negative impact on the character of the surrounding area and nearby properties. The Development Plan Document (DPD) is primarily for use by prospective planning applicants, property developers and landowners, as well as decision makers such as planning officers and elected members. However, it also intended to help local residents understand how the Council intends to apply its planning policies. It is important to note that not all HMOs require planning permission. **This document relates to the management of planning applications for new HMOs when planning permission is required, but also explains the role of the HMO licencing regime which is a separate process that can relate to both HMOs which do, and do not, require planning permission.**

3. Policy Context

National Policy Context

National Planning Policy Framework

3.1 The NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development. One of the three overarching objectives of the NPPF requires the planning system to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations.

3.2 Whilst there is no specific reference to HMOs within the NPPF, housing policies do aim to support the Government's objective of significantly boosting the supply of homes. This requires the Council to reflect on provision of the size, type and tenure of housing needed for different groups in the community, including for those who require affordable housing, students, families, and people who rent their homes. The Planning Practice Guidance echoes the content of the NPPF in that it does not provide specific advice on HMOs, however, it does provide guidance on planning for the housing needs of different groups.

Local Policy Context

Coventry Local Plan

3.3 The Coventry Local Plan was adopted in 2017 and policy H11 sets out the approach below (see fig 1). The HMO DPD will ultimately sit alongside the existing Local Plan complementing existing policy but adding a suite of additional policies to address detailed issues.

Figure 1: Coventry Local Plan, Policy H11

Policy H11: Homes in Multiple Occupation (HiMO's)

The development of purpose built HiMO's or the conversion of existing homes or non-residential properties to large HiMO's will not be permitted in areas where the proposals would materially harm:

- a. the amenities of occupiers of nearby properties (including the provision of suitable parking provisions);
- b. the appearance or character of an area;
- c. local services; and
- d. The amenity value and living standards of future occupants of the property, having specific regard to internal space and garden/amenity space.

Coventry, Solihull and Warwickshire Strategic Housing Market Assessment (SHMA) 2015

3.4 The SHMA assessments have shown that the housing market in Coventry is generally focused towards smaller, lower value properties relative to the wider housing market area and national trends. For example, 71% of all Coventry homes are within Council Tax bands A and B compared to Nuneaton where the figure is 60% and the national average is 44%. Likewise, just 10% of the city's existing housing stock is classified as detached. The Council is expecting this data to be comprehensively updated through the joint 2022 Housing and Economic Development Needs Assessment (HEDNA) later in the year. However, at present, the Council are currently planning for 24,600 additional new homes between 2011 and 2031. Any new residential schemes coming forward during this period that comprise 25 homes or 1 hectare or more will be expected to provide 25% of affordable homes¹

3.5 In addition to the provision of new affordable housing, the Council was advised to investigate how better use of the existing housing stock could be made to meet housing need (recognising that the Council does not own/manage stock such investigations would need to be conducted with its stock-owning, housing association partners).

3.6 There is also a clear role for policy to seek to encourage investment and improve standards within the Private Rented Sector. The Council already has an important enforcement role and should work to develop ways to improve the housing offer for households seeking private rented homes.

HMO and the Planning Use Classes Order

3.7 Planning use classes are the legal framework which determines what a particular property may be used for by its lawful occupants. The current Use Classes were last updated on 1 September 2020². Uses are grouped into classes B, C, E, F and Sui Generis (of their own use class).

3.8 The Government defines a HMO³ as:

¹ www.coventry.gov.uk/downloads/file/25899/final-local-plan-december-2017

² www.planningportal.co.uk/info/200130/common_projects/9/change_of_use

³ www.gov.uk/house-in-multiple-occupation-licence

‘a property rented out by at least 3 people who are not from 1 ‘household’ (for example a family) but share facilities like the bathroom and kitchen. It’s sometimes called a ‘house share’.

3.9 From a planning perspective, the Use Classes Order⁴ distinguishes between ‘small’ HMOs of up to six people (C4 use class), and ‘large’ HMOs of seven or more occupants (Sui Generis). Currently, planning permission is not needed to change the use of a house to a HMO with 3-6 residents, which is known as Permitted Development (PD). The effect of any prospective Article 4 Direction covering HMOs will be that, within any designated area, planning permission would be required for all HMO proposals (small or large).

3.10 HMOs therefore currently require planning permission once they exceed six unrelated people if that change results in a material change in use. Large HMOs, formed from seven unrelated residents or more and no PD right exists to change a HMO with 7 or more residents from any use. Consequently, for the change of use of any premises to a HMO for seven or more residents, an assessment must be made as to whether a material change of use from the prior lawful use has occurred and, if it is determined that it has, then planning permission is required.

⁴ www.planninggeek.co.uk/use-class/use-class-c/

4. HMOs in Coventry - Issues

4.1 Whilst the city's stock of HMOs is contributing to meeting local housing needs, increased numbers of multiple occupancy properties have the potential to create negative impacts. Concentrations within neighbourhoods can lead to imbalanced and unsustainable communities and can damage the residential amenity and character of surrounding areas. Harmful impacts associated with high numbers of HMOs can affect a community's health and wellbeing. Over many years across Coventry, many issues have been reported to the Council regarding the increasing numbers and concentrations of HMOs, We believe these include, but are not limited to:

- **Reduced social cohesion** resulting from the short-term nature of residencies involved with HMOs which may involve younger people overall. demographic imbalance.
- **Reduced housing choice** resulting from housing type/tenure imbalance (e.g. a shift from permanent family housing to more transient accommodation);
- **Reduced community engagement** from residents resulting from an increase in the transient population of an area;
- **Noise and disturbance** resulting from intensification of the residential use and/or the constantly changing nature of households;
- **Overlooking and loss of privacy** resulting from poorly considered internal layouts and intensification of use;
- **Detriment to visual amenity** resulting from poor waste management, poor property maintenance, accumulative external alterations to properties and use of frontage areas for off-street parking;
- **Reduced community services** resulting from a shift in the retail/business offer towards a narrower demographic such as the proliferation of Hot Food Takeaways; and
- **Highway safety concerns** resulting from congested on-street parking and poor waste management.

Question 1: Do you believe these issues are representative of your experiences and are there other issues we need to be aware of?

4.2 A number of wards across the city have high proportions of HMOs housing a range of different groups. Non-student HMOs are generally clustered across wards in Sherbourne, Whoberley and Upper/Lower Stoke. Some communities in these areas have expressed concern over increasing numbers of HMOs and the potential for damaging impacts should numbers continue to increase without appropriate planning interventions.

4.3 The level of student population in the city is also a factor affecting the amount and distribution of HMOs. A number of residential areas have high student populations living in this form of accommodation. These areas directly surround or are accessible to the city's two universities. The issues identified above have become intensified in these locations due to high HMO numbers. Significant concentrations in particular streets and neighbourhoods have had negative impacts on local communities.

Key Issues in Coventry

4.4 From the evidence gathered to date, we consider there are three key strategic issues that have emerged in Coventry and are explained below.

Key Issue 1: Concentrations

4.5 This is where issues associated with HMOs (see points above) cumulatively result in detrimental effects on the qualities and characteristics of a residential area. These qualities and characteristics are defined as generally quieter surroundings, a reasonable level of safe, accessible and convenient vehicular parking, a well-maintained or visually attractive environment and the preservation of buildings and structures that contribute to the character of a locality. It is also where the choice of housing available no longer provides for the needs of different groups within the community.



Key Issue 2: Sandwiching (street level)

4.5 A harmful concentration can arise at a localised level when an existing dwelling is sandwiched between two HMOs. This can intensify impacts on individual households even if few HMOs exist locally and can create an imbalance between HMOs and other housing at a street level.

4.6 Potential sandwiching situations can include:

- Up to three single residential properties in a street located between two single HMO properties;
- Single HMO properties in any two of the following locations: adjacent, opposite and to the rear of a single residential property;
- A residential flat within a sub-divided building where the majority of flats are HMOs.
- A residential flat within a sub-divided building in a street located between two other sub-divided buildings with at least one HMO flat in each building;

- A residential flat within a sub-divided building located between two HMO flats above and below;
- A residential flat within a sub-divided building located between two HMO flats on both sides.

4.7 Variations of these sandwiching situations may also occur. Sandwiching situations apply irrespective of limited breaks in building line, such as a vehicular or pedestrian access, apart from a separating road.

Key Issue 3: HMO Thresholds (ward level)

4.8 In analysing appropriate thresholds through other Local Planning Authorities, it is clear that proposals for the introduction of new HMOs which would result in more than 10% of the total dwelling stock being occupied as HMOs within a 100 metre radius of the centre point of the application property is considered an appropriate level before HMO thresholds give rise to the issues outlined above.

4.9 Similarly, proposals for additional bed spaces within an existing HMO where 10% or more of the total dwelling stock is occupied as HMOs within a 100 metre radius of the centre point of the application property could also be considered an appropriate level. The 100 metre radius is given to represent the immediate neighbourhood and is measured from a centre point within the centre point of the application property as defined by the Local Land and Property Gazetteer (LLPG). Dwellings on the edge of the 100 metre radius can only be included if the centre point, as defined by LLPG, falls within the radius. When considering applications, the Council's Development Management service will calculate the proportion of dwellings that are occupied as HMOs within any given 100 metre radius of the centre point of the application property when validating and determining such applications – please refer to Para 6.3 for further detail.



5. Preferred Option

5.1 With the city's growing population (and will grow further), there is a need to ensure that new development supports successful communities by ensuring the right mix of housing types in an area, securing appropriate design and supporting well managed properties. HMOs provide an important contribution to people's housing choice. The preferred policy approach aims to ensure that such development also preserves the residential amenity and character of an area and that harmful concentrations do not arise.



5.2 Large homes in multiple occupation (HMOs) can contribute to the overall supply of cheaper accommodation, particularly for students, young people and those on low incomes. Intensive occupation of former family dwellings such as those used for student accommodation or as a HMO can have negative impacts on residential amenity within an area, through increases in

on-street and off-street parking, loss of front gardens, reductions in levels of privacy, alterations to the exterior of buildings and increased generation of refuse.

5.3 A large HMO is a property accommodating more than six unrelated persons sharing facilities and a small HMO accommodates between three and six unrelated persons. Housing legislation and the Planning Use Classes Order provides for different regulatory frameworks for managing HMOs⁵.

5.4 At the current time, any proposal for a small HMO is classed as permitted development. However, this DPD is being developed in parallel with a proposed Article 4 Direction which will seek to withdraw permitted development rights for small HMOs. There are significant existing concentrations of HMOs in certain wards across the city, where an Article 4 Direction will be developed (expected to be in place by 2023) removing permitted development rights for small HMO proposals (less than 6 unrelated occupants in a single dwelling).



⁵ www.hmohub.co.uk/planning-vs-licensing/

Preferred Approach

5.5 The proposed policy approach to managing HMOs in Coventry is set out below with a suite of suggested draft policies coupled with a reasoned justification for each. Additionally, there is a proposed reasonable alternative we have suggested for each policy, but we are also keen to understand if there are other reasonable alternative options and questions for consideration. Once we have this feedback as a result of this consultation, we will undertake detailed Strategic Environmental Assessment / Sustainability Appraisal of the proposed policy options to ensure that, in line with national policy requirements, we are developing a sustainable policy approach for addressing HMOs in Coventry.

DRAFT POLICY HMO1 – HOMES IN MULTIPLE OCCUPATION (HMOS)

All proposals for the provision of HMOs will be required to demonstrate that:

- a) there is good accessibility to local amenities and public transport;
- b) they accord with the emerging Accessible Homes standards⁶ (or future equivalent) and provide satisfactory living conditions for the intended occupiers; and
- c) there will be no demonstrably adverse impact on the amenity of neighbouring properties or the character of the area by way of character, appearance, highway safety and parking. The proposal must also meet the criteria in draft policy HMO4.

Justification and reasonable alternatives

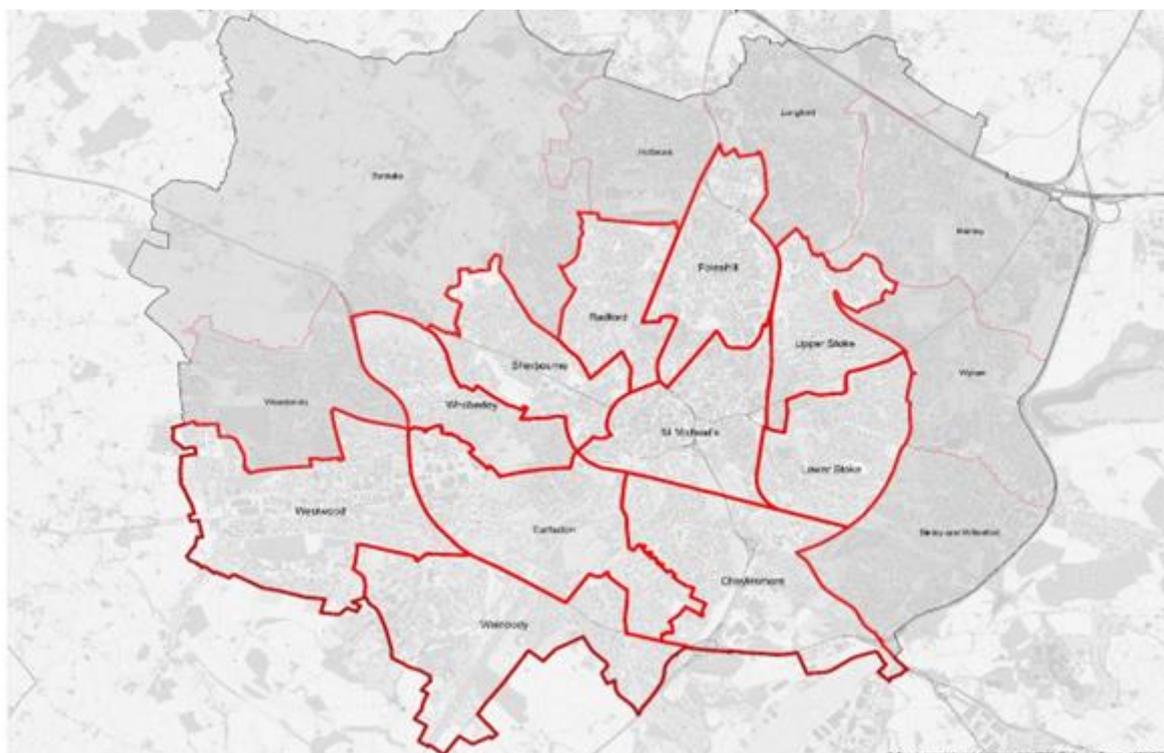
5.6 Whilst there is an existing and corporately agreed approach to managing HMOs through the licencing regime, there is a need to strengthen existing planning policy to address HMO concentration coupled with a proposed non-immediate Article 4 Direction to withdraw permitted development rights within specific wards (expected to be in place in 2023). The evidence has established that small HMO dwellings are associated with neighbourhoods where the predominant dwelling type is small (three bedroom) terraced dwellings, privately rented, and whilst mostly occupied by students, provide accommodation for a range of people. The cumulative effect of incremental intensification in an area caused by numerous changes of use from small HMO to large HMOs or the extension of existing HMOs can be also significant. For these reasons applications for such changes will be assessed using the criteria of draft policies HMO01 and HMO04.

⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/930274/200813_con_doc_-_final_1.pdf

5.7 It should be noted that the Council intends to introduce an Article 4 Direction requiring planning permission for a change of use from family dwellings (C3) to small HMOs for between 3 and 6 unrelated people (C4 dwellings) within specified wards of the city. At the current time, eleven wards have been proposed to be included as part of the Article 4 Direction area, albeit they should not be considered as being the only places in the city that have a concentration of HMO dwellings. These proposed wards are:

- Cheylesmore
- Earlsdon
- Foleshill
- Lower Stoke
- Radford
- St. Michael's
- Sherbourne
- Wainbody,
- Whoberley
- Westwood
- Upper Stoke

Please note: the Article 4 Direction is subject to a separate consultation process and is not being consulted on through this document.



5.8 The alternative approach to the proposed draft proposed policy HM01 is to do nothing and rely on the existing Local Plan policy H11 which is considered lacking an overall strategic direction to mitigate the potential impacts of further increase in HMO proposals coming forward.

Question 2: Do you believe this policy approach is reasonable and relevant to addressing the issues associated with HMOs in Coventry? If not, what alternative approach would be appropriate supported by robust evidence?

DRAFT POLICY HMO2 – CONCENTRATIONS AND THRESHOLDS

Where there is an existing HMO concentration of 10% or more of all dwellings within 100 metres radius of the centre point of the application property, HMO applications will not be supported. Where there is an existing HMO concentration of less than 10% within 100 metres radius of the centre point of the application property, HMO applications will be considered against the other Policies in this DPD and all other relevant policies.

Justification and reasonable alternatives

5.9 It is not the aim of the policy to reduce overall HMO numbers or to stop further HMO proposals coming forward, but to ensure that potentially harmful concentrations do not arise and that a high standard of accommodation and amenity is created, given the important role HMOs play as part of the city's housing offer. Clearly, patterns of supply and demand will change over time but there is a link between student shared-houses and the increasing provision of purpose-built student accommodation located in the city centre. Restricting HMO supply in one neighbourhood, may prompt landlords to examine adjoining areas, displacing the concentration. Consequently, boundaries may change, and new areas may be identified. Such areas would be subject to the preferred option policy. The evidence shows that high concentrations of HMOs in the city are already having an adverse impact on the character and amenity of local areas and this issue is spreading to further areas. The NPPF encourages

local planning authorities to help maintain mixed and balanced communities. Over-concentration of HMOs can cause imbalance, leading to the problems identified in section 4.

5.10 The proposed eleven wards to be included within the Article 4 Direction area have varying levels of existing HMO dwelling concentrations. However, the preferred option would apply to the city as a whole rather than at individual street level. A single threshold is proposed to be set at 10% which is considered to be a modest level based on the size and scale of the challenge this DPD is aiming to address. Moreover, research based on similar size cities across the country which have already implemented a policy intervention to address HMO challenges, also suggests that the threshold would be appropriate and reasonable. For neighbourhoods which exceed the threshold, no further applications to a C4 HMO dwelling, generated by the withdrawal of change of use permitted development rights would be permitted.

5.11 The alternative approach is to do nothing and rely on the existing Local Plan policy H11 which is unable to address the issues of concentration and thresholds to mitigate the potential impacts of further increase in HMO proposals coming forward. Alternative thresholds were considered but we are not proposing to pursue these as the figure is based on tried and tested good practice elsewhere.

Question 3: Do you believe this policy approach is reasonable and relevant to addressing the issues associated with HMO concentration and thresholds in Coventry? If not, what alternative approach would be appropriate and could be justified by robust evidence?

DRAFT POLICY HMO3 – SANDWICHING

Proposals for the provision of HMOs must not result in a non-HMO dwelling being sandwiched between two HMOs and must not lead to a continuous frontage of three or more HMOs.

Sandwiching includes:

- Up to three single residential properties in a street located between two single HMO properties;
- Single HMO properties in any two of the following locations: adjacent, opposite and to the rear of a single residential property;
- A residential flat within a sub-divided building where the majority of flats are HMOs.

- A residential flat within a sub-divided building in a street located between two other sub-divided buildings with at least one HMO flat in each building;
- A residential flat within a sub-divided building located between two HMO flats above and below; and
- A residential flat within a sub-divided building located between two HMO flats on both sides.

Justification and reasonable alternatives

5.12 Preventing the “sandwiching” of a non-HMO between two HMOs or a continuous frontage of three or more HMOs is an approach that aims to prevent unacceptable adverse impacts on amenity (as set out in paragraph 4.1) and to control the location of new HMOs and student accommodation in order to prevent these uses from either exacerbating existing or creating new concentrations. It is not the intention of the policy to restrict further growth in HMOs. The Council recognises the importance of HMOs and the private rented sector generally in the housing stock but seeks to ensure that the amenity of neighbouring residents is not compromised.

5.13 The alternative approach is to do nothing and rely on the existing Local Plan policy H11 which does not address the issue of sandwiching. This could lead to further issues of sandwiching and the potential impacts associated with continued increases in HMOs.

Question 4: Do you believe this policy approach is reasonable and relevant in the issues associated with HMO sandwiching in Coventry? If not, what alternative approach would be appropriate and could be justified by robust evidence?

DRAFT POLICY HMO4 – AMENITY AND DESIGN

All proposals for the provision of HMOs will be assessed against the following criteria:

- a) The premises are suitable for a full or part conversion in terms of location and size for the number of households to be accommodated;
- b) There would be no demonstrably adverse impact on the amenity of neighbouring properties and the character of the surrounding area in particular through increased activity, noise or disturbance;

- c) The configuration of internal sleeping accommodation space satisfactorily takes into account minimum room size requirements* and light and ventilation;
- d) The use of acoustic insulation to protect neighbouring and adjacent properties through appropriate party wall insulation;
- e) The design of external space is safe and secure, and includes provision for refuse storage, washing facilities and adequate vehicular and cycle parking⁷, and ensures access to outdoor amenity space; and
- f) Refuse bin storage is provided externally within the curtilage of the property, within a suitably designed structure and the refuse bin not visible from the public realm.

** 6.51 m² for one person over ten years of age, 10.22 m² for two persons over ten years of age and 4.64 m² for one child under the age of ten years. Any room of less than 4.64m² must not be used as sleeping accommodation.⁸*

Justification and reasonable alternatives

5.14 The areas around the city centre and the campuses of both Coventry University and University of Warwick have the greatest concentrations of HMOs. These areas are popular with students and young people because they provide a good range of facilities for young people and a thriving evening economy. In addition, the housing stock lends itself well to the provision of shared houses and flats. However, one of the main problems for more settled residents living in these areas is the anti-social behaviour in the streets in the early hours of the morning. Other issues include noise from neighbouring properties, poor attendance to waste storage, increased burglaries, increased street parking, and poor property maintenance. The University and the Council work together to resolve these issues wherever possible, but the Council is firmly of the view that restricting further concentrations of HMOs will help prevent a worsening of the situation.

5.15 The policy also aims to ensure that there is satisfactory provision for the storage of waste, since a house occupied as an HMO can usually generate more waste than a family or couple. It is considered that all habitable rooms should have an adequate level of natural lighting provided via a clear glazed window or windows. Where practicable, all staircases, landings,

⁷ www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031

⁸ Figures based on Coventry City Council's HMO licensing standards:

www.coventry.gov.uk/downloads/file/27566/room-size-and-amenity-provision-standards

passages, kitchens, bathrooms and toilets should be provided, with a window. Windows to bathrooms and toilets should be glazed with obscured glass.

5.16 The alternative approach is to do nothing and rely on the existing Local Plan policy H11 which does not comprehensively address the issue of amenity and design issues associated with HMO proposals.

Question 5: Do you believe this policy approach is reasonable and relevant to addressing the issues associated with HMO amenity and design issues in Coventry? If not, what alternative approach would be appropriate and could be justified by robust evidence?

6. Proposed Assessment Process

6.1 It is proposed that when determining planning applications for new HMOs or additional bed spaces within existing HMOs the following information should be submitted:

- Completed application form;
- Block plan of the site (at a scale of 1:100 or 1:200) showing site boundaries and any on-site car parking;
- Maximum number of occupants;
- Existing and proposed floor plans showing all room sizes (square metres), room uses and number of persons occupying each bedroom/bedsit;
- Cycle parking facilities;
- Appropriate use of acoustic and party wall insulation;
- Details of the location, layout, design, volume, management and collection arrangements for all recyclable and waste materials; and
- Details of any associated building works.

6.2 In some cases, additional information may be required to help determine the planning application. Further information on submitting a planning application is available on the Council's website⁹.

Calculations

6.3 It is proposed that the following approach sets out the residential properties identified for the purposes of calculating the percentage concentration of HMOs and the data sources for the purposes of identifying HMOs.

Stage 1: Identifying residential properties

The residential properties identified are those located within 100m of the centre point of the application site. For the purposes of assessing applications for HMO development, dwelling houses and HMOS that are located within blocks of flats or subdivided properties are counted as one property. This will ensure that calculations of HMO concentration are not skewed.

Stage 2: Count HMOs

HMOs are identified from the following sources:

- Properties licensed as a HMO;

⁹ www.coventry.gov.uk/planning-2/planning-application-checklist-supporting-information

- Properties with C4 or Sui Generis HMO use or issued with a Certificate of Lawful Development;
- Declared C4 HMOs recorded in the 12 month notice period for proposed Article 4 Direction, (expected to be approved in 2023); and
- Council tax records – student exemptions for council tax excluding purpose built student accommodation and private flats.

Stage 3: Calculate concentration

The concentration of HMOs surrounding the application site is calculated as a percentage of the total estimated number of existing HMO units against the total number of residential properties. It is accepted that although the HMO sources listed above provide the most robust approach to identifying the numbers and locations of HMOs in an area, it will not identify all HMOs. Additional HMOs can also impact on residential amenity where they lead to concentrations in the immediate vicinity of an application site, as well as creating other impacts where they proliferate at a broader neighbourhood level.

Planning permission would not be granted where the introduction of a new HMO would result in an existing C3 dwelling being ‘sandwiched’ by any adjoining HMOs or non-family residential uses on both sides. Planning permission would not be granted where it would result in a continuous frontage of 3 or more HMOs or non-family residential uses. In situations where properties are not traditional houses situated along a street frontage, the policy can be applied flexibly depending on the individual circumstances of the proposal.

Exceptional circumstances

6.4 The concentration of HMOs in an area may be at such a point where the introduction of any new HMO would not change the character of the area. This is because the vast majority of properties are already in HMO use. In these circumstances the retention of the property as a family dwelling will have little effect on the balance and mix of households in a community which is already over dominated by the proportion of existing HMO households. Therefore, the conversion of the remaining buildings to a HMO would not further harm the character of the area.

Question 6: Do you believe this proposed assessment process is reasonable and relevant to addressing to addressing the issues associated with HMO applications in Coventry? If not, what alternative approach would be appropriate and could be justified by robust evidence?

Appendix 2: Glossary of Terms

Article 4: A power available under the 1995 General Development Order allowing the Council, in certain instances, to restrict permitted development rights.

Certificate of Lawful Development: A legal document confirming the lawfulness of past, present or future building use.

City Centre Action Plan: sets out a blueprint for the development of the City Centre

Coventry Local Plan: adopted by the Council in December 2017, it sets out the Council's vision for the city for the period 2017 -2031.

Development Plan Document (DPDs): A Statutory Planning Policy Document which forms part of the Local Plan, setting out Strategic Policies and Development Management Policies.

Houses in Multiple Occupancy (HMO): a property rented by at least 3 people who are not from 1 'household' (for example a family) but share facilities like the bathroom and kitchen. It's sometimes called a 'house share'.

Housing and Economic Development Needs Assessment (HEDNA): provides an assessment of the development need in order to accommodate identified housing and employment requirements.

National Planning Policy Framework (NPPF): outlines the Government's planning policies and expectations which directly inform local policy.

Permitted Development Rights: certain types of building work and changes of use that can be undertaken without the need to apply for planning permission.

Sui Generis – A term used to categorise buildings that do not fall into other defined use classifications, in this context it means 'in a class of its own'.

Strategic Environmental Assessment (SEA): a process which evaluates the environmental impacts of proposed policies.

Strategic Housing Market Assessment (SHMA): provides an assessment of both housing need and demand.

Sustainability Appraisal (SA): an assessment of the effects (social, environmental and economic) of strategies and policies contained within DPD documents.

Use Classes Order: puts uses of land and buildings into various categories identifiable with B, C, E, F or SG.

If you need this information in another format or language
please contact us

Telephone: (024) 7683 1109

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COVENTRY CITY COUNCIL

TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND) ORDER
2015 (as amended)

HOMES IN MULTIPLE OCCUPATION (HMO)

DIRECTION MADE UNDER ARTICLE 4(1) TO WHICH SCHEDULE 3(1) APPLIES

WHEREAS Coventry City Council (“the Council”) being the appropriate local planning authority within the meaning of Article 4(5) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (“the Order”), are satisfied that it is expedient that development of the description(s) set out in the **Second Schedule** below should not be carried out on the land identified in the **First Schedule** and shown edged red on the map in the **Third Schedule** below (“the Land”), unless planning permission is granted on an application made under Part III of the Town and Country Planning Act 1990 (as amended).

For the avoidance of doubt, the Council is satisfied that the Direction is necessary to protect the amenity of the Land and in the interests of good planning.

NOW THEREFORE THE SAID Council in pursuance of the power conferred on them by Article 4(1) of the Order hereby directs that the permission granted by Article 3 of the Order shall not apply to development on the Land (as more particularly defined in the **First Schedule** and shown in **Schedule 3**) of the description(s) set out in the **Second Schedule** below, unless planning permission is granted on an application made under Part III of the Town and Country Planning Act 1990 (as amended).

FIRST SCHEDULE

The following Wards **ARE SUBJECT** to this Direction:

- Cheylesmore
 - Earlsdon
 - Foleshill
- Lower Stoke
 - Radford
- Sherbourne
- St. Michaels
- Upper Stoke
- Wainbody,
- Westwood
- Whoberley

SECOND SCHEDULE

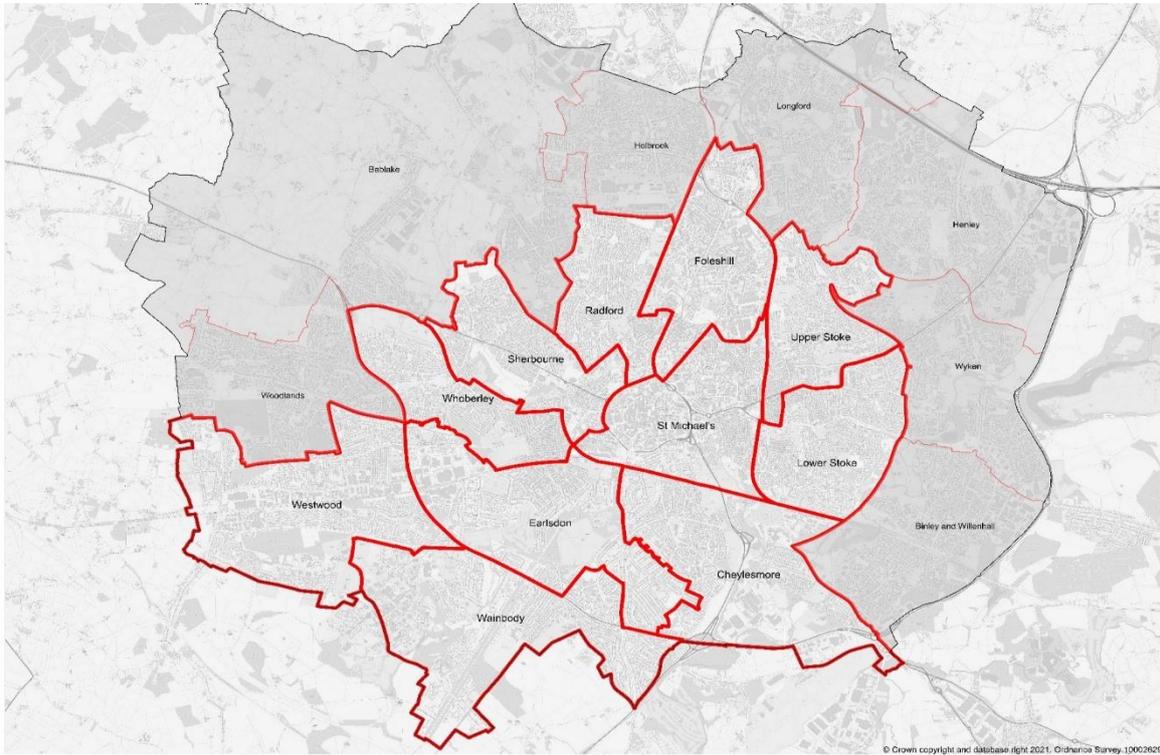
Part 3 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)

Class L (b)

Development consisting of a change of use of a building from a use falling within Class C3 (dwellinghouses) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 as amended, to a use falling within Class C4 (houses in multiple occupation) of that Schedule.

THIRD SCHEDULE

(Boundary map showing Wards subject to this direction)



To be completed when making the Article 4 Direction

Made under the Common Seal of Coventry City Council on this day of 2022

The Common Seal of the Council of the City
of Coventry was hereunto affixed to this
Direction in the presence of

Authorised Signatory

To be complete when confirming the Article 4 Direction

This Direction was confirmed under the Common Seal
of Coventry City Council this day of 202

The Common Seal of the Council of the City
of Coventry was hereunto affixed to this
Direction in the presence of

Authorised Signatory



Coventry City Council

Briefing note

To: Communities and Neighbourhoods Scrutiny Board (4)

Date: 6th October, 2022

Subject: Local Listings

1 Purpose of the Note

- 1.1 To inform the Communities and Neighbourhoods Scrutiny Board (4) of the Local Listings process and criteria and to invite comment and recommendations to the Cabinet Member

2 Recommendations

- 2.1 The Communities and Neighbourhoods Scrutiny Board (4) are recommended to:
- 1) Consider the content of the report, appendices and presentation provided at the meeting
 - 2) Identify any recommendations on the policy for the Cabinet Member

3 Background and Information

- 3.1 A 'Local List' is a list of "non-designated heritage assets". Non-designated heritage assets are 'buildings, monuments, sites, places, areas or landscapes identified by local planning authorities as having a degree of significance meriting consideration in planning decisions, but which are not formally designated'. These contrast with nationally designated heritage assets (such as listed buildings or scheduled monuments). Heritage assets on the Local List need not be less significant than designated assets; they may have important local significance.
- 3.2 Coventry City Council have maintained a Local List of Buildings of Special Architectural or Historic Interest since (at least) June 1974. The Local List has changed over time, and now over 280 heritage assets are recorded on the Local List.
- 3.3 Creating a Local List is a way for local councils and communities to identify and celebrate historic buildings, archaeological sites and designed landscapes which enrich and enliven their area.
- 3.4 These criteria set out how a heritage asset is considered for inclusion in the Local List. The public, councillors and local interest groups have been consulted on these criteria, and they have been approved by the City Council.

3.5 The criteria can be found in Appendix 1

4 What inclusion on the Local List means

- 4.1 Local listing is intended to highlight heritage assets which are of local heritage interest in order to ensure that they are given due consideration when change is being proposed.
- 4.2 Inclusion of a building or place on the Local List places no additional legal requirements or responsibilities on property owners over and above those already required for planning permission or building regulation approval.
- 4.3 It can, however, help to influence planning decisions in a way that conserves and enhances local character. Under the National Planning Policy Framework the conservation and contribution of locally listed heritage assets will be a material consideration in planning decisions that directly affect them or their setting.

Appendix 1 – City of Coventry Local List of Heritage Assets - criteria

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Organisation: Coventry City Council
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024 7697 2343



City of Coventry Local List of Heritage Assets – criteria

Introduction

A 'Local List' is a list of 'non-designated heritage assets'. Non-designated heritage assets are 'buildings, monuments, sites, places, areas or landscapes identified by local planning authorities as having a degree of significance meriting consideration in planning decisions, but which are not formally designated'¹. These contrast with nationally designated heritage assets (such as listed buildings or scheduled monuments). Heritage assets on the Local List need not be less significant than designated assets; they may have important local significance.

Coventry City Council have maintained a Local List of Buildings of Special Architectural or Historic Interest since (at least) June 1974. The Local List has changed over time, and now over 280 heritage assets are recorded on the Local List.

Creating a Local List is a way for local councils and communities to identify and celebrate historic buildings, archaeological sites and designed landscapes which enrich and enliven their area.

These criteria set out how a heritage asset is considered for inclusion in the Local List. The public, councillors and local interest groups have been consulted on these criteria, and they have been approved by the City Council.

What inclusion on the Local List means

Local listing is intended to highlight heritage assets which are of local heritage interest in order to ensure that they are given due consideration when change is being proposed.

Inclusion of a building or place on the Local List places no additional legal requirements or responsibilities on property owners over and above those already required for planning permission or building regulation approval.

It can, however, help to influence planning decisions in a way that conserves and enhances local character. Under the National Planning Policy Framework the conservation and contribution of locally listed heritage assets will be a material consideration in planning decisions that directly affect them or their setting.

Criteria

The heritage asset² be valued locally for some, or all of the following:

¹ <http://planningguidance.communities.gov.uk/blog/guidance/conserving-and-enhancing-the-historic-environment/what-are-non-designated-heritage-assets-and-how-important-are-they/>

² The heritage asset must meet the following criteria:

- It must be capable of being a heritage asset within the government's definition (<http://planningguidance.communities.gov.uk/blog/policy/achieving-sustainable-development/annex-2-glossary/>)
- It must have heritage interest that can be conserved and enjoyed
- It must have value as heritage for the character and identity of the area for its heritage interest beyond personal or family connections
- Its significance must be greater than the general positive value of its surroundings
- **Historic:** It is important to understanding an association with a person, event, episode of history, or local industry. This might be an *illustrative interest* (it illustrates an aspect of the area's past that makes an important contribution to its identity or character), or an *associative interest* (it connects us to people and events that shaped the identity or character of the area).
- **Artistic:** It makes an important contribution to the positive look of the area either by design or fortuitously. This might include *artistic interest* or *architectural interest*.
- **Community:** It is important to the identity, cohesion, spiritual life or memory of all or part of the community. This might include *commemorative* or *symbolic interest*, that reflect meanings of a place for the people who relate to it.
- **Evidence:** It is an important resource for understanding and learning about the area's history. This might include *archaeological interest*. The importance of the asset is then assessed, including a consideration of its specialness. The specialness is what makes the heritage significance of the asset stand out above the surrounding environment. The following would be considered:
 - **Age:** Is it particularly old, or of a date that is significant to the local area?
 - **Rarity:** Is it unusual in the area or a rare survival of something that was once common?
 - **Integrity:** Is it largely complete or in a near to original condition?
 - **Group value:** Is it part of a group that have a close historic, aesthetic or communal association?
 - **Coventry's identity:** Is it important to the identity or character of the city or a particular part of it?

The distinctive historic elements of Coventry's identity that may be considered:

- a) The surviving buildings, defences and street plan of the medieval city centre and its suburbs;
- b) The surviving pre-industrial settlements and landscape features which have been subsumed by the expansion of the city such as Walsgrave, Canley, Binley, Brownhill Green, Coundon Green, Little Heath (Spring Road), Stivichall Croft and Lower Eastern Green (at Dial House Lane);
- c) The wider Arden rural environment on the fringe of the city comprising field-systems, ancient woodlands and commons which developed over centuries; interspersed with a mix of settlements, farmsteads and smallholdings;
- d) 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;
- e) The Victorian and Edwardian suburbs such as Earlsdon and Stoke;
- f) Designed landscapes, including historic parks and gardens, historic cemeteries, churchyards and public parks;
- g) The significant elements of Coventry's ground-breaking post-war reconstruction including its plan, built form, public art works and public spaces; and
- h) Archaeological remains of all periods from the earliest Prehistoric human habitation to the modern industrial period.

Local Listing Process

Nominations to the Local List can be made via a form (available on the Coventry City Council website) submitted to Coventry City Council. The council will regularly review the list and propose amendments.

All nominations will be considered. Nominated assets will be presented to the public (including the owners and tenants of the assets) inviting views on its heritage value and suitability for inclusion in the Local List.

All nominations, and the decisions made by the Council, will be made available online. All heritage assets that are Locally Listed will be listed on the City Council website (see <http://www.coventry.gov.uk/locallylistedbuildings>).

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Coventry City Council

Briefing note

To: Communities and Neighbourhoods Scrutiny Board (4)

Date: 6 October, 2022

Subject: Tall Building and View Management Framework Supplementary Planning Document (SPD) public consultation

1 Purpose of the Note

- 1.1 To inform the Communities and Neighbourhoods Scrutiny Board (4) of the Tall Buildings and View Management Framework Supplementary Planning Document (SPD) consultation and for the Board to make representations to those consultation.

2 Recommendations

- 2.1 The Communities and Neighbourhoods Scrutiny Board (4) are recommended to:
- 1) Consider the draft SPD at Appendix 1 and presentation provided at the meeting
 - 2) Identify any representations for the consultation

3 Background and Information

- 3.1 The draft SPD sets out guidance to developers considering tall buildings in the city and lays out the information required in order for the Local Planning Authority to consider their application.
- 3.2 Furthermore, the SPD provides significant additional detail to policy CC4 of the Area Action Plan (AAP) regarding the protected view cones within the city centre which ensure that valued views of the three spires are retained. This analysis includes work to identify limited areas where development might be possible without eroding views, subject to meeting the other policy requirements.
- 3.3 A six week consultation was approved at Cabinet Member meeting on 28 July and took place. There was not opportunity for the SPD to be considered by Scrutiny Board 4 during that time and so comments received by the Board will be added to those already received during the consultation period.

- 3.4 All responses will then be analysed and the SPD amended accordingly, before submitting to Cabinet for final adoption. In line with the legislation, the Cabinet report will include a statement setting out the details of the consultation, a summary of the main issues raised and how they have been addressed.

Appendix 1 – draft Tall Buildings and View Management Framework Guide SPD

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Coventry City Council

Tall Buildings Design Guide & Three Spires View Management Framework

Supplementary Planning Document (SPD)
(Consultation Draft June 2022)

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1.0 Introduction

- 1.1 This Supplementary Planning Document (SPD) has been produced in conjunction with an updated View Management Framework which informs and supports the SPD and is also available through the city council's website.
- 1.2 This document has been written in response to a noticeable increase in the number of planning applications for tall buildings in the city of Coventry. This rise in applications locally reflects a wider national interest in tall buildings and wider market forces including that of the significant student market in the context of two nationally significant campuses of Coventry and Warwick universities. The SPD is intended to enable the Local Planning Authority (LPA) to provide a clear and well considered response to proposals for tall buildings and to ensure that the development of tall buildings occurs in the most appropriate parts of the city with necessary sensitivities to the city's notable heritage assets.
- 1.3 The document is divided into two parts, the first providing a clear set of criteria which the LPA will expect any applicant to address when bringing forward proposals for tall buildings. The principal objective of the criteria is to secure tall buildings of the highest possible design quality.
- 1.4 The second part of the document identifies notable view cones to the cities iconic three spires. Retaining these views, and the spires primacy in the city centre skyline, is a key consideration in any application for tall buildings in and around the city centre.

2.0 Policy Context

- 2.1 The National Planning Policy Framework (NPPF) sets out the government's objectives for new development. Whilst the NPPF does not have any specific policies on tall buildings or view cones, it does set out a number of more general design and planning principles which run throughout the document and which are relevant to the development of tall buildings and the management of view cones.
- 2.2 Good design is a key requirement of the NPPF. The NPPF states that it is important to plan positively to achieve high quality and inclusive design and that local authorities should develop robust and comprehensive policies that set out the quality of development that will be expected in their area. These should be based on a clear vision for the future of the area and upon a detailed evaluation of the characteristics that define it. The NPPF promotes an urban design led approach to planning that requires buildings to respond to the location in which they are located rather than prescribe specific architectural styles.
- 2.3 Planning policies are required to ensure that new development will:
 - Function well and add to the quality of the area;
 - Establish a strong sense of place, using streetscapes and buildings to create attractive places to live;
 - Make the most of the potential of the site;
 - Respond to local character, history and identity;
 - Create safe and accessible environments;
 - Are visually attractive;
 - Respond well to heritage assets and their setting;
 - Respond to the views of local people;
 - Make effective use of land and make use of brownfield land as much as possible;
 - Encourage multiple benefits from land, in terms of development and net environmental gains, and;
 - Support opportunities for upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties.
- 2.4 The NPPF makes a presumption in favour of sustainable development and states that buildings which generate significant movement should be located where the need to travel will be minimised and the use of sustainable transport modes maximised. The NPPF states that great weight should be given to outstanding and innovative designs which promote high levels of sustainability as long as they respond to their context in terms of form and layout.
- 2.5 Section 12 of the NPPF discusses the need to achieve well designed places. The National Design Guide was published by central Government in October 2019 to illustrate how well-designed places can be delivered in practice. The National Planning Policy Framework makes clear that creating high quality buildings and places is fundamental to what the planning and development process should achieve. The

National Design Guide illustrates how well-designed places that are beautiful, enduring and successful can be achieved in practice. It forms part of the Government's collection of planning practice guidance and should be read alongside the separate planning practice guidance on design process and tools

2.6 A core element of the Guide is that it sets out the Government's priorities for well-designed places in the form of ten characteristics:

- Context - enhances the surroundings.
- Identity - attractive and distinctive.
- Built form – a coherent pattern of development.
- Movement – accessible and easy to move around.
- Nature – enhanced and optimised.
- Public spaces – safe, social and inclusive uses – mixed and integrated.
- Homes and buildings – functional, healthy and sustainable.
- Resources – efficient and resilient.
- Lifespan – made to last.

2.7 The Council wants to significantly raise the standard of design in the built and green environments, as good design assists in the creation of sustainable and inclusive communities and can improve the quality of people's lives. Furthermore, good design can help to reduce environmental inequalities.

2.8 The Coventry Local Plan 2017 establishes the policy basis for determining development proposals across the city. This SPD should not be considered in isolation from relevant Local Plan policies relating to infrastructure, transport, sustainability and conservation, or any other policies that may be relevant to a specific proposal or site. Whilst all policies should be considered in the round, Local Plan Policy DE1: *Ensuring High Quality Design* is a key policy in relation to the design and layout of new developments. The policy sets out criteria which should be satisfied in order to create high quality developments, improve the quality of people's lives and sustainable and inclusive communities.

2.9 As well as policies contained within the Coventry Local Plan 2017, the City Centre is also subject to specific policies designed to ensure appropriate developments are managed in an appropriate way. The City Centre Area Action Plan 2017 provides additional policy and guidance for those seeking to development tall buildings and any development which may affect view cones.

2.10 Policy CC7: Tall Buildings:

The location of proposed tall buildings will be considered in relation to the views of the cities three spires. New development should reflect these view cones and seek to enhance the key views identified on plan.

Policy DE1 Ensuring High Quality Design

1. All development proposals must respect and enhance their surroundings and positively contribute towards the local identity and character of an area.
2. The setting, integrity and character of heritage assets will be protected in accordance with Policy HE2.
3. All development will be expected to meet the following key principles:
 - a. respond to the physical context of the site;
 - b. consider the local distinctiveness and identity of the site but also have regard to opportunities to enhance the local built and natural environment through new development and enhanced design;
 - c. where appropriate, retain and incorporate into the layout the protection of important views, including key views of the three spires;
 - d. preserve or enhance the character and setting of the historic built, landscape and where appropriate archaeological environment;
 - e. preserve or enhance the character and setting of major road, rail and canal corridors;
 - f. clearly define the boundaries between public and private spaces and enclosure of space;
 - g. provide attractive, safe, uncluttered, active and easily identifiable, high quality public spaces;
 - h. make places that inter-connect and are easy to move through;
 - i. ensure places are easily understood by users, with clear routes and distinct physical features;
 - j. seek high quality design and attention to detail in the layout of developments, individual buildings and infrastructure in terms of function and impact, not just for the short term, but over the lifetime of the development;
 - k. be adaptable to changing social, technological, economic and market conditions and ensure that developments maximise the use of the site;
 - l. promote diversity through mixes of uses within a site or building, which work together to create vital and viable places;
 - m. be proactive in responding to climate change and adopt sustainable and low carbon construction principles in terms of their design, layout and density;
 - n. consider green infrastructure at the earliest stage in the design process, to ensure that it is well planned, designed, managed and maintained. It should also be well integrated and serve multiple purposes (as appropriate);
 - o. support the integration of through routes for public transport and incorporate suitable bus priority measures as appropriate;
 - p. minimise adverse impact on important natural resources;
 - q. conserve, restore or enhance biodiversity; and
 - r. respect and enhance landscape quality including trees, hedges and other landscape features of value.

3.0 Pre application advice

- 3.1 Prospective applicants and their agents should note that it will be strongly encouraged to engage in Pre-application discussions with the LPA for developments of tall buildings in the city.
- 3.2 In the context of the city's notable heritage assets, conservation and urban design specialisms will always be required to be consulted in Pre-application discussions for proposals of tall buildings.
- 3.3 In order to deliver fully informed Pre-application advice, applicants are encouraged to prepare townscape visual impact assessments to accompany Pre-application submissions, referencing and identifying key views where proposals may be impactful.
- 3.4 Outline planning applications for tall buildings are strongly discouraged, as it is seen by the LPA that such proposals require significant detail in order to provide a fully informed position of acceptability.

4.0 Environmental Impact Assessment

- 4.1 Applicants and their agents should also note that an Environmental Impact Assessment (EIA) may be required as part of the application process. Potential developers may wish to seek an EIA screening opinion from the Local Planning Authority as part of any pre application discussion.
- 4.2 It should also be noted that an 'Appropriate Assessment' (AA) – under the Conservation Natural Habitat Regulations 1994 - of a proposed tall building may also be required in addition to an EIA in those areas which are near a nature conservation site.

5.0 Definition of a tall building

- 5.1 In the context of Coventry, a city characterised by large areas of low rise two storey housing within a predominantly flat landscape, it is considered both necessary and useful to define a tall building. A tall building is therefore considered to be:
 - any building above 5 storeys in height (i.e. 6 storeys or more in height from ground level) or;
 - any building of 20m or above in height (inclusive of rooftop plant)
- 5.2 Any proposal for a building, which is equal to or exceeds either of the storey/height thresholds, will trigger this SPD. This SPD may also be triggered by extensions, and/or the addition of plant or machinery and any other structural projections to existing tall buildings which take the height of the building inclusive of any plant above 20m or 5 storeys in height.
- 5.3 The height thresholds apply in all instances, irrespective of whether an application for a tall building is being made within the city.

6.0 Assessment of tall building proposals

- 6.1 In order to facilitate and encourage the design of tall buildings of the highest quality, the LPA has identified the following principles or criteria which any successful tall building should address. It should be noted that the LPA will be seeking a satisfactory response to all of these criteria. If the applicant fails to provide the relevant information, the LPA may be unable to determine the application.
- 6.2 In order to assess the suitability of proposals for new or replacement tall buildings, the applicant will be required to submit a Tall Buildings Statement.
- 6.3 This statement would be required in addition to a Design and Access Statement, and there may be some overlap between the two documents. It would also be a requirement of the criteria by which the LPA validate applications. The statement should clearly indicate how the proposal responds to the criteria/points identified below.
- 6.4 It should be noted that the requirement for the submission of a tall buildings statement applies not only to new or replacement tall buildings, but also to those situations in which the addition of an extension, or of plant/machinery and/or any other structural projections to an existing building which would take its height above 20m or 5 storeys.

Visual Impact

6.5 Applications should contain:

- Accurate visualisations which illustrate the impact of the proposal from both its immediate context and the wider urban context,
- Where appropriate, and guided by Pre-application advice, Townscape Visual Impact Assessments (TVIAs) in line with the Guidelines for Landscape and Visual Impact Assessment published by the Landscape Institute which illustrate the impact of the proposal upon longer distance important views and vistas, and, wherever applicable, or city centre view cones as identified within section two of this document,
- An urban design analysis of the surrounding area that clearly outlines the positive and negative visual impact that the proposal would make, the taller the building and the more sensitive its location, the more extensive and detailed the analysis should be.

6.6 It is essential that all illustrations provided in support of the application must be accurate, of a high quality, and capable of being easily understood. They must not seek to minimise any real or perceived negative impacts of the proposal, and as such must not deliberately misrepresent the height, scale, mass, form or architectural detail of the proposal.

6.7 An effective means of ensuring accuracy (particularly if the images are computer generated) is to base three dimensional images on the plans submitted in support of the application.

6.8 The applicant should contact the LPA for further advice regarding the nature and number of images that it is considered appropriate to provide.

Siting

6.9 Applications should:

- demonstrate by means of accurate visual representation and supporting information how the proposal sits within the townscape; and
- describe where appropriate how the proposal would contribute to the creation of a 'cluster' of tall buildings or would contribute to an existing cluster.

6.10 Groups of tall buildings should ideally be staggered or graduated to help create a richness in townscape and emphasise the buildings at the core of the cluster. They should not block significant views or vistas within, into or out of the city.

Height

6.11 Applications should:

- provide a justification of the height of any proposed new tall building; and
- seek to ensure that lift transmission equipment, air conditioning units and other plant and equipment are addressed as an integral part of the initial design of a tall building.

6.12 Whilst this document clearly indicates the minimum height at which a building could be considered tall within the context of Coventry, it does not suggest a maximum height. This should not, however, be read as an indication that any height will be acceptable. All buildings have a reasonable limit, which relates to their context, surroundings and impact on the surrounding townscape and skyline.

6.13 Applicants should seek to moderate their aspirations towards excessive heights for tall buildings and will always be required to give a thorough and well-reasoned justification for the height of any proposal. It should also be noted that in terms of massing and form a proposal will always have an optimal height in relation to its width, depth and footprint.

6.14 Plant and other equipment which is added later in the design process, or as a 'bolt on' for the purposes of expediency can significantly add to the height of a tall building and have a detrimental impact on their overall design. Such additions/equipment should always be considered as an integral part of the initial design and not as a later addition.

Effect on local views



Images above: Good examples of detailed and wireframe TVIA imagery to assess proposals



Image above: Good example of plant screening integrated into roof design

6.15 Applications should illustrate the impact of any proposal on any local views or vistas.

6.16 Foremost in this consideration are the identified view cones toward the cities iconic three spires identified within the Coventry View Management Framework; these are referred to as follows:

- View cone one – Foleshill Road
- View cone two - Stoney Stanton Road
- View cone three - Swanswell Pool
- View cone four - Sky Blue Way
- View cone five - Far Gosford Street
- View cone six - London Road
- View cone seven – Parkside
- View cone eight - Mile Lane
- View cone nine - Mile Lane (Christchurch)
- View cone ten - Quinton Road
- View cone eleven - Manor Road Footbridge and Friars Road
- View cone twelve - Spencer Park & Footbridge
- View cone thirteen - The Butts
- *View cone fourteen – (now incorporated into view come thirteen)*
- View cone fifteen - Holyhead Road
- View cone sixteen - Upper Hill Street and Footbridge
- View cone seventeen - St. Nicholas Street

6.17 The omission of a viewpoint from this list should also not be taken as an indication that they are not considered significant or sensitive. The impact on views and vistas generally should always be given extremely careful and sensitive consideration irrespective of the location and setting of any proposed tall building. Imagery and analysis of each of the above identified view cones can be found in section two of this document.

Alignment

6.18 Applications should:

- indicate how the proposal responds in a positive way to the alignment and set back of surrounding buildings, and
- illustrate the effect of the alignment of the building on local views or vistas of importance or significance.

6.19 The alignment of a new tall building should be a site-specific response to the context and surroundings of the area. In certain contexts, it may be appropriate to align a building in a manner which provides a stop to a visual axis or frames a particular view or scene.

Mass

6.20 Applications should:

- describe how the massing of the proposal relates to surrounding development; and
- illustrate how the massing of the proposal has been derived, and how it creates a form which is contextually appropriate.

6.21 New tall buildings should have regard to the massing and form of other buildings in the surrounding area. Great effort should be made to ensure that the design of new tall buildings is neither bulky nor over dominant.

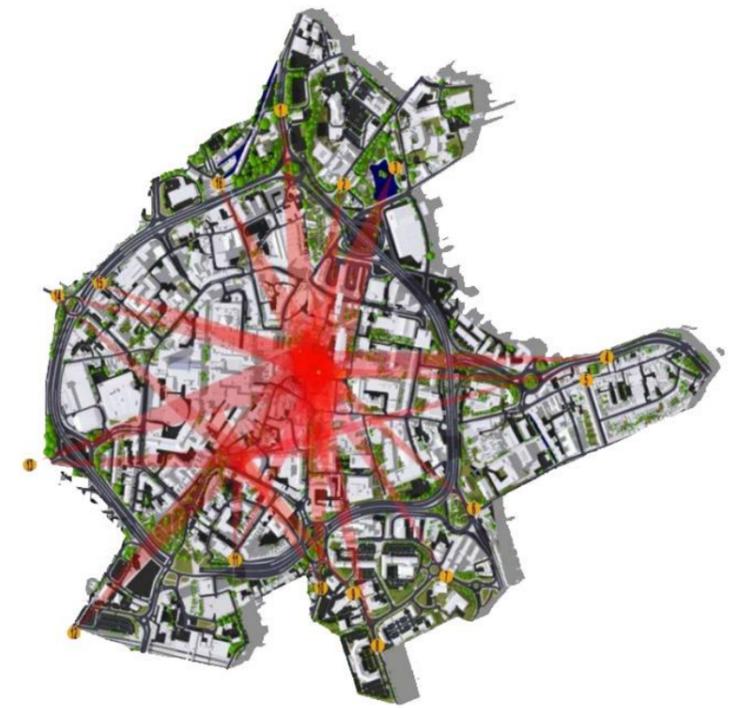


Image above: Extract from View Management Framework articulating prescribed viewcone locations



Image: The lower podium establishes a human scale to the base of the development (above)

Canopy introduces secondary scale (left)

Scale

6.22 Applications should:

- describe the rationale for the scale of the building within its context; and
- describe how the design of the building and spaces proposed around, relate to human scale at ground level.

6.23 Scale is another essential ingredient in the integration of proposed tall building into their surroundings. Generally speaking, they should respond to the building heights, depths and articulation of surrounding buildings.

Form

6.24 Applications should:

- provide a rationale for the form of the building, 'why does it have the form it does?'
- in the case of 'landmark' buildings, the rationale should consider:
 - The inspiration for the form of the building;
 - The silhouette it would create
 - Considerations of the important role of lighting in proposals for tall buildings
- the applicant should also describe and illustrate how the form of the upper part of the building would enhance the skyline of the city.

6.25 Form is one of the key factors which influence the quality of any proposed tall building. It is essential for the creation of an elegant, well-proportioned and aesthetically pleasing building.

6.26 The form of any proposal will be influenced by its proposed location, use, status and architectural context. In all instances, a proposed new tall building should seek to make a positive and elegant contribution to townscape.

Urban Grain

6.27 Applications should describe how the proposal complements and contrasts with the surrounding urban grain or pattern of the area

6.28 All new tall buildings should consider how they sit within the existing urban rhythms, architectural language, and historic setting and precedents of the area. It is essential that they make a positive contribution to their surroundings through an appropriate form, setback, massing and architectural language.

6.29 This can be achieved through a number of ways; articulation of the lower floors to reflect the surrounding streetscape, the setback of the upper floors to give continuity to the height of a proposed tall building with adjacent buildings in the streetscape, and through the use of materials that either complement or positively contrast with those on surrounding buildings. These measures should help to ensure that the streets around the building remain at a human scale.

Streetscape

6.30 Applications should indicate how the proposal contributes to the streetscape. Areas required to be articulated within the submission include :

- active frontages
- natural surveillance
- legible entrances
- clear definition of the public realm

6.31 New tall buildings should respond to and seek to have a positive impact on their surroundings. This can be achieved through the provision of active frontages, clearly legible entrances and a clear definition of public realm which reinforces the articulation of the surrounding streetscape. Applicants should seek to ensure that car parking is located within the development or behind the building and not at the front. Where this is not possible car parking should in all instances be in character with the surrounding streetscape well laid out and landscaped and provide an appropriate setting to the proposed tall building.

Architectural Lighting

- 6.32 Applications should, where appropriate give consideration to the incorporation of architectural lighting effects into any proposal for a tall building.
- 6.33 Architectural lighting has the ability to enhance the appearance of tall buildings and in situations where its use would not negatively impact on the amenity of nearby residents, consideration should be given to its use.

Signage

- 6.34 Applicants should, where appropriate give consideration to the incorporation of signage into any proposal for a tall building. The location of all signage should be given consideration at an early stage so that buildings can be designed to comfortably accommodate it rather than it having to be 'retro-fitted' at a later stage. All signage should follow the following criteria:
- Signage should be provided in a shared or complimentary material palette to that of the rest of the proposal
 - Should represent a positive precedent of place/address not just branding to provide instinctive legibility
 - Signage should be responsive of sightlines that play a wider townscape role
 - Signage should not be over dominate to the architectural form
 - Overt branding of the skyline will be resisted and expected not to challenge the iconography of the skyline

Public Realm

- 6.35 Applications should describe how the public space around the building has been designed to the highest quality; indicate how the proposal will where appropriate incorporate ground floor uses which encourage active use of the building throughout the day; and, where appropriate provide a comprehensive scheme of quality external landscaping.
- 6.36 Tall buildings are required to be designed in a way that creates safe and visually appealing environments around them. New spaces around tall buildings should be clearly defined and be activated by public uses with transparent facades at ground floor level. At a detailed design level, proposals should seek to create well oriented spaces that make a positive contribution to the quality and legibility of the wider public realm.

Public Access

- 6.37 Applications should explain how any proposal for a mixed use tall building will promote and encourage public access, not only at ground floor level, but also where appropriate at a height that would allow users a panoramic view or vista of the city and surrounding areas, allowing for enhanced appreciation opportunities of the city.
- 6.38 Public access to new tall buildings can promote their use at different times of the day, fostering a more positive perception of the building and allowing the community and visitors to make effective use of it.



Images above: positive precedents of the incorporation of architectural lighting

Climatic Impact

- 6.39 Applications should describe how the design of the building has had regard to its potential impact on the local climate; and explain how any proposal would seek to address the following climatic issues:
- high wind speeds at ground level
 - heat islands
 - glare
 - overshadowing
- 6.40 Applicants/agents may also be called upon to consider the production of documentation regarding climatic effect of any proposed tall building as part of a comprehensive submission accompanying the application.
- 6.41 Depending on their height, location and design, tall buildings can have a severely adverse effect on the environmental quality of surrounding areas. Consideration should be given to the negative effects of the diversion and funnelling of wind, and the potential overshadowing of nearby residential properties and their gardens. The impact of shadowing throughout the day and at different times of year will need to be assessed. In all instances, consideration should be given to avoiding, minimising or mitigating through design or siting any elements of a proposal which could have a negative climatic impact on the surrounding area.

Neighbourliness

- 6.42 Applications should analyse and describe the impact of proposals on neighbouring buildings.
- 6.43 The potential impact of a tall building on the amenities of surrounding residents is of particular importance when considering the impact of any proposed tall buildings. Issues that require careful assessment include:
- outlook/aspect;
 - privacy
 - daylight/sunlight;
 - noise;
 - light glare;
 - overbearing impact;
 - increased sense of enclosure

Materials

- 6.43 Applications should provide comprehensive detail of the palette of materials they intend to use; and a justification of the appropriateness of the materials in relation to the character of the surrounding area and in terms of their durability and sustainability.
- 6.44 The materials specified for use on any new tall building are considered crucial to the overall impact that the building may have, crucial in buildings of high status through height, they can make the difference between a mediocre and a quality scheme.
- 6.45 The materials selected should be of the highest quality and should show sensitivity to their surroundings either by reference to surrounding buildings using sympathetic materials, or by positive contrast to reinforce understanding of periods of distinct development.
- 6.46 The applicant is strongly encouraged to utilise local and/or recycled materials, and evidence this in applications.



Image: Godiva Place

7.0 - Three Spires View Management Framework

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- 19 **View cone six** - London Road
- 20 **View cone seven** - Parkside
- 21 **View cone eight** - Mile Lane
- 22 **View cone nine** - Mile Lane (Christchurch)
- 23 **View cone ten** - Quinton Road
- 24 **View cone eleven** - Manor Road Footbridge and Friars Road
- 25 **View cone twelve** - Spencer Park & Footbridge
- 25 **View cone thirteen** - The Butts
- 26 **View cone fourteen** – The Butts (superseded)
- 27 **View cone fifteen** - Holyhead Road
- 28 **View cone sixteen** - Upper Hill Street and Footbridge
- 29 **View cone seventeen** - St. Nicholas Street

Introduction

The View Management Framework takes forward the views of the Spires identified within the City Centre Action Plan (AAP), and undertakes an assessment of each identified site which form each view cone, and outlines, through cross sections, guidance on the appropriate height which *could* be accommodated, whilst respecting and preserving important views toward the cities iconic three spires.

The Spires of St. Michael, Holy Trinity & Christchurch have become synonymous with the image of the city, forming the iconic Three Spires Skyline. They are a majestic site on the skyline of the city and form an important link to the City’s mediaeval past.

The notable post-war reconstruction and that of development in recent years, saw the rise of a number of tall buildings which joined the Spires on the skyline and whilst many of these buildings provided a sense of modernity & dynamism, some were detrimental to the setting and views of the Spires.

Given the importance of the Spires to the identity of Coventry it is important that any additional large/tall buildings are carefully and respectfully designed and located so as to ensure the spires retain their rightful prominent position on the city Skyline

Identified Views of the Spires

Further to updated analysis undertaken 2021 / 2022, this document identifies 16 views of the spires considered to be of high value. They are located on the edge of the city centre and, in the majority of the cases, are on key routes into the city centre offering strong and extended views of one or more of the spires.

Additionally, there are further, distant views from notable local centers such as Earlsdon and Coundon which should be considered, these areas provide a broader city centre view alongside the spires which assist in providing a sense of place and city wide legibility. Whilst these outlying views are not individually identified in this guidance, analysis of any outlying appreciable viewpoint to the spires should always be considered in design proposals.

The formally Identified views contained in this document are therefore as listed below and correspondingly indicated via 3D mapping adjacent:

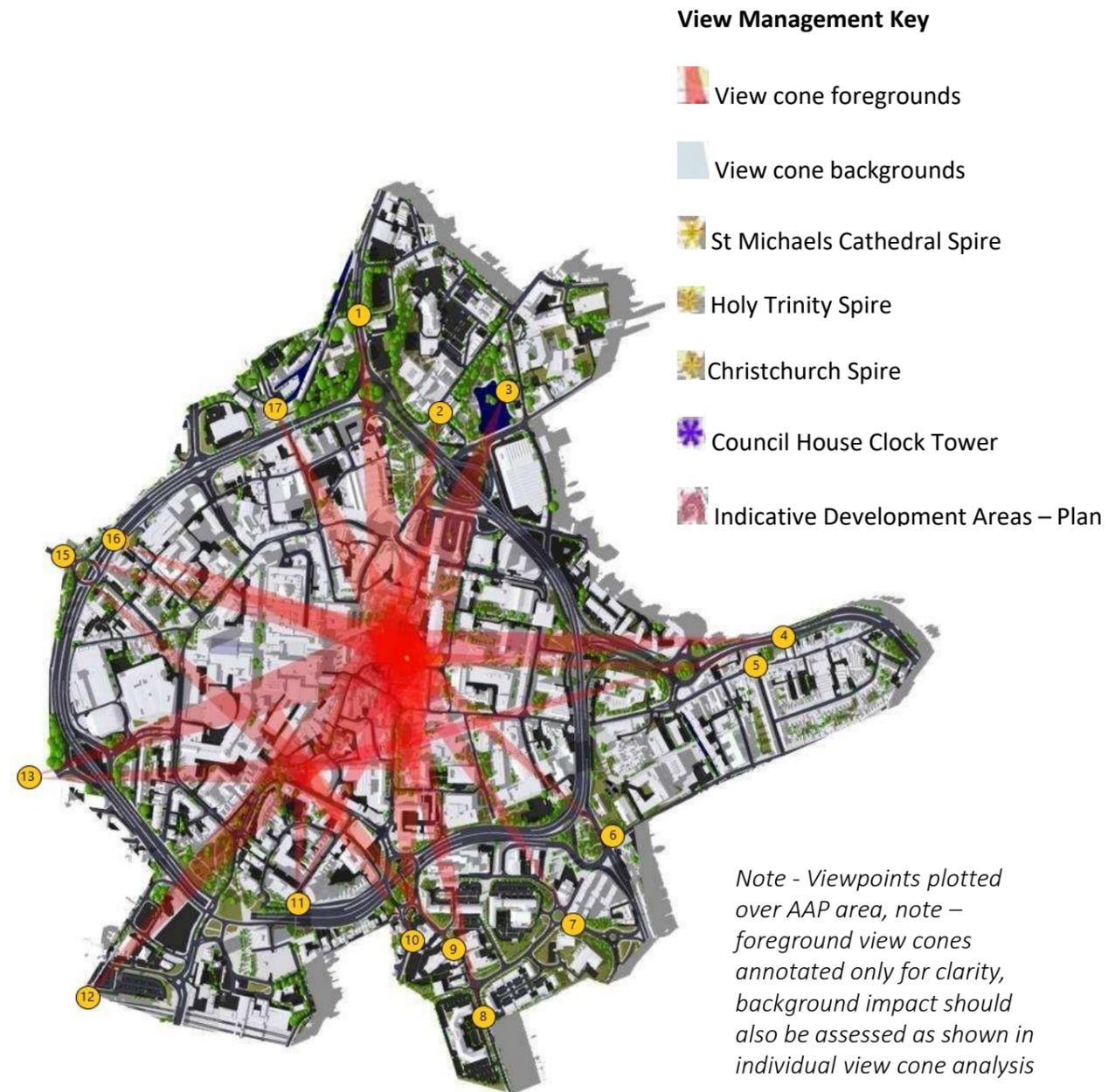
- | | |
|-----------------------------|---|
| 1. Foleshill Road | 10. Quinton Road |
| 2. Stoney Stanton Road | 11. Manor Road Footbridge & Friars Road |
| 3. Swanswell Pool | 12. Spencer Park & Footbridge |
| 4. Sky Blue Way | 13. The Butts |
| 5. Far Gosford Street | 14. <i>The Butts (superseded)</i> |
| 6. London Road | 15. Upper Holyhead Road |
| 7. Parkside | 16. Upper Hill Street & Footbridge |
| 8. Mile Lane | 17. St. Nicholas Street |
| 9. Mile Lane (Christchurch) | |

Each of these views has its own particular characteristics, but they are all dynamic in nature with the view of the spires (the number, proportion visible, and their location) changing considerably along the length of the views.

The Strength of these views depends on a number of factors; whether they are viewed on foot or in a vehicle; the time of day – the image of the spires changes dramatically from hours of daylight to night-time when they are lit by architectural lighting; the time of year – the spires become more visible on certain routes when the trees are not in leaf and; the weather conditions – the spires stand out boldly against a clear blue sky as opposed to overcast weather conditions.

Tree Planting

The view from Quinton Road illustrates the impact that tree planting can have on the views. The other views affected by tree planting are: Foleshill Rd, Swanswell Pool, The Butts, Stoney Stanton Rd, London Rd and Upper Holyhead Rd.



Assessment Principles

Modern City Centre Development

In some of the views, the spires have been infringed upon by modern development, whilst this can be seen to be to the detriment of the views now, it is feasible that redevelopment may take place which may open up new views, and in turn be material in consideration of redevelopment proposals.

The example image below of the view from Butts Road (B4101) which illustrates the improvement that the removal of Coventry Point has had on the view toward the spires. Whilst this view is modern and kinetic in nature, this new context to the viewpoint will therefore be informative of future development proposals.

The structure of the ring road also infringes on some of the views – as illustrated in the image below, the impact of the structure towards views of the spires is also evident in views from Swanswell Pool and London Road. The elevated Ring road is also present in the Sky Blue Way view corridor but it is less dominant in the foreground as it blends in against the university buildings which sit behind it.

View Assessment

In support of the guidance outlined in this document, a visual assessment has been carried out for each view, identifying the primary points from where the spires are appreciable. Further to establishing this, a viewcone has been drawn for each view based on these points.

It is important to note that these viewpoint identifications do not preclude development taking place within them, rather they define potential height limitations on development in order to preserve the important townscape role that the views play. Therefore, each view assessment is accompanied by cross sections which give broad indications of the heights that *may* be achievable in a sensitive manner within the view cones and thus without infringing on the views, notwithstanding these suggestions, it will remain for any applicant to demonstrate impacts and officers to assess acceptability in each individual case. The sightlines within the cross sections are focused on specific features of the spires of St. Michael and Christchurch.

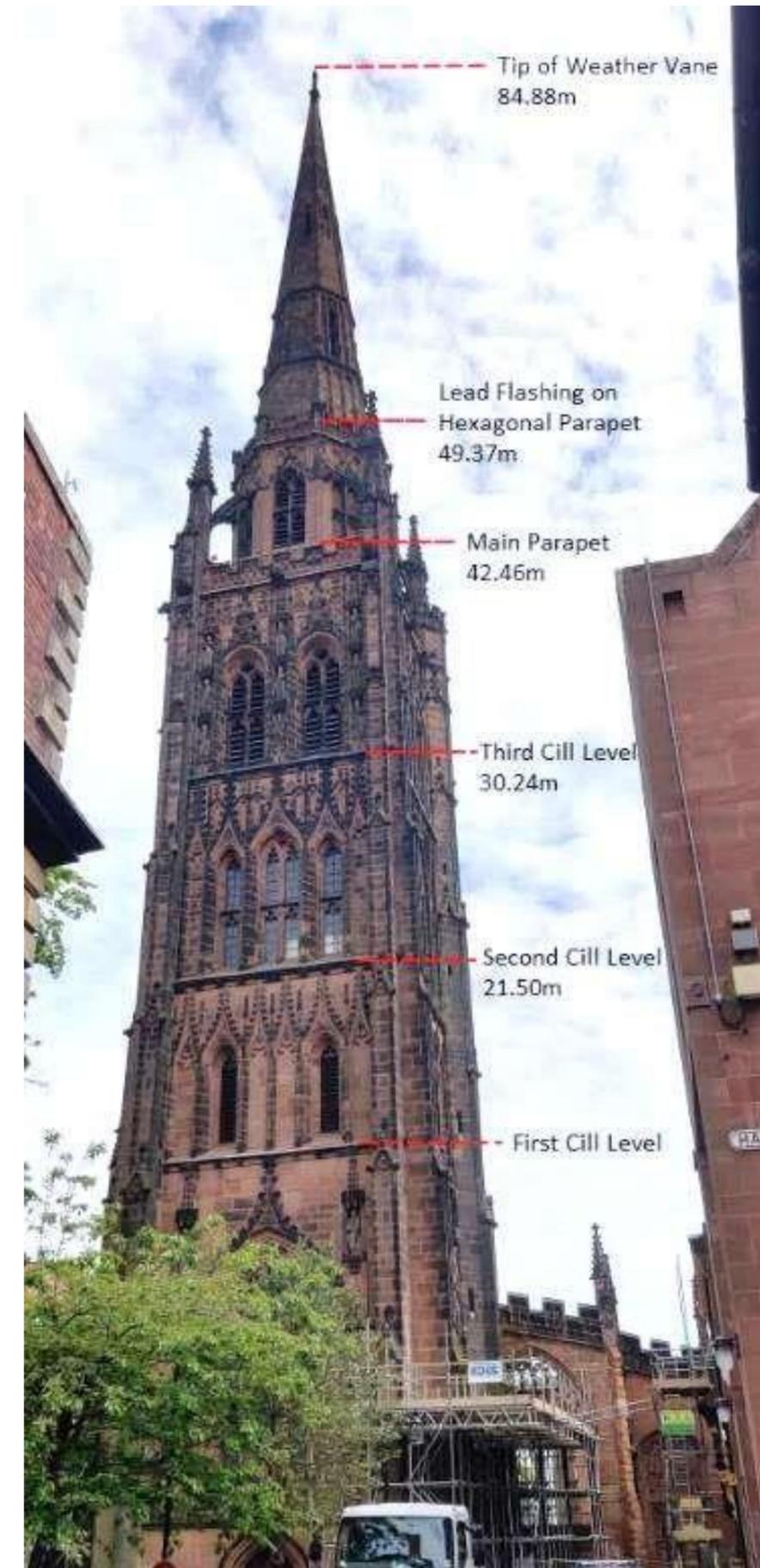


View cone Background

This document identifies the best quality, currently available views of the three spires of Coventry, and whilst height capacity indications are noted in the foreground of these view points, it is important to note that background development can also have significant impact on setting and appreciation of skyline through the potential for ‘challenge of prominence’ in the city skyline, and erosion of clear space between in and around the spires, which plays an important role in the visual definition of the landmark. Proposals for development within the identified background settings of the spires will also therefore need to be substantiated by applicants and carefully assessed.

Additional Views & Local Centres

The assessments undertaken in this document seek to highlight key views of the cities iconic three spires and ensure that any development potentially impactful on these viewpoints is fully considered and assessed in its impact. It is noted that additional views of the spires from those individually identified in this document are also present, notably from longer distance positions, applicants are therefore advised to always assess if proposals may be impactful. Notably of the longer distance views, are a number of appreciations of the spires available from distinct local centres, which provide a positive legibility of districts setting to the city centre, examples of this interface are shown below at the local centres of Earlsdon’s high street to the South of the city and Crampers Field in Coundon to the North West. These and other outlying views which deliver positive wider legibility of the city and its relationship to outlying districts should also be carefully assessed where development proposals may impact.



View cone 1: Foleshill Road

Foleshill Road offers a strong and evolving view of St. Michael and Holy Trinity, whilst Christchurch also becomes visible beyond. Although the photos are taken from the central embankment the views would be equally good from the pedestrian perspective, the North Western section of paving offers the longest view.

Upon Arrival at the roundabout St Michael and Holy Trinity come back into view as does Christchurch and the view develops to offer an excellent vista of not only the Spires but also the church rooflines, the Council House Clock Tower and the Blue Coat School and historic Priory Tower.

The cross-section provided below illustrates what levels of new height *could* be accomplished without infringing on this important view on arrival to the city centre from the North.

To assist applicants and assessors, the view cones has been bisected into development areas A,B,C & D as noted in figure 1.3, these are also shown correspondingly in the cross section (fig 1.4) which suggests heights of development which *may* be achievable whilst retaining positive appreciation of the spires from this approach. The suggestions of potential development height is given as an indication only, and it is required by the applicant to demonstrate impact of any development within view cones irrespective of suggested development capacity contained in this guidance.

Matters of detailed design and materiality will also play a key role in assessing acceptability of any proposals in the view cone, whilst background impacts should also be considered.

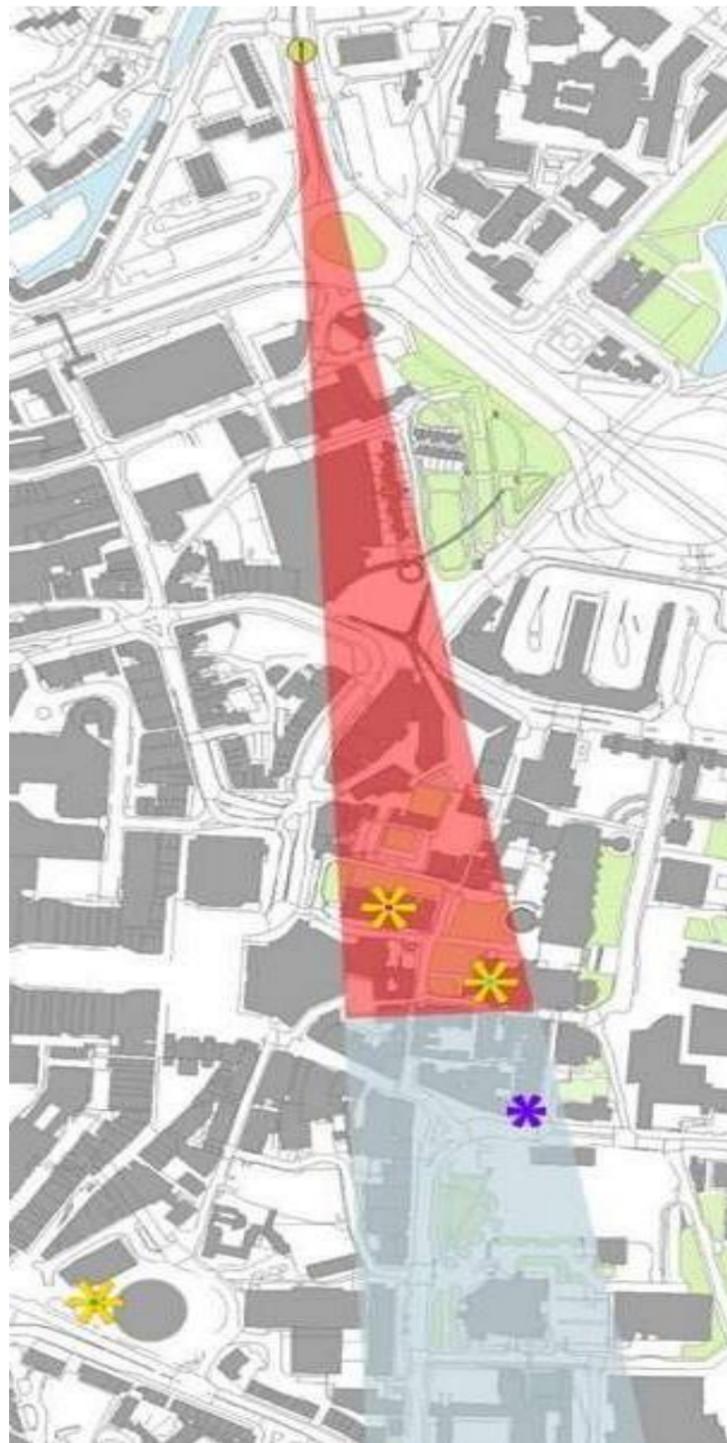


Fig 1.2

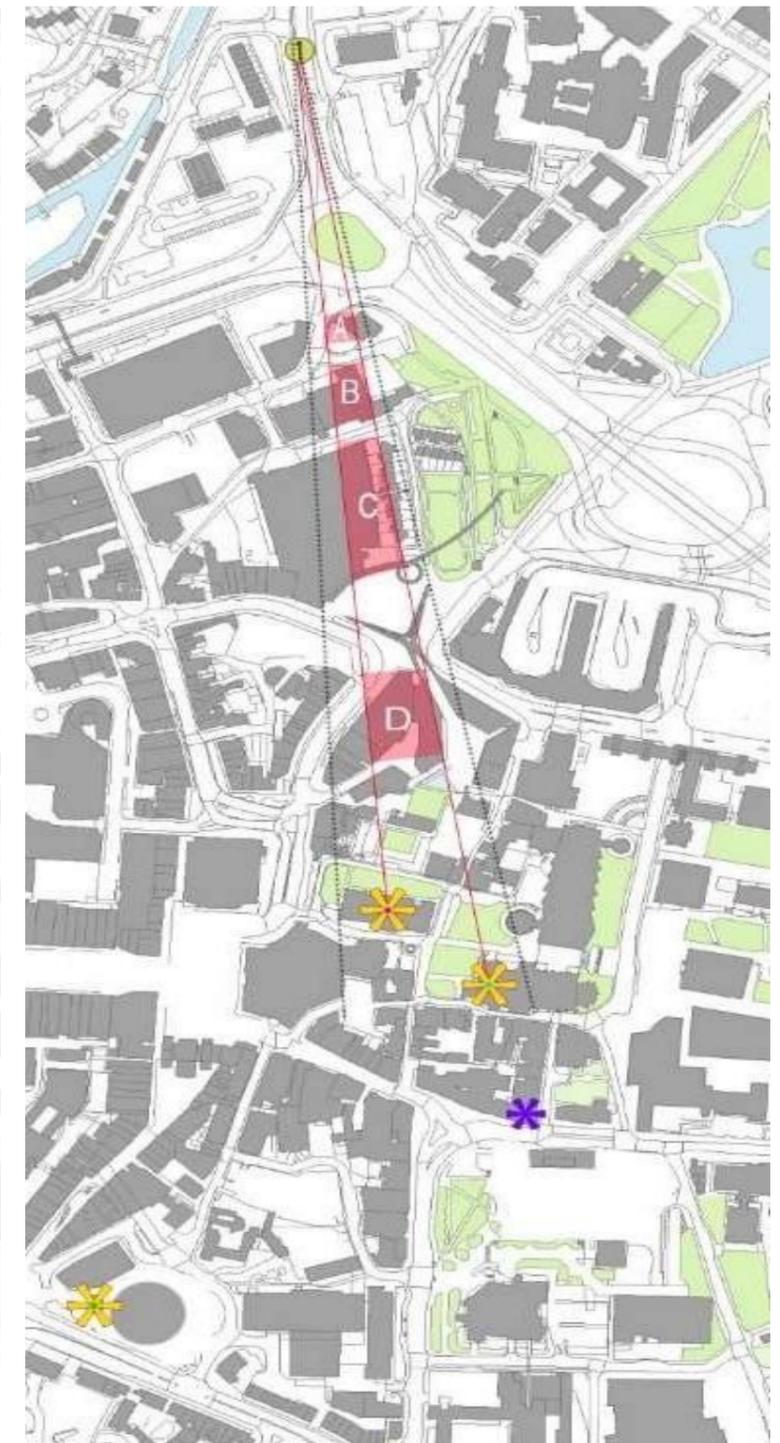


Fig 1.3



Fig 1.1

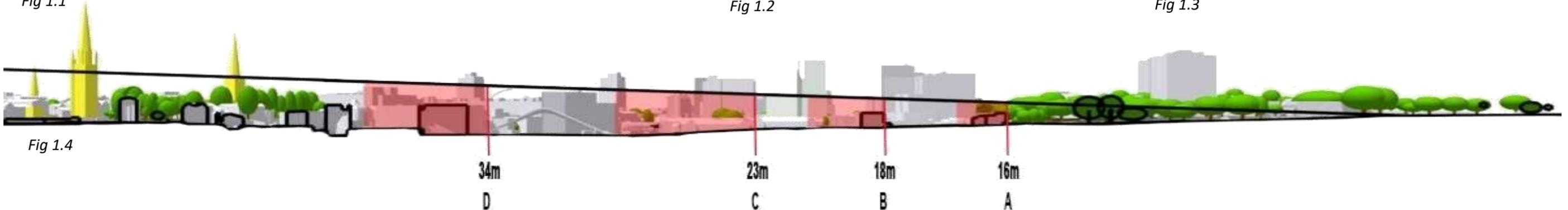


Fig 1.4

View cone 2: Stoney Stanton Road

The view down Stoney Stanton Road is limited due to the mature trees set around Swanswell Pool and along the road. Given this the Spires do not become visible until St. Mark's & here they are limited to views of St Michaels. Similarly to other views affected by mature trees, assessment of any proposals in this view cone should be undertaken both with and without the impacts of vegetation.

The Stoney Stanton Road view cone marks a positive location of appreciation of the spires set within a historic context of the Grade II listed Church of St Mark and the Grade II listed former nurses' home and outpatients' clinic, whilst viewed across the area of Lady Herbert's Garden and associated vegetation to the south west.

In defining guidance for any development proposed in the view cone, the area has been bisected into areas A and B, as noted in figure 2.6, these are also shown correspondingly in the cross section (fig 2.7) which suggests heights which *may* be achievable whilst retaining positive appreciation of the spires. The suggestions of potential height is given as an indication only, and it is required by the applicant to demonstrate impact of any proposed development within view cones irrespective of indicative suggestions contained in this guidance.

Matters of detailed design and materiality will also play a key role in assessing acceptability of any proposals in the view cone, whilst background impacts should also be considered.



Fig 2.1



Fig 2.2



Fig 2.3

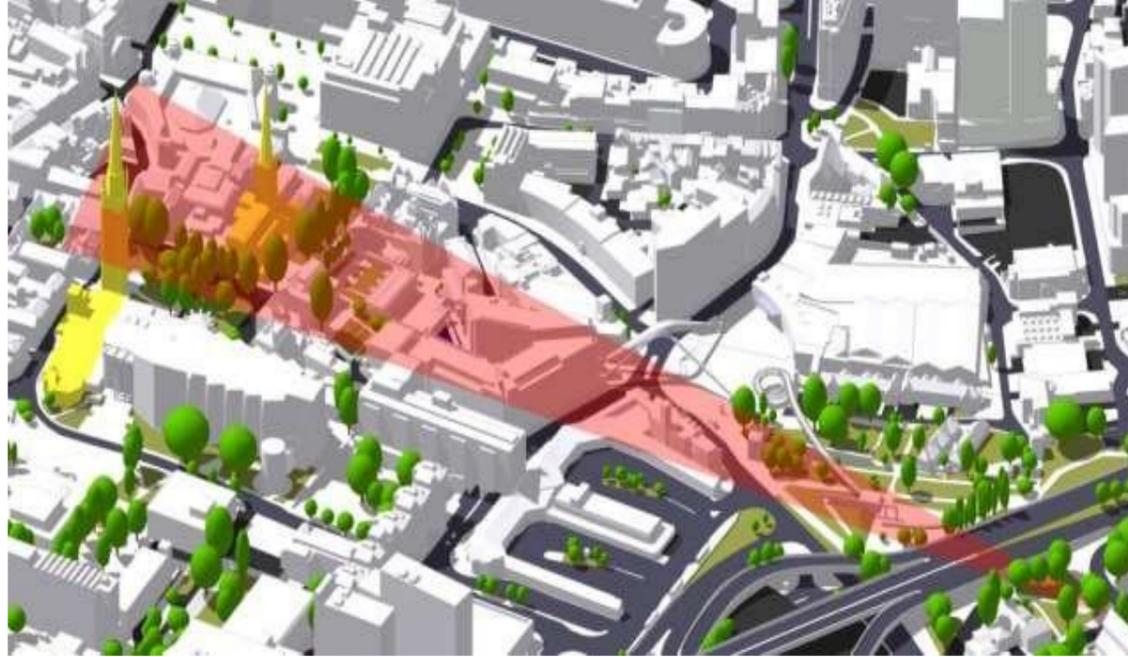


Fig 2.4

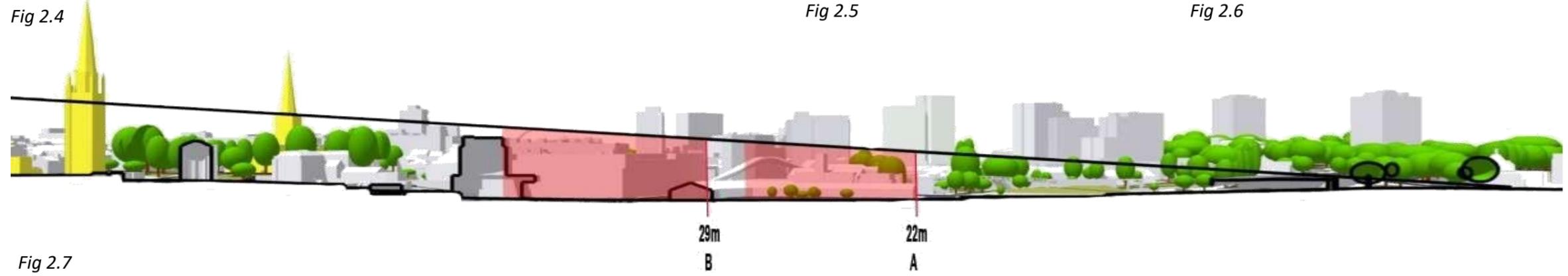


Fig 2.7

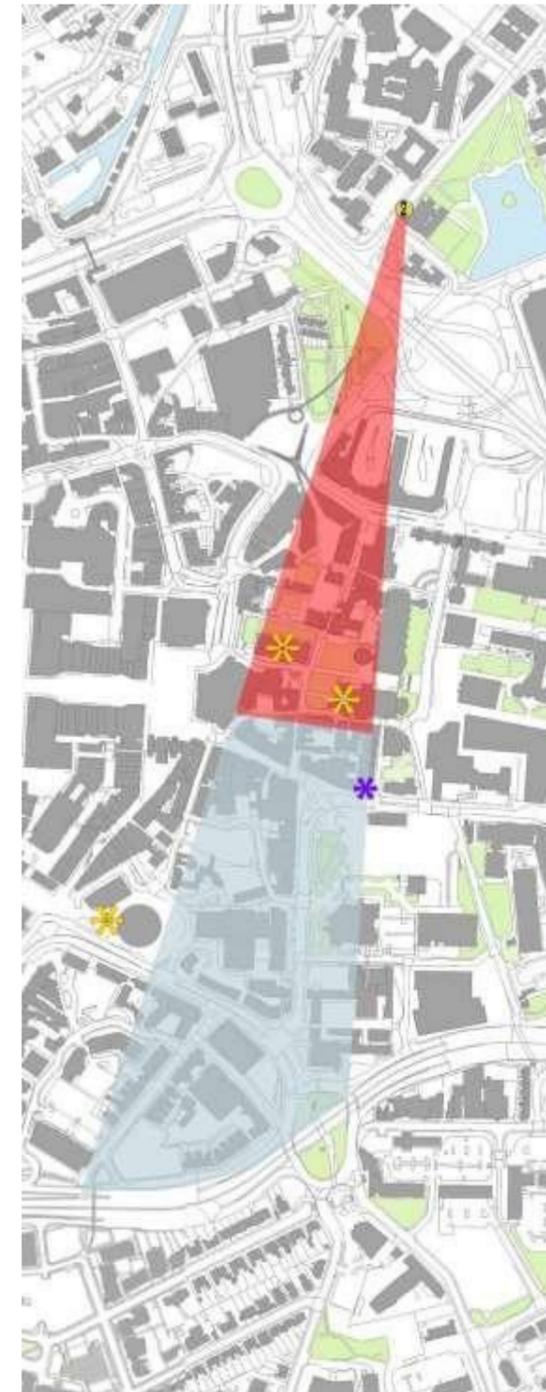


Fig 2.5

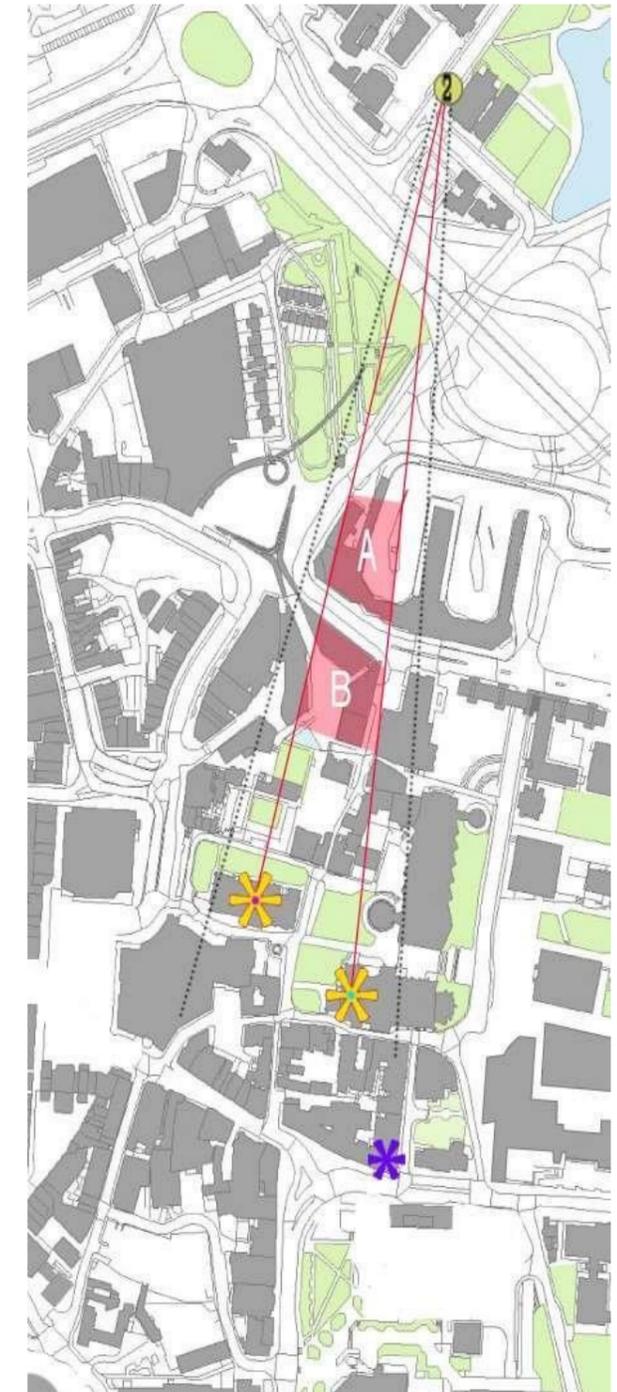


Fig 2.6

View cone 3: Swanswell Pool

Swanswell Pool offers an excellent view of St. Michaels and Holy Trinity particularly from the northern portion of the park. This view is particularly important given that park users are likely to stop or sit and look back at the City Centre, the appreciation is therefore available for a longer time frame than those view cones identified on approach points to the city, and is experienced within a mature landscape setting. View cone 3 offers a high quality position of appreciation of the primary nature of the cities three spires over the modern skyline, with the spires of Trinity and St Michaels in the foreground, and Christchurch appreciable beyond.

Particularly of consideration upon any proposals in the North Eastern area of the city centre, the area has been bisected into areas A,B, C & D as is noted in figure 3.3, these are also shown correspondingly in the cross section (fig 3.5) which suggests heights of development which *may* be achievable whilst retaining positive appreciation of the spires. The suggestions of potential heights are given as an indication only, and it is required by the applicant to demonstrate impact of any proposal within view cones irrespective of indications contained in this guidance.

Matters of detailed design and materiality will also play a key role in assessing acceptability of any proposals in the view cone, whilst background impacts should also be considered.



Fig 3.1

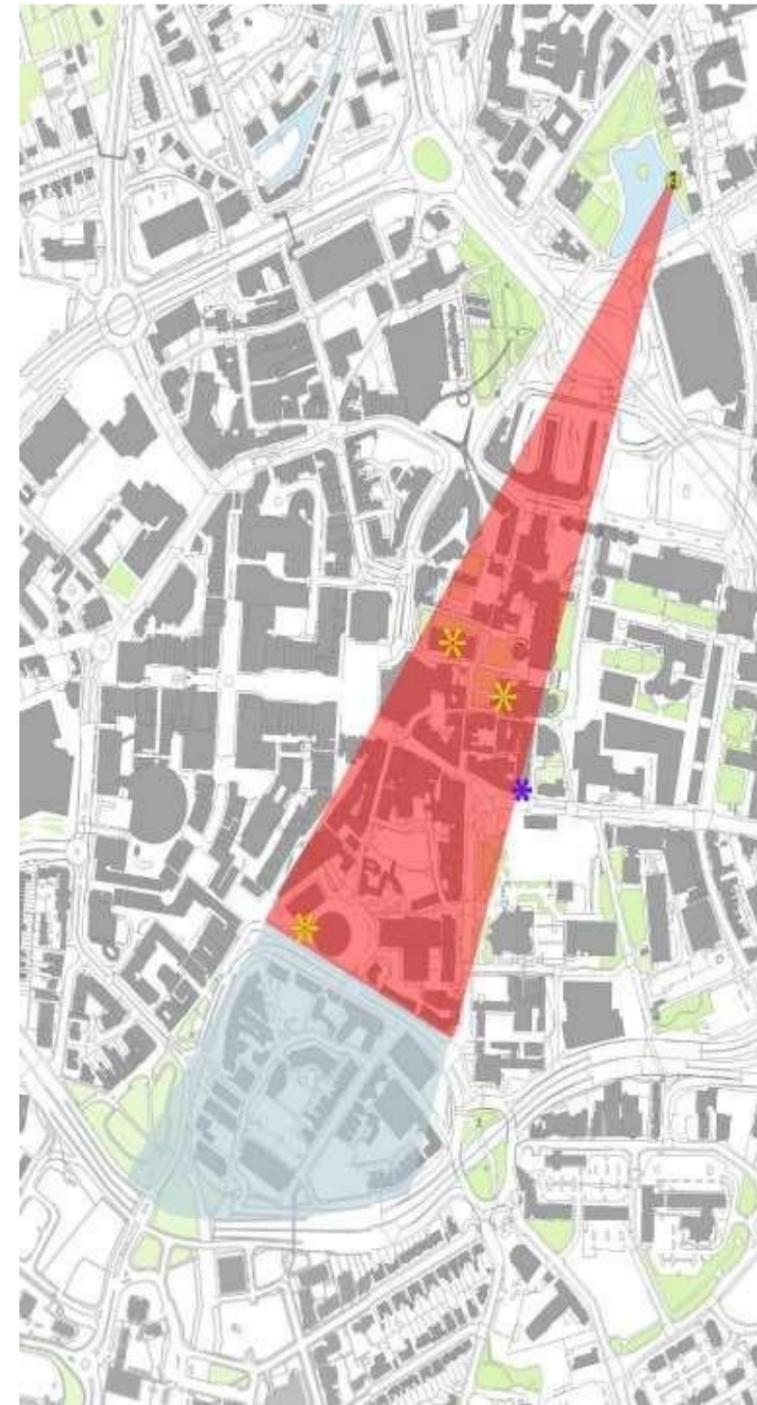


Fig 3.2

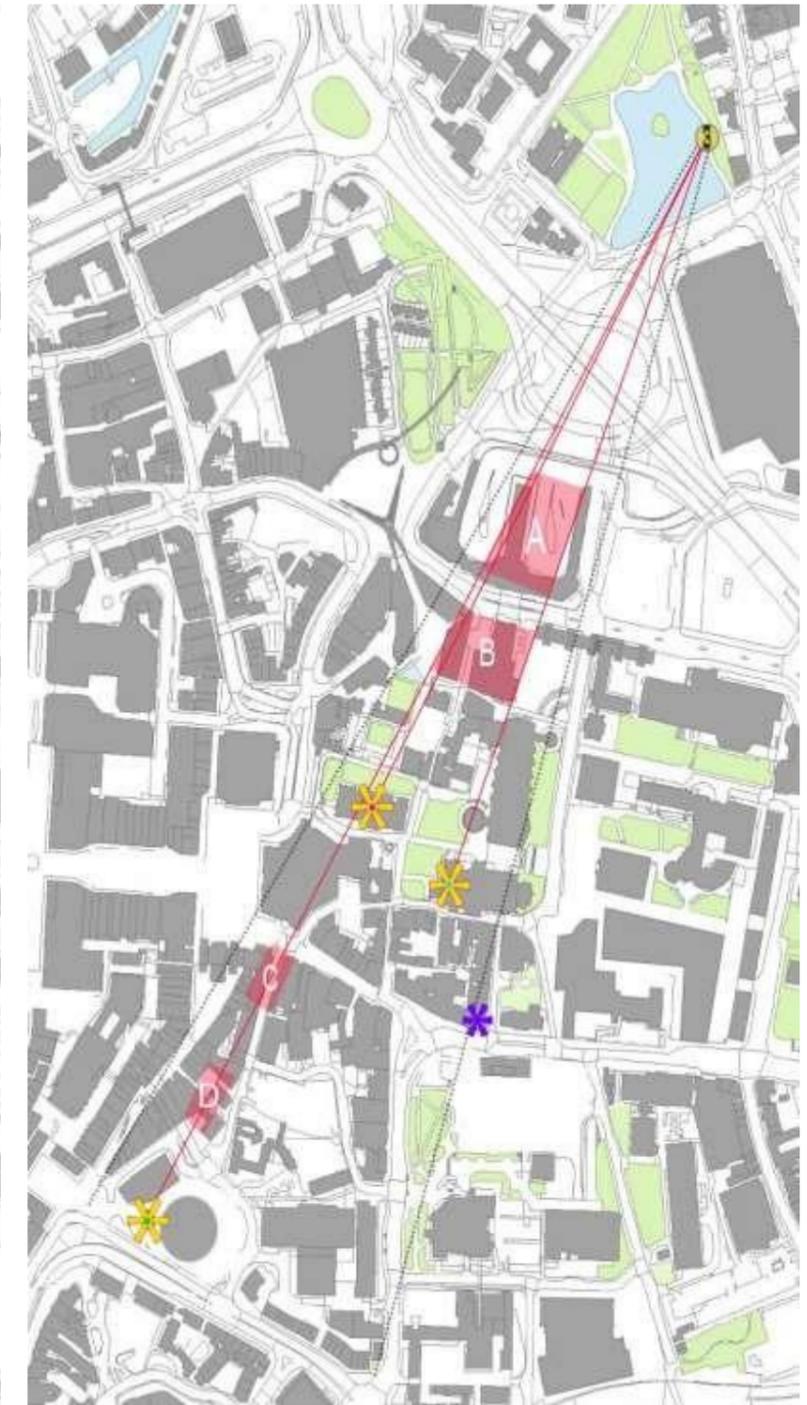


Fig 3.3



Fig 3.4

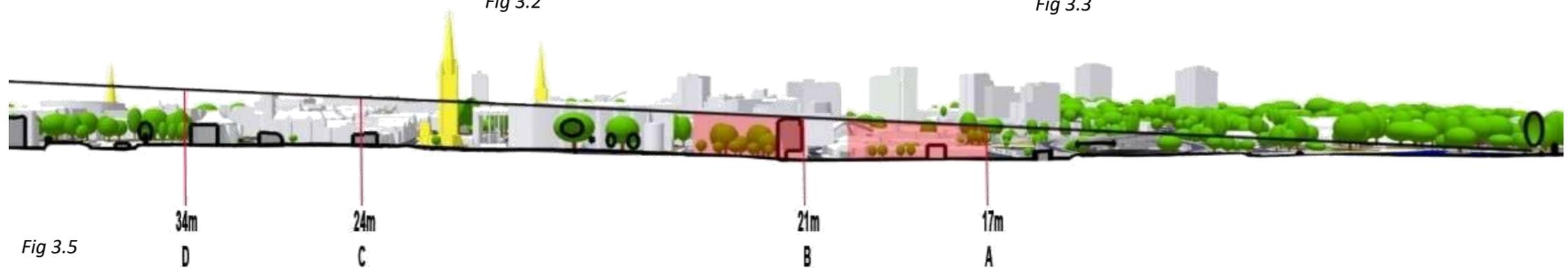


Fig 3.5

View cone 4: Sky Blue Way

Sky Blue Way offers possibly the most dynamic and evolving view of the Spires. St. Michael becomes visible from the junction of Walsgrave Road and Sky Blue Way with Holy Trinity coming into view adjacent to the junction of Oxford Street. The View remains relatively clear through to the Sky Blue Way Roundabout, thanks largely to the low rise development that surrounds the roundabout. There are also appreciable views of Christ Church particularly visible from the Northern side of the road offering road users long range views on the approach into the city.

Approaching the city from the East, Sky Blue Way forms a key axis of arrival for traffic into the city, whilst also being located beside the historic Far Gosford Street. Glimpsed views of the city's three spires are available on approach here, with the most defined being offered at the junction of Sky Blue Way and Oxford Street. At this identified location shown in mapping, the appreciation is that of two view cones, one towards the spire of St Michaels and Trinity church looking due west, and another toward Christchurch looking south west. Whilst the area between is not here defined as a view cone, development in such zones between will nevertheless be required to be considered, notably around assessment of principles of challenges of prominence in skyline.

Indicative zones A to D and E to I (fig 4.2) have been identified in the view cones with suggestions of heights which may be able to be achieved without impeding upon appreciation of the spires. The suggestions of potential development height are given as an indication only, and it is required by any applicant to demonstrate impact of any proposal within view cones irrespective of indications contained in this guidance. Matters of detailed design and materiality will also play a key role in assessing acceptability of any proposals in the view cone, whilst background impacts should also be considered.

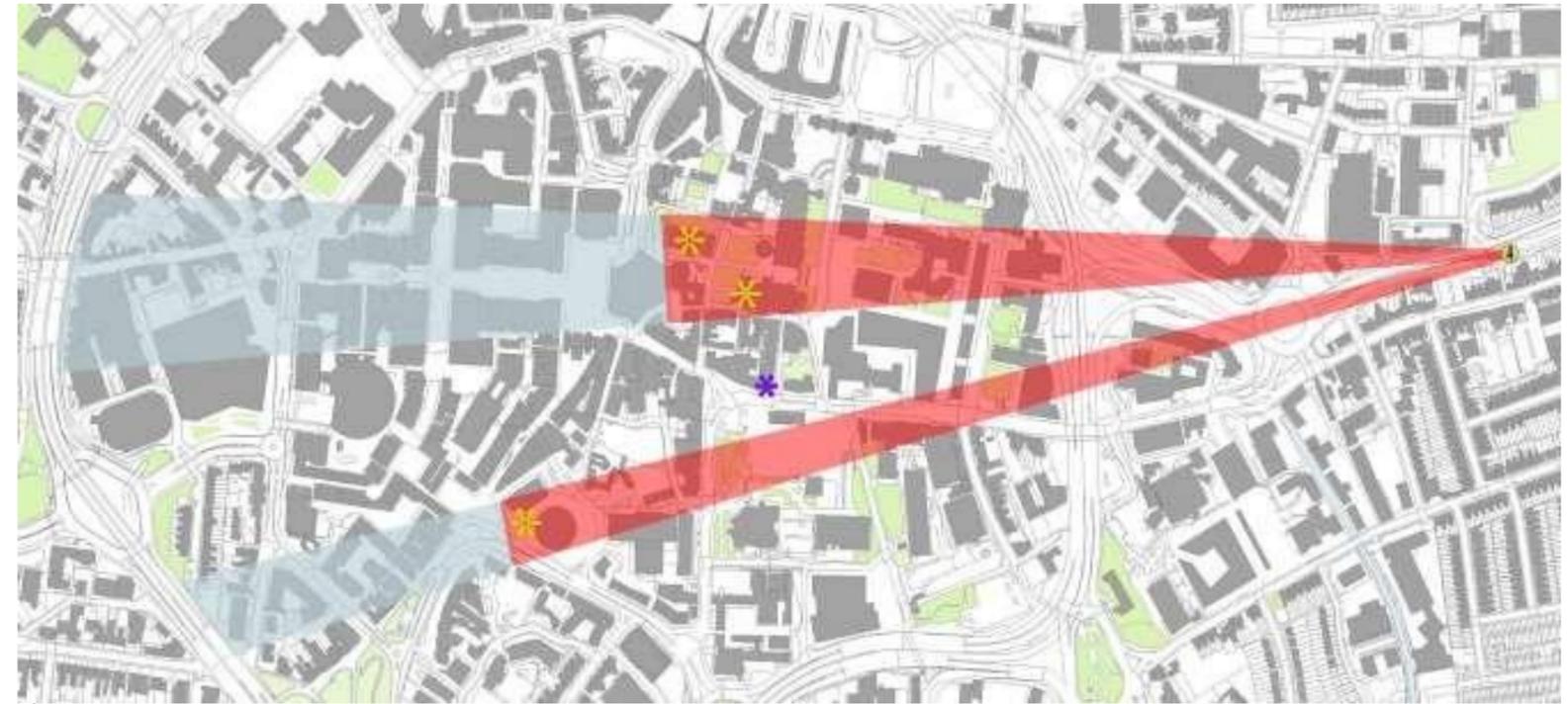


Fig 4.1

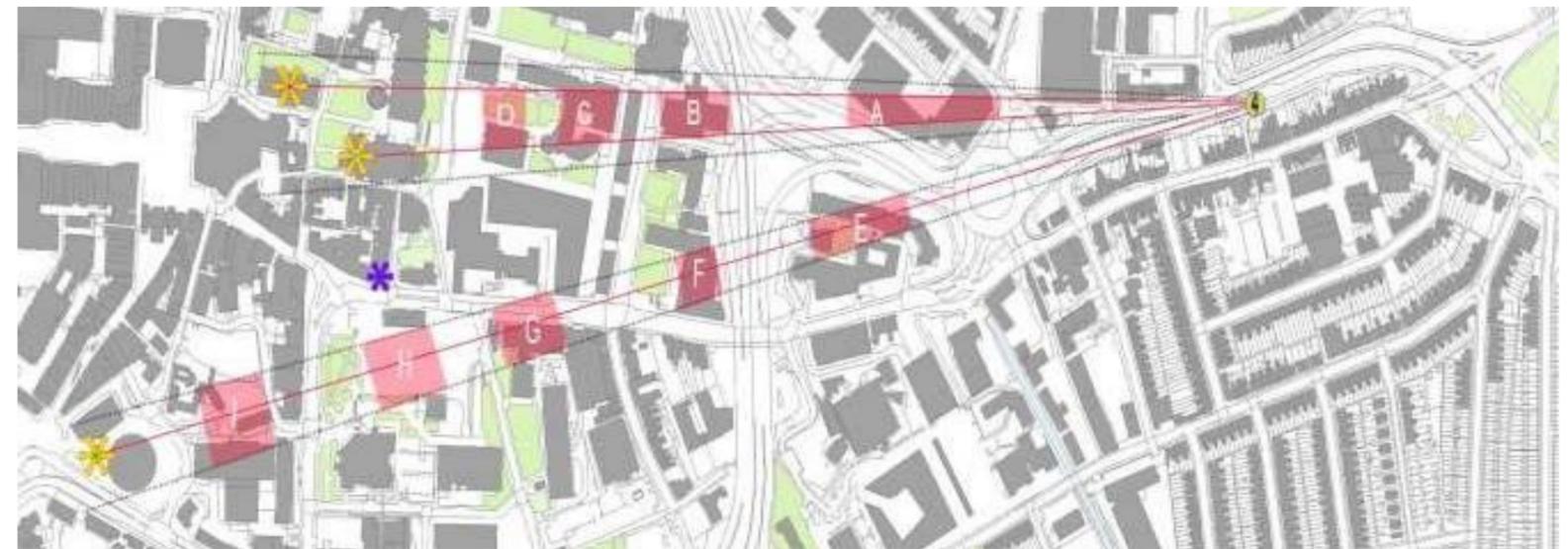


Fig 4.2



Fig 4.3

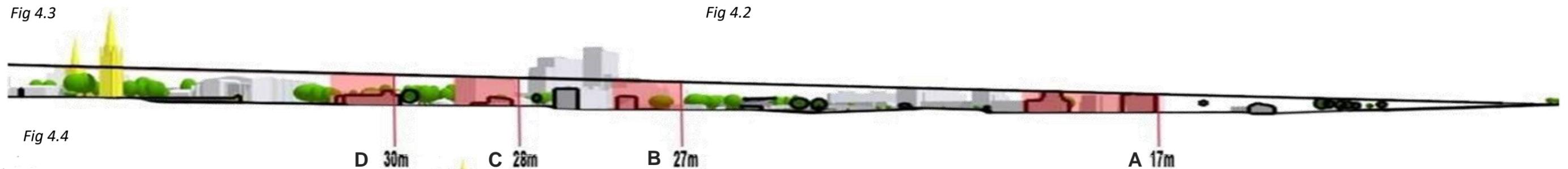


Fig 4.4

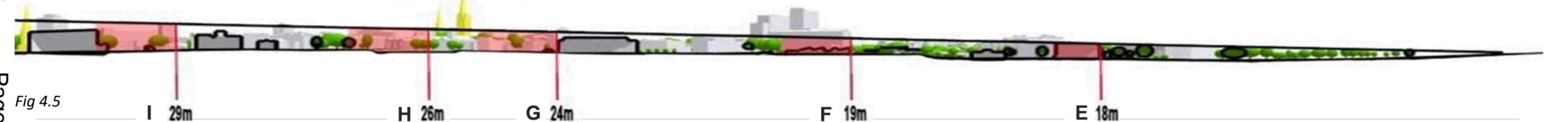


Fig 4.5

View cone 5: Far Gosford Street

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Located to the West of the city centre, Far Gosford Street and associated conservation area includes a number of important heritage assets. Views towards the cities spires from this location are constrained, however a prime appreciable view of the spire of St Michaels is present around the junction of Bramble Street, playing an important townscape role of locating this distinct district in relationship to the centre of the city.

Set within the Far Gosford Street Conservation Area, around the junction with Bramble Street, this view cone offers a visual connection between two of the cities important heritage assets. Whilst the view is somewhat constrained, the spire of St Michael's is clearly legible in the skyline over historic properties and the protection of this visual link is of key importance in understanding of the conservation areas setting to the wider landscape of the city centre.

Although not appreciable from the identified viewpoint, the view cone contains a large area of highway infrastructure and therefore height indication areas are limited around the indicative zones A and B (fig 5.2), set within the city ring road, the view cone therefore shows potential for height whilst retaining this important visual linkage to Far Gosford Street.

It is therefore stated that any development proposals in the viewcone should not be seen above the roofline of historic properties on Far Gosford Street in order to retain the view of the spire, and detailed analysis should be submitted with any proposals in order to ascertain this, whilst, as with all viewcone locations, any proposals set in the background will also need to be carefully considered in order to retain the spires primacy in the city skyline.

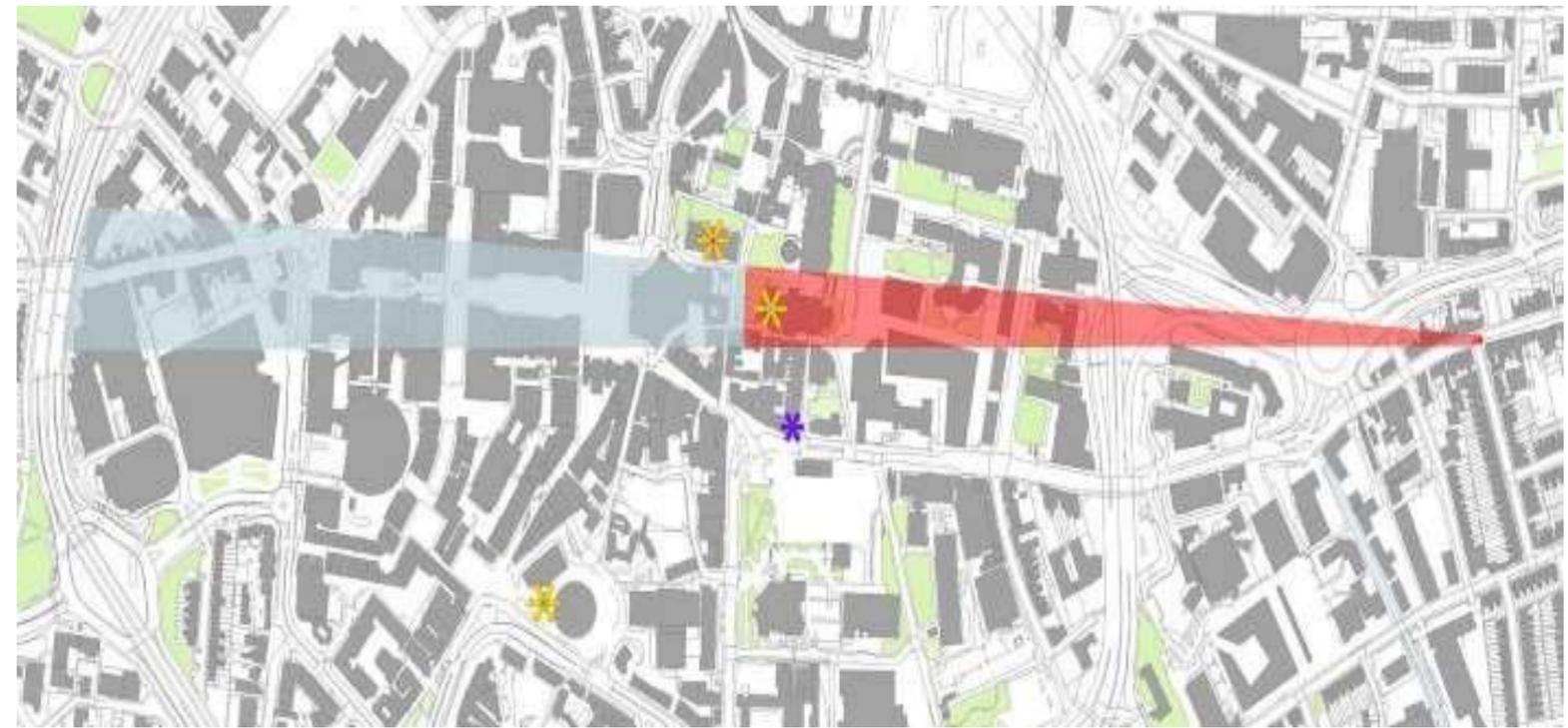


Fig 5.1



Fig 5.2



Fig 5.3

Fig 5.4

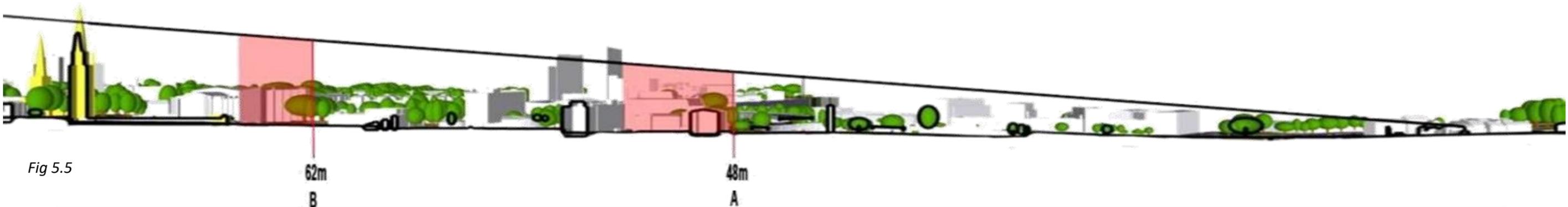


Fig 5.5

View cone 6: London Road

Although London Road is a key route into the city centre, the views it offers of St Michael and Holy Trinity are limited due to the flyover, street furniture and the mature vegetation at Junction Four of the ring road. This view cone is therefore most appreciable from the pedestrian perspective.

The St Michael Spire is the first available on this approach to the city becoming visible on the Eastern side of the road adjacent to No.63 London Road and is visible up to Whitefriars Monastery where it becomes masked by the flyover.

The Spires are most visible from the junction of Gulson Road with both St Michael and Holy Trinity being visible, although they remain partially masked by the Flyover and recent development within the City centre.

Approaching the city from the South East, London Road forms a key approach to the city, approaching aside key heritage assets of Charterhouse and the London Road Cemetery. Whilst the view of the spires of St Michaels and Trinity from this approach are heavily impacted both by modern development and highway infrastructure, the emergence of the spires to view delivers a strong sense of identity and legibility, marking the arrival into the area of the city centre.

A number of indicative zones are shown in figure 6.2, marked A,B and C, Indicative heights are then suggested in figure 6.9, however any proposal for development within or immediately adjacent to the identified view cone should be tested with impacts demonstrated by any applicant to enable thorough analysis of development impacts. Background impacts should always also be assessed and the zone of background sensitivity is identified in figure 6.1.



Fig 6.1

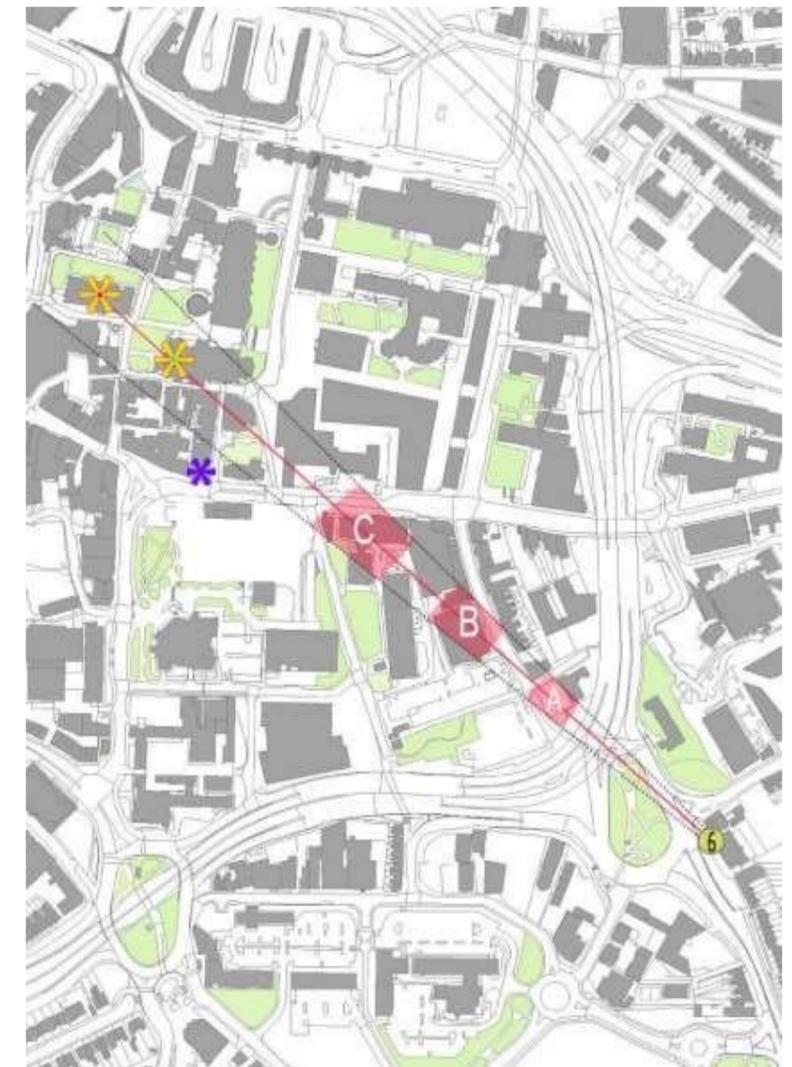


Fig 6.2



Fig 6.3



Fig 6.4



Fig 6.5



Fig 6.6



Fig 6.7



Fig 6.8

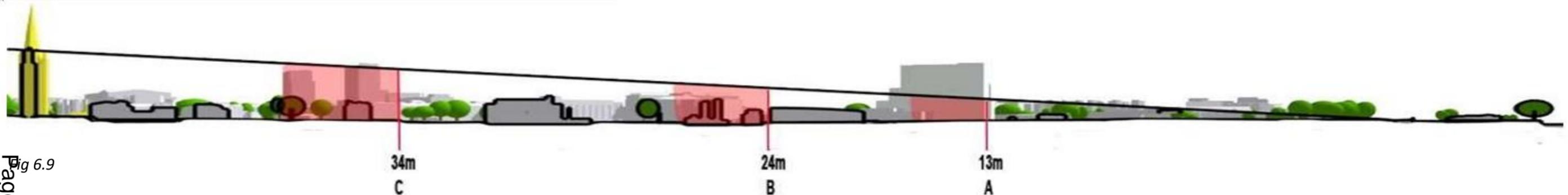


Fig 6.9

View cone 7: Parkside

Whilst this view is not a major route into the city centre, it is one of the main entrance points into the technology park and it offers a unique view of St. Michaels, Holy Trinity and the Council House clock tower. It also provides a strong visual link between the modern technology park and the historic city. At present the length of time the view is visible is relatively short being revealed on Deasy Road adjacent to the Feeder pillar on the southern side of the Road, with the best view being on the approach to the junction of the roundabout.

This view cone has an opportunity present to be improved upon with considered redevelopment of the sites that sit under the view cone – notably including light industrial units that sit in the foreground. If this area were to be redeveloped, it may be possible to enhance the view through the sensitive siting of new building footprints, the location of open space and through choosing soft landscaping that won't mature to infringe on the view – as is currently the case.

Elsewhere the view corridor passes over Whitefriars Gate and Buildings within the Civic Quarter. The cross-section provided shows that development within the Civic Quarter ranging from four to five storeys could be accommodated without infringing on the view. Any development, adjacent to Whitefriars Gate could comfortably accommodate in the region of two/three storeys.

In assessment of view cone 7 observed from Parkside, three indicative areas are identified in the foreground as noted in fig 7.2, identified as zones A,B and C. The foreground area of high sensitivity is shown red in fig 7.1 and any development within or immediately aside the view cone should be carefully assessed, it should also be noted that any proposal which falls into or aside the area of background sensitivity (indicated blue in figure 7.1) should be considered alongside demonstrations of impact, to ensure appraisals can be made which preserve appreciation of the spires in the city skyline. Indicative heights which *may* be achievable whilst preserving the appreciation of the spires are indicated in the above section (fig 7.6) however notwithstanding this, demonstrations of impact will always need to be submitted and assessed, with architectural design, scale, height, massing and material finishes.



Fig 7.3



Fig 7.4



Fig 7.5



Fig 7.1

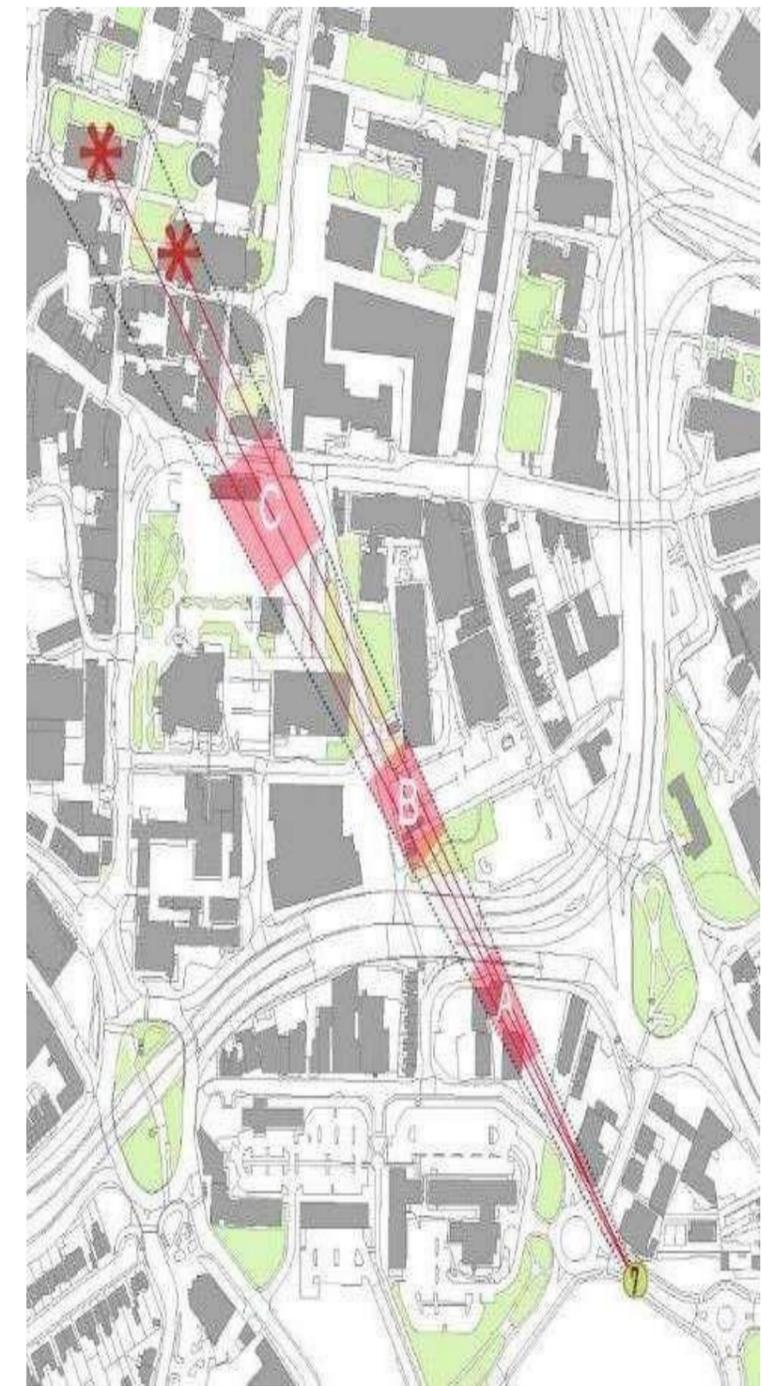


Fig 7.2

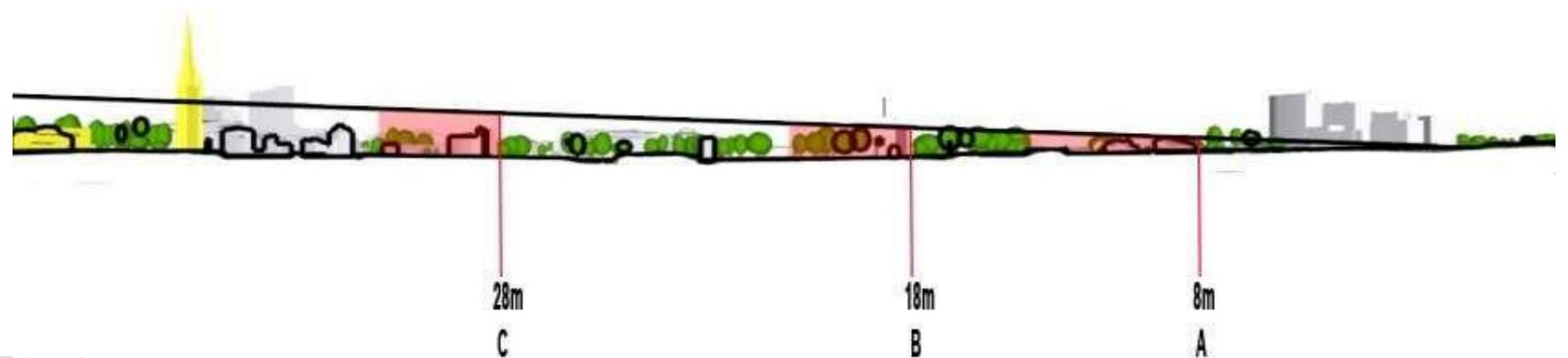


Fig 7.6

View cone 8: Mile Lane

Mill Lane offers a long and unfolding view of all three spires and the Council House clock tower. The spire of St Osburgs also becomes visible.

Western side of Mile Lane

From the point where Mile Lane bridges the railway, the Spires start to become visible. The view develops along the course of Mile Lane and is best between the crest of the hill and the junction of Merlin Road. From this point on, as the road runs down the hill curving left, the Spire of Holy Trinity gradually becomes less visible with the spire of St. Michaels disappearing from the centre of the Elm Bank Building. As the road bends to the left Christ Church Spire becomes visible up to the roundabout where it becomes masked by mature vegetation. Additionally St Michaels and Holy Trinity are masked beyond the Northern elevation of the Elm Bank Building by recent City Centre Developments, before coming back into view at the roundabout junction.

Eastern side of Mile Lane

This view is not as strong but it does offer a unique view of three spires along with St Osburgs as the road begins to bend to the left. Preservation of this view would be possible whilst still allowing development to take place within the viewcone as is suggested within the provided cross-section. Thanks to Mile Lane's elevated position development *could* take place within the Civic Quarter without infringing on the viewcone, whilst the careful siting of development on the remaining sites in Parkside that front Mile Lane would ensure the foreground remained clear and offers opportunities for framing as demonstrated with the Parkside development (fig 8.4).

Located close to the junction of Mile Lane and Merlin Close, the analysis has identified four indicative height zones in the view cone foreground, these are indicated as A,B,C and D in figure 8.2. As with all identified views, impacts must also be assessed in the immediate adjacencies to view cones and also the background impacts. Two zones are identified outside of the ring road, whilst two are indicated within, which deliver a graduation in potential availability of the height of development whilst retaining the appreciation of spires from this viewpoint. Indications of height capacity are not prescriptive and proposals of any height should be demonstrated in impacts to allow fully informed assessment of proposals.

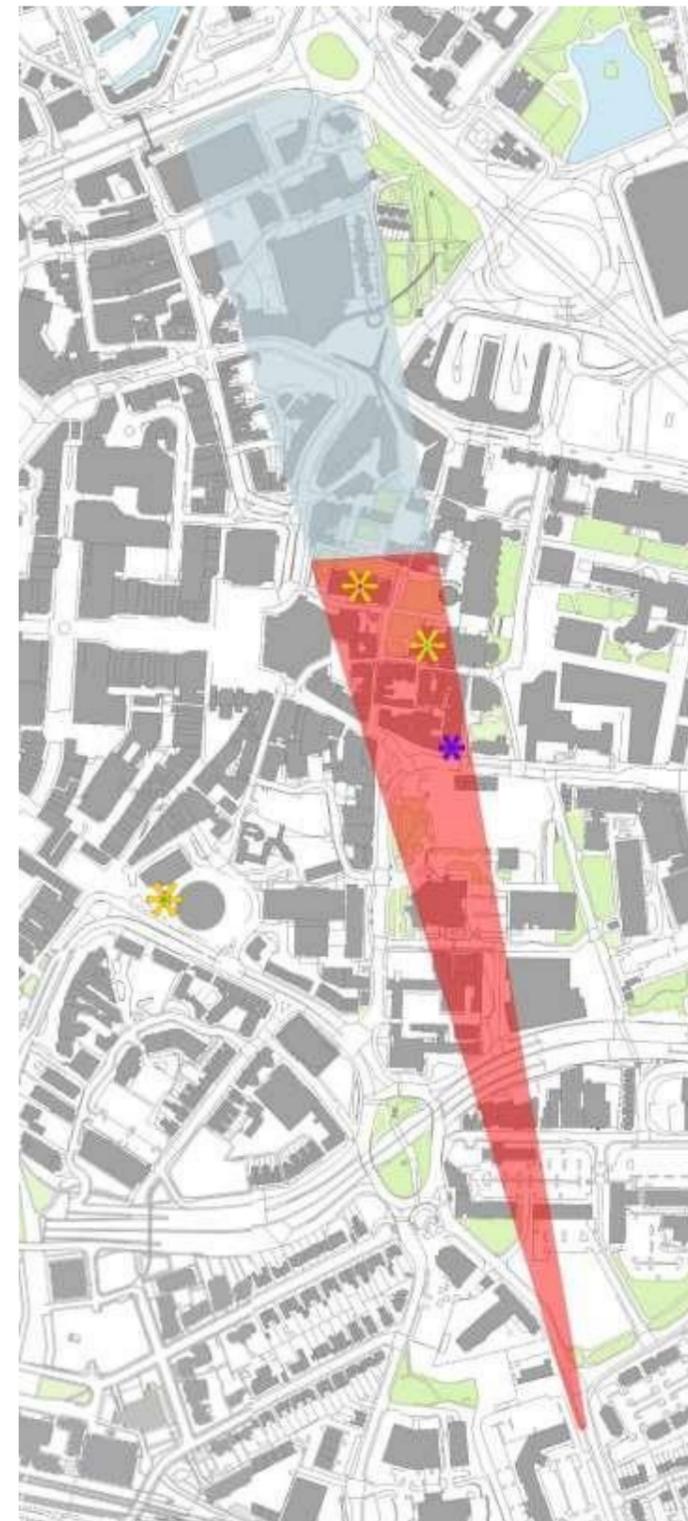


Fig 8.1

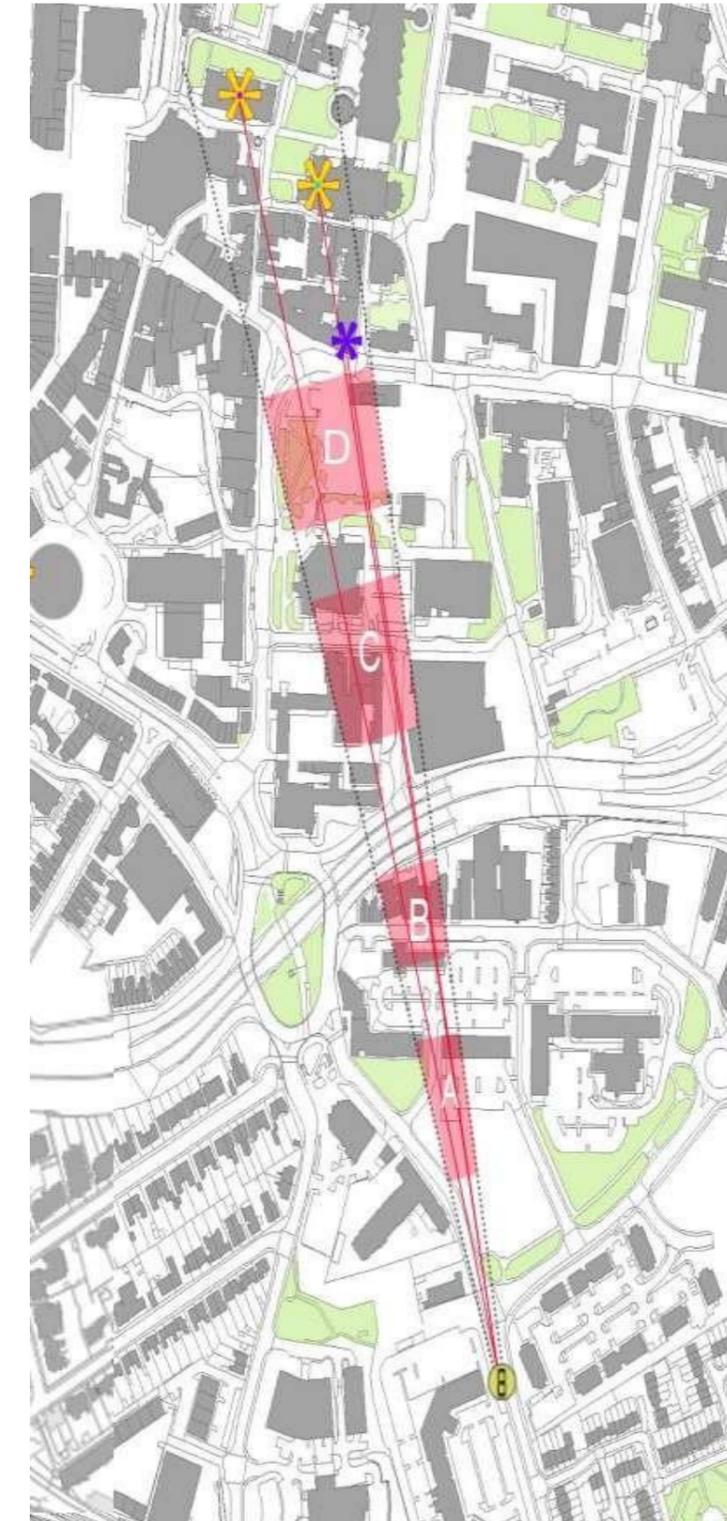


Fig 8.2



Fig 8.3



Fig 8.5



Fig 8.4

View cone 9: Mile Lane (Christ Church)

Page 74
 Moving northwest along Mile lane a second view cone appears with the spire of Christchurch becoming a dominant feature in the skyline as the road approaches the ring road junction 6.

Set aside the locally listed former Cheylesmore Council School and with the locally listed New Beeston works in the foreground, the view cone to Christchurch remains unimpeded by modern development and positive levels of appreciation of the asset, and also its positive contribution to townscape legibility are on offer.

This view cones also offers a demonstration of the importance of assessing background impacts, as seen in (fig 9.4), Mercia House is seen to the rear of Christchurch spire and as a result the primary nature of the spire in the skyline is compromised through the erosion of clear space surrounding. Similarly, the importance of materiality in background assessment is also demonstrated with the lighter materiality diminishing the impact and thus enabling the spire to remain distinct in the skyline

The foreground of the view cone is dominated by highway infrastructure and the large spaces seen around junction 6 of the ring road, therefore indicative height zones in this view cone are shown as A and B in Fig 9.2, being inside the ring road. Through a contribution of factors of topography and the distance from the primary view cone position, significant height *could* be achievable in these areas without undermining the appreciation of Christchurch spire. Indicative suggestions of acceptable height in this regard are therefore shown in the cross section below, however these are only suggestions of potential, and any proposal made within the view cones or immediately aside (inclusive of background zone) should provide evidence of impacts upon the view cone in order to fully inform of impacts.

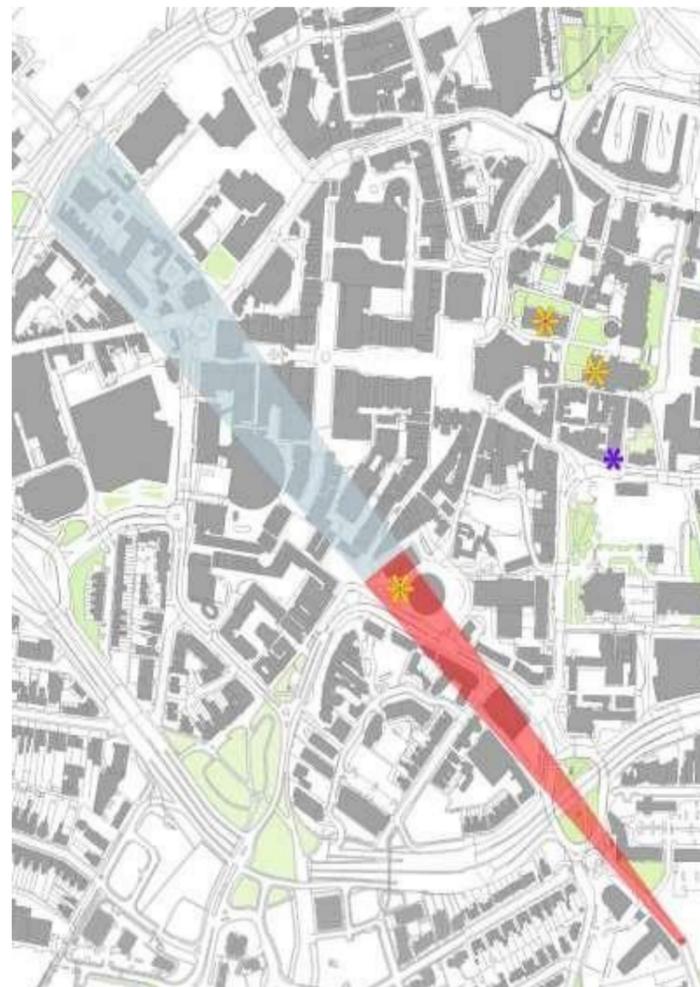


Fig 9.1

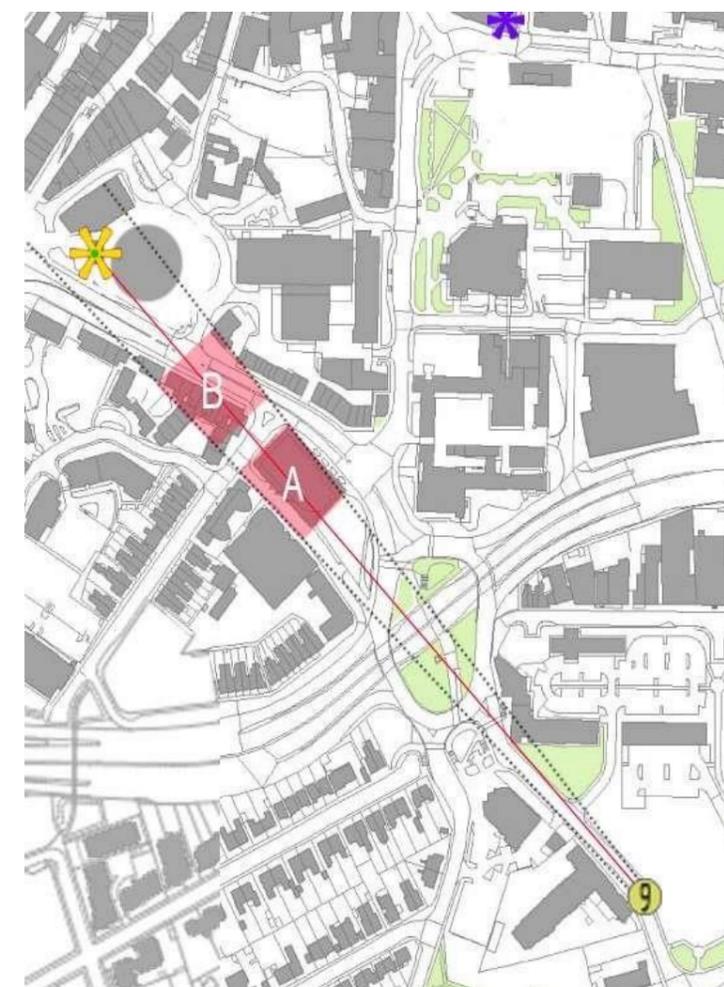


Fig 9.2



Fig 9.3



Fig 9.4



Fig 9.5



Fig 9.6

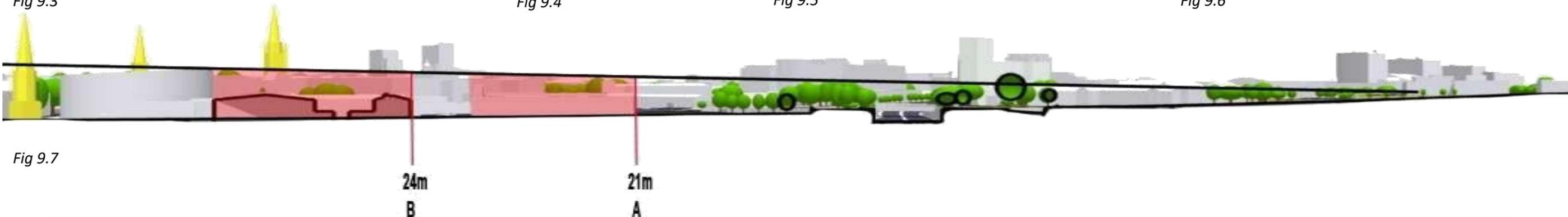


Fig 9.7

View cone 10: Quinton Road

The Quinton Road view is stronger in the winter when the trees are not in leaf. It offers a reasonable view of St. Michaels and Holy Trinity up to the ring road where a particularly strong vista opens up at the junction of Little Park and New Union Street. Due to the topography of this area with Quinton Road being only marginally higher than the land the spires, any development within the view cone would be required to be of lower level to retain this visual linkage, as is illustrated in fig 10.6 & 10.7

Similarly to view cone 9, much of the foreground is dominated by highways infrastructure and therefore indicative height areas are noted only inside the ring road and associated suggestions of development heights which *may* be achievable whilst protecting the view and noted below.

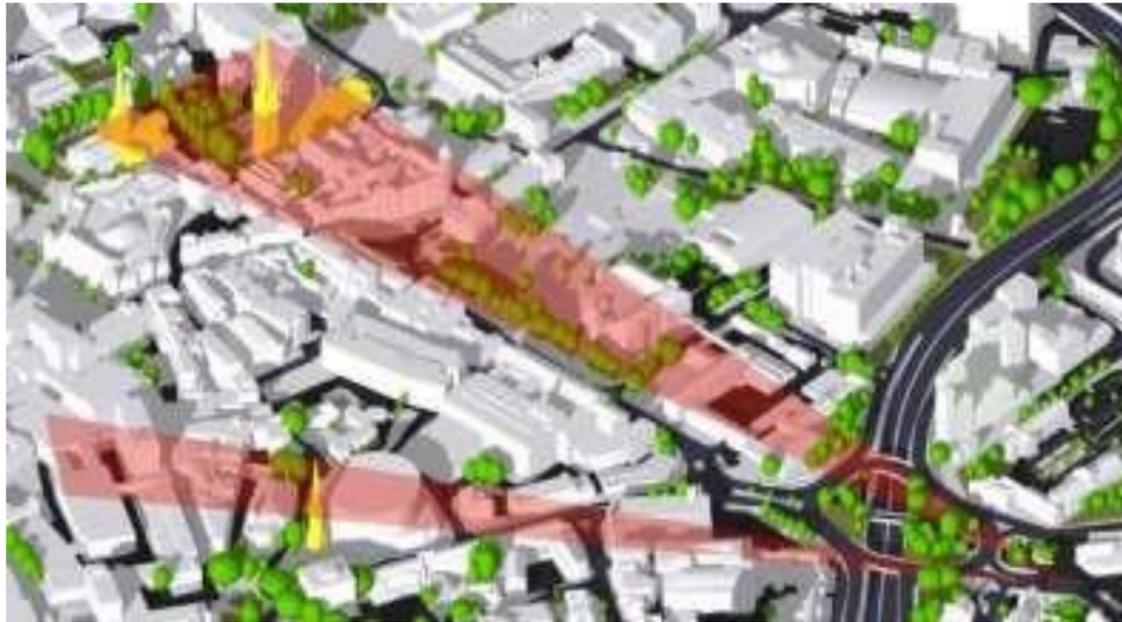


Fig 10.3



Fig 10.1

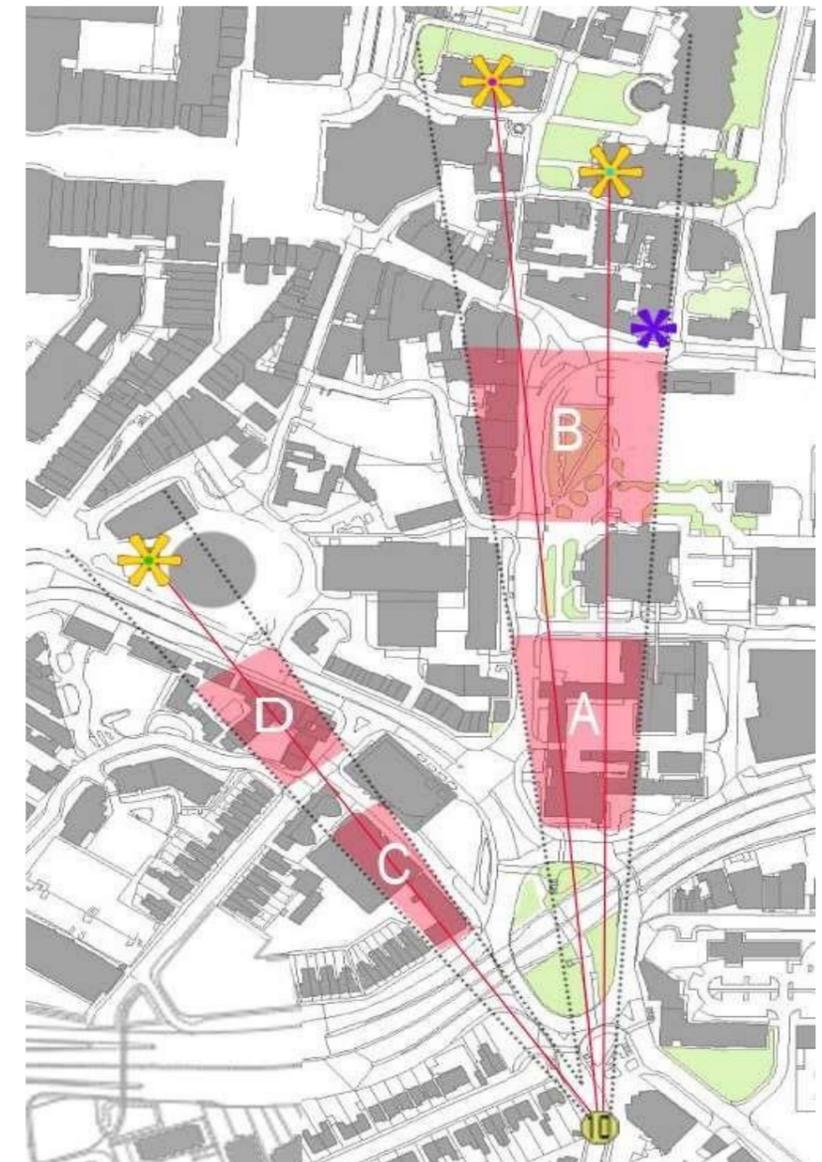


Fig 10.2



Fig 10.4

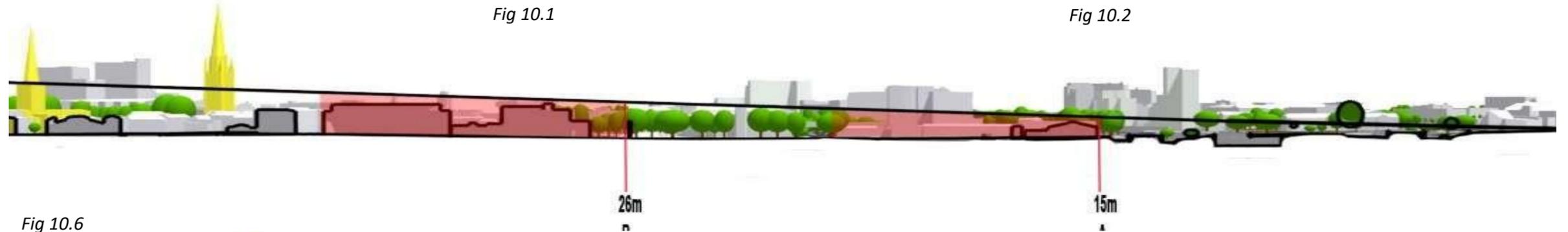


Fig 10.6



10.5

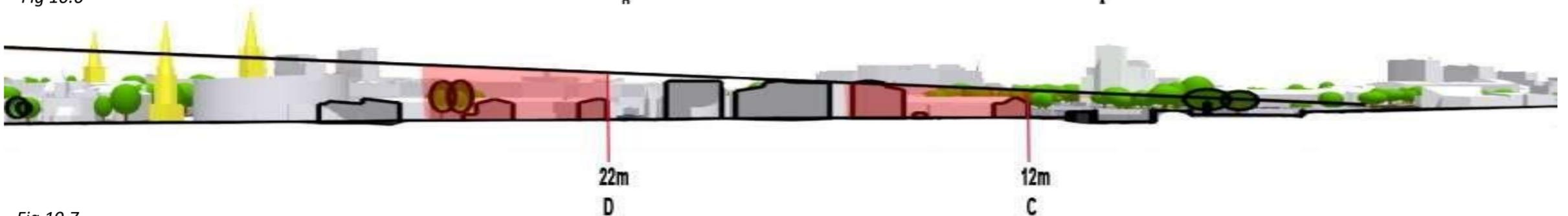


Fig 10.7

View cone 11: Manors Road Footbridge & Friars Road

Whilst Manors Road Footbridge and Friars Road offer limited views of the tops of the Spires of Christchurch and St. Michaels, given the elevated position, the length of time the views are visible to user is reasonably good. The close proximity of the Spires means that much of their detail can be appreciated and they make for a pleasant contrast with the modern buildings in the foreground.

It may be possible to enhance the view of St. Michaels were the buildings to New Union Street and the BT Telephone Exchange to be redeveloped, but this should not come at the detriment of maintaining the city scale of the buildings to New Union Street.

Indicative height assessment areas are shown in fig 11.2 and correspondingly in sections below (fig 11.6 and fig 11.7) showing a graduation of height potential whilst preserving appreciation of the spires from this viewpoint. Whilst height which *may* be achievable is noted on the below sections, applicants should produce impact assessments when proposals are within, aside or in the background of identified view cones in order for impacts to be fully assessed.



Fig 11.3



Fig 11.1

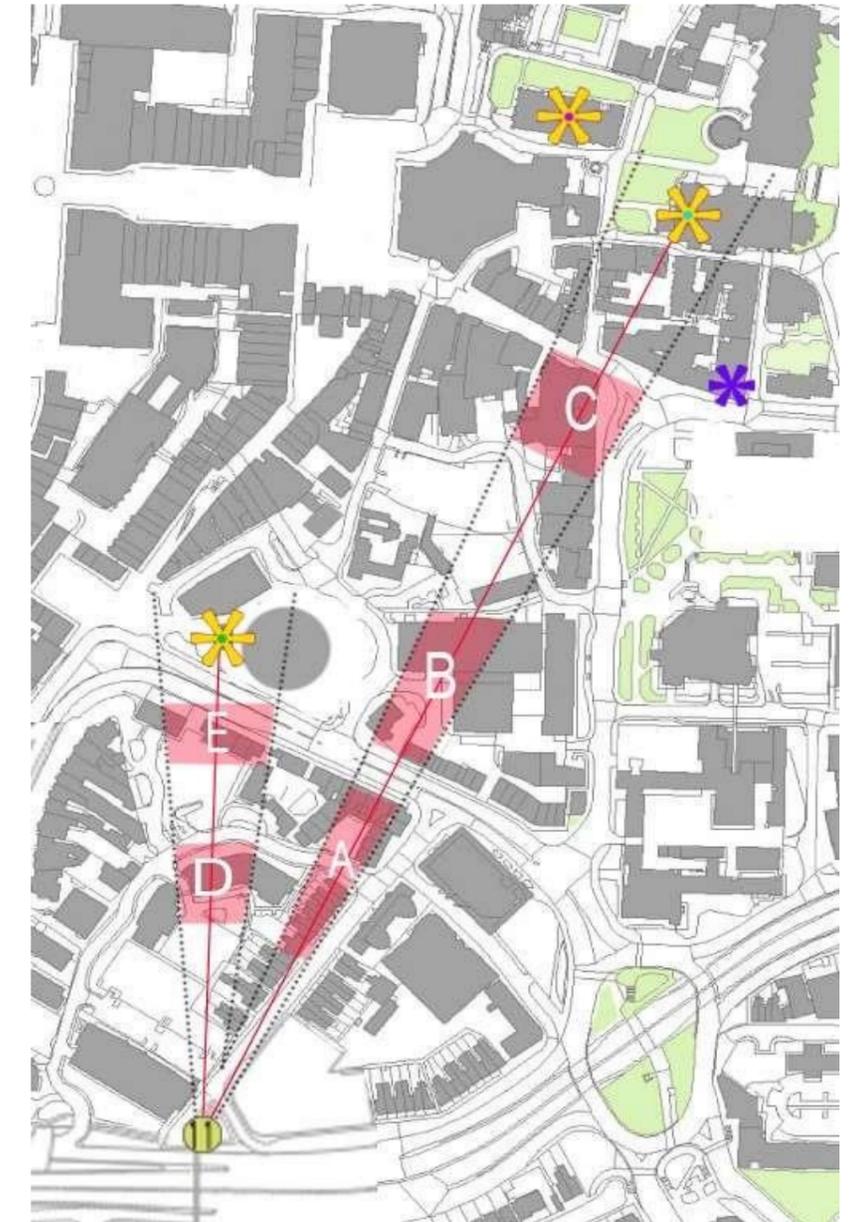


Fig 11.2



Fig 11.4



Fig 11.5



Fig 11.6

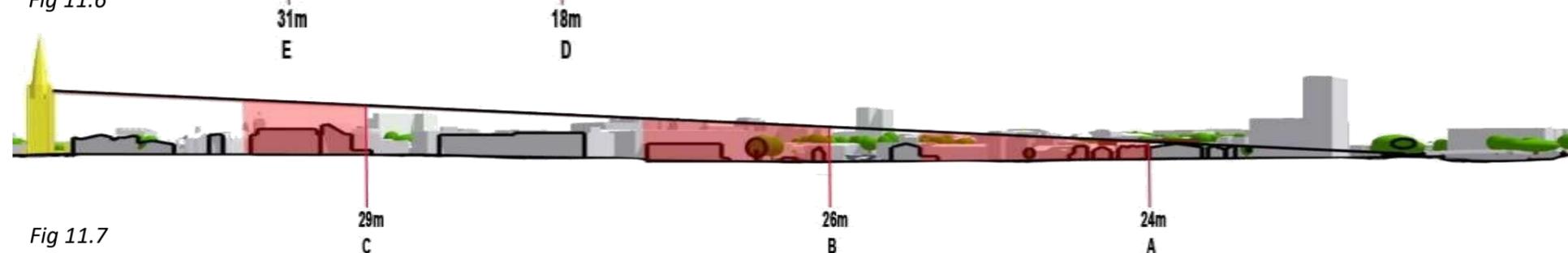


Fig 11.7

View cone 12: Spencer Park & Footbridge

This is a Key pedestrian route into the city centre from the South and it offers one of the best views of the Three principle spires. The Spires become visible from the edge of the park and are clearly visible across the length of the Footbridge.

The view of the Spires disappears at the bottom of the Footbridge ramp as the view becomes obscured by mature vegetation. Given the height of the Footbridge it would be possible to preserve this view whilst still allowing development in the Viewcone as demonstrated with the provided cross-section.

This line of approach is notably historic, and in present day well trafficked via journeys from significant residential areas of the city to the south, the view cone from both the footbridge and appreciation from Spencer Park during times of lesser leaf cover, offers perhaps the foremost viewpoint in the city where the three spires are viewed together as an understandable group. The city skyline from this approach has developed a respectful 'bowing' in scale toward the spires, however some evidence of contradictions with this positive principle is also observed. Recent large scale development on Fairfax Street also demonstrated the sensitivity of background impact consideration.

The elevated topography of Spencer Park and the footbridge may allow for height in the foreground whilst maintaining this important view of the iconic city spires, graduations of potential heights are therefore indicated on the section below. As is the case in all identified view cones, applications sited within the view cones, both foreground and background, and also those immediately adjacent, should demonstrate levels of impact in order for robust assessment to take place and ensure preservation of this high-quality viewpoint.



Fig 12.3



Fig 12.1

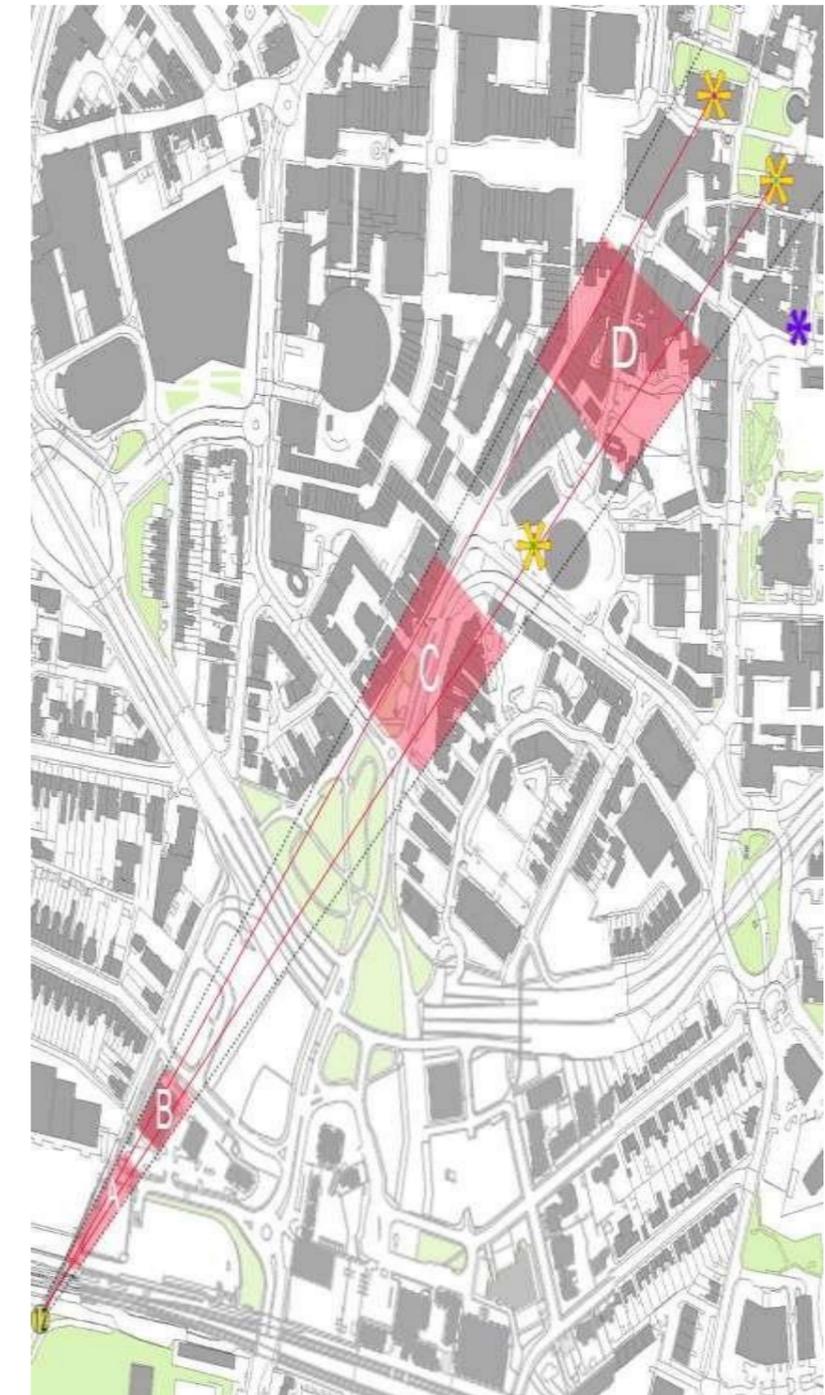


Fig 12.2



Fig 12.4

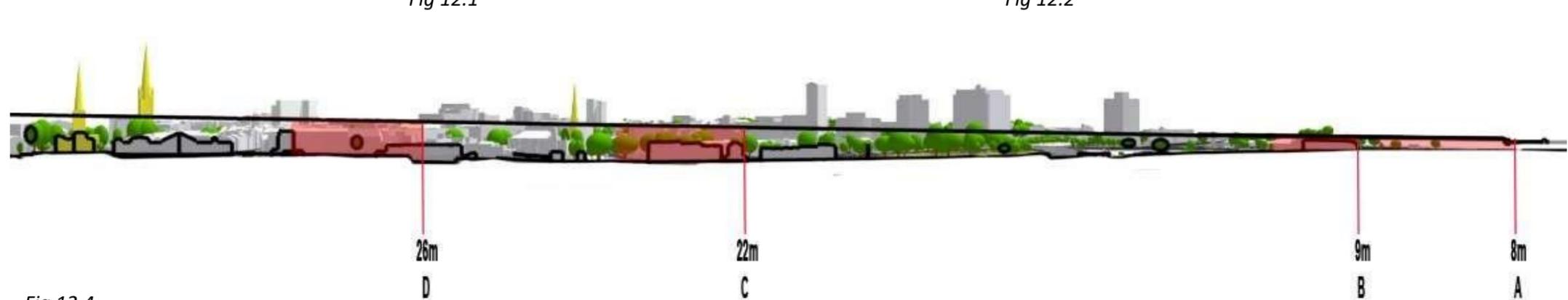


Fig 12.4

View cone 13: The Butts

The Butts is a Key route into the city centre and should offer a strong view of the Spires. This view was previously compromised by Coventry Point and currently now with its removal there is a clear view of St. Michaels and Holy Trinity that can be appreciated, with this view now appreciable, development should seek to retain the ability to appreciate the spires from this approach.

The view cone is both modern and kinetic in nature, unfolding on approach to the city as the highway sweeps toward the ring road junction and primarily visible from vehicular approach. The view cone towards the Cathedral and Holy Trinity is then also appreciable from pedestrian areas aside Croft road within the ring road. Given the kinetic nature of the view cone, a number of primary locations could be considered, however it is assessed that the location centrally in the highway of The Butts addressing vehicular approach which also covers the Croft Road approach, is the most representative location of this view as is therefore mapped as such in fig 13.1. Given the sweep of the highway however, the principle is that a point of appreciation of all three spires should now be retained post the demolition of the formerly obscuring Coventry Point development.

Through assessment of this newly appreciable view cone, a number of indicative height areas are shown in fig 13.2, which seek to articulate potential height which may be accommodated whilst retaining the views toward the city spires, these suggestions are made only as guides and proposals should be assessed with detailed impact assessments in order to ensure impacts on views are able to be fully considered.



Fig 13.3



Fig 13.4



Fig 13.5



Fig 13.1

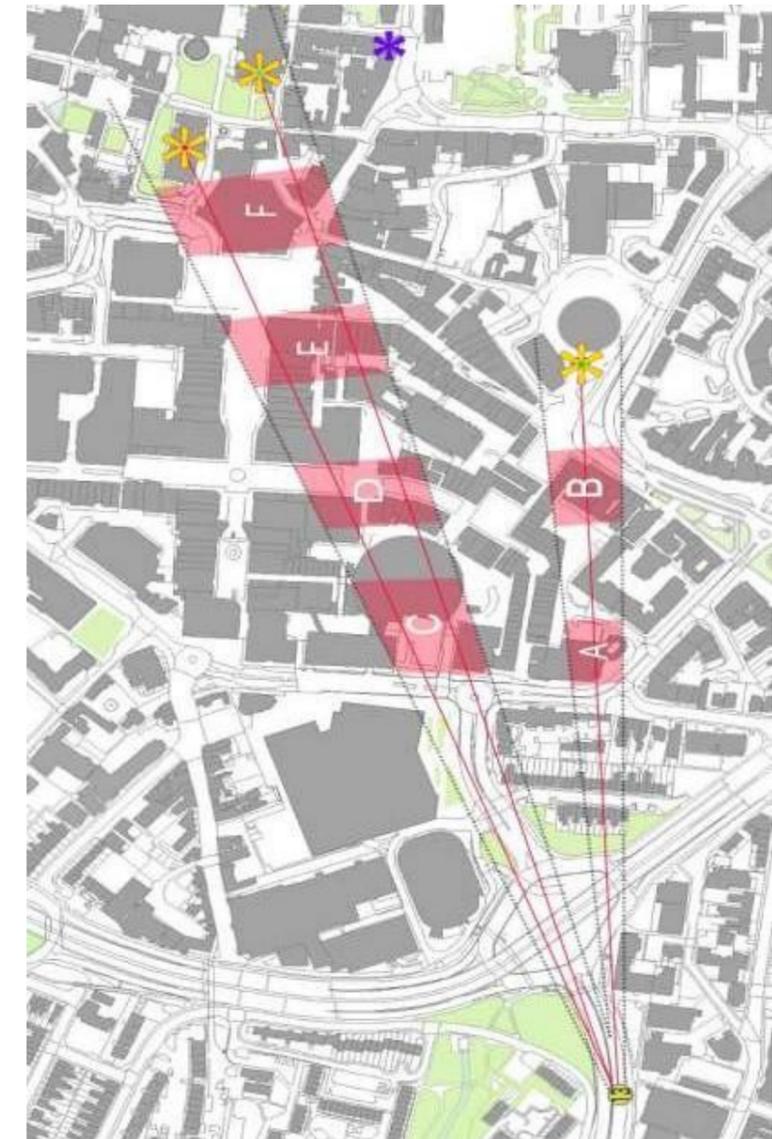


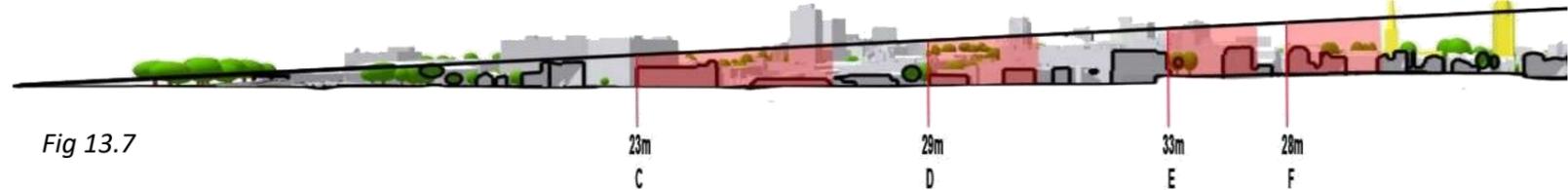
Fig 13.2



Fig 13.6



Fig 13.7



View cone 14: The Butts

Referenced within the AAP and now superseded within view management framework, viewcone 14 has now been incorporated into viewcone 13 in order to better articulate the primary points of appreciation of the Three Spires from the approach along the Butts.

View cone 15: Holyhead Road

Upper Holyhead Road offers a brief glimpse of St. Michaels, Holy Trinity and Christchurch as the view is largely obstructed by the mature vegetation on the ring road junctions roundabout, the view however intimes of low leaf cover or should vegetation be removed in future, is a key availability upon arrival to the city from a primary approach.

The spires re-emerge on either side of the ring road, with Christchurch to the right hand side and St. Michaels & Holy Trinity to the left hand side of the roundabout, the views to left become appreciable between a gap in the buildings on the interior of the ring road. A good view of Christchurch can also be experienced from the top of Lower Holyhead Road (fig 15.4).

The provided cross-sections through this view cone indicates the level of height that *could* take place whilst preserving the view across multiple indicative areas, showing a graduation of potential height capacity. Indications of acceptable heights are given only as potentials, with any application submitted within or aside the immediate adjacencies and also inclusive of background zones, requiring to demonstrate levels of impacts to the view, in order to provide a full assessment change in townscape.



Fig 15.3

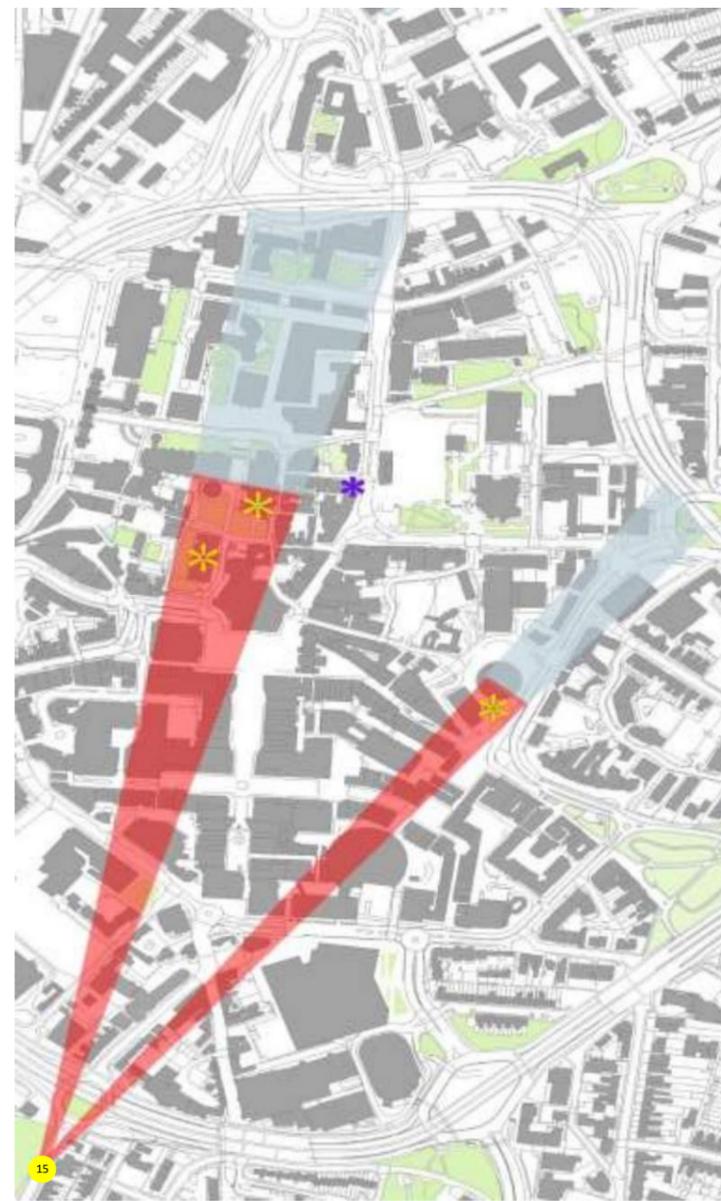


Fig 15.1

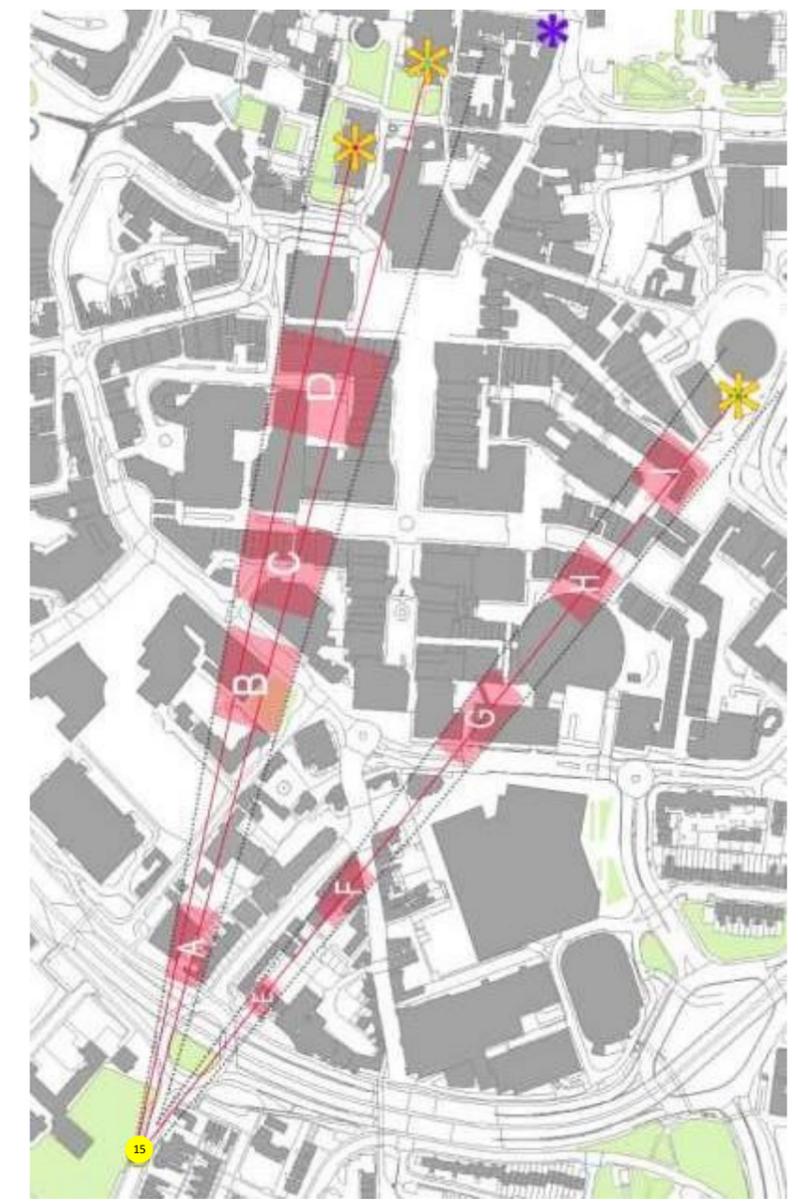


Fig 15.2



Page 79
Fig 15.4

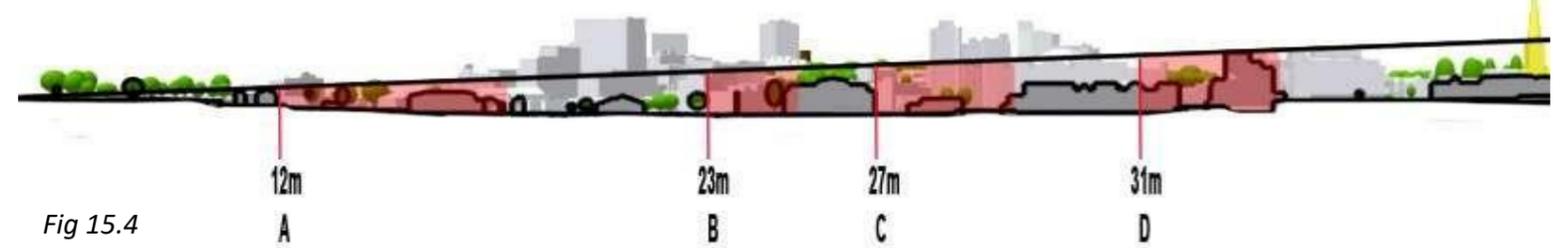


Fig 15.4

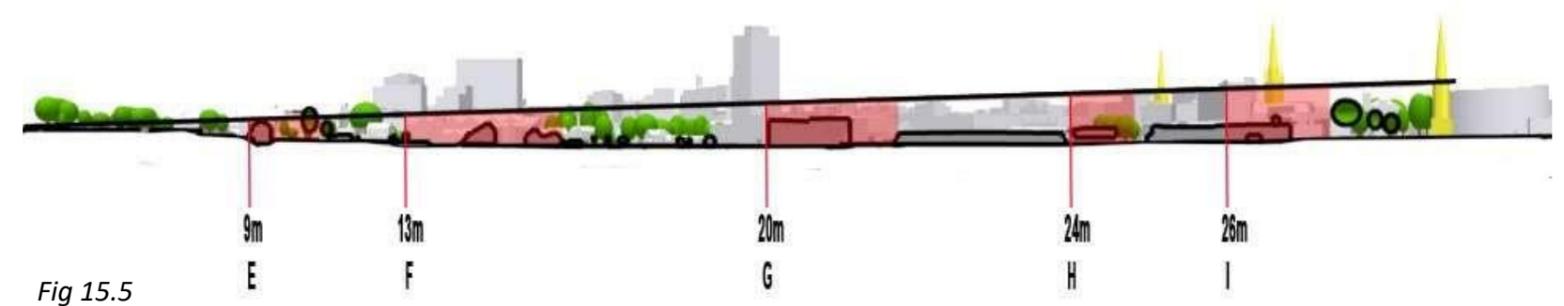


Fig 15.5

View cone 16: Upper Hill Street Footbridge

Whilst the views from Upper Hill Street are limited by developments within the ring road, excellent views become appreciable from the pedestrian footbridge crossing the ring road at the end of Upper Hill Street.

The Footbridge acts as a viewing platform offering a clear vista of the Spires on what is a busy pedestrian route into the city centre. This view is particularly sensitive due to previous developments having detracted from previously appreciable views from the junction of Upper Hill Street & Barras Lane (fig 16.6 - Historic and fig 16.7 - Current) and should be retained going forward in order to not lose the view entirely.

The provided cross-sections through this view illustrates what height *could* be accommodated within the view corridor without further infringing on the view cone.



Fig 16.5



Fig 16.6



Fig 16.7

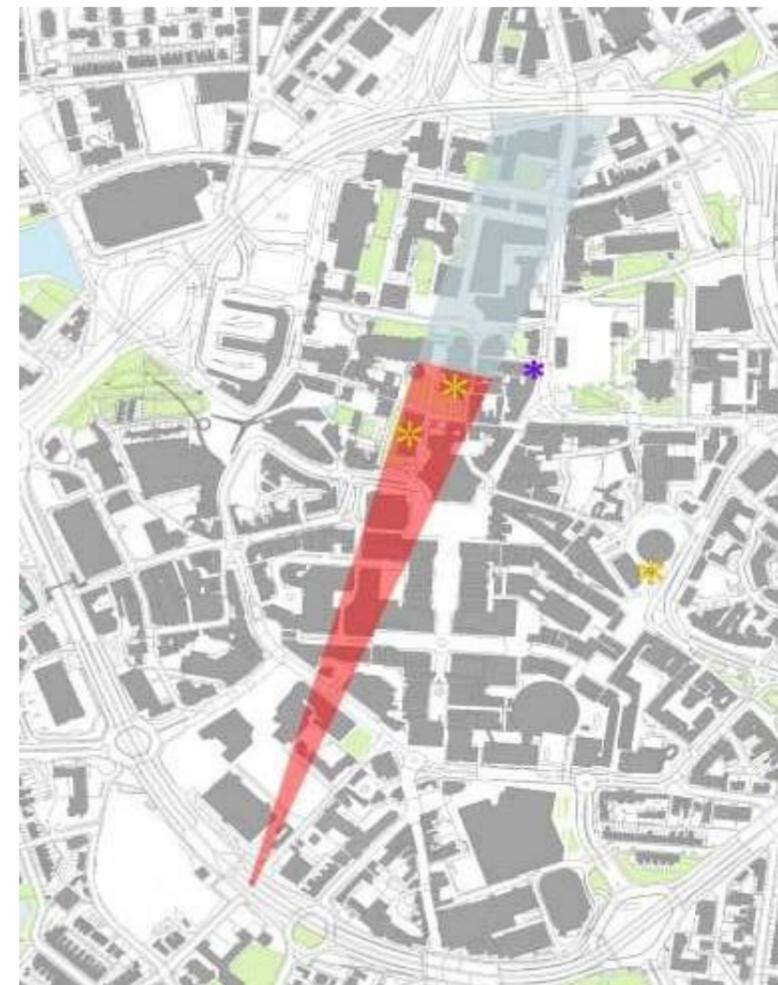


Fig 16.1

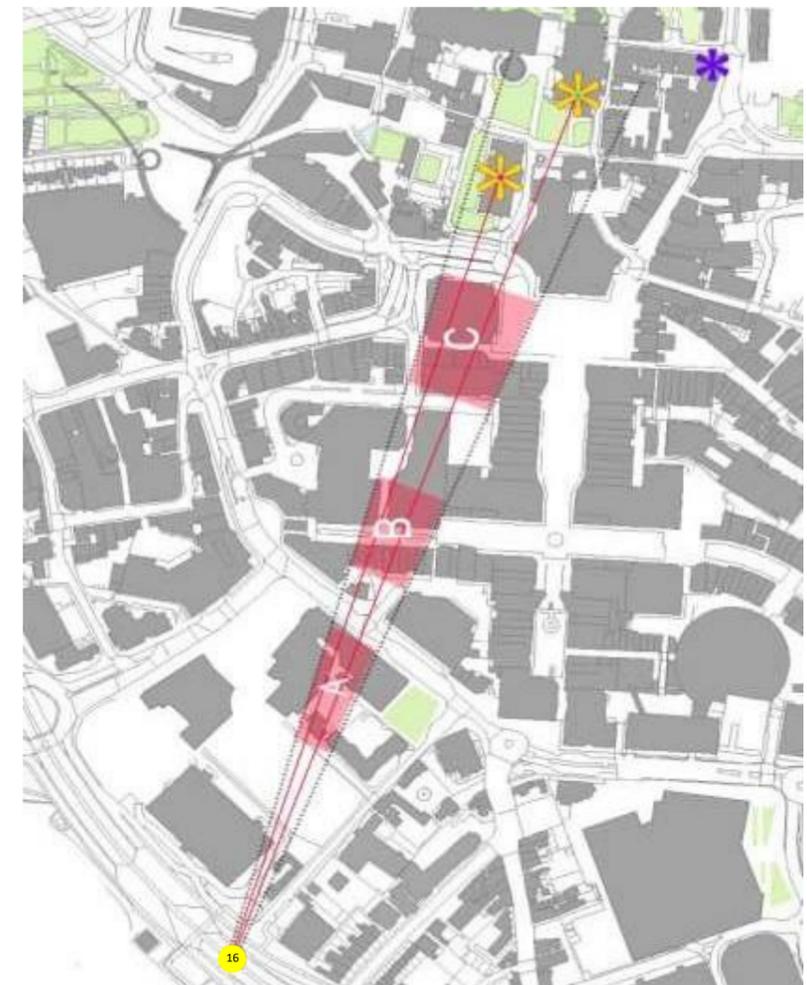


Fig 16.2



Fig 16.3

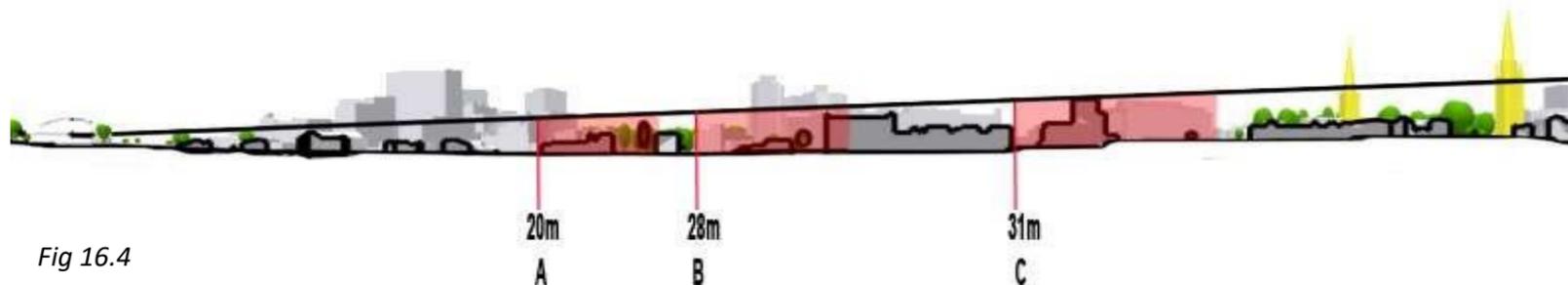


Fig 16.4

View cone 17: St Nicholas Street

St. Nicholas Street is a well used pedestrian route into the city centre and provides a visual connection from the heritage assets of the Coventry Canal Basin towards the cities three spires. St Nicholas Street offers strong views of St. Michaels and Holy Trinity, framed by modern development however remaining distinct in the skyline with positive 'space' around which benefits their primacy. From the junction with Light Lane the Spires become increasingly more prominent on the sky line with strong views looking across to Bishop Street.

The quality of the view experienced has improved with recent developments within the Civic Area which has resulted in the loss of Civic Centre 4 which previously formed the background of the Spires View. The removal of this building has resulted in this route now offering one of the best and consistent views of these Spires, which have been further framed by recent developments along Bishop Street. It is also evident on this view the importance of carefully considered street lighting infrastructure with the view somewhat compromised by a tall lighting column located aside the footbridge.

Retention of this positive viewpoint and the visual linkage between the heritage assets of the cathedral spires and the Coventry Canal Basin is crucial in delivering understanding of place, and demonstrates how new development may be accommodated whilst respecting important view cones. The view corridor highlights two indicative development zones within the city ring road to illustrate how graduations of height may be deliverable whilst retaining this view. Suggestions of height capacity are made as an example of what *could* be achieved, however demonstrations of impact will be required to accompany any proposal which is located within, immediately aside or within the background of the view cone.



Fig 17.3

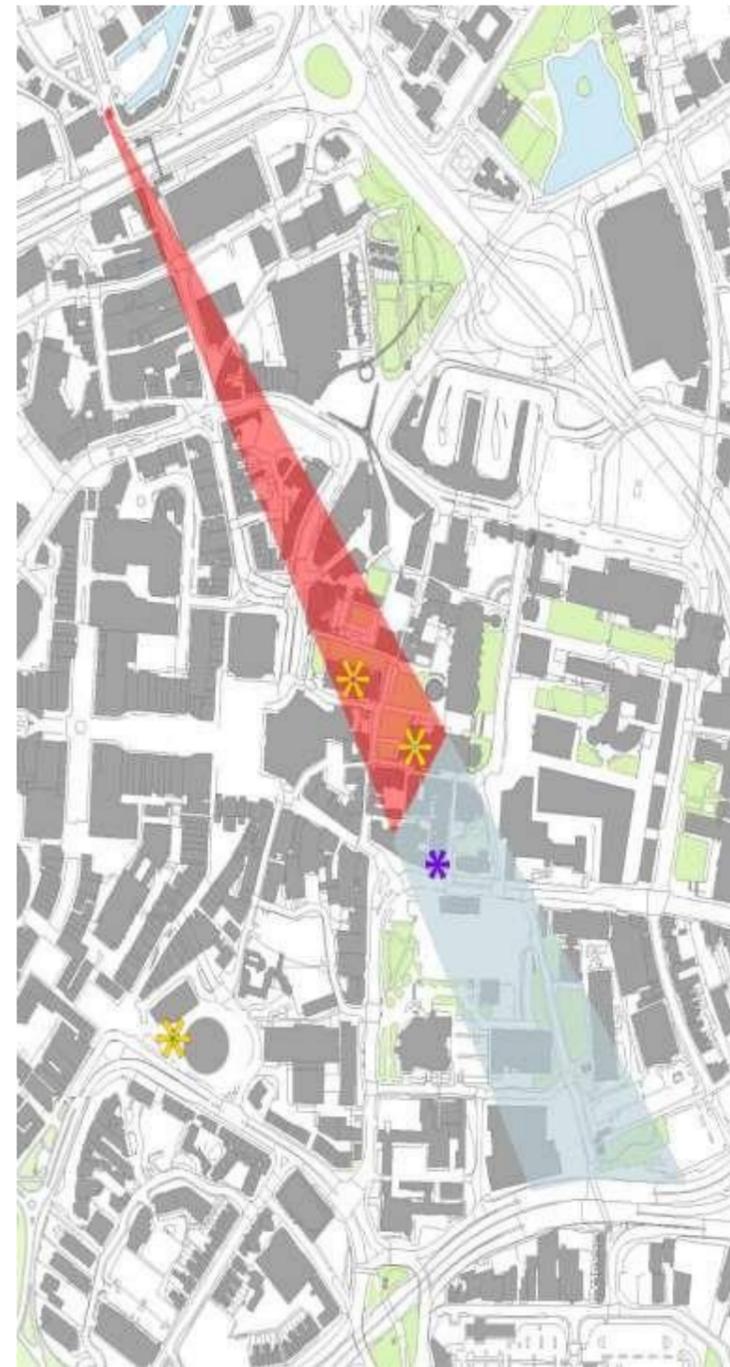


Fig 17.1

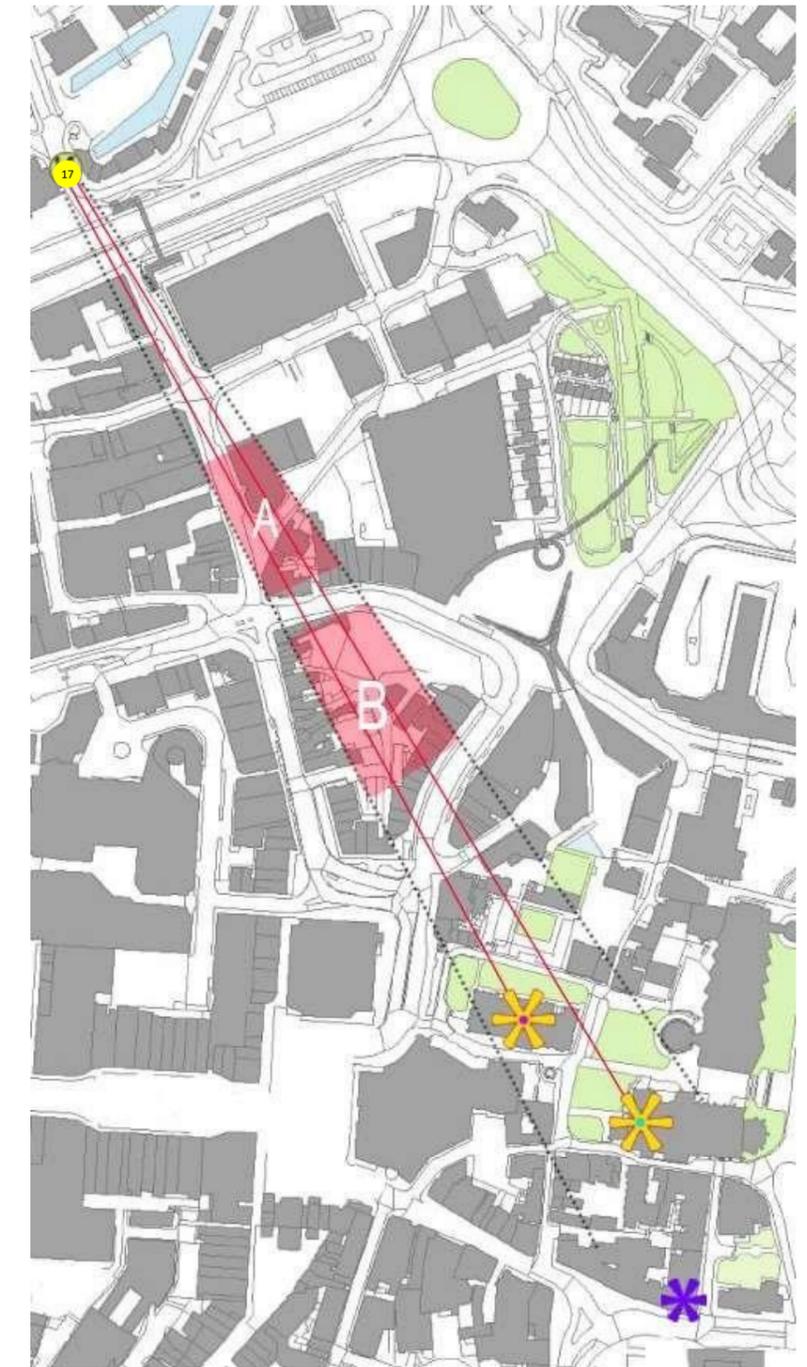


Fig 17.2



Fig 17.4



Fig 17.5

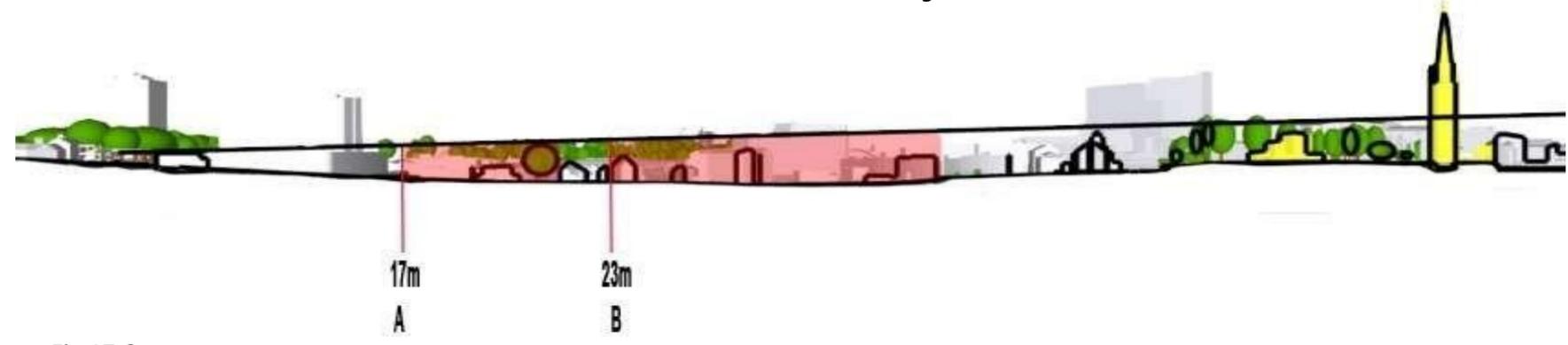


Fig 17.6

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Agenda Item 7

Communities and Neighbourhoods Work Programme 2022-23

|
Please see page 2 onwards for background to items

Last updated 21st September 2022

7th July 2022
Consultations on SPD's – Biodiversity and Residential Building Design Highways Asset Management Programme - Scheme Assessment Process
6th October 2022 (moved from 22nd September)
Article 4 consultation HMO DPD Local Listings SPD -Tall Buildings and View Management
3rd November 2022
Homes for Ukraine Scheme
8th December 2022
Housing and Homelessness Services
9th February 2023 23rd March 2023 2022/2023
Housing Development Infrastructure Residents Parking Scheme Fly-tipping Task and Finish Group Report Update Water Courses – management, infrastructure, and investment Skip Licenses Dropped kerb applications

Date	Title	Detail	Cabinet Member/ Lead Officer
7th July 2022	Consultations on SPD's – Biodiversity and Residential Building Design	To input into the consultation on the Supplementary Planning Document for Biodiversity and Residential Building Design	Cllr Welsh David Butler
	Highways Asset Management Programme - Scheme Assessment Process	About the selection and assessment process for schemes coming forward.	Cllr Hetherton Neil Cowper
6th October 2022 (moved from 22nd September)	Article 4 consultation HMO DPD	For the board to contribute to the consultation process	Cllr Welsh David Butler
	Local Listings	To look at the process and criteria for Local Listings	Cllr Welsh David Butler
	SPD -Tall Buildings and View Management	To consider the final SPD before Cabinet agreement	Cllr Welsh David Butler
3rd November 2022	Homes for Ukraine Scheme	How the Council is supporting the Homes for Ukraine scheme	Cllr Welsh Peter Barnett
8th December 2022	Housing and Homelessness Services	An update following an item in December 2021.	Cllr Welsh Jim Crawshaw
9th February 2023			
23rd March 2023			

Communities and Neighbourhoods Work Programme 2022-23

Date	Title	Detail	Cabinet Member/ Lead Officer
2022/2023	Housing Development Infrastructure	To look at proposals for planned housing developments and infrastructure. Specifically, to look at the timetabling of these developments and associated roads and infrastructure which will be required to support population growth and movement. To seek assurances that infrastructure will be in place before homes are occupied.	Cllr Welsh Andrew Walster/ David Butler
	Residents Parking Scheme	A report considering the changes suggested to meet the income target set in the MTFS. To look at the potential repercussions of introducing changes where there are none currently.	Cllr Hetherton Paul Bowman
	Fly-tipping Task and Finish Group Report Update	Progress report on implementation of recommendations	Cllr Hetherton, Cllr AS Khan Craig Hickin, Martin McHugh
	Water Courses – management, infrastructure, and investment	An item on Water Courses within the city, including investment in infrastructure in the City, with appropriate organisations, including Severn Trent Water and the Canal Trust, to be invited – to include the annual report.	Colin Knight/ Neal Thomas Cllr Hetherton
	Skip Licenses		
	Dropped kerb applications		

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