

Tall Buildings Design Guide and View Management Framework - SPD Consultation Summary

Tall Buildings Guide SPD:

Comment Reference	Respondent	Page/Para Reference	Consultation Response	Officer Summary	Proposed Change to SPD
TB1	Birmingham Airport		<p>Birmingham Airport should be consulted on proposed tall buildings or structures within close proximity of the aerodrome. This ensures the safety of aircraft operations.</p> <p>This is achieved through both the 'Obstacle Limitation Surfaces' (OLS) and the 'Instrument Flight Procedure' (IFP) protected surfaces. Safeguarding maps are available on request.</p>	<ul style="list-style-type: none"> - Noted. This already happens as part of the planning application process. 	No action required
TB2	Historic England	General, Section 1.0, Section 3.0, Section 5.0, Section 6.0, Section 7.0, SEA Screening Assessment,	<p>General:</p> <p>Historic England recognises the clear benefits of producing an SPD for this topic area. The purpose of an SPD is to provide guidance on the application of adopted policy, and it is important to ensure that the implication of this important policy document does not adversely affect or undermine the historic, physical and social value of the historic environment. However, the document seems to stray beyond the realms of an SPD in parts and we would question whether some parts should actually be considered as policy as part of any development plan review.</p> <p>Historic England has recently published an updated Advice Note (HEAN 4), which provides advice on planning for tall buildings within the historic environment. Its purpose is to support</p>	<ul style="list-style-type: none"> - Noted, and supportive comments welcomed. We do not agree that the SDP overreaches it's remit as it does not set any new policies, but articulates those already stated in the City Centre Area Action Plan adopted in 2017. 	No changes required.

Tall Buildings Design Guide and View Management Framework - SPD Consultation Summary

			<p>local planning authorities (LPAs), developers, communities and other stakeholders in dealing with tall buildings proposals within the legislative and planning framework relevant to the historic environment. This can be accessed via the following link: https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/heag037-tall-buildings-v2/</p>		
	Historic England		<p>Section 1.0:</p> <p>Firstly, we welcome that the SPD provides a clear set of criteria which the Council will expect to be addressed in any applications for tall buildings, with the principal objective of securing tall buildings of the highest possible design quality.</p>	- Noted and welcomed.	No changes necessary.
	Historic England		<p>Section 3.0 Pre application Advice:</p> <p>Historic England is also supportive of the requirements for pre-application advice on proposals for tall buildings; particularly that townscape visual impact assessments, including the identification of key views, are encouraged, and that outline applications will be discouraged</p>	- Noted and welcomed.	No changes necessary.

Tall Buildings Design Guide and View Management Framework - SPD Consultation Summary

	Historic England		<p>Section 5.0 Definition of a tall building:</p> <p>We are also pleased to see that the local context has been considered when defining what constitutes a tall building within Coventry.</p>	- Noted and welcomed.	No changes necessary.
	Historic England		<p>Section 6.0 Assessment of tall building proposals:</p> <p>Historic England welcomes the requirement for a 'Tall Buildings Statement' and that the principles/criteria identified by the LPA should be addressed within these statements. We especially note and welcome the criterion that applications should illustrate the impact of tall buildings proposals on any local views and vistas</p>	- Noted and welcomed.	No changes necessary.
	Historic England		<p>Section 7.0 Three Spires View Management Framework:</p> <p>Historic England notes that this section takes forward the views of the Spires identified within Policy CC7: Tall Buildings, of the adopted City Centre Action Plan (AAP). However, we also note that for the 17 separate view cones identified toward the city's three spires, cross sections are included which suggest potential heights of development which may be achievable at specific locations.</p> <p>In relation to this approach Historic England raises serious concerns about this part of</p>	- The draft SPD made clear that the heights identified were considered the maximum possible in the context of the impact on the established view, rather than allocating land for a tall building or providing any other such surety. However, in order to make sure this distinction is crystal-clear a number of amendments will be made to the SPD.	Adjust terminology to make sure there is no doubt that any heights referred to do not constitute an allocation or assurance that that height can be reached.

Tall Buildings Design Guide and View Management Framework - SPD Consultation Summary

			<p>the SPD and whether it goes beyond the role of an SPD into the realms of what should be policy, especially with reference to specific locations identified within the various view cones. Furthermore, we are concerned that the suggested suitable locations for tall buildings is not informed by any robust evidence base, including Strategic Environmental Assessment/Sustainability Appraisal or by Mapping Zones of Theoretical Visibility.</p> <p>In relation to this we refer you to HEAN 4, section 4 on “Tall Buildings and the Development Plan”, which sets out that development plans should include a specific tall buildings policy accompanied by site-specific policies to support areas / sites identified as appropriate for tall buildings; or, where tall buildings proposals are the exception, as well as a more general place-shaping policy, which includes building height, density and local context.</p>		
	Historic England		<p>Tall Buildings Design Guide and Three Spires View Management Framework SPD SEA Screening Assessment:</p> <p>With regard to the SEA Screening Assessment that accompanies the consultation on this SPD, we consider that identifying potential locations for tall buildings within the city of Coventry may result in significant environmental effects with regard to the historic environment. As this has</p>	<ul style="list-style-type: none"> - As noted above, the SPD articulates the impact heights of the protected views (as per the City Centre Area Action Plan), rather than permit tall buildings in specific locations. Changes are proposed that will make that distinction clear and, 	Changes as per the above

Tall Buildings Design Guide and View Management Framework - SPD Consultation Summary

			<p>not been tested within the Development Plan, we therefore consider that a SEA should be carried out in relation to this SPD.</p> <p>As a result, we would not endorse the Authority's conclusions that it is not necessary to undertake a Strategic Environmental Assessment of this particular SPD. We look forward to engaging with you as this SPD is progressed over the coming months and we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise (either as a result of this consultation or in later versions of the guidance) where we consider that these would have an adverse impact upon the historic environment</p>	<p>therefore, we remain of the view that an SEA is unnecessary.</p>	
TB3	The Coal Authority	General	<p>It is noted that this current consultation relates to an SPD on Tall Buildings & Three Spires View Management Framework. I can confirm that the Planning team at the Coal Authority have no specific comments to make on this document.</p>	<ul style="list-style-type: none"> - Coal Authority have no specific comments to make on this document. 	No action required

Tall Buildings Design Guide and View Management Framework - SPD Consultation Summary

TB4	Ministry of Defence	General	In summary, the MOD have no concerns with the Tall Buildings Design Guide & Three Spires View Management Framework SPD but would emphasise that if development is proposed in excess of 50m AGL, then consultation with the MOD should take place. Policy wording that alerts developers to this potential would be welcomed.	- Policy wording for dev above 50m AGL triggering consult with MOD would be welcomed	Additional wording added at 6.15
TB5	Coventry Society	General	The Coventry Society supports the adoption of these policies. We believe that they are well considered and set out clear principles without being over-prescriptive. They tell developers what is expected of them and we believe that over time, as the city skyline changes they will be useful in bringing about improvements. They are a valuable complement to City Centre Action Plan policies.	Noted and welcomed	No action required
TB6	Fabric Advisory Committee of Coventry Cathedral	General	General: The FAC welcomes the creation of a guide which respects the importance of key views of the iconic Coventry three spires and endorses the view cones identified in paragraph 6.1.6 of the Supplementary Document. It also endorses the following paragraph which states '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	- Comments noted and welcomed	No action required

Tall Buildings Design Guide and View Management Framework - SPD Consultation Summary

			<p>consideration irrespective of the location and setting of any proposed tall building.'</p> <p>In addition, the Committee considers that, as you have pointed out, an additional view is worthy of explicit protection, i.e., the long view which, on the imminent demolition of the Alan Berry building, will open up along the pedestrian route through the University of Coventry campus. This view terminates in the east end of the ruined cathedral with the spire rising beyond, an iconic view in its own right captured in the celebrated John Piper water colour painting (now in the Herbert Art Gallery) created following the cathedral's 1940 destruction. While only the one spire is visible, it is a sufficiently important view to be as well protected within the policy document as that of the three spires together.</p> <p>Finally, the committee notes that, longer term, other views of the cathedral spire, and potentially the other spires, which have in the last forty or fifty years been lost or diminished may be able to be improved once current buildings are demolished. Omission of these from the view cones adopted in this document should not influence the Council's ability to introduce new view cones to the list should such opportunities arise.</p>		
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Tall Buildings Design Guide and View Management Framework - SPD Consultation Summary

TB7	Coventry Cathedral	General	<p>Chapter welcomes the consultation and is pleased that the Council is taking seriously the preservation of the views of our iconic 3 Spires. The 3 spires of Coventry are part of our shared history as a City and the views need to be preserved. Chapter notes that it is a shame such considerations were not made before some buildings were allowed to be built which have disrupted the views.</p> <p>In the document Chapter recognises all the views you mention and thinks they should all indeed be protected. In addition, Chapter would like to add in the view from Cox Street through the University buildings up towards the apse of the Ruined Cathedral. This is quite a narrow view, but is spectacular. With the imminent demolition of the Alan Berry building, the view may become even more significant and indeed any decisions on whether a building should be built in replacement need to consider the impact on the view and certainly to preserve it. Chapter therefore considers that this view needs to be added to your list of protected views. In conversation, I have mentioned this to the University so that they know our view of the importance of this view through their precinct.</p>	<ul style="list-style-type: none"> - Comment noted and welcomed. The creation of prescribed new view points is beyond the remit of a Supplementary Planning Document. However, such matters may be considered as part of the forthcoming Plan Review. 	No action required.
TB8	Resident	General	I had a look at the assessment criteria for tall buildings and I hope it is used properly.	<ul style="list-style-type: none"> - Noted 	No action required

Tall Buildings Design Guide and View Management Framework - SPD Consultation Summary

TB9	Resident	General	<p>I am writing to give feedback on the Tall Buildings Design Guide & Three Spires View Management Framework SPD. I fully support the concept of having an SPD on the design of tall buildings and the management of the three spires view which will provide guidance for developers in the future. It is much needed and, in many ways, it is a pity that it has not been in place before now. The SPD is well presented and covers the main areas; nevertheless, there are a few points which I hope will be helpful to consider.</p>	<ul style="list-style-type: none"> - Comment noted and welcomed 	No action required
	Resident		<p>City-centre focus</p> <p>Although a focus on the city-centre and its views is important, would it be possible to extend the remit to setting standards for all tall buildings within or on Coventry’s administrative boundaries? There already have been proposals to build tall buildings outside the ring-road, in areas such as Foleshill, Earlsdon and Radford. There is a concern that if different standards are set, it could displace the siting of tall buildings as developers look to maximise their profits by locating them where they believe there are lower standards.</p>	<ul style="list-style-type: none"> - The standards set out in the first part of the document are applied to all tall buildings within the boundary of the city. The view cones are those from the specific points detailed in the second part of the SPD. 	No action required

Tall Buildings Design Guide and View Management Framework - SPD Consultation Summary

	Resident		<p>Distribution Centres</p> <p>With the trend in building big sheds (distribution centres) and Coventry being within the Golden Triangle, there is a need to look at their impacts especially as they are often located near to residential areas such as within mixed-use sites, on ex-greenbelt or on brownfield. Eave heights of 18m are common but there are warehouses in this country that go above 20m. In other parts of the world, 'multi-storey' warehouses have been built and there is discussion about bringing this concept over to the UK. At the moment, the SPD's definition of a tall building is '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)'.</p> <p>Understandably, there is a focus on tall buildings in terms of their use as apartments or office-space but it is also important to consider the impacts of B8 in residential areas especially as there is little guidance on this currently.</p>	<ul style="list-style-type: none"> - The SPD has set the height at what we believe to be a reasonable level. Clearly there will be buildings that fall just under this bar, and will be determined against the policies in the Local Plan, NPPF and all other relevant documents. 	No action required
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Tall Buildings Design Guide and View Management Framework - SPD Consultation Summary

	Resident		<p>Siting – roads, other building types, etc.</p> <p>It is good to see that there are references to siting, massing, scale and urban grain within the SPD.</p> <p>It is a concern that tall buildings are being placed so close to busy roads, including the ring road. This cannot be pleasant for whoever lives in them or for pedestrians. This practice can lead to an increase in issues with air quality by creating street canyons. Furthermore, it can be assumed that the windows facing busy roads may be sealed to avoid issues with noise pollution. Has the heat island effect and the need for ventilation been considered effectively within the design of these developments?</p> <p>Could an item be added to the climate impact section to deal with the siting of tall buildings next to roads. The management of the impacts of roads on air quality, noise pollution and the heat island effect on residents and pedestrians should be referred to including how blue green infrastructure (BGI) should be used to reduce them</p>	<ul style="list-style-type: none"> - Such matters are already considerations of the planning process, and location with regards to air quality is picked up in our Air Quality SPD 	No action required
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Tall Buildings Design Guide and View Management Framework - SPD Consultation Summary

	Resident		<p>Secured by design</p> <p>It would be useful to have a section on crime reduction within the design guide and references to the 'Secured by Design' initiative. Their section on physical security is particularly relevant to the SPD as it refers to issues such as visitor door entry, access to landings/stairwells, CCTV, emergency door release devices, etc</p>	<ul style="list-style-type: none"> - Please see responses to the representation from West Midlands Police 	No action required
	Resident		<p>Parking</p> <p>It is a concern to read the following within the SPD: 'Applicants should seek to ensure that car parking is located within the development or behind the building and not at the front.'</p> <p>How does this support modal shift, prevent public space from being compromised, improve air quality or reduce heat island effects? With the ever-increasing pressure for growth and densification, it is essential that the public realm is protected from becoming cluttered with cars and that inefficient parking schemes are prevented from using up land. The SPD should outline figures for parking standards and provide detail on the types of scheme which would be considered within urban environments of high housing density. Developers should be required to contribute towards public transport schemes such as the reintroduction of trams, secure park-and-ride facilities, etc.</p>	<ul style="list-style-type: none"> - Parking standards are already articulated within the Local Plan. Some parking, such as disabled spaces, may still be required and it is appropriate for the SPD to set the locational expectations of these. Indeed, by ensuring that essential parking is provided to the rear of tall buildings the SPD helps maintain uncluttered public realm. 	No action required

Tall Buildings Design Guide and View Management Framework - SPD Consultation Summary

			<p>The back of buildings should be prioritised for managing pick-up and drop-off, deliveries, cycle storage and waste management within a safe and secure environment</p> <p>It would also be useful if permeable paving materials and the prevention of watercourses from being contaminated through run-off from parking areas and roads into storm drains were referred to within the SPD. 'The SuDS Manual' produced by CIRIA (2015) is a useful resource for practical solutions</p>		
	Resident		<p>Access, services and open space</p> <p>Where there are limitations to providing onsite provision, it is vital that nearby locations for open space are identified and secured. Would it be possible to set standards for distances to pocket parks, children's play areas, MUGAs, etc., which are specifically tailored to the needs of a population within a high-density location? Should the developer be required to make financial contributions towards these? How will maintenance be secured in the long-term?</p>	<ul style="list-style-type: none"> - Open Space matters are fully addressed in our recently adopted Open Space SPD 	No action required

Tall Buildings Design Guide and View Management Framework - SPD Consultation Summary

	Resident		<p>As the trends to convert retail and office space to residential continues it is important that the provision of services keeps pace with the population increases within the city centre. Developers should be required to make contributions towards services such as GP practices, dentists, nurseries and primary schools. In addition, Coventry's Local Plan needs to identify locations where existing provision could be expanded or new premises built. With careful neighbourhood planning, some of these services could be incorporated within the ground floors of tall buildings themselves. It is essential that the SPD highlights the importance of '20-Minute Neighbourhoods',</p>	<ul style="list-style-type: none"> - Developer contributions are not by this SPD. However, many of the contributions you note are already requested through the planning process. Clearly this SPD cannot dictate policy to the Local Plan, and such matters will be reviewed as part of the Local Plan Review. 	No action required
	Resident		<p>Approval of elderly and student accommodation needs careful consideration especially if there is any possibility of a later change of use. Smaller one bed units, limited parking and common room/shared areas without play areas/open space would not be suitable for young families. There is a real danger for student accommodation to be used as a vehicle to maximise profit by avoiding the financial contributions and standards normally attached to residential apartments. The clear demarcation of public versus private space is also an important factor and needs to be considered in terms of public access and movement through an area; public rights of way need to be clearly defined and the security features used to enclose private spaces and/or</p>	<ul style="list-style-type: none"> - Conversions such as those indicated require planning permission and any required contributions and so forth would be addressed at that point. 	No action required

Tall Buildings Design Guide and View Management Framework - SPD Consultation Summary

			use of signage needs to be evaluated carefully to prevent the streetscape being undermined by threatening atmospheres		
	Resident		<p>Use of segregation</p> <p>It is good to see a reference to public spaces being ‘safe, social and inclusive uses – mixed and integrated,’ that ‘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’ and the inclusion of the statement ‘... good design can help to reduce environmental inequalities.’</p> <p>It is essential that tenants in affordable housing are treated equally and are not segregated from the rest of their community. Therefore, the SPD should cover affordable housing in more detail as segregation issues do appear to be associated with tall buildings and high-density developments.</p>	<ul style="list-style-type: none"> - Affordable housing matters are addressed fully in our recently adopted Affordable Housing SPD 	No action required
	Resident		<p>Service and delivery yards, waste disposal, etc</p> <p>Attention should be given to pick-up and drop-off areas, cycle storage facilities, access points for delivery and locations for waste disposal. These areas can become focal points for anti-social behaviour and crime; if they are poorly designed, lack security or have an inadequate</p>	<ul style="list-style-type: none"> - Noted, these areas are covered by the Design and Access Statement and other required application documentation. 	No action required

Tall Buildings Design Guide and View Management Framework - SPD Consultation Summary

			amount of space allocated to them, they can undermine the surrounding area and streetscape.		
	Resident		<p>Appreciating our history, architecture and public art.</p> <p>It is good to see the phrase ‘respond to local character, history and identity’ used within the SPD but there should be a separate section on appreciating our history, architecture and public art</p> <p>It is good to see the reference to the selection of materials which ‘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.’ Some of the tall buildings built recently do not reference their surroundings and have used garish cladding instead.</p> <p>Could a palette of colours, materials, examples of artwork and motifs be provided within the SPD to engage developers and inspire them to create buildings which will age well and portray the essence of Coventry?</p>	<ul style="list-style-type: none"> - We are not able to prescribe a palette of materials or colours within the city centre. Equally we want to encourage innovative response to individual site contexts and promoting specific city-wide responses may fetter that. Such advice is best placed in Conservation Areas where a distinctive single characteristic has been identified. 	No action required

Tall Buildings Design Guide and View Management Framework - SPD Consultation Summary

	Resident		<p>Providing shade</p> <p>Street trees will become increasingly important as we start to make adaptations for climate change. However, with densification and the competition for space within the city centre, I do have concerns about future choices of species for streets and open spaces. Will they provide enough shade? Will they have a long lifespan? We need to allow enough space and time for new trees to become our veterans and ancients of the future. Areas within the city centre need to be dedicated for planting our larger native species with the intention of them becoming our new Cofa's Trees – creating outdoor meeting places for the people of Coventry under the protection of their cooling shade and providing a symbol of hope and commitment to the future in uncertain times. However, engineered shade should not be overlooked as the use of some urban forms, such as building overhangs and breezeways, can sometimes be more effective</p>	<ul style="list-style-type: none"> - Noted, tree planting and the creation of new public space are beyond the scope of this SPD. 	No action required
	Resident		<p>Building with nature</p> <p>Using best practice guidance, standards and benchmarks helps to streamline the planning process, ensures consistency in approach and supports Coventry City Council in keeping its policies and practice up to date. Therefore, I wondered whether it would be possible for Coventry City Council to explore the use of the 'Building with Nature Standards Framework,</p>	<ul style="list-style-type: none"> - The purpose of this document is to set the requirements of Tall Buildings and also how they interact with the protected views of the Three Spires. Such matters as outlined are not sought to be addressed here, and indeed the Tall Buildings 	No action required.

Tall Buildings Design Guide and View Management Framework - SPD Consultation Summary

			<p>Unfortunately, there appears to be no reference to building-dependent wildlife within the SPD To support nature recovery, it is essential that our new buildings are designed with wildlife in mind. There are excellent examples of how this can be achieved within the book and there is now a British Standard for nest boxes</p> <p>In their TAN, Oxford City Council have used a table to outline expected provision of artificial features for different types of development and a section on artificial nests or roost sites. Is that something Coventry City Council could do?</p>	<p>Technical Advice Note from Oxford City Council does not address such matters either.</p>	
	Resident		<p>Lighting schemes, etc</p> <p>Lighting schemes, building design/height and use of materials are factors which can have impacts upon biodiversity. Currently, the SPD appears to focus on the use of lighting to ‘enhance the appearance of tall buildings’ and there appears to be no mention of the impact on wildlife. Should all tall buildings not require a light impact assessment?</p>	<p>- This SPD is part of a suite of documents that help inform applicants and decision makers. Specific biodiversity and wildlife concerns are captured in our Biodiversity Net Gain SPD, and it is not practicable to repeat all requirements here.</p>	No action required.

Tall Buildings Design Guide and View Management Framework - SPD Consultation Summary

	Chief Constable of West Midland Police		<p>The CCWMP welcomes recognition in the Draft SPD of the need for planning applications to include consideration of active frontages, natural surveillance, legible entrances and clear definition of public realm – as set out in sub8/10 section ‘Streetscape’ in section 6 ‘Assessment of tall building proposals’ (page 8).</p> <p>He also supports the recognition in paragraph 6.36 that tall buildings need 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...’</p>	<ul style="list-style-type: none"> - Noted and welcomed. 	No action required.
	Chief Constable of West Midland Police		<p>30. However, the Draft SPD does not currently fully meet the requirements of national planning policy, as set out in detail above, including NPPF paragraphs 92, 97, 130(f), and 187.</p> <p>31. There is a fundamental need for safety and security measures to be considered as a core design principle for tall buildings. Developments should be designed to fully address safety and security matters employing proven Secured By Design principles. This would include consideration of all relevant measures to reduce crime, anti-social behaviour and the fear of crime. In addition, there is a need for counter-terrorism measures to be intrinsic within the design of tall buildings to reduce the risk of them</p>	<ul style="list-style-type: none"> - Whilst we disagree that the SPD is contrary to the NPPF, we do consider that a subparagraph highlighting the NPPF requirements regarding crime and safety would be helpful 	Additional wording added at 2.10 – policy context

Tall Buildings Design Guide and View Management Framework - SPD Consultation Summary

			<p>becoming potential targets for terrorist attacks.</p> <ul style="list-style-type: none"> - Section 6 'Assessment of tall building proposals' - <u>'Architectural and Security Lighting'</u> Paragraph '6.32 'Applications should, where appropriate give consideration to the incorporation of architectural lighting effects into any proposal for a tall building. Consideration should also be given to the use of lighting to illuminate approach pathways, lobbies, communal areas and internal walkways to reduce crime, anti-social behaviour and the fear of crime. 		
	Chief Constable of West Midlands Police		<p>32. Appropriate wording is also required in the SPD to protect the sensitive operational requirements of Police premises in the vicinity of any proposed tall buildings, as required by NPPF paragraph 97(b). This is in terms of, for example preventing overlooking and maintaining unobstructed telecommunication communications pathways. Development of tall buildings should not be an agent of change. Current and future Police operational requirements should not be compromised by the development of a nearby tall building.</p>	<ul style="list-style-type: none"> - This is already covered by National Policy, which the SPD does not seek to repeat. 	No action required

Tall Buildings Design Guide and View Management Framework - SPD Consultation Summary

	Chief Constable of West Midland Police		<p>33. To appropriately address the design requirements for tall buildings, the CCWMP requests reference is made in the SPD to the need for early engagement with West Midlands Police Design Out Crime & Crime Reduction Officers, together with counter-terrorism officers, at the preapplication stage.</p> <ul style="list-style-type: none"> - Section 3 'Pre application advice' paragraph 3.1 <i>'Prospective applicants and their agents should note that it will be strongly encouraged to engage in Pre-application discussions with the LPA and West Midlands Police Design Out Crime & Crime Reduction Officers, and with counter-terrorism officers for developments of tall buildings in the city</i> 	As the Local Planning Authority, it would not be appropriate for us to suggest engagement with third parties as a requirement of our planning pre application process.	No action necessary
TB10	Chief Constable of West Midland Police	General	<p>34. Therefore, the CCWMP formally requests that the following additional wording is included in the final version of the SPD. The proposed amendments are written in 'bold' text:</p> <p><u>'Public Realm'</u> paragraph 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 evening; and, where appropriate provide a comprehensive scheme of quality external landscaping with a maintenance plan</p>	<ul style="list-style-type: none"> - Para 6.35 – agreed - Para 6.42 – there will be a number of exceptions, and the SPD does not propose to list them all here, especially where NPPF and Local Plan policies are clear - Para 6.43 – This point is covered by the outlook point - Para 6.47, 6.50 – The SPD cannot set requirements that are not in the Local Plan or the NPPF, such as 	<p>Revision to wording at 6.35 to incorporate 'evening' and maintenance plan</p> <p>Addition of Designing out Crime section at 6.40</p>

Tall Buildings Design Guide and View Management Framework - SPD Consultation Summary

			<ul style="list-style-type: none"> - <u>'Neighbourliness'</u> paragraph 6.42 'Applications should analyse and describe the impact of proposals on neighbouring buildings. Particular attention should be paid to separation distances, height and overlooking where a tall building is proposed near an operational Police premises - <u>'Neighbourliness'</u> paragraph 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...overlooking. - 'Design out Crime' new paragraphs <ul style="list-style-type: none"> ▪ 6.47 All tall building designs will be required to meet Secured By Design standards and consider safety and security and the need to reduce anti-social behaviour and the fear of crime. ▪ 6.48 Designs should seek to prevent crime and be developed in consultation with the Force Design Out Crime & Crime Reduction Officers at the pre-application stage. ▪ 6.49 Any relevant counter terrorism standards applicable at the time should be taken into consideration. ▪ 6.50 Details of Secured By Design compliance should be included in Design and Access Statements and Tall 	<p>the use of Secured by Design.</p> <ul style="list-style-type: none"> - Para 6.48 – It is not appropriate for us to require specific third party engagement as part of the pre application process - Para 6.49 – Agreed - Para 6.51 - Agreed 	
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Tall Buildings Design Guide and View Management Framework - SPD Consultation Summary

			<p>Building Statements at the planning application stage.</p> <p>▪ 5.51 All design proposals should consider the legacy of the development and whether a maintenance plan would be appropriate, particularly in communal areas, to reduce the risk of crime in the short, medium and longerterm.</p>		
	Chief Constable of West Midland Police		<p>Conclusions:</p> <p>35. The CCWMP has a statutory duty to secure the maintenance of an efficient and effective Police force for its area and the Council has a statutory requirement to consider crime, disorder, and community safety in the exercise of its planning functions.</p> <p>36. It is requested that in accordance with national planning policy, the theme of community safety, security and crime prevention is given greater prominence in the SPD to promote sustainable new communities where safety, reducing crime, fear of crime and anti-social behaviour, are prioritised. It is proposed that this be achieved by introducing additional wording into the SPD, including the introduction of a new sub-paragraph within Section 6 to address the need to design out crime.</p>	<ul style="list-style-type: none"> - Noted, the CCWMP is a statutory consultee of relevant planning applications, giving appropriate opportunity to be engaged in planning applications. The insertion of some of the suggested wording into section 6 gives the greater prominence requested. 	No action required

Tall Buildings Design Guide and View Management Framework - SPD Consultation Summary

			37. The CCWMP formally requests that relevant officers are invited to be involved in the design of developments. The centrally based Design Out Crime Team (DOCT) have extensive knowledge of security measures and 'Designing Out Crime		
TB11	Communities and Neighbourhoods Scrutiny Board		<p>Members of the Board made the following comments:</p> <ul style="list-style-type: none"> • Concerns that the proposals could lead to lots of tall buildings in one area of the city centre where views aren't affected • Whether views opened up by the removal of buildings could be added to the protected views • How the viewpoints were identified. • Whether the viewing points were promoted as tourist attractions. 	- Question raised on how to secure views potentially opening up in the future	No revision to SPD necessary