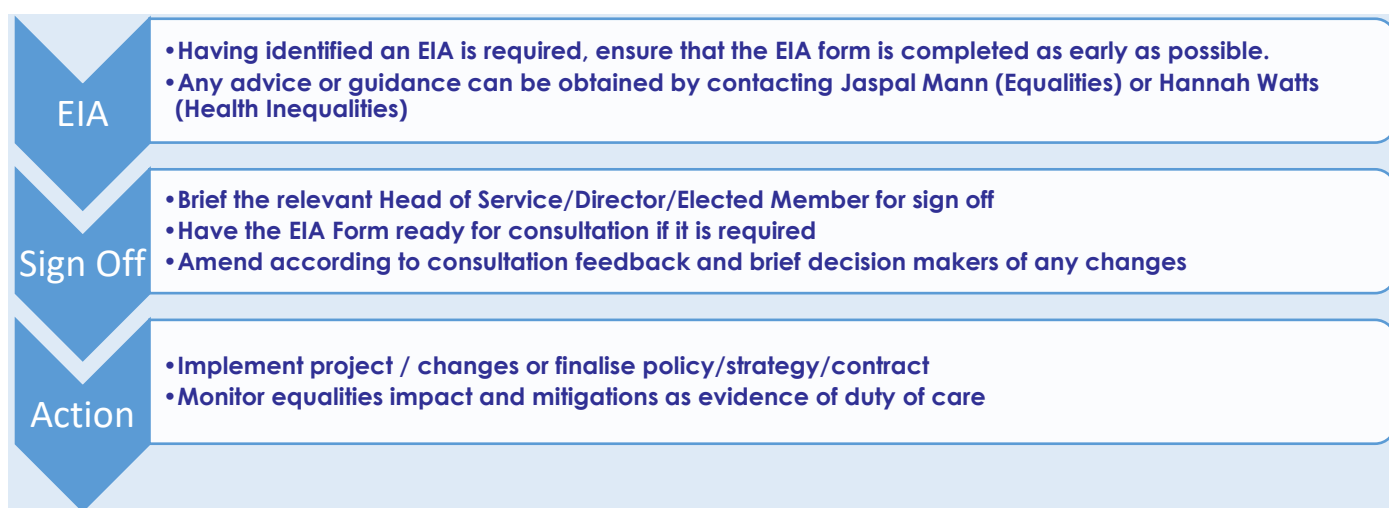


EQUALITY IMPACT ASSESSMENT (EIA)



Title of EIA		EIA Tall Buildings Design Guide & Three Spires View Management Framework SPD
EIA Author	Name	Clare Eggington
	Position	Planning Policy Manager
	Date of completion	07/07/2022
Head of Service	Name	David Butler
	Position	Head of Planning Policy and Environment
Cabinet Member	Name	Councillor David Welsh
	Portfolio	Housing and Communities



PLEASE REFER TO [EIA GUIDANCE](#) FOR ADVICE ON COMPLETING THIS FORM

SECTION 1 – Context & Background

1.1 Please tick one of the following options:

This EIA is being carried out on:

- ☐ New policy / strategy
- ☐ New service
- ☐ Review of policy / strategy
- ☐ Review of service
- ☐ Commissioning

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☒ Other project (*please give details*) *Supplementary Planning Document for Householder Design*

1.2 In summary, what is the background to this EIA?

The Tall Buildings Design Guide & Three Spires View Management Framework Supplementary Planning Document (SPD) adds further detail to the Local Plan and City Centre Area Action Plan (AAP) which were adopted on 6th December 2017 and for which EIA was undertaken. SPDs do not introduce new policy, but provide further detail and guidance to enable the delivery of adopted policies.

Delivering high quality design over the Plan period to 2031 is a key objective of the adopted Coventry Local Plan and City Centre Area Action Plan. The aim of this SPD is to facilitate the delivery of high quality design in relation to tall buildings (including the protection of views of the city centre spires) as set out in the adopted plans and in compliance with the most up to date national policy as set out in the National Planning Policy Framework.

The additional guidance provided within the SPD sets out detail for developers who are designing schemes for tall buildings.

1.3 Who are the main stakeholders involved? Who will be affected?

Developers, those who will live / work in the properties, the communities where the properties will be located, those who have an interest in the way in which plans are prepared (eg the various statutory consultees)

1.4 Who will be responsible for implementing the findings of this EIA?

Coventry City Council Planning Service

SECTION 2 – Consideration of Impact

Refer to guidance note for more detailed advice on completing this section.

In order to ensure that we do not discriminate in the way our activities are designed, developed and delivered, we must look at our duty to:

- Eliminate discrimination, harassment, victimisation and any other conflict that is prohibited by the Equality Act 2010
- Advance equality of opportunity between two persons who share a relevant protected characteristic and those who do not

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- Foster good relations between persons who share a relevant protected characteristic and those who do not

2.1 Baseline data and information

Please include a summary of data analysis below, using both your own service level management information and also drawing comparisons with local data where necessary (go to

<https://www.coventry.gov.uk/factsaboutcoventry>)

The Local Plan and AAP were independently examined by a Planning Inspector to ensure that policies were robust and formulated using appropriate evidence before they could be sound and capable of adoption. Further detail on the Local Plan, AAP and the evidence base can be found here

<https://www.coventry.gov.uk/localplan>

This SPD expands upon adopted Local Plan Policy DE1, Ensuring High Quality Design, and AAP policy CC7 (Tall Buildings). It provides additional for guidance developers who are designing tall buildings to ensure they produce high quality design which also respects the historic landscape of the city.

2.2 On the basis of evidence, complete the table below to show what the potential impact is for each of the protected groups.

- Positive impact (P),
- Negative impact (N)
- Both positive and negative impacts (PN)
- No impact (NI)
- Insufficient data (ID)

Any impact on the Council workforce should be included under question 2.6 – **not below*

Protected Characteristic	Impact type P, N, PN, NI or ID	Nature of impact and any mitigations required
Age 0-18	P	Whilst those aged 0-18 would generally not be directly involved in the design process, some may live in new tall buildings or in the environment / community which they impact and the SPD will ensure that such developments are of a high standard. 19.5% of the population are aged 0-15 so well over a fifth of the population (when the 16-18 year olds are factored in) could potentially benefit.
Age 19-64	P	67% of the population of Coventry are of working age (16-64). Many will live and work in new tall buildings or in the environment / community which they impact and the SPD will ensure that such developments are of a high standard.

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Age 65+	P	13.5% of Coventry's population aged above 65. As above, many may live in new tall buildings or in the environment / community which they impact, and the SPD will ensure that such developments are of a high standard.
Disability	P	17.7% of Coventry's residents have a limiting long term health problem or disability. The SPD encourages good design in new tall - build developments.
Gender reassignment	P	Good building design has a positive impact on everyone in the community.
Marriage and Civil Partnership	P	Good building design has a positive impact on everyone in the community.
Pregnancy and maternity	P	Good building design has a positive impact on everyone in the community.
Race (Including: colour, nationality, citizenship ethnic or national origins)	P	Good building design has a positive impact on everyone in the community.
Religion and belief	P	Good building design has a positive impact on everyone in the community.
Sex	P	Good building design has a positive impact on everyone in the community.
Sexual orientation	P	Good building design has a positive impact on everyone in the community.

HEALTH INEQUALITIES

2.3	<p>Health inequalities (HI) are unjust differences in health and wellbeing between different groups of people which arise because of the conditions in which we are born, grow, live, work and age. These conditions influence our opportunities for good health, and result in stark differences in how long we live and how many years we live in good health.</p> <p>Many issues can have an impact: income, unemployment, work conditions, education and skills, our living situation, individual characteristics and experiences, such as age, gender, disability and ethnicity</p> <p>A wide range of services can make a difference to reducing health inequalities. Whether you work with children and young people, design roads or infrastructure, support people into employment or deal with welfare benefits – policy decisions and strategies can help to reduce health inequalities</p>
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<p>Please answer the questions below to help identify if the area of work will have any impact on health inequalities, positive or negative.</p> <p>If you need assistance in completing this section please contact: Hannah Watts (hannah.watts@coventry.gov.uk) in Public Health for more information. More details and worked examples can be found at https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx</p>		
Question	Issues to consider	
2.3a What HIs exist in relation to your work / plan / strategy	<ul style="list-style-type: none"> Explore existing data sources on the distribution of health across different population groups (<i>examples of where to find data to be included in support materials</i>) Consider protected characteristics and different dimensions of HI such as socio-economic status or geographical deprivation 	
	<p>Response: The Tall Buildings Design Guide & Three Spires View Management Framework Supplementary Planning Document (SPD) supplements the policies of the adopted Local Plan / Area Action Plan which was subject to Health Impact Assessment. The Health and Wellbeing chapter of the Local Plan, which includes Policy HW1, requires Health Impact Assessments for particular types and scale of development where there could be significant impacts. See https://www.coventry.gov.uk/localplan This was supplemented by a Health Impact Assessment SPD which provided further detail and guidance including that in relation to design. See https://www.coventry.gov.uk/downloads/file/28900/health_impact_assessment_spd Whilst only major residential applications are subject to HIA, the explanatory text still encourages the use of the toolkit for smaller developments than those covered by the policy (which relates to developments of 150 homes or more, or a site area of 5 hectares or more). This Tall Buildings Design Guide & Three Spires View Management Framework Supplementary Planning Document (SPD) will help provide further guidance on good design (in terms of the tall building itself but also in relation to the surrounding area) and this will help to ensure decent living standards especially in terms of amenity, avoiding negative impacts (for example outlook, aspect, privacy, daylight, sunlight, noise, light glare, overbearing impact and an increased sense of enclosure).</p>	
2.3b How might your work affect HI (positively or negatively). How might your work address	<p>Consider and answer below:</p> <ul style="list-style-type: none"> Think about whether outcomes vary across groups and who benefits the most and least, for example, the outcome for a woman on a low income may be different to the outcome for a woman a high income Consider what the unintended consequences of your work might be 	

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the needs of different groups that share protected characteristics																	
	<p>Response:</p> <p>a. Potential outcomes including impact based on socio-economic status or geographical deprivation</p> <p>The Health Impact Assessment SPD referred to above includes the following:</p> <p>Category 1: Housing Quality and Design</p> <p>Access to decent and adequate housing is critically important for health and wellbeing, especially for the very young and very old. Environmental factors, overcrowding and sanitation in buildings as well as unhealthy urban spaces have been widely recognised as causing illness since urban planning was formally introduced. Post-construction management also has an impact on community welfare, cohesion and mental wellbeing.</p> <table><tr><th>Considerations</th><th>Negative effects</th><th>Positive Effects</th><th>Relevant Local Plan Policies and Supplementary Planning Documents</th></tr><tr><td rowspan="3"><ul style="list-style-type: none">• Accessible and adaptable dwellings• Internal space standards, orientation and layout• Affordable housing and dwelling mix• Energy efficiency• High Quality Design</td><td>A lack of affordable housing within communities may compromise the health of low-income residents as they are likely to spend more on housing costs and less on other daily living needs.</td><td>Making provision for affordable housing has the potential to improve wellbeing, while housing quality can be improved by use of appropriate construction methods. This includes use of good materials for noise insulation and energy-efficiency, and detailed design considerations to make sure that homes are accessible, adaptable and well oriented.</td><td rowspan="3"><ul style="list-style-type: none">• AC2: Road Network• DE1: Ensuring High Quality Design• DS3: Sustainable Development Policy• EM2: Building Standards• EM5: Sustainable Drainage Systems SuDS• H3: Provision of New Housing• H4: Securing a Mix of Housing• H5: Managing Existing Housing Stock• H6: Affordable Housing• H8: Care Homes, Supported Housing, Nursing Homes and Older Persons accommodation• Coventry Connected (Transport) SPD• Delivering a more Sustainable City SPD</td></tr><tr><td>Poor choice of location, design and orientation of housing developments can be detrimental to physical and mental health.</td><td>Providing a sufficient range of housing tenures with good basic services is also essential. Adaptable buildings for community uses such as health, education and leisure can contribute towards a sustainable community.</td></tr><tr><td>The quality of design, including internal sound insulation, daylighting and provision of private space can influence the health and wellbeing of occupiers.</td><td>Providing adaptable homes allows residents to remain in their home despite changing accommodation requirements. In this context, adaptable housing allows care to be</td></tr></table> <table><tr><td></td><td></td><td>provided in the community more easily.</td><td><ul style="list-style-type: none">• Sustainable Urban Extension Design Guide SPD</td></tr></table> <p>b. Potential outcomes impact on specific socially excluded or vulnerable groups eg. people experiencing homelessness, prison leavers, young people leaving care, members of the armed forces community.</p> <p>Ensuring well designed developments to meet a range of needs and circumstances is a key aim of the Local Plan (and AAP) design policy and the SPD provides the further detail to ensure that policy can be delivered.</p> <p>Policy DE1 of the Local Plan sets out the context, and the SPD provides the detail for ensuring that tall building developments are well designed and appropriate to meet the changing needs of the communities impacted.</p>	Considerations	Negative effects	Positive Effects	Relevant Local Plan Policies and Supplementary Planning Documents	<ul style="list-style-type: none">• Accessible and adaptable dwellings• Internal space standards, orientation and layout• Affordable housing and dwelling mix• Energy efficiency• High Quality Design	A lack of affordable housing within communities may compromise the health of low-income residents as they are likely to spend more on housing costs and less on other daily living needs.	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2.4 Next steps - What specific actions will you take to address the potential equality impacts and health inequalities identified above?

This was considered through the Local Plan and the AAP (the 'parent documents'), this document provides the detail to ensure the Local Plan and AAP policies can be delivered effectively. The SPD elaborates on adopted Policies DE1 and CC7 to ensure that high standards of design are implemented.

2.5 How will you monitor and evaluate the effect of this work?

Planning applications and their outcomes are monitored. However there is scope to improve the monitoring process and this is an action which will be undertaken by the planning policy team to consider moving forwards in terms of the effectiveness of design policy. In terms of the outcomes of further monitoring, if there are issues which are emerging, this can then be fed into a review of the wider local Plan policies.

2.6 Will there be any potential impacts on Council staff from protected groups?

No

You should only include the following data if this area of work will potentially have an impact on Council staff. This can be obtained from: lucille.buckley@coventry.gov.uk

Headcount:

Sex:

Female	
Male	

Age:

16-24	
25-34	
35-44	
45-54	
55-64	
65+	

Disability:

Disabled	
Not Disabled	
Prefer not to state	
Unknown	

Ethnicity:

Religion:

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White	
Black, Asian, Minority Ethnic	
Prefer not to state	
Unknown	

Sexual Orientation:

Heterosexual	
LGBT+	
Prefer not to state	
Unknown	

Any other	
Buddhist	
Christian	
Hindu	
Jewish	
Muslim	
No religion	
Sikh	
Prefer not to state	
Unknown	

3.0 Completion Statement

As the appropriate Head of Service for this area, I confirm that the potential equality impact is as follows:

No impact has been identified for one or more protected groups ☐

Positive impact has been identified for one or more protected groups ☒

Negative impact has been identified for one or more protected groups ☐

Both positive and negative impact has been identified for one or more protected groups ☐

4.0 Approval

Signed: Head of Service: David Butler	Date:
Name of Director: Andrew Walster	Date sent to Director:

EQUALITY IMPACT ASSESSMENT (EIA)



Name of Lead Elected Member: Councillor D Welsh	Date sent to Councillor:
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Email completed EIA to equality@coventry.gov.uk