



City Centre Area Action Plan

Background Paper

November 2024



Contents

| | |
|--|---|
| Introduction | 2 |
| National Policy Context | 2 |
| Emerging NPPF Consultation | 3 |
| City Centre Area Action Plan aside other plan policies | 3 |
| Regulation 18 consultation | 3 |
| AAP Policy Evolution | 4 |
| Policy CC1: Coventry City Centre – Development Strategy | 4 |
| Policy CC2: Enhancement of Heritage Assets | 4 |
| Policy CC3: Building Design | 4 |
| Policies CC4: Public Art, CC5: Lighting, and CC6: Public Realm. | 5 |
| Policy CC7: Tall Buildings | 5 |
| Policy CC8: Green and Blue Infrastructure | 5 |
| Policy CC9: Drainage and Flood Risk | 6 |
| Policy CC10: Environmental Management | 6 |
| Policy CC11: Accessibility | 6 |
| The City Centre Character Area Policies CC12 to CC26 | 6 |
| Conclusion | 7 |

Introduction

In undertaking a Local Plan Review, the authority seeks to ensure policies are in line with the current situation in the City and aligned to National policy.

The City Centre Area Action Plan was prepared to help guide, inform and consider development proposals within the defined City Centre area, sitting alongside the Local Authorities adopted Local Plan.

The Area Action Plan contains 26no policies, 14 of which are specific to a number of identified 'character areas' within the City Centre.

The Local Plan Review process is inclusive of a review being undertaken of the City Centre Area Action plan and its contained policies. At regulation 18 consultation, feedback was sought upon the most effective mechanism for specific City Centre policy and guidance and if the Area Action Plan remains fit for its purpose.

National Policy Context

The December 2023 National Planning Policy Framework references development in City Centres in regard to protections of Green Belt land at Chapter 13 para 146 stating that:

"the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- a) makes as much use as possible of suitable brownfield sites and underutilised land*
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport"*

Chapter 11 addresses making effective use of land, directly addressing this in regard to City centre land at para 129 stating that:

"plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate"

Para 130 however also states that:

"In applying paragraphs 129a and b above to existing urban areas, significant uplifts in the average density of residential development may be inappropriate if the resulting built form would be wholly out of character with the existing area. Such circumstances should be evidenced through an authority-wide design code which is adopted or will be adopted as part of the development plan"

In an over-arching policy the NPPF further states:

“The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.”

Being a distinct and individual area of the City with its own character, setting, opportunities and constraints, it is assessed that the necessity for an individual policy area within the Local Plan to guide development in the City Centre, remains aligned with National Policy.

Emerging NPPF Consultation

At the time of writing National Government has undertaken a consultation of proposed reforms to the NPPF which is inclusive of a proposal to delete paragraph 130 which is suggested to be a potential restrictor to making the best use of sustainable development sites, stating that *“We are clear that local planning authorities should identify opportunities for maximising the efficient use of land, especially in areas well served by transport and other infrastructure. By restricting density, the existing policy is likely to have longer term negative impacts on achieving sustainable patterns of development and on meeting expectations on future housing supply. Alongside this reversal, we propose strengthening expectations that plans should promote an uplift in density in urban areas”*. Whilst specific matters of development density are discussed in separate background papers, the goals of the NPPF, including the draft revised NPPF, make clear that a priority of development in urban areas well served by public transport and infrastructure is a key aim of national policy. In delivering development in line with these national priorities, the necessity for policy areas in the Local Plan to guide the highest standards of development in central urban areas is seen to be reinforced.

City Centre Area Action Plan aside other plan policies

Development proposals within the defined City Centre are subject to both the policies contained within the City Centre Area Action Plan alongside those within the core Local Plan, therefore proposals are subject to an elevated number of policy compliance tests.

Conversely developments which are located outside of the defined boundary of the City Centre are not subject to the policies of the AAP, this context has formed a key point of assessment of the review of the AAP, reviewing if policies contained within the AAP may be appropriate to be more widely applicable.

Outside of the AAP, the core Local Plan makes direct reference to the City Centre Area in identifying overall development needs within policy DS1, outlining general masterplan principles for any major development proposal within policy DS4, in regard to employment needs and retail growth at policies JE1, JE4 and R1 and the City Centre development strategy at policy R2. Direct reference to conservation principles and heritage assets of the City Centre is also made at policy HE2

Regulation 18 consultation

During the regulation 18 ‘issues and options’ consultation stage, question 108 sought responses to “ What are your views on the most effective mechanisms for the future

planning of Coventry City Centre”. A majority of responses suggested that the AAP should be incorporated into the core local plan in order to provide additional clarity upon planning guidelines and requirements within the City Centre. Additionally, a suggestion was submitted to enlarge the city centre boundary, which would widen the effect of positive City Centre policies upon development proposals.

Representation also referred to the need for residential development in the city, including referring to the possibility of making residential allocations in the city centre. Residential allocations proposed within the Local Plan review are discussed within Growth Needs and Housing background papers.

A number of representors also made reference to the need for updating of maps and imagery within the AAP to reflect changes which have occurred since its adoption in 2017. Furthermore, reference to the university area of the City and promotion of the need for a guiding masterplan was also made.

AAP Policy Evolution

Policy CC1: Coventry City Centre – Development Strategy

- Policy Retained and Updated as CC1 (Part A)

The overall aims of the development strategy of the city centre are seen to be robust and reflective of the current context, additional wording is however introduced to align principles of respecting views of the Cities three spires to the now adopted Tall Buildings and View Management Framework SPD. Additional wording is also proposed to be included to reference the Cities emerging ‘City Centre Vision’ document which articulates key drivers for change in the city centre.

Policy CC2: Enhancement of Heritage Assets

- Policy removed from AAP and incorporated into Policies HE2 and HE4

Policy CC2 is currently aligned with core plan policy HE2 however offering additional guidance regarding the primary shopping area of the City Centre and its notable post war reconstruction and archaeological points of guidance around the city centre medieval walls. It is proposed that these points are transferred into core plan policy HE2 – Conservation and Heritage Assets and new core local plan policy HE4 – Archaeology to provide clarity into the core local plan heritage policies, and further to this policy CC2 of the AAP may be omitted.

Policy CC3: Building Design

- Policy removed from AAP and incorporated into Policies DE1, EM11 and EM12

This policy is seen to duplicate that of core local plan policy DE1, whilst reference to building energy efficiency standards is now proposed to be contained within core EM local plan policies. In delivering clarity of policy requirements, the policy is proposed to be omitted to avoid duplication.

Policies CC4: Public Art, CC5: Lighting, and CC6: Public Realm.

- Policy removed from AAP and incorporated within Policy DE2

These policies are seen to provide positive guidance upon key issues of the use of public art which can play an important role in the shaping of place, careful considerations of the use of lighting to consider benefits of legibility and safety and the promotion of high-quality design for the implementation of public realm schemes. The policy review has concluded that these policies remain valid for the forthcoming plan period to guide the best quality outcomes, however these principles should be made applicable city wide in seeking to deliver this quality consideration throughout the administrative area. These policies are therefore proposed to be omitted for the AAP and be included within new core local plan policy DE2 ‘Delivering High Quality Places’.

Policy CC7: Tall Buildings

- Policy removed from AAP and incorporated within Policy DE1

Since the adoption of the 2017 Local Plan and AAP, the commitment to produce a tall buildings SPD as established in the AAP at policy CC7 has been fulfilled with adoption of the tall buildings design guide and view management framework adopted in December 2022. The SPD has also provided a definition of tall buildings in the city (being of 5 stories from ground level or above) and the city has seen development of this type occur outside of the city centre boundary. Therefore, the policy is proposed to be omitted from the AAP and reference to tall building design guide be placed within core local plan policy in order that this becomes applicable across the administrative area.

Policy CC8: Green and Blue Infrastructure

- Policy retained and updated – now referenced as policy CC1 (Part B)

Policy CC8 sets out the Council's expectations around considerations of Green and Blue infrastructure within the city centre. Similar to many urban centres, the availability of such environments within the urban core can become constrained and as such the policy is seen to remain a necessary policy objective in the delivery of a high quality and resilient City Centre. The necessity for the policy is also seen to be further reinforced with the anticipated growth of residential living in the city centre.

The policy addresses a number of environmental issues which are specific to the City Centre and therefore justify a standalone policy, including the considerations of development adjacent to the central ring road. Minor wording updates are proposed to the policy to ensure alignment to wider plan policies, and notably a cross reference to core plan policies of Green Environment, alongside a new reference to affording positive weight to proposals which positively contribute toward achieving the goals of the Coventry City Centre Vision, which promotes the delivery of accessible green networks across the city and supersedes the principles of green linkages within the 2017 Area Action Plan.

Policy CC9: Drainage and Flood Risk

- Policy retained and updated – now referenced as policy CC1 (Part C)

The core of the City of Coventry is located along the route of the River Sherbourne, this route being largely culverted and unavailable for access and viewing. The Council maintains an aspiration to make this watercourse available for view to capitalise upon the opportunity for environmental quality enhancements. Consideration of drainage and flood risk issues are key throughout the administrative area, however the policy reinforces this important consideration alongside the aspirations of de-culverting the river Sherbourne and acknowledging the that the increased levels of impermeability found in Urban Centres reinforce this important consideration. The policy is therefore proposed to be retained within the Area Action Plan chapter of the Local Plan, with minor wording revisions incorporated to reference further policy requirements of drainage and flooding consideration found in core plan policy EM4.

Policy CC10: Environmental Management

- Policy retained and updated – now referenced as policy CC1 (Part D)

Environmental management policies are a key consideration in the creation of high quality environments, and may be considered of heightened importance within urban areas where higher density development takes place and close proximity interfaces between uses. In line with this it is assessed that policy CC10 of the AAP remains appropriate to retain to ensure such considerations are carefully considered in development proposals in the City Centre. In line with the integration of City Centre policies into the core local plan, minor referential wording updates are proposed to ensure that the policy is read across other relevant policy areas within the local plan.

Policy CC11: Accessibility

- Policy removed and incorporated into plan policies AC1 to AC5

Current policy CC11 promotes accessibility principles across the City Centre and also highlights redevelopment proposals around a number of the city's car parks. During the review it has been concluded that most of the content of policy CC11 duplicates that within core local AC policies, whilst reference to the regeneration of parking areas is now largely outdated with development which has taken place since the 2017 adoption or has now been consented to take place in the coming years. The policy is therefore proposed to be deleted from the Area Action Plan chapter of the reviewed local plan, with content included within core local plan AC policies, alongside reference to the promotion of White Street Coach Park within character areas policy within the aims of the northern regeneration area.

The City Centre Character Area Policies CC12 to CC26

- Policies retained, now contained within policy CC1 (Part E)

The adopted AAP is inclusive of identification of a series of City Centre Areas which are identified both regarding their geography and their anticipated use profiles. Whilst these are broadly seen to remain relevant in their distinction of individual areas of character within the City Centre, several revisions are proposed to the boundaries of these character

areas to reflect the evolving City Centre, informed by consented development proposals and defined areas of anticipated future change.

Whilst evolution of the character area identification is proposed to reflect the current situation, it is also anticipated that changes to character will continue to take place during the forward plan period, a notable example of this being the recently consented City Centre South regeneration scheme, in this context the character areas are proposed be updated to best reflect forthcoming expected change in the City Centre. It is also accepted that the nature of uses in the City Centre has undergone significant evolution in the last plan period as the economics of City Centres continues to evolve on a national level, therefore the character areas are proposed to be re-titled in reference to their existing and foreseeable urban character.

Representation referred to the potential for review of the defined City Centre boundary, however further to examination this has been found to remain a reasonable definition of the urban core of Coventry. However, it is accepted and identified within the review of Density Policy H9 that an area of higher density urban character is seen to existing in the periphery to the defined City Centre. Whilst located outside of the boundary of the AAP, the Local Plan Review proposes to be responsive to this character by incorporating elements of city centre policy into core plan policy. A transitional area is therefore identified beyond the defined City Centre boundary, acknowledging this periphery character area.

Whilst City Centre policies remain applicable within the defined City Centre boundary, development proposals within the transition zone should seek to acknowledge this 'transitional area' and consider how planned development may positively interface with the adjacent character areas within the defined City Centre.

Conclusion

Through review of the City Centre Area Action Plan a number of requirements for updates have been identified. The plan review proposes to remove areas of repetition to core plan policies in order that the policy requirements are clearly defined, whilst additional clarity is also seen to be available by integration of City Centre policies into the core Local Plan, this being a point of feedback also raised during the regulation 18 consultation. Additionally, several areas of policy requirements are identified as being applicable outside of the defined city centre boundary, and where these have been identified, these policy elements have been incorporated into wider Local Plan policy areas to ensure application to the wider administrative area.

City Centre policies remain an important role in the planning policy landscape in identifying a City Centre development strategy which supports the City as a whole, alongside specific considerations around a range of environmental considerations and identification and response to character areas which are singular in the authority area.

The City Centre policies are then proposed to be retained as a distinct chapter within the Local Plan to ensure that these considerations are clear to the reader, alongside a broader simplification of format through integration into the core Local Plan.

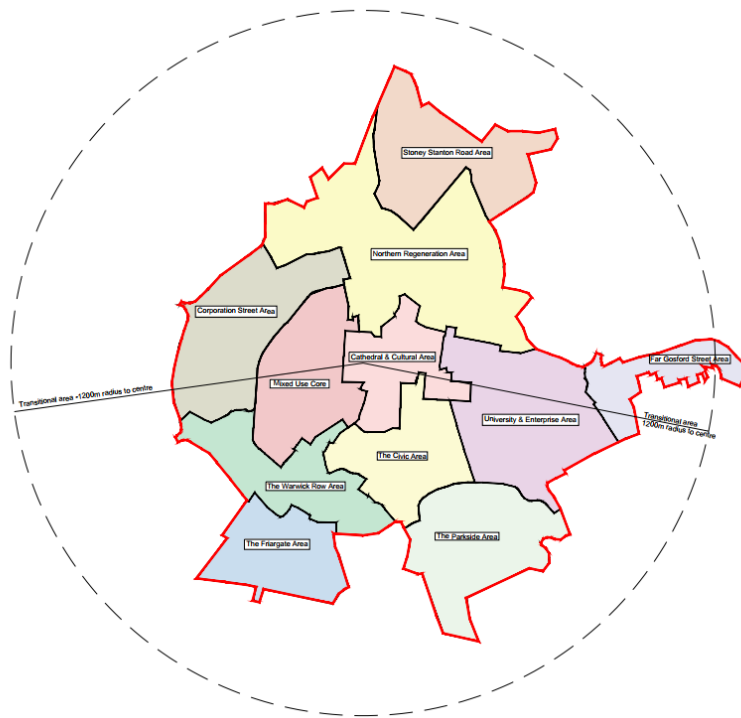


Fig 1 – Reviewed City Centre Character Areas Map