



# Design and Heritage

Background Paper

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Coventry City Council

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## Introduction

Coventry enjoys a rich history of architectural innovation and continual aspirational development, the city now enjoys an environment where markedly different periods of development and associated architectural styles may be experienced in close proximity, delivering a stimulating environment where the patterns and styles of development through a variety of periods can be experienced and understood.

In seeking to both respect these markers of development periods and also continually evolve as a city, the creative role of urban design in the built environment is critical in delivering positive environments which benefit the wellbeing of the city, contribute positively toward the challenge of the changing climate, respect and celebrate heritage assets, attract inward investment, whilst responding positively to established built form precedents which are a key marker of the cities identity.

Through the plan review process, both the Design and Heritage policies of the plan have been reviewed to ensure that these important matters of assessment in local planning policy continue to promote the best possible outcomes for the City.

## National Policy Content

Whilst the National Planning Policy Framework (NPPF) refers to the importance of these areas throughout the framework, chapter 12 – ‘Achieving well designed and beautiful places, and chapter 16 – Conserving and enhancing the historic environment’ are the two primary areas of the NPPF which address Design and Heritage.

Regarding Design, the NPPF clearly states the importance of the role of good design in delivering sustainable buildings and places and promotes that Local Plan should set clear expectations in how this is achieved, including promoting the production Design Codes to guide development and inform applicants of expectations. The NPPF also places significant focus on the need to be responsive to the existing character of an area.

Regarding Heritage matters, the NPPF states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, highlighting the role of heritage in the character of place and the wider social, cultural and economic benefits which can be capitalised upon through a positive policy approach toward conserving and enhancing the historic environment.

## Emerging NPPF

At the time of writing, national government has undertaken a public consultation upon proposed revisions to the NPPF, which includes considerations of revision to chapters 12 and 16.

In respect of Chapter 12 proposed revisions, these are seen to be minimal, with reference to the term ‘beauty’ proposed to be removed in acknowledgement the subjectivity of the term. Other proposed revisions pertain to the focusing of Design Codes in a more localised manner, proposing that Local Authorities undertake their

production aligned to spatial visions where areas of most change are anticipated. Regarding Chapter 16 'Conserving and Enhancing the Historic Environment' no revisions were proposed within the NPPF consultation.

## Regulation 18 Consultation

The regulation 18 consultation made reference to the areas of Design and Heritage at chapters 9 and 10 of the Issues and Options consultation, with comment sought on planning policy DE1 – Encouraging Good Quality Design and across the three current Heritage policies within the adopted Local Plan. The Issues and Options consultation also sought views on if the creation of a dedicated Archaeology planning policy for the city may be proportionate and aid in providing clarity of requirements.

### Question 78 – Policy DE1

Question 78 of the issues and options stage consultation sought comment of the role and content of the current planning policy and the development areas which were proposed.

Several key themes emerged in response to question 79, these being a consideration of the inclusion of renewable technologies and measures to mitigate the impacts of climate change, the role of Design Codes and discussion of the suitability of inclusion of Nationally Described Space Standards (NDSS) and Housing and Aging Population Policy Initiative (HAPPI) within policy DE1.

Having reviewed the representations the authority has concluded that the inclusion of the HAPPI reference would not be proportionate given that this policy is read across all development types proposed in the City, which space standards should be included within the policy specific to the provision of new housing in the City (H3).

### Question 79 – Policy HE1

Responses to the proposed review of Policy HE1 were supportive of the ongoing principle of review of the City's Conservation Areas and their boundaries and the new inclusion of now established Conservation Areas of Earlsdon and Brownhill Green, the authority also intends to retain this commitment in the forthcoming plan period, including this commitment within the policy narrative. Comments were further received in respect of the need for climate change mitigation, and the authority recognises these points through the Environmental Management policies of the Local Plan.

The responses also sought to identify the need for balance of conservation matters whilst meeting the cities growth needs and associated public benefits, this point is addressed within policy HE2 – Conservation and Heritage Assets.

### Question 80 – Policy HE2

The proposed inclusion of Historic England's 'street for all' guidance was discussed within question 80, however responses suggested that this single document may not warrant specific inclusion into policy. As a result, the reference to Historic England best practice guidance has been widened to encourage applicants to engage with these guides in order to yield the best outcomes for heritage assets in the city. A further

representation suggested that additional emphasis should be placed on the City's Post-War heritage.

### Question 81 – Policy HE3

The authority did not propose revision to policy HE3 and suggested its retention to retain the ongoing support of the Charterhouse Park within policy. 2 representations were received in respect of policy HE3, with both comments supporting the ongoing inclusion of Policy HE3.

### Question 82 – Proposed Policy HE4

The Issues and Options consultation sought views on if the inclusion of a specific Policy for the consideration of Archaeology matters may aid clarity on this important development consideration. The responses provided showed a spread of views on the proposal, a number noted that the topic was already included within the term 'heritage assets' in other Conservation and Heritage policies, however a number also recognised that a dedicated policy would help to articulate the local authorities' expectations.

## Policy Evolution

### DE1 – Ensuring High Quality Design

The authority has developed policy DE1 wording to draw reference to a number of Local Authority emerging strategies, in regard to Climate Change, these being the Coventry Climate Change Strategy and the Adaptation and Resilience Strategy, promoting that development should draw reference to these strategies in the development of design proposals. Matters of thermal efficiency and renewable energy generation are covered elsewhere in the plan review, with the Environmental Management chapters.

Seeking to develop the policies to be as clear and concise as possible, policy DE1 has also been developed to incorporate elements of design guidance which had formerly been contained within the City Centre Area Action Plan, where these policies are reasonable to be included as guidance across the administrative area, notably this includes reference to the Tall Buildings Design Guide which has been developed since the last plan adoption. Finally, and in line with National Policy, the developed policy establishes a reference to the important role of Design Codes in guiding high quality design in the forthcoming plan period.

### Policy DE2 – Ensuring High Quality Places

A second design policy has also been developed, which seeks to establish principles of good placemaking across the authority area, drawing upon elements of policy which had previously been adopted and contained within the City Centre Area Action Plan. Establishing policy DE2 ensures that all areas of the City benefit from equivalent high levels of design consideration and assessment, given that high quality placemaking should be sought throughout the authority area. Additional consideration is included

for 'meanwhile uses' to help ensure the vitality of place during times of redevelopment, alongside a new reference to evidencing of considerations for how sites located within the transitional area have responded to the wider townscape principles of the area.

Whilst the new policy DE2 largely draws upon elements of adopted policy of the 2017 Local Plan, its inclusion seeks to clarify design requirements across the authority area, and sits alongside plan policy aspirations of positive placemaking and making best and most positive use of available development land where new development is proposed.

## Policy HE1 – Conservation Areas

The Local Plan Conservation Area policy is assessed to remain up to date and fulfilling its function during the plan period since adoption, therefore this policy is retained and carried forward, with the addition of the Earlsdon and Brownhill Green Conservation Areas, which have been established since the 2017 adoption in line with plan commitments.

## Policy HE2 – Conservation and Heritage Assets

This policy was reviewed and found to be largely fit for purpose, however reference to best practice guides provided by Historic England has now been inserted to ensure the policy remains able to promote best practice and refer to the most up to date guidance through the coming plan period. Alongside review of the City Centre Area Action Plan, reference from previous policy CC2 and point (g) has been incorporated, in order to ensure those elements of heritage previously specifically references within the AAP are retained within heritage policy, this also is responsive to a need for recognition within the policy of Coventry's distinct post-war heritage assets. Finally, the City Council acknowledges the potential for conflict between best practice in the preservation and respect of setting of heritage assets alongside the enabling of new development. Whilst the City Council will prioritise mitigation of such conflicts through the highest standards, it is accepted that there may be occasion where harm to setting may not be able to be fully mitigated. For the policy to acknowledge this, additional point 10 has been proposed for inclusion to HE2, referencing exceptional cases where harm cannot be mitigated or balanced by public benefit, where the Local Authority may then consider S106 contributions for the repair and maintenance of assets which may be affected by development.

## Policy HE3 – Heritage Park

Policy HE3 has been assessed to remain fit for purpose in reinforcing the important role of the Heritage Park to the City's assets, with this being in line with the feedback received through the regulation 18 stage. The Policy has however been updated to remove previous reference to the creation of the Heritage Park and removal of land from previous designations which has now taken place and is then not an element needing to be referenced for the future plan period.

## New Policy HE4 - Archaeology

A new policy specific to Archaeological matters has been included within the plan to aid clarity of requirement in respect of archaeological matters. The Local authority maintains a publicly available mapping system which identified areas of archaeological constraint where the policy would be engaged. Principal matters of preservation and where possible, enhancement is included in the policy, alongside a requirement for proportionate recording of archaeology to report to the city's Historic Environment Record (HER). The Plan review is also inclusive of a review of the City Centre Area Action Plan DPD which itself referred to specific considerations of works in proximity to Coventry's Medieval City Wall have been incorporated into policy HE4. Finally, and similarly to policy HE2, in referencing exceptional cases where harm cannot be mitigated or balanced to public benefits, the Local Authority may consider S106 contributions for the enhancement, repair and maintenance of archaeological assets in the vicinity of a development site, to contribute toward heritage harm mitigation.

## Sustainability Appraisal

Regulation 19 local plan policies in respect of design and heritage are considered in the Sustainability Appraisal, with positive impacts seen for each developed policy area. In regard to developed design policies the SA identified positive impacts for communities, health and active living and townscape and landscape categories, with the SA stating that *"Policies DE1 and DE2 seek to promote diverse, viable places with high quality design, good environmental quality and healthy communities – all contributing to positive effects for vibrant communities"*.

Heritage policies are also identified as having positive impacts to the same areas and also to the preservation of the historic environment, the SA findings state that *"Policies HE1-4 continue to provide strong mitigation measures to protect the historic environment such that there should be no significant negative effects and there are possibilities for enhancement, for example, through the refinement of character areas in the City Centre and support for high quality regeneration"*.

## Conclusion

Design and Heritage policies have been reviewed with the aims of providing strong mitigation to harm on the historic environment and promoting the highest possible levels of design quality throughout the authority area. The inclusion of two new policy areas of DE2 and HE4 have been significantly informed through the incorporation of the City Centre AAP into the Local Plan, whilst comments from regulation 18 consultation have been considered and policies tested through sustainability appraisal. Both the developed existing policy areas, and the introduction of new policy areas for clarity are positively prepared to meet the aims of the NPPF in achieving well designed and beautiful places and Conserving and Enhancing the historic environment.