

Householder Design Guide Rep Tracker:

Comment Reference	Respondent	Page/Para Reference	Consultation Response	Officer Summary	Proposed Change to SPD
HH 1	CCC Scrutiny Board	<ul style="list-style-type: none"> • Para 4.19 • Figure 8 • Outbuildings principles • Glossary • Appendix One 	<p>Para 4.19:</p> <ul style="list-style-type: none"> - drafting error <p>Figure 8:</p> <ul style="list-style-type: none"> - Suggest use of a ‘tick’ in similar fashion to other dormer guidance may assist reader <p>Outbuildings principles:</p> <ul style="list-style-type: none"> - clarify use for home office being acceptable or not <p>Glossary:</p> <ul style="list-style-type: none"> - Suggestion of glossary / definition of terms would be useful to reader <p>Appendix One:</p> <ul style="list-style-type: none"> - Suggestion of glossary / definition of terms would be useful to reader 	<ul style="list-style-type: none"> - Drafting errors to be amended - Standardisation of use of tick to guide readers notably in relation to Figure 8 would assist in legibility - It is agreed that an adoption of a glossary of terms to guide readers would prove beneficial - Appendix one wording retained for robust justification statement requirements, however glossary now included to assist reader. - In respect of nature of ‘incidental use’ and garden offices, the wording is retained, given some areas of the city are subject to controls in this regard. In addition, clarifications on home working offices may be included in the upcoming local plan review process. 	<ul style="list-style-type: none"> - Addition of tick to figure 8 - Adoption of a clear glossary of terms to the rear of the document
HH 2	Internal consult	<ul style="list-style-type: none"> • use of word ‘canopy’ 	<p>Porches:</p> <ul style="list-style-type: none"> - Additional use of word ‘canopy’ to accompany porch guidance – non substantive 	<ul style="list-style-type: none"> - Addition of the term ‘canopy’ when referring to porch elements would assist and deliver additional clarity to reader 	<ul style="list-style-type: none"> - Add the term ‘canopy’ to porch guidance
HH 3	Historic England	<ul style="list-style-type: none"> • General • Page 3 • Principle 3 • Principle 6 	<p>Page 3:</p> <ul style="list-style-type: none"> - Historic England welcomes the inclusion of the reference to the Council’s Conservation Area Appraisals, and that 	<ul style="list-style-type: none"> - The response is positive and supportive of the design guidance being addressed notably in relation to key principles 	<ul style="list-style-type: none"> - Noted and welcomed - no action necessary

		<ul style="list-style-type: none"> • Justification statement • SEA 	<p>this SPD should be read in conjunction with them (page 3).</p> <p>Principle 3 & 6:</p> <ul style="list-style-type: none"> - We also welcome the recognition that these Conservation Area documents should be consulted particularly with regard to identifying and detailing the nature of important spaces between buildings when designing side extensions (Principle 3) and also when considering roof alterations (Principle 6). <p>Justification statement:</p> <ul style="list-style-type: none"> - In addition, Historic England supports the Council's approach in requiring a 'Justification Statement' for proposals which seek to deliver architectural innovation, in order to ensure that proposals are well justified and appropriately responsive to local context. - Historic England has information on good practice for design when making changes to the built historic environment through development, which includes information on our role, design codes basic principles and case studies. This can be accessed via the following link: https://historicengland.org.uk/advice/planning/design-in-the-historic-environment/ <p>SEA:</p> <ul style="list-style-type: none"> - With regard to the Householder Design Guide SPD SEA Screening Assessment, in terms of Historic England's area of 	<p>regarding responsive architectural detailing and the justification statement to encourage the appropriate delivery of architectural innovation</p>	
--	--	--	--	---	--

			<p>interest, given the nature of the SPD, we would concur with your assessment that the document is unlikely to result in any significant environmental effects and will simply provide additional guidance on existing Policies contained within the adopted Coventry City Council Local Plan, which has already been subject to a Sustainability Appraisal/SEA.</p> <ul style="list-style-type: none">- As a result, we would endorse the Authority's conclusions that it is not necessary to undertake a Strategic Environmental Assessment of this particular SPD. However, the views of the other two statutory consultation bodies should be taken into account before the overall decision on the need for a SEA is made.- 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>HH 4</p>	<p>Coventry Society</p>	<ul style="list-style-type: none"> • General • When and what Planning permission is required • Permitted Development • HMOs 	<p>General:</p> <ul style="list-style-type: none"> - Strong welcome for this SPD as it ought to help improve the quality of residential extensions and alterations. - The detail in the draft SPD is appropriate and highly relevant and covers often neglected issues such as boundary treatment, hardstanding areas, impact on gardens etc. <p>Clarity on planning permission:</p> <ul style="list-style-type: none"> - One of the challenges faced by property owners is whether planning permission is required. <i>We suggest that there should be a section (and / or appropriate links to guidance) on this issue including information etc that is required as part of a planning application as well as the value of pre-application advice (and see above) – we are aware of a number of councils that have included this in their householder design guides (eg Leeds and Newcastle).</i> - Property owners are also often confused over other permissions that are required when considering extensions and alterations such as building regulations, and highways approval as well as the special rules covering conservation areas, listed buildings and tree preservation 	<ul style="list-style-type: none"> - Comments are positive however reference to how this guidance fits with planning permissions, permitted development and HMOs are noted - It is recognised that further signposting to relevant additional guidance that may prove relevant to applications and what permissions may be necessary would assist in ease of use for readers - Whilst this guidance primarily responds to development which requires permission it is recognised some elements of applications coming forward may encompass elements which if seen solely would fall under permitted development and thus having clear guidance on these elements once they cross the threshold within a wider application is seen as beneficial to ensure best outcome. - Moreover, having a general steer for best practice regarding the delivery of these individual elements may prove beneficial for applicants wishing to explore these options going forward. - Additionally, it is recognised points are raised with regard to 	<ul style="list-style-type: none"> - Addition of signposting to other existing relevant guidance and links or table outlining what permissions could be relevant to the applications - Addition of signpost towards existing guidance in regard to HMOs would prove beneficial for reader legibility and ease of use in conjunction with other documents.
--------------------	--------------------------------	---	--	--	---

			<p>orders. <i>We recommend that this is given more detailed coverage.</i></p> <p>Permitted Development:</p> <ul style="list-style-type: none"> - <i>Permitted development:</i> As there have been significant changes in rules on permitted developments over the last decade with the government emphasising the importance of relaxing controls, how relevant is this SPD? - For example, a small extension may not need planning permission but could nevertheless have a detrimental impact on nearby properties leading to a loss of amenity. - So, is this SPD primarily aimed at schemes where planning permission is required <i>or</i> is it aimed at also encouraging better design even where planning permission is not required? I would hope that the focus is on both aims and that they both should be explicitly highlighted in the introduction. <p>HMOs:</p> <ul style="list-style-type: none"> - Page 3 states that this SPD also focuses on ‘Conversions to residential uses and extensions & curtilage development in relation to Houses In Multiple Occupation (HMO’s)’. - Conversion of property to HMOs is a major issue in Coventry (and many other 	<p>HMO developments and how this guidance sits with these applications and whilst some applications may be included that refer to this document for signposting it is noted that the Council currently has a sperate document for the Delivery of HMO developments with the Coventry City Council Property Licensing Teams ‘Amenities and Facilities Guide for Houses in Multiple Occupation (HMO)’ Guide. These comments are welcomed, and it therefore may prove beneficial to provide a signpost within this document highlighting the presence of this existing supporting document going forward to ensure clear guidance</p>	
--	--	--	--	--	--

			<p>local authorities in England). The recent consultation on an Article 4 direction and HMOs is illustrative of this point.</p> <ul style="list-style-type: none"> - From research and consultancy projects across England that I have been involved with, the quality of some HMO conversions is extremely poor and sometimes has been carried out without obtaining planning permission even when it is required. - Some local authorities have specific guidance on HMO conversions as part of broader HMO SPDs eg Bristol, Sunderland, and Wolverhampton. - In order that the issue of poor design of HMO conversions is tackled, would it not be better, therefore, to have a specific SPD on HMOs? This would help to ensure that existing and prospective landlords (as well as managing and letting agents) are aware of the design requirements? Including HMO conversions within an SPD on Householder Design Guide (without specific detailed sub-sections on HMOs) is unlikely to be effective and could miss the target audience. 		
HH5	Private Resident Comments	<ul style="list-style-type: none"> • General/Sustainability 	<ul style="list-style-type: none"> - I support this SPD being added to the planning process. It is clear and offers a good range of examples to help illustrate the issues it discusses. 	<ul style="list-style-type: none"> - Greater emphasis on future proofing for climate warning, whilst this notion is supported it is considered beyond the scope of this document to 	<ul style="list-style-type: none"> - Adoption of sketch examples to support guidance

			<ul style="list-style-type: none"> - The focus on good design, and on integrating buildings with landscaping that enriches the environment and avoids habitat or biodiversity loss - and giving these issues equal weighting to human issues such as overlooking and blocking light - are very welcome. - I think the document could be improved by more emphasis on, and examples of, green building materials and processes, and on designing/building for 1.5-2 degrees of climate warming -thinking ahead so that extensions are, to an extent, future-proofed. - I would also add in more details, and some visual examples, of permeable drive landscaping to give more of an idea about water soaks, retention, preventing run off etc (which is mentioned but could be higher in the mix). I imagine that this is something many people are not hugely knowledgeable about, but will become increasingly important as the climate continues to break down. 	<p>accommodate greater level of changes in regard to these elements which would go beyond that currently outlined within the Local Plan</p> <ul style="list-style-type: none"> - A suggestion is made that a larger provision of visuals to support permeable landscaping could be accommodated to provide a clearer steer on guidance, this could be accommodated through the use of sketch precedents going forward 	<p>regarding permeable landscaping which is referenced within the document</p>
HH6	E-on	<ul style="list-style-type: none"> • General/Energy Efficiency 	<ul style="list-style-type: none"> - E.ON welcome the opportunity to comment on the Householder Design Guide Supplementary Planning Document (“SPD”) and supporting 	<ul style="list-style-type: none"> - A suggestion is made for the Greater emphasis on the delivery of key themes in relation to energy efficiency, whilst this 	<ul style="list-style-type: none"> - No action necessary going forward

			<p>documents published by Coventry City Council (“the Council”) in December 2022.</p> <ul style="list-style-type: none"> - While we recognise that the SPD is to be read alongside other Council and nationally published regulations, the current SPD drafting is very focussed on the external appearance of house extensions within Coventry. E.ON believe that the current SPD drafting would benefit from the inclusion of key themes associated with energy efficiency. Including such themes would encourage residents and architects to consider energy efficiency as part of good design and help to reiterate the Council’s ambitions around Net Zero. - As the Council has not outlined specific questions as part of its consultation document, we have structured our comments under relevant headings. If required, we would be willing to discuss our response in more detail with the Council. <p>Building Insulation Guidelines</p> <ul style="list-style-type: none"> - While the SPD includes cross references to other planning documents, we believe that guidance on building insulation should be specifically and visibly addressed in this and other SPD’s. The installation of floor, solid wall, cavity wall, 	<p>notion for the introduction of a greater emphasis on these elements is supported it would fall beyond the scope of this document which follows the currently adopted Local Plan</p>	
--	--	--	--	--	--

			<p>and roof space insulation at the point of construction is the most cost-effective stage to deliver these measures. These measures also offer a significant opportunity to dramatically reduce energy usage across the housing stock in the United Kingdom, contributing to the Net Zero targets that the UK government has outlined.</p> <p>As the current draft SPD includes no reference to the term “insulation”, we would welcome the Council updating the document to provide guidance in this area.</p> <p>Energy Efficient Material Specification Guidelines</p> <ul style="list-style-type: none">- Although the SPD provides guidance on the external appearance of windows and brick walls, we believe that this should be expanded to address expectations on the use of energy efficient materials.- The installation of energy efficient materials at the point of construction typically offers cost savings over the medium to long term, compared to the subsequent retrofitting of additional measures post construction.- This specific SPD could address topics associated with the thermal efficiency of windows and doors		
--	--	--	--	--	--

			<p>installed in a building extension. Promoting the use of well insulated, thermally efficient doors and windows avoids the requirement for subsequent retrofitting of measures, avoids waste, and delivers health benefits to residents of the property</p> <ul style="list-style-type: none"> - The choice of building materials could also offer the opportunity to promote and improve biodiversity in Coventry. As this is a focus area of the Council-sponsored Resilient Pathway Group, updating the SPD to encourage the use of wildlife friendly materials could support the delivery of the Council's ambitions in this area - <p>External Roof Extension Impacts</p> <ul style="list-style-type: none"> - We recognise that the Council's focus in this SPD section is the visual impact on the streetscape from the style and positioning of external roof extensions, such as dormer windows. However, this SPD and other similar documents provide a good opportunity for the Council to communicate guidance on the visual impact, or lack of visual impact, of renewable technologies. - E.ON believe that renewable technologies such as roof mounted solar photovoltaic, Air Source Heat 		
--	--	--	---	--	--

			<ul style="list-style-type: none">- Pumps (ASHP), or battery technology can contribute significantly to improved energy efficiency in cities such as Coventry. Encouraging the installation of these technical solution also offers the opportunity to deliver health benefits for residents, given the reduction in fossil fuel use, improvements to air quality and other factors.- An update to the draft SPD to address topics associated with renewable energy technologies would therefore be welcomed.- <p>Equalities Impact Assessment – Health Inequalities</p> <ul style="list-style-type: none">- While Section 2.3 of the supporting Equalities Impact Assessment (EIA) document highlights the positive impacts of good building design, we believe this section should also visibly address the energy efficiency elements of “good design”. We believe that integrated and well-designed energy efficiency measures in properties will contribute positively to the living standards of residents in Coventry.- Addressing this topic visibly in the Council’s planning guidance documents is important given the current cost of living		
--	--	--	---	--	--

			<p>crisis, and the material difference that energy efficiency solutions can practically deliver.</p> <p>Energy Saving Technology</p> <ul style="list-style-type: none"> - While this consultation is very focussed on design aspects and aesthetics, we believe that the Council could hold a key role in advocating the installation and use of energy saving technology solutions. Smart Meters and other existing technologies provide residents with the opportunity to monitor and alter their energy consumption, allowing energy bill reductions to be achieved in the short, medium, and long-term. We believe that the Council's Planning process (e.g., guidance documents, and the communication of planning decisions) offers a route to practically encourage residents to take up, but also utilise energy saving technology solutions. - E.ON would welcome the Council considering whether additional supportive messaging could be delivered in this area. 		
HH7	Hinckley & Bosworth Borough Council	<ul style="list-style-type: none"> • General 	<ul style="list-style-type: none"> - I write on behalf of Hinckley & Bosworth Borough Council ('the Council'), in respect of the above. - Thank you for the opportunity to comment on the Householder Design Guide SPD. Hinckley & Bosworth Borough 	<ul style="list-style-type: none"> - No comments made 	<ul style="list-style-type: none"> - No action necessary going forward

			<p>Council has no specific comments to make on the document at this time.</p> <ul style="list-style-type: none">- We look forward to continuing working with Country City Council on strategic planning matters in the future		
--	--	--	---	--	--