



**The City Centre Area Action Plan – February 2015**  
**Feedback and Submissions of the Coventry Society**

**A. Foreword**

1. The Coventry Society's response to the CCAAP will initially be provided in the submission of this formal written document. The content of this is anticipated to form the basis for further presentation of our views to various individuals / bodies, and will provide material for an on-going dialogue and participation in the planning process. We want to develop an ongoing working relationship with the Council and developers to reinvigorate the City Centre, which is key to developing the whole city - "making our City great once again".
2. This document will provide detailed feedback on the content of the CCAAP although we can summarise our views by stating that the overriding desire of the Coventry Society is to install a "Culture of Quality" in the city centre. In order to achieve the Council's aspirations of making Coventry a Top 10 City again we need to demand development of the highest quality. The Coventry Society promotes ideas and input regarding architecture, street-scene and the urban realm.
3. At the time of preparing this submission the Coventry Society has made significant progress in the development of a working group (yet to be named) with stakeholders and experts in the fields of architecture, urban design and the built environment. One of the early goals of this working group is to raise awareness of design issues and encourage debate and interaction across the city. The group's aspiration is also to develop a culture of utilising Design Briefs to guide development of city centre sites.

**B. Community Involvement – National Context**

4. The Coventry Society's desire to develop an ongoing working relationship with the City Council and developers reflects the recommendations and guidance produced at national level.
5. **The Farrell Review** shines a light on the importance of place making. The report contends that a planning system which focuses on place-making and recognises distinctiveness through visionary local leadership will give certainty to both developers and communities.
6. **Civic Voice** has issued various publications of direct relevance including '**Street Design for All**' which sets out national advice and good practice on the design and management of streets, intended to help local community groups understand how they can take part in the development and adaptation of their own streets and talk with knowledge to decision makers. '**Localism for Real**' emphasises the need to give

all citizens opportunities to actively shape the future of their place and give communities the powers they need to enable their city centre to prosper.

7. Civic Voice's Manifesto calls for...
  - Make improving the quality of the public realm a priority
  - Give all citizens opportunities to actively shape the future of their place
  - Give local communities the powers to enable their (city) to prosper
  
8. **Civic Voice's 'Collaborative Planning for All'** argues that it is time to change the way things are done and to bring communities genuinely to the heart of planning and place making. Participation not consultation is about bringing people in at an early stage to develop the proposals through collaborative planning processes. The 'Charrettes' approach involves community members working alongside local authorities and developers to co-create design-led visual plans and strategies...it is an inspirational and energising activity ...to bring these collaborative processes into mainstream planning so that through shared working from an early stage, communities can help shape and support growth and development that is right for their place.

### C. The CCAAP – Specific Feedback

#### Policy CC1: Enhancement of Heritage Assets

9. We are pleased to see renewed interest in the city's heritage and a commitment to implementing policies designed to preserve and enhance the city's historic buildings and Conservation Areas.
  
10. We strongly agree with Policy CC1 (b) which provides that *"all development relating to or in close proximity to heritage assets...shall be undertaken sympathetically to those heritage assets and seek to enhance their setting."*
  
11. Recently we have seen inappropriate painting of the AXA building off Corporation Street which overshadows the Grade I Listed Old Grammar School, The Canal Basin Conservation Area, the city's two surviving medieval gates and Lady Herbert's Garden Conservation Area. We believe that means of ensuring that prominent structures in close proximity to heritage assets are not inappropriately painted, rendered or clad in future. If current national planning policy restricts the Local Planning Authority's ability to resist such alterations, we suggest that means of preventing such alterations be explored – perhaps in the form of designating relevant structures as Locally Listed buildings, including such within the boundary of new or existing Conservation Areas, or the use of Article 4 Directions.
  
12. We support Policy CC1 (c) which provides that *"where new developments take place adjacent to the remaining sections of the Historic City Wall, opportunities to enhance the setting of the wall and to incorporate it into the landscape design should be taken... Opportunities to reflect the line of the Historic Wall should also be incorporated into such developments."*
  
13. We would suggest that the policy goes a step further in that any proposals to reconstruct elements of the city wall and gates should be supported. One of the aspects of the Jerde Plan <sup>1</sup> that we liked was the proposal to reconstruct a section of

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<sup>1</sup> Jerde Plan – proposed redesign of the Bull Yard, and proposed "urban village" at Bishop Street

the city wall in the Bull Yard area, and to establish an urban village in the Bishop Street/Cook Street/Tower Street area to the north of the city centre that followed the line of the city wall in that location. We understand that proposals to rebuild Gosford Gate have been discussed and, further, that the suggestion of rebuilding Greyfriars Gate to the south of the city centre has been mooted also, to serve as a landmark entrance to the historic city which links the Friargate Development to the city centre.

14. Similar proposals to rebuild city gates and walls have been put forward in other parts of the country and internationally. In Southampton the medieval Bargate and adjoining wall are to be reinstated.<sup>2</sup> In Datong, China the authorities are rebuilding Datong's 14<sup>th</sup> Century city wall with watchtowers.<sup>3</sup> In Chester works are ongoing to restore sections of the city wall also.
15. The potential for boosting civic pride, increasing tourism and leisure and improving the aesthetics of urban areas through restoration and partial reconstruction of medieval city walls and gates has therefore been recognised in other urban areas and we believe this potential should be recognised in Coventry as well through appropriate planning policy.

#### Policy CC2: Building Design

16. We are encouraged by the content of Policy CC2 as drafted and by the content of the draft CCAAP which precedes it (pages 18 to 20 of the draft CCAAP as published in February 2015).
17. We strongly agree with the statement that *“monolithic ‘slab’ like buildings that wholly occupy the building envelope will not be acceptable. Any block/building will need to be articulated within these envelopes through varied storey heights and the projection and recession of elements along the elevations and above the roofline (for example with entrances and corners) to provide interest at both street level and on the skyline.”* The paragraphs contained within the draft CCAAP which follow this statement are also well considered and we support them.
18. In particular, we support what is said about ‘Active Frontages’ (page 19) and ‘Materials’ (page 19). With regard to the choice of materials used in new developments, we would suggest that serious consideration is given to adopting a policy to resist certain types of cladding and surface treatment in terms of colour and material. Coventry is often perceived as a concrete, grey, dull and unattractive city largely owing to the post war legacy of concrete buildings and the elevated Ring Road. As a city we must tackle that negative perception. Yet in recent years there has been a trend of cladding new buildings in grey synthetic (plastic like) materials which continues rather than reverses the perception of Coventry being a grey, dull and unattractive place. Examples of prominent buildings which have seen significant use of grey synthetic materials include West Orchards; the SkyDome and Arena; the Iceland building on Queen Victoria Road; Coventry University's Gosford Street Car Park; IKEA; and some elevations of Coventry University's Engineering and Computing Building (the east elevation is rather dull and bland compared to the principal west elevation, and the south elevation fronting the surviving stretch of the medieval wall is not as considered as it ought to have been).

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<sup>2</sup> [www.dailyecho.co.uk/heritage/archives/10112472.Looking\\_to\\_the\\_past\\_for\\_the\\_Bargate\\_s\\_future/](http://www.dailyecho.co.uk/heritage/archives/10112472.Looking_to_the_past_for_the_Bargate_s_future/)

<sup>3</sup> <http://news.bbc.co.uk/1/hi/world/asia-pacific/8596076.stm>

19. We would therefore like to see the introduction of a policy which supports the use of subtle colours that are polite neighbours. Strident or grey / dull colours should be confined to small areas and trim rather than whole elevations.
20. Also on the issue of materials, whilst we appreciate the need and indeed desirability for a variety of materials to be used in future development, we would comment that there is a distinct “Coventry style” which derives from the city’s medieval golden age and transcends through the post war development of the city through to modern times. Some of our best buildings are built of sandstone, red brick and timber. These include our nationally listed and locally listed buildings; Gibson’s post war Upper Precinct; and modern developments including Severn Trent’s Operations Centre in St John’s Street and the recent extension to the Herbert Art Gallery and Museum. Accordingly we would like to see the introduction of an appropriate policy which emphasises the importance of the “Coventry style” and encourages new developments to comprise elements of our locally distinct building materials.
21. With regard to the wording of the proposed Policy CC2, it is stated that *“High quality design will be required for all new buildings with the criteria set out in the supporting text above forming an integral part of the building design process.”*
22. We believe that Policy CC2 needs to be supported and supplemented by appropriate additional guidance, perhaps in the form of Supplementary Planning Guidance, to help guide and inform future developers as to the high standards of architecture and design that they will be expected to meet in order to secure planning permission for their development schemes. The Coventry Society advocates strongly for the introduction and implementation of Design Briefs to guide and shape development of key sites in the city centre and we would like to see the introduction of planning policy that achieves this goal.

#### Policy CC3 – Public Art

23. We support the installation of appropriate artwork around the city centre. In particular we would like to see the introduction of a policy which supports the installation of statues and other appropriate works of art to commemorate Coventry’s ‘Great and Good’ such as John Kemp Starley, the English inventor and industrialist who is widely considered the inventor of the modern bicycle and also originator of the name Rover. The introduction of appropriate policy here would help to enrich the city’s cultural offering and boost civic pride. We feel this would be an important step to take as part of Coventry’s bid to be ‘City of Culture’.
24. We would like to see better use of public art to mark and celebrate the city’s rich history. Currently, there is a distinct lack of this, particularly with respect to the city’s medieval heritage. By way of example, Greyfriars Green presently has no art work or display boards to mark the fact that the land once formed part of the Greyfriars’ Monastic Estate. There is also little information in respect of the surviving sections of the city wall and gates. The surviving elements of Whitefriars Monastery stand isolated without any display boards to educate visitors as to the original scale of that monastic site and the locations of the structures that have been lost.
25. We believe that a policy should be implemented which requires better use of good quality display boards including maps and artists’ impressions, when considering developments affecting or in the vicinity of heritage buildings, structures and sites.

#### Policy CC4 – Lighting

26. We welcome the commitment to carefully considered architectural lighting proposals for new buildings and refurbishment of existing buildings. The programme of lighting the city's spires and other historic buildings in recent years / decades has been very successful in improving the night time appeal and use of the city centre, and we believe that further use of quality lighting will aid and assist the city's night time economy.
27. Recognising that good lighting requires expenditure to sustain and maintain – which can quickly be sacrificed in times of economic hardship – we would suggest that consideration should be given to installing means of generating power through sustainable means where possible.

#### Policy CC5 – Public Realm

28. We applaud the Council's ongoing commitment to achieving high quality public realm in and around the city centre and we support Policy CC5 as drafted. The Coventry Society has developed a good working relationship with Colin Knight and his team and we wish to build upon that relationship through continued consultation and involvement with future public realm improvement schemes.
29. We wish to see, through means of clear and detailed planning policy, a commitment to the ongoing "decluttering" of the city centre; reduction of road space and expansion of pedestrian space; "greening" of the city centre and installation of high quality street furniture. We suggest that Supplementary Planning Guidance be considered to support Policy CC5. It is important that private sector developers who introduce future development schemes that affect the public realm meet the same exacting standards and principles that the Council has successfully introduced into the city centre.

#### Policy CC6 – Routes, Linkages and Gateways

30. We are impressed by the Council's stated commitment to tackle improvements to crossing the Ring Road to ensure enhanced connectivity between the city and the wider city.
31. With regard to Junction 4 of the Ring Road (Whitefriars – London Road – Gulson Road) it is our view that the current infrastructure is poor, dated, over-engineered and represents an extremely negative visual entrance to the city centre from the south. What is initially a very pleasant route along the London Road towards the city centre via the Joseph Paxton London Road cemetery and the Charterhouse Fields is then ruined by the concrete mass of the Ring Road junction and the sea of tarmac which visitors are met with. The elevated and sweeping section of the Ring Road strangles the remnants of Whitefriars Monastery – one of the city's medieval gems that deserves better.
32. At the time of preparing this submission the Coventry Society has engaged with a landscape consultant who is interested in developing an idea for remodelling and landscaping Junction 4 with support from a suitable highways engineer. We would like to develop that idea in conjunction with the City Council and any relevant development partners.
33. With regard to Junction 5 (Cheylesmore) we welcome proposals to improve linkages to the city centre from that location. The present deep subway and overpass system

are highly undesirable and represent negative aspects of the Ring Road which the nearby Friargate scheme is removing and remedying. In recent years the Council has done some excellent work filling in subways elsewhere in the city centre (Warwick Road-Warwick Row; Eaton Road-Greyfriars Green; The Butts-Albany Road) and we would like to see policy implemented to further those positive changes.

#### Policy CC7 – Tall Buildings

34. We note that the Council intends to introduce detailed guidance on tall buildings in the form of Supplemental Planning Guidance. We would welcome the opportunity of having input into that document.
35. We do not consider that any further tall buildings should be introduced into the Upper Precinct-Lower Precinct-Smithford Way-Market Way areas as the existing skyscrapers in those locations (particularly Coventry Point) are widely regarded as unsightly, of poor quality and design and serve as visual barriers that prevent legibility and connectivity around the city centre.
36. We would support a policy that encourages the removal of certain existing post war skyscrapers around the city such as Coventry Point in Market Way; Civic Centre 4; Priory Hall in Priory Street/Fairfax Street; the Britannia Hotel in Fairfax Street; and Mercia House in the Lower Precinct.
37. As referred to at paragraph 11 above we have recently seen the inappropriate painting of the city's iconic AXA building off Corporation Street. This "golden tower" was one of the city's best post war buildings and the retrospective planning application that was submitted to seek permission for those changes (later withdrawn on the basis that planning permission was deemed to be not necessary) was objected to by over 70 individuals and groups across the city. The issue attracted significant interest within the local media (Coventry Telegraph newspaper and BBC Coventry & Warwickshire Radio).
38. We strongly argue therefore that there needs to be specific planning policy that requires planning permission for any material changes to tall buildings whether that means cladding, rendering, painting or other surface treatments. Our comments set out at paragraph 11 above apply.

#### Policy CC8 – Green and Blue Infrastructure and Policy CC9 – Drainage and Flood Risk

39. We support the policy to maintain and enhance green and blue infrastructure and develop the greening of vertical surfaces adjacent to the Ring Road.
40. The Ring Road - Warwick Road junction had very attractive plants trailing down the blue brick retaining walls prior to commencement of the Friargate scheme. We would like to see planting of at least equal merit added back. Further, the central reservations of the Ring Road were originally covered with attractive stone chippings. We feel that reinstatement of an appropriate decorative surface or greening of the central reservation would improve the utilitarian appearance of the Ring Road and we would suggest that this be included in future maintenance work.
41. We are excited by the opportunities to de-culvert sections of the River Sherbourne and we are particularly supportive of Policy CC9 (e) which states that *"Where a development proposal lies adjacent to the existing de-culverted River Sherbourne, a natural sinuous river channel should be retained. Consideration should be given to*

*remove culverts along Fairfax Street as shown in Figure 7 in order to create multi-functional green/blue spaces or consider opportunities to create a water channel that respects the alignment of the River Sherbourne.”*

42. We believe however that Policies CC8 and CC9 ought to go further by identifying other sections of the River Sherbourne which would benefit from culverts being removed. The Ripple Effect report <sup>4</sup> identifies other sites where the River Sherbourne ought to be de-culverted including Palmer Lane/The Burges, Naul’s Park the IKEA public realm (Croft Road).

*“The River Sherbourne runs directly beneath the front entrance of the [IKEA] store where there is a large paved public realm area. There is potential to daylight the river here and create public realm that celebrates the river while providing flood storage and water quality improvements. **This is one of a few sites which could be delivered in the short term to form the catalyst for eventually daylighting the river throughout Coventry’s city centre.**”*

43. We have highlighted the words in bold above as they emphasise that the ambition should be to daylight the river throughout the city centre and not just focus on one or two small sites.
44. We would like to see planning policy introduced which ensures commitment to implementing the recommendations of the Ripple Effect report in opening up the River Sherbourne and other relevant watercourses throughout the city.

#### Policy CC11 – Parking

45. We support the policy of redeveloping surface level car parks including Cox Street, Bishop Street and Cheylesmore.
46. We consider that there is a particular need for a high quality car park at Pool Meadow that will serve the Cathedral Quarter. With the loss of the car park to the rear of the Transport Museum, such a car park would also serve both city museums and activity at Millennium Place.
47. However with regard to the Salt Lane car park, we are of the view that this land should be earmarked for development other than use as a car park. The central site, with the adjoining Grade I listed Ford’s Hospital and the excellent view of Greyfriar’s Spire lends itself to use for residential, office, retail or commercial uses. There is an opportunity to create highly desirable units in that special location which would compliment the Council’s goal to introduce more housing into the city centre and create a more vibrant night time economy.
48. There is also an opportunity here to create an interesting new square with limited kerbside parking that would serve clients at offices in the daytime economy and cafes and restaurants in the night time economy.
49. We support the policy of encouraging multi storey car parks in the Technology Park Quarter. Whilst the existing buildings in that location are generally of good quality, the quantity of surface level car parking which often fronts the roads and pathways is a negative aspect of the Parkside development. We would like to see better and

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<sup>4</sup> The Ripple Effect: Building Resilience of Urban Water Systems to Climate Change – Executive Summary, the Case for Birmingham and Coventry (Severn Trent Water and Aecom 2014)

more efficient land use in that location with buildings that have active frontages fronting the roadside.

50. We strongly endorse policy CC11 (e) which states that *“Proposals for further new multi-storey public car parks will be supported, provided they are of good design ... and ensure an appropriate relationship with adjacent buildings and uses.”*
51. There are many examples of poorly designed multi storey car parks and we agree that it is important therefore to ensure that new car parks are of good design. We suggest that Supplementary Planning Guidance, perhaps in the form of Design Briefs, would be valuable in helping to achieve the Council’s objectives.
52. We support the policy to prohibit new surface level car parks in the city centre, however, we believe it would be beneficial for the draft policy to emphasise that this does not relate to on street parking which we believe should be encouraged and expanded across the city centre. We wholly support the recent changes made by the Council as part of the public realm improvements which have introduced new on street parking, for example, on Little Park Street and Warwick Row.

#### **D. The City Centre Quarters**

##### Policy CC12 – The Business Quarter – Friargate

53. We have been generally supportive of the Friargate scheme since its inception. We approve draft policy CC12 which follows the basis upon which outline planning permission has been granted in any event.
54. We look forward to continued dialogue with the Council and the developer as the Friargate development progresses and we would welcome the opportunity of engaging fully in respect of future detailed planning applications which relate to the site.
55. In particular we are keen to ensure that transport links serving Friargate are effective and efficient, and that the designs of new buildings are of the highest quality. We would suggest that serious consideration be given to using architectural competitions for future new build which could be encouraged through appropriate planning policy.
56. With regard to Friars House, we regard that skyscraper as one of the best post war buildings in the city and we would suggest that the building be added to the Local List and/or brought within the boundary of the Greyfriars Green Conservation Area if it is currently outside that boundary. We are keen to avoid future detrimental changes to the exterior of the building which in its present state is attractive and represents a landmark asset of which the city can be proud.

##### Policy CC13 - Cathedrals and Cultural Quarter

57. We note that the proposed Policy CC13 is linked heavily to the Conservation Area Management Plans for the Hill Top Conservation Area and Lady Herbert’s Garden and The Burges Conservation Area. We gave positive feedback to those Management Plans when they were proposed and we therefore endorse Policy CC13 fully.

### General Comments - Reconstruction of historic buildings?

58. With regard to future development of the Cathedrals and Cultural Quarter in general, we strongly urge the Council to consider the kind of developments that are taking place in key German cities including Dresden, Frankfurt and Berlin. Like Coventry, those historic cities suffered significant war time damage in World War II. Yet reconstruction of historic buildings is now taking place in the 21<sup>st</sup> century which is reaping significant benefits for those urban areas.
59. In Dresden, the ruined Frauenkirche has been rebuilt and the surrounding area is being rebuilt by way of reinstating and reconstructing lost historic buildings, with other classically designed buildings being added.<sup>5</sup>
60. In Frankfurt, the historic Cathedral was neighboured by a brutalist post war structure. That has recently been demolished and, like Dresden, the city is now reconstructing a number of historic buildings that were lost in the war and adding other classically designed buildings to compliment the area. The Dom-Roemer area is now set to become a major attraction in the Frankfurt Altstadt comprising retail, leisure, restaurant, office and residential uses.<sup>6</sup>
61. Coventry's Cathedral Quarter is internationally renowned and its architectural and historic qualities are enjoyed by Coventrians and tourists alike. The area is however relatively compact and the transition between the historic core and the surrounding areas is often poor. The link between the Cathedral Quarter and Broadgate, for example, is particularly poor. Whilst we recognise the clear benefits of the public realm improvements that have taken place at the top of Trinity Street, the view of the side of Primark which pedestrians are met with as they exit the Cathedral Quarter past Holy Trinity Church and Priory Row is disappointing to say the least.
62. The public realm improvements at Broadgate/Trinity Street have resulted in a large area of paving and landscaping and we consider that sensitive development in that location should be considered in future in order to expand the Cathedral Quarter and better integrate it with the Primary Shopping Quarter. If Coventry considers that the reconstruction projects in Dresden and Frankfurt are of merit and should be followed here, which we strongly endorse, we suggest that serious consideration should be given to reconstructing the medieval lanes of Great Butcher Row - Little Butcher Row - Cross Cheaping which were sited in that location and destroyed in the 1930s for the construction of Trinity Street. This would give Coventry a destination similar to York's Shambles<sup>7</sup> which is widely recognised as being a major attraction in that city.

### The Burges

63. We are keen to see appropriate development of the Palmer Lane area and opening up of the River Sherbourne in that location.
64. We are also keen to see the medieval, Victorian and pre war buildings in The Burges area restored and revealed where applicable. The pleasing redevelopment in Far Gosford Street shows what can be done.

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<sup>5</sup> Frauenkirche, Dresden [www.frauenkirche-dresden.de/en/building/reconstruction](http://www.frauenkirche-dresden.de/en/building/reconstruction)

<sup>6</sup> Frankfurt Dom-Roemer [www.domroemer.de](http://www.domroemer.de)

<sup>7</sup> <http://www.historyofyork.org.uk/themes/medieval/the-shambles>

65. Some of the post war buildings along the Burges are of particularly poor architectural quality including the units on the south east side of the Burges / Cross Cheapings which were recently taken over by Study Inns. Those flat roofed, “monolithic slab like buildings” are set back from the street line which other buildings along the Burges otherwise follow. They seriously detract from the quality of the Conservation Area. We would welcome a policy or Management Plan that encourages the demolition of those buildings so as to allow a more appropriate development that respects the adjoining historic buildings and follows the original street line.
66. The link from the Burges to Cross Cheaping - Broadgate is poor and we recommend that encouragement through planning policy should be given to opening up the covered walkway that exists alongside the Primark building. The buildings at the upper end of The Burges in that location are of post war construction and are generally of poor quality. We would like to see those buildings redeveloped and replaced with sensitive builds that compliment rather than detract from the historic character of The Burges.
67. The street name “The Burges” derives from “the Bridges” as the street crosses the River Sherbourne and the (we believe) Radford Brook. We understand that the remnants of a medieval bridge lies beneath the Burges and we would recommend that the opportunity to reveal that bridge and the watercourses below be pursued in future as part of any development in the Burges. This would support the recommendations of the Ripple Effect report and also add to the character of the Burges Conservation Area.
68. There are examples of similar schemes elsewhere in the country. In Rochdale there is a plan by BDP Architects to de-culvert the River Roch and expose a medieval bridge which includes a series of modern glass viewing platforms around it.<sup>8</sup> A similar project is planned in Bradford, dubbed the Bradford Beck project.

#### Hales Street

69. The 1960s buildings adjoining the Old Grammar School and the extension to the Transport Museum are of particularly poor quality and we would recommend the introduction of planning policy that encourages the demolition of those buildings and replacement with sensitive redevelopment. The Victorian Opera House that stood on that location until 1961 was of significant architectural quality and the opposite side of Hales Street also contained a number of attractive Victorian buildings, some of which still survive. We suggest that consideration should be given to reinstating the Victorian character of Hales Street as part of future redevelopment. Again we advocate for a Design Brief for this critical location which contains listed buildings and key attractions and tourist destinations.
70. With regard to uses, we recommend mixed use development in Hales Street with the introduction of office and residential accommodation at the upper levels of existing and new buildings. Presently the street predominantly contains retail and hot food takeaway uses which limit the appeal and vitality of the street.

#### Policy CC14 – The Civic Quarter

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<sup>8</sup> <http://www.rochdaletowncentre.com/home/Developments/river-re-opening>

71. We are aware that Coventry University has recently acquired a large area of land within the Civic Quarter which includes the Council's Civic Centres 1-4 inclusive. We were pleased to hear Deputy Vice Chancellor David Soutter's commitment in the local media to full public consultation taking place in relation to the University's development plans, particularly with regard to the design of the new buildings. We intend to fully engage in that consultation and build a working relationship with Coventry University.
72. We strongly advocate for the use of Design Briefs for this central and historically important location and would suggest that Supplemental Planning Guidance be introduced for this key regeneration site. We are aware that some Local Authorities adopt a policy of requiring developers to fund Design Briefs and we invite the Council to consider whether Coventry University should be required to fund such for this particular site.
73. We are encouraged by the wording of Policy CC14 (b) which states that "*New developments must also respect and enhance the setting of the areas heritage assets, and where appropriate incorporate them into the design of new buildings and landscape.*"
74. The Civic Quarter includes the site of the historic Palace Yard as well as medieval cellars which are at present largely unknown and certainly under utilised. We would like to see development highlight and make better use of these heritage assets. Public access to the medieval basements in particular would be advantageous and would add to the interest of the neighbouring Cathedrals Quarter. There should be signs and displays at ground level which educate passers by as to the historic structures below.
75. If a substantial redevelopment of the current Palace Yard takes place then we would support any proposals to reconstruct the historically significant Palace Yard where James I's eldest daughter Princess Elizabeth was lodged at the time of the Gunpowder Plot – another important historic link the Coventry has with royalty. A Design Brief for this site might indicate the possibility of incorporating domestic scale architecture with modernism design for the university in this section of the current civic centre.
76. We consider that some of the civic buildings with copper roofs and stone clad piers (such as Civic Centre 1) are of architectural merit and we believe that consideration should be given to retaining and reusing those buildings rather than demolishing them.
77. There are other buildings within the Civic Quarter which are of poor architectural quality and detract from the area. Civic Centres 2-3 (the red block) and the bridge which link them to the Grade I listed Council House are particularly poor and we would welcome the demolition of those structures.
78. We would also welcome the demolition of Civic Centre 4 (Tower Block). One of our members has commented that "*The tower block is an inefficient building with a low useable area compared with the space taken up by service areas!*"
79. The redevelopment of the Civic Quarter provides an opportunity to enhance the street fronts along Little Park Street, Earl Street, Jordan Well and Much Park Street. Presently a number of sites in this location contain little or no activity at street level.

Civic Centre 3 for instance has no active frontage and this is worsened by the fact that the footpath is shadowed by the low ceiling of the structure above.

80. The corner of Much Park Street and Jordan Well is poor as it primarily comprises the vehicular entrance to the service area and underground car park behind. We strongly believe that the opportunity should be taken to reinforce the street lines at this location through sensitive development that contains active frontages and a mix of uses.

### Much Park Street

81. Once the main thoroughfare to and from the south, Much Park Street was one of Coventry's premier streets and it was lined with quality buildings bursting with activity fronting the street line. Following the Blitz, the post war clearances of the 1960s and 1970s and the construction of the Ring Road the street has been left fragmented, devoid of life and activity and it now cries out for significant regeneration.
82. We recommend that Design Briefs are implemented for this key location. The street contains two listed buildings that are presently unused and without context. The street benefits from fantastic views of the Cathedral Spire which are not taken advantage of. Again, we suggest that Coventry University be invited to fund a Design Brief for this key area.
83. The construction of Severn Trent's Operation Centre on the eastern side of Much Park Street has left a large gap site fronting the street which should be developed sensitively to compliment the listed Whitefriars Gatehouse and medieval stone ruins that are sited opposite. We would recommend that any development on that site contain a mix of two, three and four storey buildings suitable for a range of end uses. The use of traditional building materials would be appropriate given the setting of the listed buildings. We opposed the demolition of the former Greyhound Pub in that location at the time Severn Trent's premises were built as we felt that this three storey Georgian/Victorian building could easily have been restored and converted to a range of mixed uses including residential, office, retail and food outlets.
84. We support the Council's intention to improve the link across/under the Ring Road between Much Park Street and Short Street-Parkside.
85. The north east side of Much Park Street (approaching Jordan Well) has the potential for significant development. The paved ramp that was built as the lead up to the Combined Crown and County Court building from Much Park Street is over engineered and excessive. The result is a large expanse of steep grass verge fronting Much Park Street. We recommend that the access to the Court is changed and simplified as part of any future development so that land adjoining Much Park Street can be reclaimed for new build that fronts the street line. Buildings could be cleverly designed and arranged so as to provide access at lower street level from Much Park Street and access from the raised Court level above.
86. We are aware that Coventry University has announced plans to demolish the Sir John Laing building which we applaud. The present building is of poor quality and its position, set back from the street level, increases the fragmented and lifeless appearance of the street in general. We recommend that planning policy is implemented to ensure that future development reinstates the street line.

87. We are concerned that the University may opt for “monolithic slab like” development along Much Park Street in future, based upon the University’s recent development projects including the Computing and Engineering building on Gulson Road, the Hub on Jordan Well and the Health and Science building along Whitefriars Lane.
88. We would strongly oppose any such development along Much Park Street and we believe that, instead, future development should comprise a range of buildings of differing heights, scales, designs and materials. This approach could be achieved by way of constructing a large skeletal frame which spans the development site but then adopts different architectural treatments to the facades. Such an approach has been taken to the Gosford Gate development between developer CDP and Unite Group and we recommend that this precedent is endorsed for locations elsewhere around the city centre including Much Park Street.
89. The city centre needs a better balance between the larger scale post war buildings and domestic scale development that reflects the historic context of the street.
90. Much Park Street contained a number of medieval and timber framed buildings right up until the 1970s when a number were either demolished or relocated as part of the Spon Street Townscape Scheme. If Coventry opts to follow the sort of reconstruction schemes being adopted in Dresden, Frankfurt and Berlin (again, which we would strongly support) then it may be that Much Park Street is viewed as an ideal location for that type of development. It has the advantage of being within the wider Cathedrals and Cultural Quarter and so has the potential to compliment and expand the historic core.

#### *New Union Street and Cheylesmore*

91. We support draft Policy CC14 (f) which seeks to encourage development of the surface level car park at Cheylesmore, with integration to and improvement of the existing multi storey car park on New Union Street-Friars Road.
92. We are aware that the Council has earmarked Spire House and Christchurch House on New Union Street for demolition and redevelopment. We would support any demolition of those structures which we consider to be poor and inappropriate given their proximity to a number of listed buildings including Greyfriars Spire, the locally listed Methodist Hall, Cheylesmore Manor House (Registry Office) and Fords Hospital.
93. Once again we recommend the implementation of Design Briefs for this location which could extend to the junction with Little Park Street and indeed the Police Station complex opposite. Any new development on the site of Spire House should be of much smaller height and scale, and a “monolithic slab like” building should be strongly resisted. As with Much Park Street, we would recommend that any new development comprises a mix of building heights, scales, designs and materials. If a large sports complex is to be built in place of Spire House and Christchurch House (as has been indicated by the Council) then we would suggest that this could be achieved as well as a development along the lines that we envisage by way of “wrapping” the central sports building with a variety of smaller units around the perimeter. This would result in a development which is far more aesthetically pleasing and also provides opportunities for smaller independent retailers, offices or residential units to be introduced.

94. We support the intention of creating a gateway scheme at Junction 5 of the Ring Road connecting New Union Street and Little Park Street and again a Design Brief would be of merit in that location.

#### Policy CC15 - Far Gosford Street Quarter

95. We have long supported the regeneration of Far Gosford Street and we had input into the recent Management Plan which was developed by the Conservation Officer. We note that Policy CC15 supports that Management Plan and we therefore wholly support this draft policy.
96. The way in which Far Gosford Street has been restored and reinvigorated sets an example and forms a blue print which we believe should be copied elsewhere in the city. We would like to see other streets in and around the city centre restored with gap sites being filled with sensitive development and a range of uses.
97. The recent reconstruction of timber framed structures which were lost in the 20<sup>th</sup> century is a particularly interesting element of Far Gosford Street's regeneration and one which we believe should be considered elsewhere. This recommendation links with our comments above concerning the Cathedrals and Cultural Quarter, and the examples of reconstruction that are taking place in Dresden, Frankfurt and Berlin.
98. We support draft policy CC15 (b) which seeks to prevent any more fast food takeaways opening on the street. We would suggest that, if it is possible to do so, the policy is extended to prevent any more barber salons / hairdressers and small convenience/grocery stores opening on the street, of which there are also an excessive number.
99. We are aware that there has been some consideration given to the reconstruction of the medieval Gosford Gate on the boundary of Gosford Street and Far Gosford Street. We would recommend that planning policy be implemented to ensure that the opportunity to do so remains in future, and that this is not frustrated by any development of the adjoining National Tyres and Autocare business.

#### Policy CC16 – Health and Education Quarter (Swanswell)

100. We support draft Policy CC16 which states that *“New developments within the Health and Education Quarter must have regard to its established character; respond to the environmental issues associated with its proximity to the Ring Road and deliver high quality buildings and public space which reflect this areas position as a gateway to the inner city centre.”*
101. We support the conversion of existing buildings, particularly the listed buildings identified. We recommend that all available planning tools be used to ensure the preservation of those buildings pending the implementation of restoration and conversion works, for example, the use of Article 4 Directions and the service of appropriate statutory notices on landowners.
102. We support the intention to expand and enhance Swanswell Pool with better links to the city centre.
103. We are conscious that significant plans for redeveloping this “quarter” were presented around 10-15 years ago when the regeneration quarter was then referred

to as the Swanswell Initiative. A comprehensive report was commissioned by the City Council and completed by Urban Initiatives who produced an in depth masterplan. That plan put forward several options for tackling the elevated section of the Ring Road between Junctions 1 and 3<sup>9</sup> and recommended that the elevated section be lowered to an at grade boulevard. The proposed scheme would have had many benefits including:

- land reclamation to enable comprehensive and quality redevelopment;
- major improvements to links between Hillfields and the City Centre;
- expansion of the Swanswell Pool and green/blue infrastructure (with the possibility of a new Marina linking to the Canal Basin)
- the creation of new homes and commercial units on land currently taken up by the highway and slip roads
- significant improvements to the green and blue infrastructure in that location

104. There is no reference to the Swanswell Masterplan or the report of Urban Initiatives in Policy CC16 and it appears that the recommendations in that report have been either overlooked or disregarded altogether. We therefore recommend that the contents of that plan be reconsidered and integrated with Policy CC16 where appropriate. A significant amount of time, effort and resource (tax payers' money) went into that plan and its merits deserve to be considered again.

#### Policy CC17 - Leisure and Entertainment Quarter

105. We will support any planning policy that endorses the guidelines set out in any relevant Management Plan and Conservation Area Appraisal. We have not yet had the opportunity to provide input in the Spon Street Conservation Area Appraisal which is due to be released this year, although we will do so as indeed we have with regard to other Conservation Areas across the city.

#### Spon Street and Watch Close

106. In the previous Core Strategy document much of the Spon Street Conservation Area had been re-designated for inclusion in the Primary Shopping Area. This would reinforce the original concept for Spon Street as a thoroughfare of high quality specialist shops. We are concerned that the current situation of including the street in the Leisure and Entertainment Quarter undermines the policy for Spon Street.

107. We recommend that a Far Gosford Street style approach be taken towards Spon Street, with gap sites being filled with sensitive development and links into the city centre being improved. We applaud the Council's proposed public realm improvements at Lidice Place-Corporation Street-Spon Street which will help to improve those links.

108. However, further works are required to provide better links between Spon Street and the Lower Precinct and it may be that partial demolition of the buildings at the western end of the Lower Precinct, including the TJ Hughes building and Mercia House, would be beneficial. The facade of these buildings from T.J. Hughes to New Look is particularly ugly. It would be more interesting to see an arcade entrance to the Lower Precinct between T.J. Hughes and the buildings abutting the Co-op.

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<sup>9</sup> Swanswell Initiative Masterplan – Urban Initiatives

109. There are opportunities here to create domestic scale small developments that would reinforce and enhance the existing 'medieval street' scene. The city centre badly needs an extension of secondary retail premises that are affordable for the small local trader. There are opportunities here to produce a Design Brief describing an enhanced conservation area.
110. We support the policy of preventing further hot food takeaways being permitted along the street as these detract from the character of Spon Street and result in a lack of activity during daytime hours, plus the associated problems of litter and anti social behaviour that late night premises of that nature can create.
111. We recommend that opportunities be explored to improve the link between Spon Street and Upper Spon Street and tackle the Ring Road at this location.
112. Redevelopment opportunities in Watch Close should be explored to maximise the use of that land. The area is presently dominated by surface level car parking, and service areas which do little to enhance the appeal of Spon Street or encourage activity to the area. Watch Close also contains a number of post war buildings of poor quality and we recommend that these be identified in the emerging Conservation Area Appraisal for future demolition and redevelopment.
113. Watch Close may to some degree be likened to the former Far Gosford Street Industrial site which has recently been transformed into Fargo Village. We suggest that radical means of transforming Watch Close so as to enhance the Spon Street Conservation Area be explored.

#### Bond Street and Hill Street / Belgrade Plaza

114. We support draft Policy CC17 (c) which states that *“development for at least 95 homes on vacant land between Bond Street, Hill Street and Ryley Street will be supported subject to:*
- *The development providing an active frontage at ground floor to Belgrade Plaza. To provide this activity A1-A4 uses will be considered appropriate*
  - *High quality design that both relates well to the modern Belgrade Plaza development whilst ensuring the setting of adjacent listed buildings and Spon Street Conservation Area is preserved*
  - *Satisfactory noise mitigation measures, where required.”*
115. However, we consider that the site comprising Bond Street, Hill Street and vacant land at 'Belgrade Plaza' is another key location where the use of Design Briefs would be highly beneficial. If the existing Belgrade Plaza buildings are the kind of structures that future development will follow there is a risk of new build in the Bond Street and Hill Street areas comprising "monolithic slab like buildings" faced with cladding or render which would not be appropriate neighbours to the historic buildings in these locations. We therefore recommend that restrictions be placed on the choice of materials for new buildings in that location. The historic buildings in that location including Bonds Hospital and the cottages on Hill Street are of traditional timber, brick and stone and we recommend that a complimentary palette of building materials be used in future development in that location.
116. Development of the Belgrade Plaza site on Bond Street should incorporate active frontages at pavement level to complement the Town Wall Tavern and almshouses.

This would improve security in the area as well as complement the adjacent conservation area.

117. The opportunity to provide better markings and displays in respect of the city wall and Hill Street Gate should be taken as part of any future development and we would like to see planning policy that encourages this.

118. We support the proposed redevelopment of Ringway House, Hill Street and would favour demolition of that building which we consider to be of poor architectural quality. A sensitively designed new build would be more appropriate for that location.

#### Policy CC18 – The Primary Shopping Area and Policy CC19 – Primary Shopping Area (South)

119. We approve of Policies CC18 and CC19 as drafted.

120. At the time that the indicative masterplan was produced for the City Centre South scheme we provided written feedback to the Council (18<sup>th</sup> April 2012). We **enclose** a copy of that submission as the contents of that remain representative of our views in respect of the policy for redevelopment of this site.<sup>10</sup>

121. In particular we strongly recommend that the awkward arrangement of steps and ramps at the southern end of Hertford Street be addressed to reinstate the gradual incline that formerly existed. With the proposed redevelopment of the Barracks Car Park the vehicular tunnel underneath Hertford Street would no longer be necessary and this presents the opportunity to re-engineer the highway in that location and improve connectivity between Warwick Row - Bull Yard – Broadgate.

122. We advocate for taller buildings along Hertford Street of similar scale and height to the NatWest bank building and the former General Post Office. There should be a mix of uses to include residential accommodation above and retail, office and other ancillary uses below. The post war buildings which presently exist at the southern end of Hertford Street (up the ramp) are of poor quality and inappropriate scale for a key gateway site. We would recommend that those buildings be demolished and replaced with sensitive new buildings which are at least three storeys in height.

#### Policy CC20 – Primary Shopping Area (North)

123. We support draft Policy CC20 which promotes “...high quality entrances at Smithford Way and Corporation Street; enhanced linkages to Belgrade Plaza and Spon Street, and associated residential, leisure, office and hotel uses on upper floors above retail uses.”

124. Whilst we support the general principles set out, we would comment that a masterplan has not yet been produced for the northern part of the Primary Shopping Area and we look forward to being consulted on proposals for that development in future when plans are brought forward.

#### Policy CC21 – Cathedral Lanes

125. Cathedral Lanes is widely disliked amongst Coventrians and during public consultation at the time the Jerde plan was unveiled there were significant calls for

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<sup>10</sup> Coventry Society’s response to the City Centre South masterplan – 18<sup>th</sup> April 2012

the building to be demolished. The architecture is poor and the location of the building disturbs views of the Cathedral and Holy Trinity Church Spires. The service yard that was situated along Pepper Lane has completely destroyed the character of that key access point into the Cathedral Quarter.

126. We recognise that Cathedral Lanes occupies a key central location and that it has potential to serve as a destination for both day time and night time economies. Whilst we support the current plans to convert Cathedral Lanes into a restaurant quarter, we feel strongly that the longer term aspiration must be to demolish the building in line with the popular requests that were revealed as part of the Jerde consultation. When construction of Cathedral Lanes was put forward in the 1980s there was an alternative scheme presented which sought to reconstruct a series of small lanes and streets in period styles. We favour that development concept in this key location (adjoining the Cathedral and Cultural Quarter) over the shopping mall approach that was ultimately endorsed in the 1980s.

#### Policy CC23 - Technology Park Quarter – Parkside

127. We support this draft policy, in particular with regard to the development of a 'London Road Gateway' and a high quality frontage to London Road and the Ring Road. As stated at paragraph 32 above, the Coventry Society has recently engaged with a landscape consultant who is interested in developing an idea for remodelling and landscaping Junction 4 with support from a suitable highways engineer. We would like to develop that idea in conjunction with the City Council and any relevant development partners.

128. We support the policy of encouraging multi storey car parks in the Parkside area as the existing volume of surface car parking is unsatisfactory. Much of the land in that location is currently wasted which could be put to better use for housing and or additional commercial space. We would recommend that Policy CC23 be amended so as to encourage development of some areas of surface level car parking for such uses.

#### Policy CC24 - University and Enterprise Quarter

129. We are concerned by the wording contained within Policy CC24 as it appears to exclude land uses other than those which directly serve the needs of Coventry University and its students. The policy as drafted states that

*“Within the University and Enterprise quarter, proposals for redevelopment, refurbishment, extension or conversion of buildings for the following uses will be supported subject to high quality building and landscape design:*

- I. Education and faculty buildings;*
- II. University administrative facilities;*
- III. Residential provision including student accommodation; and*
- IV. Multi-story car parks (subject to evidence of need).”*

130. Whilst the Coventry Society supports the continued success of Coventry University and appreciates the benefits that the institution brings to the city, we are also understanding of the tensions that can exist when local people feel they are being pushed out of their city centre. The present Jordan Well – Gosford Street – Cox Street area is dominated by University buildings that are often accessible only to students and staff. As such a large section of the city centre in which the University

has a presence is out of bounds to Coventrians and we consider that to be wholly unacceptable. There should be a commitment, through planning policy, to achieving a range of uses throughout the area labelled the University and Enterprise Quarter so that these places and streets can be enjoyed by the many and not the few.

131. This is a particular concern in respect of the land which includes Civic Centres 1-4 that has recently been acquired by Coventry University. That is a central site which has long been well used by the public. We are concerned about the prospect of this land becoming part of the University Campus, effectively shut off to local people. Consideration should be given to making the University area more part of the city centre rather than a separate entity used solely by students.
132. We support Policy CC24 (b) which deals with the development opportunity to the east of the Computing and Engineering Building on Gulson Road, however, we recommend that the policy stipulates that as part of any future development there shall be improvements to blue infrastructure bearing in mind the location of the River Sherbourne within the site boundary. We would like to see an expansion of the existing public footpath which runs along the eastern side of the river.
133. We fully endorse Policy CC24 (c) which supports the demolition of the Priory Halls and Foundation Campus building at Priory Street and the introduction of new high quality residential buildings to support the setting of the Cathedrals and improve pedestrian routes and vistas along Priory Street.
134. We support Policies CC24 (d) and (e) which support the restoration and reuse of Whitefriars Monastery, and redevelopment of the Sir John Laing building respectively. With regard to the latter, we have set out our views at paragraphs 86 to 89 above.
135. We support Policy CC24 (f) which supports the redevelopment of the James Starley building. That structure is of poor architectural value and represents the “monolithic slab like” development that this new City Centre Area Action Plan specifically seeks to avoid in future. We would recommend that once that building is demolished it is replaced with a series of buildings of varying heights, scales, designs and materials. Our comments at paragraph 85 above as to how that might be achieved equally apply.

## Regeneration Areas

### *The Bishop Street Regeneration Area*

136. We strongly support the redevelopment of the Bishop Street area which currently presents as being in a high state of dereliction and decay. This is a key entrance to the city centre and must be a priority for future regeneration.
137. We support the demolition of the former Royal Mail Sorting Office and redevelopment of that site, together with the existing surface level car park off Bishop Street – Tower Street. We would like to see mixed development with active frontages along Bishop Street, Tower Street and Sliver Street.
138. We are keen to see a properly thought out plan presented to allow easy pedestrian access from Bishop Street to the Canal Basin and bring the canal area back from its isolation.

139. We are aware that Barberrry Developments currently owns a large plot of land in this regeneration area and the last scheme put forward is for high rise residential dwellings designed for the private rental market. Whilst we support residential use in this area, we are concerned by the scale of development proposed by Barberrry and we would prefer to see mews-style housing with street frontages that could entice the professional to live in the city centre. High rise accommodation could be provided in the centre of any new development but we feel strongly that development at street front should be linking with the Canal Basin and Lady Herbert's Garden. There is an opportunity to create new green areas, even small green courtyards to serve a new community.

140. By open letter dated 30<sup>th</sup> July 2014 sent to Councillor Kevin Maton we set out detailed comments in respect of regeneration of the Bishop Street area. The contents of that letter remain reflective of our views. We wrote:-

*"The Coventry Society is pleased to see renewed interest in the area dubbed Bishop Gate in the north of the city centre following the unveiling of the latest plans by developer, Barberrry. The current scheme, which is to be residential led, is certainly an improvement upon the previous proposals to retain the former Royal Mail Sorting Office and construct adjoining large prefabricated retail units that visually looked like they belonged on an out of town retail park rather than a key city centre site. However, whilst we embrace the principle of residential development on this site, the Coventry Society has concerns about the limited residential offering that is being put forward as well as the design and scale of the proposed development.*

#### Limited Residential Offering

*The city centre desperately needs more life and more foot fall and one way of achieving those goals is to create more residences in the central area. By having more people live in the city centre we will create more demand for quality retail, leisure and recreational facilities that the city cries out for. In this respect, we agree entirely with the comments of Coun Kevin Maton. However, to create this demand there must be a true mix of residential units in the city centre. We need to provide large family homes as well as 1 and 2 bedroom flats and apartments. We need to provide aspirational housing as well as affordable and social housing. There needs to be a mix of housing for the buying market as well as the rental market.*

*The Bishop Gate proposals in their current form are said to target the rental market only. Whilst apartments and flats are proposed, it appears that traditional housing and dwellings that would be suitable for families are not. The risk with this approach is that the scheme will create a limited and transient community which comes and goes with the expiry of each rental agreement. The city centre needs to provide quality homes for purchase by couples and families that can become established and create a true community within the city centre that will support ancillary land uses.*

*It could be argued that traditional family homes have no place in the city centre. The Coventry Society disagrees. In market towns like Leamington and Stratford, and in large urban cities like Birmingham, quality homes exist in the central urban areas in the form of 2-3 storey town houses and "mews" style developments. In Coventry, such a development is currently taking place at Far Gosford Street, where a range of 1 to 4 bedroom properties is being built to accommodate a variety of residences suitable for single persons, young couples and families. The Coventry Society believes that this precedent should be followed at Bishop Gate.*

*If we do not achieve a mix of residential units in this location and move instead towards a series of high rise towers for rent, are we not risking a repetition of some of the problems caused by the 1960s high rise developments like those which took place in Hillfields, many of which have since been demolished?*

#### *Scale and Design of Development*

*The development area dubbed Bishop Gate comprises the Bishop Street, Silver Street, Cook Street and Tower Street areas. Historically the north arterial route in and out of the city centre Bishop Street was a prominent, thriving and densely built up area with a mix of characterful residential and commercial premises facing the street on both sides. This character remained for centuries until the destruction of World War II and the redevelopment of the city centre in its aftermath. The street is now one of the most tired and run down in the city centre featuring vacant commercial units of no or little architectural value, a surface level car park, and the large vacant red bunker that was the Royal Mail Sorting Office. Yet the area has great potential. From the top of Bishop Street some of the finest views of the Cathedral Spire and Holy Trinity Church can be enjoyed. The development area sits next to historic gems like the Grade I listed Old Grammar School, the Canal Basin with its listed warehouses, the best surviving section of Coventry's medieval city wall including Swanswell and Cook Street Gates and the site of the original Bishop Gate, and Lady Herbert's Garden. The area is deserving of a quality scheme that respects and compliments the unique features that survive and surround the site.*

*Sadly, from the visuals published which depict high rise residential towers in a uniform style and choice of materials, there has been little or no regard to Bishop Street's heritage and the unique features of this urban area that survive today. The high towers would dwarf and overshadow the surrounding structures. They do not appear to contain much if any of an active frontage to the key streets including Bishop Street and Tower Street. Instead, large expanses of walls and glazed panels are presented. By means of proposing a number of high rise blocks of flats built at 90 degrees to Bishop Street, the opportunity to create a visual link from the Burges through Bishop Street up to the Canal Basin would be lost. Legibility and connectivity around the city centre would be worsened.*

*The indicative design and choice of materials selected for the high rise towers makes no reference to the locally distinct pattern of development and the surrounding structures. There is, for instance, no reference to the industrial qualities of the Canal Basin with its rich blue and dark bricks, tiled roofs, and use of timber. Similarly there is no reference to the warm sandstone of the city wall and gates. Rather than attempt to create a varied streetscape along Bishop Street such as that which existed for centuries it is proposed that there be a uniform block development with little variety, character or feature at street level.*

*There is a real opportunity at Bishop Gate to create a commercially successful and visually stunning scheme. Large scale residential accommodation could be provided at Bishop Gate without reliance upon a series of scattered and oversized high rise towers. Instead, there could be a dense development with apartment blocks at the core and more traditional housing units on the perimeters fronting Bishop Street, Tower Street, Silver Street, etc. Family housing could be provided in the form of 2-3 storey townhouses and mews style developments. Such buildings could be built with individual character so as to break up the scale and massing of the overall development. There could be a mix of architectural styles to add interest and appeal.*

*The Coventry Society's suggestions are not without basis. The Jerde Masterplan of 2008 put forward the concept of a largely residential based development on the site covered by the Bishop Gate proposals. The Jerde scheme proposed a series of residential blocks with some mixed uses also, of differing scales and designs, which followed the existing street lines of Bishop Street, Tower Street and Silver Street. That concept would appear more appropriate than that of scattered high rise tower blocks. To the north of the development site, the Jerde scheme proposed a development that followed the line of the city wall. It even proposed an aqueduct feature to run along Bishop Street and link with the Canal Basin. Although now generally dismissed, the Jerde scheme did at least demonstrate that some thought was given to the unique character of the Bishop Street area. The proposals now advanced by Barberrry, sadly, do not.*

#### Fairfax Street Regeneration Area

141. We support Policy CC25 (d) which states that *“the removal of the slip roads around Junction 2 of the Ring Road will be supported alongside the development of the White Street car and coach park. Any proposals should come forward as a comprehensive scheme, include significant green infrastructure and create a new high quality route between Fairfax Street and Swanswell Pool.”*

142. However, we reiterate our comments set out above at paragraphs 103 and 104. We strongly recommend that the Swanswell Initiative masterplan completed by Urban Initiatives be reconsidered and properly reassessed and that the option of lowering the elevated section of the Ring Road from Junctions 1 to 3 inclusive be revisited, rather than the lesser option of removing Junction 2 only. This solution, whilst bold and potentially controversial, would have significant and far reaching benefits for the city centre.

143. We strongly support the extension of Swanswell Pool which has the potential to help attract the sort of quality residential development that the Council aspires to achieve in this location.

144. The River Sherbourne is culverted in the Fairfax Street and Cox Street area. We would strongly support the deculverting of the River Sherbourne in this location. The site at present is dominated by the surface level car park and the elevated Ring Road. There is an exciting opportunity to transform this grey, densely urban area to one which features much improved green and blue infrastructure.

145. A more radical option would be to link the de-culverted River Sherbourne into a large water feature/marina which could be developed on Pool Meadow car park. This would reflect the fact that the Pool Meadow area was originally a water source. Such a development in this location could contain residential and commercial “lake side” units. This, with an improved Swanswell Pool, would introduce major improvements to green and blue infrastructure in an area which is otherwise dominated by tarmac and concrete. Again such development would help attract the quality residential development that the Council aspires to achieve in this location.

146. A surviving stretch of the medieval city wall runs off Cox Street alongside the Ring Road towards Sky Blue Way and Far Gosford Street. We recommend that the setting of the surviving stretch of the city wall be improved in this location and that the wall be repaired where necessary. The location of Bastille Gate / Mill Lane Gate which

stood on present day Cox Street should be marked with appropriate interpretation boards and displays.

147. With regard to future development along Cox Street, we argue for the retention and reuse of the city's listed Swimming Baths and Sports Complex as well as the "elephant" extension which we have recently recommended for listing by English Heritage.

148. With the commitment of Coventry University to demolish and replace the Graham Sutherland building there is potential to insert modern buildings of high quality along Cox Street to complement and enhance the setting of the listed Swimming Baths and Sports Complex. We repeat however our concerns about any future development in this location being of a "monolithic slab like" design and we recommend that appropriate policy be introduced to resist such development. Instead any new build on site should comprise a range of architectural styles and materials, heights and scales.

### The Warwick Row Area

149. As the Friargate scheme takes shape over the coming years we anticipate that the Warwick Row area will be revitalised and we look forward to seeing greater activity and a wider range of uses in this area. Whilst this City Centre Area Action plan states that the area is already home to a range of uses, the dominant users are estate agents, financial institutions and professional offices. There is limited night time offering in this location and we would therefore like to see policy which encourages activity "24-7". In particular we would like to see more quality residential accommodation introduced in the Warwick Row area and quality eateries and restaurants.

150. With regard to the Methodist Central Hall at Bull Yard / New Union Street, we consider that this has potential to be converted into a music venue or entertainment space should the current occupier vacate that building in future. The size of the building and close proximity to the train station and central retail area lends itself to such future uses.

151. We therefore support Policy CC26 which states that

*a. Proposals for limited and sympathetic infill development in the Warwick Row area will be encouraged and supported where appropriate.*

*b. Applications for conversions or changes of use will be considered on the basis of their relationship with adjoining buildings and uses. Where appropriate, proposals should complement existing styles and designs of adjoining buildings.*