

## Appendix B

### Statement of Main Issues Raised Through Sustainability Appraisal and Public Consultation

ORGANISATION	RESPONSE	AMENDMENT TO SPD
<p><b>English Heritage</b></p>	<p><b>English Heritage.</b> The draft SPD sets out some basic principles and the criteria, which will be used in assessing applications for tall buildings to reasonable effect (please see detailed comments below). It also refers strongly to the EH/CABE document 'Guidance on Tall Buildings', which is also useful.</p> <p>As the SPD is to guide development in Leicester, however, it should go beyond the merely generic criteria if it is to fulfil its function of informing applicants and decision-makers. There is little in the draft SPD which illustrates how developers should begin to set about satisfying the stated criteria and no strategic analysis of the urban form of the city which could inform the appropriateness of tall buildings.</p> <p>Ideally there should be 3 main strands to a robust Tall Buildings SPD:</p> <p><b>Information</b>  City Specific: Illustrative strategic urban analysis indicating areas which may successfully accommodate tall buildings, and examples of successful and less successful tall buildings.  Generic: Guiding principles on development; examples of building typologies.</p> <p><b>Criteria</b>  A clear indication of the range of considerations which will be applied to schemes and how developers should satisfy those (eg. requirements for photo montages, long range views etc).</p> <p><b>Policy</b>  Setting out the policy framework in which decisions will be reached. If the local authority has adopted its Statement of Community Involvement then this might also incorporate results of public consultation.</p> <p>Paragraph 6 of the SPD seeks to explain the City Council's approach. This seems to imply that the strategic rather than site specific criteria-based approaches are mutually exclusive; whereas, as we have just indicated, if these are complementary, not only should there be no fear of a presumption in favour of 'unacceptable proposals' but there is the added advantage that all people coming to the 'development table' are all equally informed.</p>	<p><b>Information.</b> At this stage the SPD purposely does not does indicate suitable areas for tall buildings. These areas will be identified by further analysis and urban design frameworks that will be undertaken to the major regeneration areas within the city.  Examples of successful and less successful tall buildings have been included in the SPD.</p> <p><b>Criteria.</b> Further clarification of the material developers should prepare has been included.</p>

	<p>Bristol City Council have produced, in-house, a good Tall Buildings SPD, which might be worth consulting. Whilst even Bristol City would acknowledge that it was relatively expensive to produce, there may be opportunities to streamline the approach in tailoring the SPD for Leicester (for example, one of the major costs was the public consultation exercise 'Height Matters': although the value of public involvement should not be underestimated, an alternative approach may prove less expensive). The benefits of the Bristol SPD have already been realised by the Council officers and developers: schemes for tall buildings at the University are progressing more smoothly, for while the design criteria are still having to be satisfied by the developers the baseline principle on the appropriateness of a tall building has already been resolved; there has also been a reduction in the number of wholly inappropriate enquiries for tall buildings, saving officer time, as developers understand in advance the reasoning behind the stance adopted by the Council.</p> <p>It is this last point which may have the greatest influence on the assertion in paragraph 6; a lack of strategic analysis can actually weaken the defence against inappropriate schemes.</p> <p>There are also a number of detailed comments on particular points in the draft SPD:</p> <ol style="list-style-type: none"> <li>1. Elucidation of the various approaches to 'density' would be useful guidance for developers when they are exploring potential schemes.</li> <li>2. Equally, drawing out more fully the importance of encouraging sustainable communities through diversity of activity and housing provision would be welcome.</li> <li>3. 'legibility' within the Cityscape is mentioned in section 4, but is not extrapolated further in the criteria for assessment; this is a crucial element of the function of tall buildings.</li> <li>4. It is not clear how the storey-height maximum for podiums of '4 storeys' has been arrived at, nor how it is justified. Podium height should be dependent on the proportions of the surmounting building, the surrounding context, etc.; setting a proscriptive maximum could seem arbitrary unless justified, and without those other parameters could lead to inappropriate heights being adopted.</li> <li>5. Car parking: a caveat protecting archaeological considerations should be incorporated into the line establishing an 'ideal' for below ground car parking.</li> </ol>	<p>Site specific criteria-based approaches will be studied within the remit of the further analysis work and preparation of new urban design frameworks to the city's key regeneration areas.</p> <ol style="list-style-type: none"> <li>1. Clarification has now been given to the definition of density.</li> <li>2. The benefits of diversity and housing provision have now been included.</li> <li>3. The importance of legibility has now been included in the criteria for assessment.</li> <li>4. Greater clarification and justification has now been given to podium heights.</li> <li>5. A caveat protecting archaeological remains has now been included.</li> </ol>
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<p><b>The Countryside Agency</b></p>	<p>6. We would discourage a 'blanket' negative criticism of two decades of architecture (1960s and 1970s), unless it can be justified; as with so many periods of architecture there are both good and bad examples. It might be better to demonstrate poor and successful effects of existing buildings through examples (provided these are reasoned and carefully annotated).</p> <p>7. Within the same paragraph, the requirement on design typology is unclear: the intimation is that each new building should be completely ground-breaking and without precedent, and the implication is that buildings that are not so are of lesser value (such an assertion would denigrate most of the preceding forms of architecture, much of which we now treasure, but which have sought inspiration from various sources – Classical forms and proportions, Georgian pattern books etc.). If the requirement is seeking to encourage 'design in context' then that is wholly appropriate; equally, encouraging innovation once that principle has been established, may also have merit. These points should be made simply and, where possible, with illustrations.</p> <p><b>Conclusion</b></p> <p>We would strongly endorse CABE's assessment of Leicester's draft SPD that it should go further than a set of generic criteria in the abstract and that it should establish the Leicester case for, or against, tall buildings.</p> <p>In the light of the financial and staff commitment involved in carrying out a fuller urban analysis, some authorities have considered adopting a simple policy line of 'no buildings over x storeys will be accepted unless an exceptional case can be made'. On the face of it, this appears to offer a safety-first defence against inappropriate applications: in reality, however, it could mean that local authority staff would not be armed with a thorough analysis of the Cityscape with which to assess such an application, other than that produced, in isolation, by the applicant. There is also the question as to what message it would put out to developers at a time when Leicester is seeking to encourage investment in the fabric and economy of the City.</p> <p><b>TCA.</b> We support the policy context of PPS1 that encourages the development of well designed, safe and sustainable buildings that show respect for their surroundings and context. Of particular concern to the Agency is that any works should respect the intrinsic character of the area. Landscape character assessment provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change, and to make</p>	<p>6. The SPD does not proclaim a blanket criticism of 1960s/70s architecture. However, the failure of many tall buildings from this period is well known and documented elsewhere.</p> <p>7. Greater clarity has now been given to section 5.4 regarding the architectural excellence of proposed buildings.</p> <p>More precise criteria for the case of tall buildings in the city will be made in further detailed studies of the city's regeneration areas.</p> <p>Sufficient policies and expertise exist to determine proposals for tall buildings. The SPD does not prohibit the development of appropriate tall buildings.</p> <p>The support of the Countryside Agency is welcomed. The SPD aims to fully incorporate the philosophy of the Countryside Agencies approach to the</p>
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	<p>positive proposals for conserving character, enhancing it or regenerating it, as detailed proposals are developed. The relevant character area extract from the Countryside Agency's (East Midlands Volume 4) can be downloaded from our web site at <a href="http://www.countryside.gov.uk/LAR/Landscape/CC/index.asp">http://www.countryside.gov.uk/LAR/Landscape/CC/index.asp</a>.</p> <p>The Countryside Agency firmly supports the pursuit of high standards of design in all development, and especially that, which respects local character and distinctiveness. The Countryside Agency believes that all development should be of a high quality design not only in terms of aesthetics but also in ways by which it incorporates the full range of sustainable development objectives i.e. economic, social and environmental. In our planning policy statement 'Planning Tomorrow's Countryside' available at <a href="http://www.countryside.gov.uk/LivingLandscapes/PositivePlanning">www.countryside.gov.uk/LivingLandscapes/PositivePlanning</a>, we propose that planned development should be good enough to approve not bad enough to refuse. Our 'New Vernacular' approach advocates the development of new buildings in the countryside that re-connect their design and construction with the environment. It promotes innovative, sustainable, high quality buildings that enhance local character and respect their context and the key principles are also relevant to buildings in an urban setting.</p> <p>The relationship of new development to existing transport infrastructure is an important consideration and we support this SPD which promotes buildings with good proximity and accessibility to public transport and the provision of safe walking and cycling routes which will contribute to a healthy, safe, less congested environment.</p> <p>The appraisal has also highlighted the potential for the SPDs to be used to improve and enhance open spaces and we would wholly support this opportunity to add value through either the provision of open space included in the development or through the process of planning gain. The CA promotes the concept of "Green Infrastructure" (GI) a network of multi-functional greenspace that contributes to the high quality natural and built environment required for existing and new sustainable communities in the future. GI offers a range of environmental and social advantages that has proven associated health benefits and reduction in crime. The 'Green Infrastructure Guide' was developed on behalf of the Milton Keynes and South Midlands growth areas but would be of relevance to the East Midlands region as a whole. I have included a summary sheet, which gives a more detailed explanation of GI.</p> <p><b>Sustainability Appraisal</b></p>	<p>development of tall buildings.</p>
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<p><b>Environment Agency</b></p>	<p>The SA process has tested the sustainability of the proposed SPD and considered the implications from a social, economic and environmental perspective. This process has shown the implementation of the supplementary planning guidance will have overall positive benefits on sustainability for the city of Leicester.</p> <p>Of particular relevance to the Agency are SA Objectives 2,3,4,5,8,12 and 14.</p> <p><b>Overall Impact of the SPD</b> In Table 3 with reference to SA objective; 2. The SPD can also promote healthy lifestyles by incorporating green space into the design and providing easy access by safe walking and cycling routes.</p> <p><b>EA.</b> Paragraph 8.1 of the Draft Sustainability Appraisal Report states that the comments of the Agency in response to the Scoping Report have been addressed in the revision of the SPD. However, no changes have been made to either Paragraphs 4.2 or 5.6.</p> <p>Without appropriate consideration of the environmental impact, there may be human health impacts for the occupiers of tall buildings. Similarly, the impact of a tall building on a regulated process needs to be assessed. As proposed the Agency object to the adequacy of the Sustainability Appraisal.</p>	<p>The SPD has been amended to fully address the concerns raised by the Environment Agency.</p>
<p><b>Government Office of East Midlands</b></p>	<p><b>GOEM.</b> Thank you for consulting GOEM on the development of your Tall Buildings SPD. I note that you link the SPD to Local Plan Policy UD02. However, the guidelines in the SPD appear to also relate to several other policies, including heritage and transportation policies. You may consider that the SPD would be more robust if it could demonstrate a clear link to those policies, by all relevant policies being listed under Section 2: Policy Context.</p> <p>If a clear link is not established to all underpinning policies, an argument could be made at some time in the future that those parts of the SPD that refer to matters not included in Policy UD02 are invalid.</p>	<p>The SPD highlights certain policies within the Local Plan of particular relevance. In addition the SPD does relate to several policies not referred to in the document. However, these policies remain totally valid and are not superseded by the SPD.</p>
<p><b>Housing Corporation</b></p>	<p><b>HC.</b> There is a useful publication which you may wish to consult, "Higher Density Housing for Families: a design and specification guide". It is available from London Housing</p>	<p>This publication been obtained and will be referred to during the</p>

<p><b>Leicester Civic Society</b></p>	<p>Federation, Lion Court, 25 Procter Street, London WC1V 6NY Tel: 020 7067 1010 Fax 020 7067 1018</p> <p><b>LCS</b> Urban regeneration is one of the most exciting opportunities that faces Leicester at the beginning of the 21<sup>st</sup> Century. Most of the areas ripe for regeneration lie immediately outside the historic central core of the City - though the riverside north of Abbey Park can also be included. These areas have been identified correctly by Leicester Regeneration Co. whose efforts have been concentrated on them. They exist for a number of reasons. Principal amongst these is the isolation of the central core from its immediate hinterland by the construction of the central ring road in the 1970's. In certain directions, particularly to the north and west, this has resulted in large areas of land dominated by new roads and motor traffic with little of the former built environment remaining and little thought given to pedestrian routes across them. The problem was exacerbated by the closure of the Central Station that led to a rapid decline in both retail outlets and the general condition of High Street and that lasted for many years, only being reversed by the Shires Shopping Centre.</p> <p>Leicester Civic Society broadly welcomes the regeneration proposals of LRCo. Many of these offer exciting and innovative solutions to the problems. The Waterside, Abbey Park Road, Science Park and DeMontfort University proposals in particular offer a real solution to the problems of these areas for the first time. As firm believers in heritage led regeneration we would wish to see the growth of regenerated areas out from the historic inner core with buildings echoing the scale, urban grain and materials of that core, thereby recreating much that was needlessly lost. Coupled with this new urban growth it is vital to launch a programme aimed at curtailing the detrimental effects of the central ring road. The present state of the road is appallingly disruptive to the quality of life in the City. Heritage led regeneration cannot proceed effectively without traffic reduction, traffic calming, reduction in environmental and noise pollution, reduction in the detrimental effects on visual amenity, improved street-level routes for pedestrians, quality surfaces and extensive tree planting.</p> <p>Heritage led regeneration can therefore be seen to have its problems, the principle one of which is the impetus of resources. It is clear from what is beginning to happen in Leicester that development led regeneration is seen as a much easier option. Create the opportunities for development, attract developers and 'set the ball rolling' can be viewed as a good quick fix. However developers quite naturally want to do their own thing with the minimum of restraint. One of these things is to be allowed to erect tall buildings.</p>	<p>course of assessing all proposals for tall buildings.</p>
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	<p>Any development that fails to respect its context is bound to be contentious to both planners and members of the public that care about the fabric of the City. Tall building proposals highlight this situation and rapidly become an issue both contentious and emotive. Leicester City Council is quite right in seeking to address this issue head on as one of urban design, though we are perhaps all guilty of taking this problem seriously rather late in the day.</p> <p>Tall buildings are bound to be an emotive issue. On the one extreme they are often condemned out of hand by a small but vocal number who won't even take the time to look at the proposals. Equally bad is the gut reaction common in Leicester that views any concern with the considerable historical and architectural heritage of the City as an irritating barrier to 'progress'. Indeed, such has been the poor perception of the city by its people over the last sixty years that many no doubt find the phrase "Leicester's heritage" a mildly amusing oxymoron. Councillors, who ultimately take decisions on our behalf, cannot fail to be influenced one way or the other by such strongly held extreme opinions. The SPD attempts to take a dispassionate view of the problem and as such deserves respect and should be taken very seriously indeed.</p> <p>Leicester Civic Society particularly welcome the view quoted in the appendix at 4.14. below. It would be fatal to give a 'green light' to tall buildings in named specific areas for any reason. We note with alarm a recently expressed view to Council that tall buildings may be appropriate at 'nodes' where major roads intersect with the central ring road, presumably on the grounds that at these places there is a lot of open space created by the roads themselves. However these places are many and due to the wider impact of tall buildings it would be difficult to avoid a growing ring of buildings spreading from these locations on either side of the ring road and starting to encase the inner core in inappropriate development utterly devoid of any contact with the urban grain of that core. This would add to the urban design problems created by the road in the 1970's by adding a further ring - this time of buildings - in the 2000's. This is the very antithesis of the kind of heritage led regeneration that we would wish to see and it is unfortunate that this opinion has been expressed at the same time as the SPD seeks a more sophisticated approach. It is doubly unfortunate inasmuch that many of the areas that would be so identified are those at most under current development pressure. Such unguarded statements can only fuel this pressure and undermine the establishment of proper planning guidelines.</p> <p>We are strongly supportive of the view quoted by the Civic Trust in the appendix at 2.4.</p>	<p>Concerns about the Central Ring Road accommodating a double ring of tall buildings that could encase the inner core of the old town are extremely valid. Within the Criteria for Assessment section 5.4 <i>Architectural Excellence</i> and section 5.7 <i>Contribution to Permeability and Legibility</i> have therefore been expanded to address these concerns.</p> <p>Within the Criteria for</p>
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below. There is a regrettable tendency to view the work of modern architects with an 'exciting' reputation as almost sacrosanct and see anything that carries their name as an almost thrilling opportunity. That it would be backward not to miss out on gaining one of their buildings for the City. This is not a view with which we would concur. The Civic Trust is quite correct to warn of the dangers of fashionable fetish in architecture and the deleterious effects this can have by imposing tall buildings on an urban landscape almost regardless of other considerations. We strongly regret that this common sense does not appear to be expressed directly in the SPD.

Planners must be aware that the errors of the past have created a credibility gap in the minds of the public. It is of little use enthusiastically pointing to the dreadful mistakes Leicester made in the 1960's and 1970's and saying that this cannot happen again as we now have a better system of planning controls in place. This was only one generation ago and many of us remember only too well that the objections to tall office buildings that we then raised on the grounds of atrocious design and total lack of respect for their surroundings, led to us being labelled as people outdated and obstructionist. We need to see that the mistakes of one generation will not be repeated by the next generation uttering the same mantras and platitudes as their predecessors. The frightful results of the 1960's and 1970's are largely still with us. One generation is of little account in a City with a two thousand year history but such planning mistakes live on and blight the future.

#### TALL BUILDINGS IN CONTEXT

Although the SPD is quite right to avoid naming specific sites where tall buildings would be acceptable, it cannot be wrong to inform ourselves of their pros and cons by considering some of those we have already in an effort to avoid past mistakes and seek out an appropriate context for any tall buildings of the future.

##### 1. Tall buildings in the historic core.

It is important to realise that existing tall buildings in the historic core of the City have an almost totally negative effect and that this has been brought about by a fatal combination of universally poor design, excessive height and insensitive sites. Any one of these is severely damaging. Any two out of three guarantees a disaster. Particularly bad examples are Cardinal House, Bosworth House and the New Walk Centre, which are of very poor design, far too tall and occupy sites severely damaging to the historic fabric of the City. The James

Assessment, Section 5.4 *Architectural Excellence*, warns architects against the dangers of blindly following fashion, and over stylizing buildings. However, it is virtually impossible, nor desirable to legislate against those architects at the vanguard of their profession and who are widely acclaimed. Designs by both famous and lesser known architects will be rigorously assessed against the criteria set out in the SPD without distinction.

Planning officers are fully aware of the mistakes made during the 1960s/70s relating to tall buildings. In addition the SPD requires architects to be fully conversant with the writings of Oscar Newman, Alice Coleman and Jane Jacobs.



	<p>Went Building at De Montfort University certainly came under the same category but it has mercifully been demolished. St. Georges Tower and 60 Charles Street are well sited but once again are too tall and of poor design. Elizabeth House is of a better design but is too tall a building for such a sensitive location. Thames Tower is of an appropriate height but very poor design. The developers of these buildings had an “It’s not as bad as some built before” attitude, an opinion actually expressed by Councillors in 1973.</p> <p>A further concern is the way in which the tops of these buildings have become littered in masts and dishes, adding to their gross impact on the historic core of the city.</p> <p>It is difficult to identify any modern tall building in the central core that has been anything other than a total failure and we should therefore consider that the core of the City <i>and its immediately adjoining hinterland</i> is totally unsuitable for such buildings as most forcefully expressed by English Heritage and CABE in the appendix at 3.10 below.</p> <p>2. Tall Buildings at the University.</p> <p>Leicester University has three tall buildings. Two of these are of a very good design standard. (The Charles Wilson building leaves much to be desired) It must be recognised that these tall buildings work in an open landscape and appropriately distanced from the historic Fielding Johnson Building. Here we have tall buildings that work given their setting. To the front they face tree-covered slopes that fall away through Welford Road Cemetery. To the rear they fringe the great expanse of Victoria Park and are absorbed by its space. Indeed, were it not for the quality of the hinterland behind the London Road and Victoria Park Road frontages to the park, expressed by their proper designation as the Evington Footpath and Stonegate Conservation Areas, these too would be sites where tall buildings could be absorbed alone by the size of the park.</p> <p>3. Hillside to the north of the University.</p> <p>This is an interesting and informative area. On a hillside dominated by the suburban-like parkland of the War Memorial and Regent College, the new halls of residence on De Montfort Street take advantage of tall trees and the steepness of the slope to present an acceptable frontage to the street. Only from below can their true height be judged. Here again we have an open landscape of the railway and Nelson Mandela Park that serves to</p>	<p>This important point has now been addressed under the Deign Criteria.</p> <p>Proposed development schemes to the historic core of the city always warrant special consideration. However, by identifying the core as being unsuitable for tall buildings, this might suggest that all other areas of the city are suitable, which is not the case.</p> <p>Design analysis is always subjective, it could equally be argued that the Charles Wilson Building is one of the city’s finest tall buildings. Would tall buildings to London Road and Victoria Park Road be acceptable if the hinterlands were not conservation areas? Not necessarily.</p> <p>The Granby Halls site is surrounded by broad streets, public open space, the LRI car park and a rugby stadium. Tall buildings could therefore be</p>
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	<p>mitigate their impact. However, unlike Victoria Park, this space is not large enough to cope with any fringe of tall buildings and any redevelopment of the former Granby Halls site would therefore be singularly inappropriate for tall building construction.</p> <p>4. Abbey Meadows.</p> <p>Open water meadows are often very suitable for tall buildings and the National Space Centre provides an excellent example of a landmark tall building of first class design. The science park could similarly absorb tall buildings. The proposals for Abbey Park Road are equally good with tall buildings facing a wide, relatively quiet roadway with an expanse of heavily tree-covered parkland in front.</p> <p>PROTECTING VIEWS</p> <p>Once again a poor perception of the City has led to the erroneous opinion that it possess no views worth protecting. Indeed the major fault of the SPD is its failure to identify specific views that should be protected. This failure in the past has already led to a serious loss of quality in the urban landscape of the City. It is regrettable that, whereas the SPD is ahead of any tall buildings policy in Nottingham, the Nottingham City Centre Masterplan clearly identifies views and states that they will be protected.</p> <p>The apartments of West Bridge Wharf, although of a not unattractive design, are too tall by far. They ‘canyonise’ Bath Lane, dominate the riverside, and rise over the backs of the properties on Talbot Lane. They destroy the river terrace as a feature in the topography of an historic core that is otherwise flat, and they inappropriately stare across the Roman Baths, Jewry Wall and St. Nicholas sites. They also have blocked the view of St. Nicholas from the Glenfield Road and Hinckley Road hilltops. All of these errors could have been avoided if they had only been four to five storeys lower.</p> <p>The current proposals for tower blocks on Bath Lane would have the exactly the same faults <i>but by virtue of their excessive height would be far worse</i>. Any development on this site should actually step <i>down</i> so as to avoid overwhelming the listed Friar’s Mills. The modern developments at West Bridge Mills, on the other side of West Bridge, set good standards of both height and design in relation to a listed building.</p> <p>The new BBC Broadcast Centre on St. Nicholas Place, in addition to complimenting the</p>	<p>considered to this site.</p> <p>Leicester is blessed with a multitude of fine views. The SPD makes repeated references to the importance of considering views.</p> <p>Criticism of the West bridge Wharf scheme is noted.</p> <p>New developments constantly stepping up and down would deliver an incoherent skyline. Sensitively designed tall buildings should not overwhelm neighbouring smaller buildings. Criticism of the new student</p>
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<p><b>CABE</b></p>	<p>Cathedral, briefly enjoyed a view of St. Mary de Castro. This has now vanished behind the poor quality student residential block being constructed on St. Nicholas Circle.</p> <p>Phases two and three of the St. John's House, East Street, granted planning permission but mercifully not built, would have blocked the view of Bradgate Park from Victoria Park Gates.</p> <p>Friar Lane has one end dominated by Bosworth House and the other by the top four floors of 60 Charles Street.</p> <p>These are but a few examples. There are many more.</p> <p><i>Existing views of the towers and spires of the Cathedral, St. Mary de Castro, St. Nicholas and St. Margaret's churches must be protected by the SPD, as should the Lewis's Tower and the Town Hall Tower. These are elements in the historic built environment too powerful to be ignored.</i></p> <p>In conclusion Leicester Civic Society feels that the SPD is an excellent document but it must be given more teeth. There should be no conflict between heritage led and development led regeneration in Leicester. If developers want to come they will come. However, it is necessary to establish ground rules for regeneration the primary one of which must be the protection and enhancement of the City's existing built environment. Allowing development led regeneration too much of a free hand is not an option. To this end the City Council's policy on tall buildings must become a vital component in the heritage led regeneration of the City. Naturally we shall continue to view its progress and implementation with interest.</p> <p><b>CABE.</b> Thank you for consulting the Commission for Architecture and the Built Environment (CABE) on your draft Supplementary Planning Document on tall buildings. The document has been discussed with CABE commissioner Robin Nicholson and members of design review staff, and our comments are as follows.</p> <p>It is welcome to see tall buildings guidance being developed in the light of our and English Heritage's 'Guidance on Tall Buildings', and to note the reference you have made to it in your Policy Context section.</p> <p>Your introduction refers to the need for clear policy guidance because of an 'urban</p>	<p>building at St Nicholas Circle is noted.</p> <p>It will be impossible to protect every single view into and out of the city. What views do these tall buildings obscure, Just sky?</p> <p>Views of existing tall buildings such as the Cathedral and church spires will form important considerations in the assessment of proposed new tall buildings.</p> <p>The SPD is intended to guide the appropriate development of tall buildings, whether as part of developer or conservation led regeneration.</p> <p>Further studies, which will</p>
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	<p>regeneration programme unparalleled for 40 years' but we are concerned that the consultation document as it stands fails to achieve the desired clarity, mainly because it lacks a thorough analysis of the Leicester context. It is understood from the draft document that you are not proposing areas either suitable or unsuitable for tall buildings, but are providing guidance for case by case assessment of proposals. We assume that this is why the draft document offers no analysis of Leicester. Although the logic of your approach can be seen, we are concerned that you do not miss the opportunity to focus the time and effort of applicants as well as yourselves on areas, which are most likely to see tall buildings proposals. If there are areas of opportunity or significant change where tall building proposals might be made, possibly alongside other significant developments, infrastructure and transport changes, you may wish to give these areas attention.</p> <p>You should include a thorough graphic analysis indicating topography, green space and public realm, view corridors and key views, key approaches to the city, conservation areas, listed buildings, scheduled ancient monuments and registered parks and gardens, character areas, the existing city centre. Identifying areas where there are opportunities for tall buildings would be likely to improve your effectiveness in processing major applications and cause less frustration with developers and architects as well as the Leicester community.</p> <p>Another concern is that the 'Criteria for assessment' includes phrasing that is not clarified through graphics, or is too imprecise to be helpful. For example in 5.4 Massing and Scale it states that podiums should be no more than 4 stories without offering any thorough logic for this particular height. If you feel it important to include this constraint you will need some further justification. You also state in 5.4 Form that tall buildings must be 'slender graceful structures and not broad and staggered'. It is hard to see how users will be able to understand the guidance without graphic representation of terms such as 'graceful'. Also in 5.4 you ask for buildings that are far better designed than 'most of those built during the 1960s and 1970s'. Again without further explanation and images it is hard to see how this will provide effective guidance and perhaps particular examples would help.</p> <p>Because the draft SPD is totally text based we think it offers little more guidance than '<i>Guidance on Tall Buildings</i>'. We would expect the SPD to be less generic and more specific to Leicester. For the SPD to add value to the development process we think it essential that this is addressed.</p>	<p>include thorough analysis and urban design frameworks will focus upon specific regeneration areas, and identify areas and sites suitable for the consideration of tall buildings.</p> <p>See above.</p> <p>Greater clarification of the Criteria for Assessment has been included together graphic illustrations of successful and not so successful tall buildings.</p>
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<p><b>University of Leicester</b></p> <p><b>Gerry Murphy</b></p>	<p><b>UoLI</b> support the document generally but would suggest that you might consider adding reference to colour and texture as additional bullet points in section 5.4 Architectural Excellence.</p> <p><b>GM.</b> My initial reaction is that there needs to be more thought put into the actual use of Tall Buildings and their usage for residential purposes is suspect. (See Birmingham's tall residential blocks lining the M6!)</p> <p>They should be mainly for commercial purposes and should clearly be a tool to enhance the city, make it an exciting place to work in, but mostly to generate jobs, Council revenue (rates etc) and sustainable wealth for the ongoing prosperity of Leicester.</p> <p>It is only after tall buildings, have provided modern offices and work environments, together with rooftop restaurants etc should they then be considered for residential purposes. This only when the pressure on inner city space for residential demand has made it necessary. This is not yet the case.</p> <p>Unless the commercial aspect of Leicester's future is secured by providing Tall buildings for "High Wealth Creation" in the first place, the City is condemned to be a secondary dispersal area for low income residential units, thereby creating a vicious circle of a race to the bottom.</p> <p>It may be an idea to circulate your draft SPD to all developers in Leicester to ascertain their thoughts on this matter and if considered helpful to hold a meeting /seminar for further discussion on this important subject. At the moment the SPD is been developed in isolation and does not take the whole picture of Leicester's future into account. As Clinton said " It's the economy that matters"</p>	<p>These issues have now been addressed with section Architectural Excellence.</p> <p>Mistakes made in the planning and design of tall buildings in the 1950's and 60's have been well documented. They do not offer suitable accommodation for everyone, but for others, well planned, designed and managed tall buildings do offer an attractive residential option.</p> <p>The development of high quality modern office buildings is recognised as being essential to the regeneration of the city's economy. However, research has informed us that office based companies prefer medium rise buildings with broad floor plates rather than tall buildings with relatively smaller floor plates.</p>
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