

LAND OFF TAMWORTH ROAD, COVENTRY

SUSTAINABILITY STATEMENT

ON BEHALF OF

LIONCOURT HOMES LIMITED

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

Reference: BIR.2588 Date: June 2014

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1. INTRODUCTION

1.1 This Sustainability Statement responds to current and emerging national and local guidance on sustainable development issues and sets out an approach to ensure an environmentally friendly, energy efficient and subsequently sustainable new development is proposed.

1.2 This Statement considers the development proposals in the context of important environmental, economic and social factors and identifies how the scheme would provide a sustainable community for new residents, with benefits and enhancements for existing residents to improve the sustainability of the surrounding area.

Site Description and Context

1.3 The site is contained between the Tamworth Road (B4098) to the west and Sandpits Land to the south. Bennetts Road South forms the eastern boundary and the northern boundary is formed by the Hall brook. The site covers an area of 42.2 Ha. and is open land used for varying agricultural purposes and the keeping of horses.

1.4 Immediately to the south of the site on the opposite side of Sandpits Lane is the Cardinal Newman School and associated areas of playing fields. Sandpits Lane also contains the John Reay Golf Centre which consists primarily of a golf driving range and assorted facilities.

1.5 Adjacent to the site on Bennetts Road South is a ribbon development of housing constructed during the inter-war period. The northern portion of Bennetts Road South is predominantly open and forms part of the application site. Immediately to the north of the site is Manor Farm and its associated buildings. The western side of Tamworth Road, opposite the site, contains linear residential development comprising of detached houses.

- 1.6 The wider area surrounding the site is characterised as part of the Coventry Urban Fringe. Notable features include various areas of residential development including Keresley Newland to the north, areas of Holbrook to the southeast and in particular Prologis Industrial Park to the northeast.
- 1.7 Other notable features within the site include the electricity line on substantial pylons which cross the site in a southeast/northwest direction. The Hall brook is another feature and this flows northwest/southeast. The brook corridor contains numerous trees and other vegetation.
- 1.8 The site is gently undulating and also contains three existing ponds. The first is located to the north of the Royal Court Hotel site close to Tamworth Road. Two of the ponds are located centrally within the site. These ponds would be incorporated within open spaces within the development and will be maintained as wetland areas.

Proposed Development

- 1.9 The application is for outline planning permission. The nature of the outline application means that the detailed design of the proposed development has yet to be fixed. This will be subject to further design stages and in due course applications for approval of reserved matters
- 1.10 The proposed development will comprise of the following:
- Up to 800 residential dwellings with a mix of size, tenures and types
 - Provision of a local centre to potentially include small convenience store, small office spaces, crèche, cafe and community meeting room
 - Primary school
 - Public open space and green infrastructure including children's equipped play area, nature conservation areas, informal and incidental open space, retained and new landscaping, allotments and orchards

- Vehicular access to Tamworth Road and Bennetts Road South and also within the site
- Associated infrastructure including surface water attenuation facilities, foul drainage and retained ponds
- Network of pedestrian and cycle paths including greenway
- Development of village square plus other key note open spaces within the development.

2. RELEVANT PLANNING POLICY, PUBLICATIONS AND GUIDANCE

2.1 This section provides an outline of the current planning policy context and guidance for sustainable development nationally and in Coventry City Council.

Understanding Sustainability

2.2 Sustainable development is commonly defined as ***"development that meets the needs of today without compromising the ability of future generations to meet their needs."***¹

2.3 Thus the concept of sustainable development primarily seeks to implement development that will fulfil the 'needs' of today whilst consequently creating, and maintaining, an efficient and effective world for future generations. Sustainable development consists of three general pillars;

- Economic – striving for a competitive and growing economy;
- Social – aiming for safe, accessible communities whilst improving the quality of life for all; and
- Environmental – protecting and enhancing the environment whilst effectively and prudently managing natural resources

2.4 UK policy and guidance has developed and evolved from this overarching understanding of sustainable development and there is now a range of legislation, policy and guidance which supports the implementation of measures to ensure new development is sustainable and low carbon.

2.5 Through the National Planning Policy Framework (March 2012) the Coalition Government has upheld the importance of 'sustainable development' by stating that 'The purpose of the planning system is to contribute to the achievement of sustainable development'.

¹ World Commission on Environment and Development (1987) *Our Common Ground*

2.6 The following documents are a small indicator to provide a form of context to what sustainable development in the UK means, and how therefore planning policy has evolved to take on board some of the key themes. This is followed by a consideration of the key planning policy constraints in relation to sustainable new development.

National Context

2.7 There has been a raft of legislation at national, regional and local levels in relation to issues that come under the general umbrella of 'sustainable development'. These have developed from the early ideas of the Rio Earth Summit in 1992 which are encapsulated within 'Local Agenda 21'. The following information helps to provide some context of how the UK has developed this theme, such that sustainability now forms a key pillar of planning policy at national and local levels.

Securing the Future: Delivering UK Sustainable Development Strategy

2.8 "Securing the Future", published in March 2005, set out clear sustainable development goals and aims for the UK. The Strategy updated and replaced the 1999 Strategy entitled "A Better Quality of Life – Strategy for Sustainable Development for the United Kingdom". The 1999 Strategy characterised sustainable development using the Brundtland Report definition and had four central aims:

- Social progress;
- Effective environmental protection;
- Prudent use of natural resources; and
- Maintenance of high and stable levels of economic growth and employment.

2.9 Whilst these aims were all appropriate, practitioners primarily focussed on the one or two that were most relevant to their area of work rather than taking a more holistic approach. "Securing the Future" took the above aims and added a further aim – to achieve integration with all aspects of sustainable development. The Government's overall sustainable development aim therefore is as follows:

"...to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life of future generations."

2.10 To achieve this overall aim Securing the Future introduced five guiding principles for the UK, these are:

- Living within environmental limits;
- Ensuring a strong, healthy and just society;
- Achieving a sustainable economy;
- Promoting good governance; and
- Using sound science responsibly.

2.11 In response to these guiding principles, four shared priority areas for immediate action were highlighted:

- Sustainable consumption and production;
- Climate change and energy;
- Natural resource protection and environmental enhancement; and
- Sustainable communities.

Planning for a Sustainable Future White Paper

2.12 This document, published in May 2007, identified the need for effective and efficient planning as a high priority. The paper envisioned that:

"...our planning system should continue to set the standard in terms of the quality of outcomes for the individual citizen, the local community, developers and consumers of the system, and in terms of promoting sustainable and inclusive patterns of urban and rural development."

2.13 It outlined the following long term challenges for planning:

- meeting the challenge of climate change;
- supporting sustainable economic development;
- increasing the supply of housing;
- protecting and enhancing the environment and natural resources;
- improving our local and national infrastructure; and
- maintaining security of energy supply.

2.14 The White Paper further suggested that the need for a faster, more cost effective, accountable and participatory planning system is vital for the advance of sustainable development. Integration between all levels of planning and those involved will ensure that the three pillars of sustainable development (environmental, economic and social) are met.

Homes for the Future: More Affordable, More Sustainable

2.15 This Housing Green Paper, published in July 2007, outlined the Government's plan for delivering more homes to ensure that everyone has access to a decent home at a price they can afford, in a place where they want to live and work.

2.16 Whilst this paper primarily dealt with the issue of rising demand and subsequent need for new homes, it also pledged to provide 'greener' homes. It outlined the Government's intention to increase the protection of the environment by cutting carbon emissions and required all new homes to be zero carbon by 2016.

Lifetime Homes, Lifetime Neighbourhoods: A National Strategy for Housing in an Ageing Society

2.17 This document, published in November 2007, provided a strategy for housing in an ageing society. By 2026 older people will account for almost half of the increase in the number of households, which accounts for approximately 2.4 million additional older households than at present.

2.18 Lifetime Homes aspire to 'future proof' society, to encourage inclusive and accessible communities, where adaptations to homes for disability purposes are appealing, and can add value to homes rather than detract.

Climate Change Act 2008

2.19 This Act sets a legally binding target for reducing UK CO₂ emissions by at least 80% by 2050. The Act is supported by the Low Carbon Transition Plan (2009), which sets out the UK's approach to meeting our carbon reduction commitments. More recently, the government has accepted the Committee on Climate Change's 4th carbon budget recommendations which sets a CO₂ reduction target of 50% by 2027. Key points of the Act include:

- A series of clear targets for reducing carbon dioxide emissions;
- A new system of legally binding five year "carbon budgets", set at least 15 years ahead, which caps emissions over the five years;
- A new statutory body, the Committee on Climate Change, to provide independent expert advice and guidance to Government on achieving its targets and staying within its carbon budgets;
- New powers to enable the Government to implement a domestic emissions trading scheme;
- A new system of annual open and transparent reporting to Parliament. The Government must report to Parliament every five years on the risks to the UK in relation to climate change and provide measures of how to combat these risks;
- An Adaptation Sub-Committee from the Committee on Climate Change will scrutinise the Government's adaptation work;
- A requirement for Government to provide guidance on how companies should report their greenhouse gas emissions;
- New powers to support the creation of a Community Energy Saving Programme; and
- New requirement for yearly reports on the efficiency and sustainability of the Government estate.

UK Low Carbon Transition Plan (July 2009)

2.20 This White Paper outlined the UK's first low carbon transition plan, which aimed to cut emissions by 18% on 2008 levels, by 2020. The paper highlighted the Government's 'Five Point Plan' for tackling climate change. The five points are as follows;

1. Protect the public from immediate risk;
2. Preparing for the future;
3. Limiting the severity of future climate change through a new international climate agreement;
4. Building a low carbon UK; and
5. Supporting individuals, communities and businesses to play their part.

2.21 Key steps in achieving the Government's aims include; the introduction of departmental carbon budgets which have been allocated to every UK Government department; low carbon sources to produce 40% of electricity by 2020; making homes greener; helping the most vulnerable; helping the UK to become a centre for green industry; cutting average CO₂ emissions from new cars by 40% etc.

2.22 In the aim for greener buildings the Government committed themselves to providing assistance to help households become more energy efficient. Additionally smart meters will be implemented into every home by the end of 2020 and clean energy cash-back schemes will be introduced.

UK Renewable Energy Strategy (July 2009)

2.23 The UK Renewable Energy Strategy explains how the Government is aiming to reach the goal of sourcing 15% of energy from renewable sources by 2020 (which is almost seven times the amount sourced in 2008). The document outlines what fuels and technologies will be needed to reach this goal.

Floods and Water Management Act 2010

2.24 The aim of the act is to provide better, more comprehensive arrangement of flood risk for people, homes and businesses.

Energy Act 2011

2.25 The Energy Act provides for a step change in the provision of energy efficiency measures to homes and businesses, and makes improvements to our framework to enable and secure low-carbon energy supplies and fair competition in the energy markets.

2.26 Of particular relevance the Act includes provisions on:

Green Deal - a new financing framework to enable the provision of fixed improvements to the energy efficiency of households and non-domestic properties.

Energy Company Obligation - which amends existing powers to enable the Secretary of State to create a new Energy Company Obligation that will:

- take over from existing obligations to reduce carbon emissions (the Carbon Emissions Reduction Target and Community Energy Saving Programme), which expire at the end of 2012; and
- Work alongside the Green Deal finance offer by targeting appropriate measures at those households likely to need additional support - in particular those containing vulnerable people on low incomes and in hard-to-treat housing

2.27 The Act also includes measures to:

- improve energy efficiency and energy security
- enable low-carbon technologies
- extend the role of the Coal Authority
- repeal the Home Energy Conservation Act 1995 (HECA) in Scotland and Wales.

Building Regulations Part L

- 2.28 The Building Regulations Part L is of particular relevance to the sustainability of new development as it sets out the minimum efficiency requirements for both new and existing residential dwellings.
- 2.29 Of particular relevance to this application is Approved Document L1A relating to 'Conservation of Fuel and Power (New Dwellings)'. This document was updated with effect from 6th April 2013 to take account of a recast of the 'European Energy Performance of Buildings Directive'. It sets out key criteria in relation to the energy performance that new buildings will be expected to achieve. This in turn links closely with both the Code for Sustainable Homes and Energy Performance Ratings.
- 2.30 In addition, Approved Document L2A relating to 'Conservation of Fuel and Power (New Buildings other than Dwellings)' is also relevant. This document was updated with effect from 6th April 2013 to take account of a recast of the 'European Energy Performance of Buildings Directive'. It sets out key criteria in relation to the energy performance that new buildings will be expected to achieve.

Code for Sustainable Homes

- 2.31 The Code for Sustainable Homes is an environmental assessment rating method for new homes, which assesses environmental performance in a two stage process (design and post construction), using objective criterion and verification. Code for Sustainable Homes level 3 is the minimum standard new homes are expected to achieve and Level 6 the highest.
- 2.32 The code covers nine categories of sustainable criteria:
- Energy and Co2 emissions
 - Water
 - Materials
 - Surface water run – off
 - Waste
 - Pollution
 - Health and Well Being

- Management
- Ecology

2.33 Each category includes a number of environmental issues, and mandatory minimum performance standards are set for some of them.

2.34 In July 2013 the Government announced the next uplift in Building regulations towards zero carbon (Code Level 6) in 2016. Under the Code for Sustainable Homes, zero carbon takes into account energy efficiency usage within the boundaries of the house. However following concerns raised about the potential costs and impracticalities of delivering these standards entirely on site, the government has been looking at a more flexible definition of 'zero carbon'. Consultation has therefore taken place in regard to 'Fabric Energy Efficiency Standard' (FEES) which proposes a maximum limit on the amount of energy a new home would need, and 'Carbon Compliance' in relation to the appropriate limit on the generation of on-site energy through low and zero carbon technologies. Most recently, in autumn 2013 the Government consulted industry on the principles and delivery of off-site measures to reduce carbon emissions, known as 'Allowable solutions'. At the moment there is uncertainty as to what these might be, or what they may cost, but it could be it includes, for instance, retrofitting existing homes to offset emissions from new homes, or funding renewable infrastructure.

National Planning Policy

National Planning Policy Framework (March 2012)

2.35 The NPPF came into effect in March 2012 and replaced the existing suite of Planning Policy Statements and Guidance that had previously been in effect. The Ministerial forward underscores the importance of sustainable development, and the role planning has in helping to reach sustainable objectives, through the presumption in favour of sustainable development.

"...sustainable development is about positive growth – making economic, environmental and social progress for this and future generations... Development

that is sustainable should go ahead without delay – a presumption in favour of sustainable development that is the basis for every plan, and every decision... Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives..."

2.36 Paragraph 8 of the NPPF notes that

"...to achieve sustainable development economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions."

Therefore development must take a holistic approach and incorporate, and balance, the three tiers of sustainable development - economic, social and environmental.

2.37 The NPPF highlights the following headings for 'delivering sustainable development':

1. Building a strong, competitive economy;
2. Ensuring the vitality of town centres;
3. Supporting a prosperous rural economy;
4. Promoting sustainable transport– minimising vehicular usage and encouraging the use of sustainable methods of travel (walking, cycling and the use of public transport);
5. Supporting high quality communications infrastructure;
6. Delivering a wide choice of high quality homes;
7. Requiring good design - consideration of good design and layout within the proposed development;
8. Promoting healthy communities - measures to improve the quality of life including lighting, sound and access to outdoor facilities;
9. Protecting Green Belt land;
10. Meeting the challenge of climate change, flooding and coastal change – initiatives to reduce the level of energy consumption; to reduce the emissions of carbon dioxide generated from the scheme; the potential use of renewables and non

fossil fuels; and, the use of sustainable construction techniques and design. Use of Sustainable Urban Drainage Schemes (SUDS);

11. Conserving and enhancing the natural environment – reducing the impact on biodiversity and providing opportunities to enhance the site; use of materials that come from sustainable sources; measures to reduce the levels of waste produced during the construction and operational stage of the development, in particular consideration is given to waste segregation and recycling facilities; and, conservation of water through reduced use;
12. Conserving and enhancing the historic environment; and
13. Facilitating the sustainable use of minerals.

2.38 The above criteria have been utilised in Section 4 to illustrate how the proposed development achieves these goals. Due to the nature and location of the proposed development headings 2, 3, 5, 9 and 13 are not deemed relevant for this statement and have not been included.

Local Policy

Coventry Development Plan

2.39 The Coventry Development Plan (CDP) was adopted in 2001 and covered the period 1996-2011. It is now, therefore, time-expired and the policies are out of date in terms of their compliance with the National Planning Policy Framework (the Framework) which was published in March 2012.

2.40 Two subsequent Core Strategies, intended to replace the CDP, were prepared for Coventry in 2009 and 2012, with the former the subject of an Inspector's Report following an Examination in Public. The Core Strategy 2009 included the application site as forming part of the Keresley Eco Suburb. The Keresley proposal included the removal of an extensive area of Green Belt and designated the Keresley site as reserved land for housing development of 3,600 homes and a country park.

2.41 However the 2009 Core Strategy was abandoned after the Council Elections and formally withdrawn in October 2012. The more recent 2012 Core Strategy went through the initial stages of Examination by the Secretary of State in early 2013,

but was withdrawn following the initial findings of the Inspector in March 2013 that the Council had failed to meet its duty to cooperate.

- 2.42 The Development Plan position therefore now falls back to the 2001 CDP which is out of date, however there is no other emerging policy for the city that can be given any weight in decision making at this time. The NPPF must therefore be given primacy in decision making on planning applications, but for completeness, reference is made in this Sustainability Statement to relevant policies in the CDP.

Specific Development Plan Policies

- 2.43 One of the 'Overall Strategy' Policies of the 2001 CDP, OS4, relates to the broad aspiration of 'Creating a more sustainable city', stating that

'The developing concepts and techniques of sustainability will be applied through policies in this Plan to:

- *ensure the efficient use and re-use of land and buildings;*
- *encourage rational modes and patterns of travel; and*
- *promote the good stewardship of the natural and built environment.'*

- 2.44 Chapter 3 of the CDP deals with the issues of environmental management. The introduction to this chapter recognises that energy resources are a key issue in promoting sustainable development and that land use planning has an important role to play in encouraging energy efficiency by guiding and controlling the location and form of development.

- 2.45 The Development Plan promotes and encourages a hierarchy of waste reduction, re-use, recovery and safe disposal of waste through Part One Policy EM9.

- 2.46 Policy EM 4 gives a very broad policy direction that development should be designed and located so as to minimise the risk of flooding and to maximise the absorption of surface water run-off by the ground.

2.47 An integrated, accessible and sustainable transport strategy is promoted in Policy AM1 which seeks to ensure that new developments are located in accessible locations, with access to alternative means of transport.

**Supplementary Planning Document – Delivering a More Sustainable City
(adopted January 2009)**

2.48 Coventry City's Supplementary Planning Document (SPD) on 'Delivering a More Sustainable City' sets out the City's commitment to achieve greater levels of sustainable development through the planning process, most particularly through the Implementation of Policy OS4 of the Development Plan. It shows how sustainability requirements can be met, and helps those submitting applications, to consider how the sustainability of their proposals might be improved. The SPD centres on seven key sustainable themes which link with the Code for Sustainable Homes (2008) and UK National Sustainable Development Strategy (2005). These themes are:

- Energy
- Materials
- Contaminated land
- Travel
- Waste and recycling
- Water
- Air quality

2.49 The SPD goes on to identify how applicants must demonstrate how they comply with assessment criteria as laid out within Tables 2 – 8 of the document. In summary for all major development this includes:

- a minimum of 10% of the developments energy requirements should be provided through on site generation of renewable energies
- it should be demonstrated that maximum use is made of reclaimed materials, or recycled materials for construction
- No adverse impacts on human health and water quality are caused during the construction or use of the development

- Meet BREEAM EcoHomes assessment standard for walking distances to key services and local amenities
- Must make provision for the discreet storing of recycling and waste storage bins.
- Must apply the Construction Industry Research and Information Association guidance on Sustainable Drainage Systems.
- Must aim to minimise the exposure of the public to harmful air pollutants.

3 Sustainable Development Proposals

Lioncourt Homes Ltd Environmental Policy and Approach

- 3.1 Lioncourt Homes is committed to creating environmentally friendly homes and communities through innovative design and build and by encouraging a more sustainable lifestyle.
- 3.2 Lioncourt Homes also has strict policies to responsibly source materials and labour to minimise their carbon footprint.
- 3.3 In line with this ethos, sustainability objectives have been produced for the proposed development at South Keresly which include high quality design set within an attractive landscape setting. These objectives are:
- To provide a sustainable development which relates well to the existing residential area and the existing facilities, which would reduce the need to travel by car;
 - To provide a high quality development which responds to, and respects, the local townscape and landscape character, whilst establishing its own distinctive identity;
 - To provide a safe and desirable development with optimal living conditions which promotes social inclusion and helps to support community facilities;
 - To provide a range of dwelling types whilst contributing to affordable housing;
 - To provide high quality accessible green spaces;
 - To protect and, wherever possible, enhance the natural environment;
 - To provide a sustainable drainage strategy, and not increase the flood risk level of properties in the area;
 - To facilitate sustainable waste management practices during both the construction and operational phases of the development;
 - To promote water efficiency through the installation of low flow appliances;
 - To create an energy and resource efficient development to reduce emissions associated with the proposals;

- To promote the sustainable use of resources in the construction of the development.
- To design the layout to make best use of the natural resource of sunlight energy;
- To accord with the relevant Code for Sustainable Homes in force at the time of development; and
- To meet Lifetime home requirements where practicable.

3.4 Lioncourt Homes recognise and acknowledge that they have a responsibility to ensure that the environmental impacts of their development are, where they cannot be avoided, are minimised and well managed. The development will therefore include measures to ensure that it meets with current policy objectives, Level 3 of the Code for Sustainable Homes, and Building Regulations Part L1A and L2A. Lioncourt are therefore committed to building high quality, environmentally sustainable housing which mediates the future actions of the inhabitants to act in a more sustainable manner.

3.5 Under the headings as outlined within the NPPF, this section demonstrates and discusses what the site will deliver by way of sustainability credentials.

Building a Strong, Competitive Economy

3.6 The NPPF, at paragraph 19, places emphasis that **"...the planning system does everything it can to support sustainable economic growth"**. In January 2013 the Key Messages Paper produced by the Home Builders Federation, reported that Government figures show, even in the current crisis, housing supply accounts for around 3% of UK GDP, and provides between 1 and 1.25 million jobs in the UK. Each home built creates 1.5 full time direct jobs, and about twice that number is created within the supply chain.

3.7 The paper also indicates that for every £1 spent on housing £3 is put back into the economy. As almost 90% of building materials are made in the UK, the impact on local communities is almost immediate. In addition, buying a new home is arguably the only time one makes significant purchases of white goods and furniture at the same time. This therefore helps increase retail activity in the economy.

3.8 The construction of this development itself therefore contributes as an economic generator, driving local economies, local companies and local employment. The proposals are therefore in line with the NPPF ethos of building a strong, competitive economy.

Promoting Sustainable Transport

3.9 Transport and accessibility are key factors in achieving sustainable development, and the site is well placed for easy access to a range of local services.

3.10 The provision of public transport is important in reducing carbon emissions by reducing the need to travel by private car. This site benefits from the following:

- **Bus Links:** The site is served by the 16 and 16A which operate along Bennetts Road South and combine to provide 6 buses per hour in the inter-peak to Coventry, Keresley, Stoke Aldermore, Binley and Walsgrave University Hospital.

The 735 also serves the site with a limited service which operates along Tamworth Road and Sandpits Lane, immediately at the western and southern edges of the site.

The nearest bus stops are located on Tamworth Road and on Bennetts Road South. All stops provide timetabling information and are located within 700m from the site.

Interchange with other bus routes is possible in Coventry City Centre which provides access to all major trip destinations in the city, and to points outside the city, such as Birmingham City Centre, Birmingham Airport, Solihull and major towns in Warwickshire.

- **Rail Opportunities:** Coventry Railway Station is located approximately 5km from the development site to the south of Coventry City Centre. Although not within an attractive walking distance from the site, the station can be accessed via other sustainable modes such as cycling and the frequent bus routes.

- 3.11 A footway with street lighting is provided on the western side of Bennetts Road South which provides a link to the village of Keresley and Prologis Park to the north. A second footway on the eastern side of Bennetts Road South begins just north of Penny Park Lane which, together with the western footpath, provides links to the surrounding residential and employment areas within the Bablake and Holbrook wards and towards Coventry City Centre to the south.
- 3.12 Footways with street lighting are also present along the eastern side of Tamworth Road and the northern side of Sandpits Lane which provide connections to residential areas and educational facilities to the south and east.
- 3.13 The site is crossed by several Public Rights of Way.
- 3.14 On carriageway signed cycle routes are located along Coundon Wedge Drive, approximately 1.5km southwest of the site, which provides high quality links into Coventry City Centre. Off carriageway signed cycle routes are located approximately 1.5km north of the site along Central Boulevard at Prologis Park which link to the Ricoh Arena and Arena Park to the east.
- 3.15 There are also numerous advisory cycle routes within the vicinity of the site which provide suitable lightly trafficked routes around Keresley and Coventry.
- 3.16 The neighbouring Keresley Village area to the north has a local centre on Bennetts Road North, approximately 1.7km from the site. It comprises of a convenience food store, hot food takeaway, pharmacy, medical centre, library and a community centre. The city centre is located 5km south of the site and is readily accessible by bus. It provides a number of additional facilities such as superstores, leisure centres, local shops, restaurants and bars.
- 3.17 The site is also located within close proximity to employment opportunities such as Prologis Park which is approximately 1.5km to the north of the site and is accessible by cycle and on foot.

- 3.18 The Institute of Highways and Transportation (IHT) guidance document 'Providing for Journeys on Foot' (published 2000) suggests a maximum distance of 2km is acceptable for commuting/school journeys. A maximum distance of 1.2km is considered acceptable for accessing other facilities. There are four primary schools and two secondary schools within walking distance to the proposed site.
- 3.19 The location of the site therefore promotes sustainable transport due to its close proximity to public transport, to Coventry City Centre and other local service providers. Future residents would therefore be able to capitalise on the surrounding services and facilities without reliance on the private car.

Delivering a Wide Choice of High Quality Homes

- 3.20 Delivering a wide choice of high quality homes is an important element of creating sustainable, inclusive and mixed communities. The proposed development will provide a wide range of dwellings types, including affordable and open market housing. This mix of dwelling types and tenures, supports Coventry in the aim to provide housing for all sections of society, and encourages the social aspect (safe and accessible communities) of sustainable development to be fulfilled.
- 3.21 In order that residents can understand the efficiency of their new buildings, as well as making best use of the local facilities, each dwelling will be provided with a 'Home User Guide'. The information pack will be written in simple language, and wherever practicable, will provide users with quantified environmental benefits to be gained from effective use of a particular feature. The guide will include information regarding energy, transport and water usage.

Requiring Good Design

- 3.22 The development will provide a high quality design which responds to, and respects, the local area whilst establishing its own identity. Successful urban design is dependent upon achieving an appropriate relationship between community needs, development principles, development form and a positive response to local conditions. It will provide a variety of dwelling types, including affordable housing. High quality green spaces, including open space, will strengthen existing landscaping and further enhance the natural environment.
- 3.23 The layout of the site includes high consideration of the existing character of the area, the need for safe and secure communities, and the provision of green infrastructure and open space. The development also maximises opportunities to create and utilise sustainable links to the surrounding area.
- 3.24 Alongside the aforementioned aims, design can help to reduce energy consumption, thus reducing energy costs and helping to provide a development which is more conscious of climate change and the impact of energy usage.

Promoting Healthy Communities

- 3.25 Helping to improve the quality of life of residents within a building is an important element of achieving sustainable development. This can be done primarily through good day lighting and reducing the need for artificial lighting within a building, both of which have been considered as a part of these proposals.
- 3.26 Sound can also have an effect on the health and wellbeing of residents. The residential layout aims to reduce the likelihood of noise complaints from neighbours as well as protect the dwellings and surrounding communities from external noise nuisances. All properties will be constructed to meet the current requirements for sound insulation to combat any potential effects, and the development proposals will seek to achieve standards of sound insulation in line with Building Regulation requirements.

- 3.27 Access to the outdoors generally has a positive impact on health and well being and therefore the provision of private and public spaces has been an important consideration within the design of the proposals.
- 3.28 These areas will allow for informal open space and walking routes, and have the potential to provide for more formal play areas and spaces where appropriate through more detailed submissions at the reserved matters stage. The proposed retention of existing green infrastructure and habitats, as well as the introduction of new landscaped areas are key parts of the overall contribution of open space to the function of the new housing community.
- 3.29 In addition the proposed development will include substantial contributions towards refurbishing the President Kennedy Swimming Pool. This will clearly assist in providing key sports facilities in the local area and assisting in promoting a healthy community.
- 3.30 The scheme also proposes to provide a wide range of dwelling types, sizes and tenures, including both affordable and open market housing. This mix of dwelling types and tenures aims to create a mixed, inclusive and enhanced community.
- 3.31 The layout of the development proposals have also been carefully considered to ensure the safety or perceived safety of those living in or visiting the development. The aim is to ensure that the quality of life and community cohesion is enhanced. This can be achieved through the careful layout of streets, plus the relationship between them and the built form, utilising buildings that overlook/front onto public areas. Adequate lighting will also be provided in public and semi public areas. These design considerations are however to be addressed fully at the later detailed design stages of the planning process.

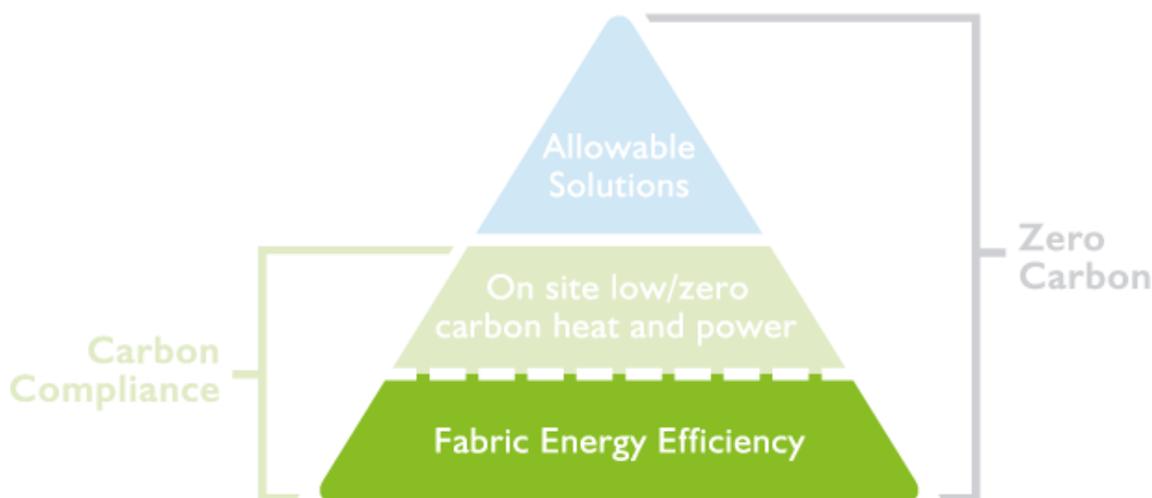
Meeting the Challenge of Climate Change, Flooding and Coastal Change

Climate Change and Energy

- 3.32 Lioncourt are committed to reducing the energy needs of the development, and thus carbon reduction. This will be evidenced through a fabric first approach ensuring the residential dwellings are level 3 compliant in relation to Code for

Sustainable Homes. In this manner the proposals support the Government's desire to achieve new housing stock that is 70% more efficient than pre 1990 standards.

- 3.33 This is consistent with the principles of the Energy Hierarchy (see diagram below) towards achieving zero carbon and prioritising energy efficiency over renewable energy generation.



- 3.34 The CO₂ emissions savings achieved through 'fabric first' measures enable savings to be made throughout the lifetime of the whole development, and reduces the risk of 'bolt on' technologies such as solar pv from failure through lack of maintenance or removal. Instead it relies on super high insulation, absolute air tightness, and harvesting the suns energy through appropriate orientation, thus decreasing the actual energy need of occupants.
- 3.35 Energy Performance Certificates (EPC) are produced through the calculation of energy performance for dwellings, known as the Standard Assessment Procedure (SAP). This methodology is used by the Government to assess and compare the energy and environmental performance of dwellings. Its purpose is to provide accurate and reliable assessments of dwelling energy performances. Calculations relating to the minimum energy performance requirements for buildings known as

Target Emission Rate (TER) and the Designed Emission Rate (DER) for each dwelling type produce estimated CO₂ emissions per m² for a dwelling.

3.36 These regulations require the achievement of five criteria:

1. The predicted CO₂ emissions from the new dwelling DER must be no greater than the TER calculated on a notional building of equivalent size and form and specified to minimum standards (as set within the approved tools).
2. That reasonable provision should be made to limit heat gains and losses through the fabric of the building, and that energy efficient services with effective controls should be provided.
3. Limiting of solar gains.
4. Reasonable quality of construction so that the insulation is continuous and air permeability within reasonable limits. Hot water systems should operate for the purposes of fuel conservation.
5. Requires an owner's manual for the building and its systems.

3.37 The above methodology is used to evaluate the impacts of different dwelling types, their orientation and energy efficiency measures for the proposed development. Reductions in energy demand are achieved by focussing on the areas that deliver cost effective and resident friendly solutions.

3.38 The elements used within the SAP calculations include external walls, roof, floor, windows and doors. The performance of these elements can be improved beyond the minimum requirements set within Building Regulations through:

- improved U-values (a measure of heat loss in a building element such as a wall, floor or roof) to reduce heat loss through these elements;
- reduction of air leakage and thermal losses through cold bridging (a weak spot in the insulation surrounding a house, occurring whenever there is a break in the

continuity, or a penetration of the insulation) by improved accredited construction details at junctions.

- enhanced construction detailing to further reduce leakage and losses through thermal bridging at junctions.

3.39 The dwellings will therefore be designed to reduce overall energy and carbon dioxide emissions by

- Reducing energy consumption through design, orientation, lighting, heating requirements and air tightness; and
- Including low energy appliances and heating systems

3.40 The value of this approach is that it enables the CO2 emissions savings to last for the duration of the dwelling rather than the life of the technology. Typically, domestic scale technology lasts 10-15 years before either faults occur, or replacement is required, and therefore the anticipated carbon savings cannot be guaranteed in the longer term.

3.41 In addition, in relation to 'Meeting the challenge of climate change, flooding and coastal change' as set out within the National Planning Policy Framework, paragraph 95 indicates that to support the move to a low carbon future, local planning authorities should:

- plan for new development in locations and ways which reduce greenhouse
- gas emissions;
- actively support energy efficiency improvements to existing buildings; and
- when setting any local requirement for a building's sustainability, do so in a way consistent with the Government's zero carbon buildings policy and adopt nationally described standards.

3.42 Most recently, a Ministerial Statement on 13th March 2014 relating to the outcomes of the Housing Standards Review included the intention to set out a new roadmap to deliver a radically simplified system for setting standards in the design and construction of new homes by the end of this Parliament. A "Building Regulations only" approach has been advocated, with a new zero carbon homes standard intended to come into force from 2016. The Statement indicates that

there will be no additional local standards in excess of the provisions set out within Part L of the Regulations.

- 3.43 Fabric First is therefore consistent with the Government's Zero Carbon Policy and latest Government and Industry guidance, including the latest revisions in relation to Code for Sustainable Homes, and Building Regulations Part L.
- 3.44 Lioncourt also recognise and acknowledge their responsibility to ensure that the environmental impacts of their development, where they cannot be avoided, are minimised and well managed. This includes impact in relation to the construction phases (through for instance materials used and waste disposal), and at operational stage, for example through energy usage. Within the proposed development the aim has been to start with the energy hierarchy (reduce – reuse (energy efficiency) – recover (renewable sources)) as a principle of the design so as to limit carbon emission through the design of the overall development and the measures detailed below.

Site Design & Layout

- 3.45 The design team has considered energy, carbon reduction and wider sustainability opportunities as part of the site layout and design process.
- 3.46 This includes consideration of the orientation of buildings to utilise solar gain where practicable.
- 3.47 The dwellings will also be designed with appropriate ventilation so as to keep them at an ambient temperature, thus reducing the need for powered air conditioning units or fans.
- 3.48 Further consideration to the detail of the site design and layout is provided within the accompanying Design and Access Statement.

Building Fabric & Energy Efficiency

- 3.49 As previously indicated, a key element of sustainable development over the long term is energy efficiency. New development therefore seeks to minimise energy demand and maximise energy efficiency. Just as the proposed development has incorporated site design measures to enhance the energy efficiency of the scheme, the proposals will also incorporate construction features which will enhance energy efficiency still further. As discussed above, this fabric first approach will be in line with Building Regulations Part L1A (new dwellings).
- 3.50 The building fabric will be designed to create a balance between minimising heat loss, utilising passive heat from the sun, maximising daylight penetration and minimising infiltration, whilst meeting Building Regulations Part L (Conservation of Fuel and Power). Installing appropriate standards of insulation will improve the ability of a property to retain heat energy, which will in turn require less fuel for heating and also reduce the associated carbon dioxide emissions. Building fabric thermal performance into the development will ensure U-Values are equal or lower than those required by current Building Regulation standards.
- 3.51 Some insulating materials are manufactured with blowing agents that have Ozone Depletion Potential (ODP) and cause long term damage to the ozone layer, exposing the earth and living organisms to harmful radiation from the sun. Such blowing including CFC's and HCFC's have now been banned or phased out. However, many replacement blowing agents (e.g. HFCs, commonly used as replacements for HCFCs) have significant global warming potential (GWP). In addition to committing to the insulation requirements of the Code, the developers have set the target for all insulation materials being used to have zero ODP and a GWP of less than 5.

Lighting, Appliances & Home Energy

- 3.52 Energy efficient lighting will be installed in all homes, and externally where provided, to meet Building Regulations minimum standards. The design of the development has aimed to maximise use of daylight to reduce the need to utilise

artificial lighting. Windows will be designed to maximise daylight further, and consideration will be given to the orientation of habitable rooms to face south to maximise sunlight exposure. Where outside security lighting is installed for properties, this will incorporate on/off controls and PIR detectors where appropriate, in order to reduce energy consumption in these fixtures. All light bulbs placed within the homes will be energy efficient.

3.53 Energy efficient appliances within homes are an important element of the proposals. Domestic appliances currently account for approximately 1/3 of energy bills and 1/4 of household CO2 emissions, and therefore this area presents considerable scope for energy saving. It is proposed that where white goods are provided, these will aim to have energy efficiency ratings of A or B.

3.54 In respect of the proposed development it is intended that:

- Domestic appliances, where provided, shall be A or B rated under the EU Energy Efficiency Labelling Scheme;
- Where no white goods are provided information on the EU Energy Efficiency Labelling Scheme shall be provided in each new dwelling;
- All units will have privately lockable gardens with adequate space to install facilities for air drying clothes, with the aim of reducing the need to use electric dryers within the home.

Flooding

3.55 The Flood Risk Assessment submitted with this application indicates that the proposed development site is located primarily within Flood Zone 1. Modelling of the Hall Brook has shown that the encroachment of the floodplain onto the proposed development site is minimal and that the proposed dwellings will be outside the area identified as being affected for up to at least the 1 in 100-year +20% flood event. Areas of the site which are less than 0.6m above the 1 in 100-year +20% flood level will be raised to achieve a minimum freeboard of at least 0.6m.

- 3.56 The risk of surface water flooding within the proposed development site is low for flooding originating from both land beyond the site boundary and within the site itself. Flood risk management measures in terms of setting finished floor levels above external ground levels and designing external surfaces to direct flows away from buildings will mitigate any remaining risk.
- 3.57 The risk of groundwater flooding is low due to site topography preventing the accumulation of any emerging water and providing a direct drainage route to the Hall Brook. Flood risk management measures will ensure that the risk to properties will not change into the future.
- 3.58 The risks to the proposed development associated with sewer flooding are low with the risk being mitigated by the same measures implemented to control the impact of surface water flooding.
- 3.59 The proposed development will incorporate Sustainable Urban Drainage (SuDS) for flow control and water treatment purposes. The choice of SuDS within the development will be confirmed later in the design process.
- 3.60 The use of SuDS) within the proposed development enables the implementation of an environmentally sensitive solution to surface water drainage attenuation and assist in the reduction of flood risk.

The aim of SuDS is to;

- mimic, or better, the surface water regime on site that is present prior to development;
 - protect and enhance water quality; and
 - encourage natural groundwater to recharge, thus causing minimal change to the hydrological and hydrogeological profile on site and in the surrounding area.
- 3.61 SuDS can also have positive impacts on biodiversity through, for example, introducing new water habitats for local wildlife.
- 3.62 The SuDS design and strategy will take into account the sustainable drainage guidance provided by the Construction Industry Research and Information Association (CIRIA), CIRIA C624 'Development and Flood Risk – Guidance for the Construction Industry' (2004) and has been designed to accommodate the 1 in

100 year flood risk, including 30% to allow for climate change, in accordance with the NPPF requirements.

- 3.63 Further information on flood risk and drainage can be found in the accompanying Flood Risk Assessment.

Conserving and Enhancing the Natural Environment

Ecology & Biodiversity

- 3.65 An Ecology Report forms part of the ES and therefore part of this application submission. The Ecology Report concludes that habitats on the site are not of such significance to impact on the principle of development.

Resources (including Materials, Waste and Water)

- 3.66 The efficient use and management of the world resources is an important consideration for sustainable development, and their use should be reduced where possible. In relation to the proposed development it is therefore important to consider how this issue will be addressed.

Materials

- 3.67 The dwellings will seek to reduce thermal loss through the use of energy efficient materials and insulation. Where possible recycled materials will be utilised.
- 3.68 All timber used for the basic building elements will be supplied from managed, sustainable forestry practices.
- 3.69 To avoid wasting any soils imported to site during the construction phase, soil will be re-used on site where appropriate, and required for residential gardens and other landscaping elements. Any surplus soil not re-used on site will be sold for use in off-site locations.

- 3.70 Construction materials will be sourced from local suppliers where feasible to reduce the emissions associated with transportation to site.
- 3.71 Construction companies will aim to work with their suppliers to enable the material packaging to be appropriately stored and returned to the supplier to allow them to re-use or recycle the packaging where possible. Many companies are also working with a number of suppliers to introduce degradable packaging.
- 3.72 Similarly, developers will work with their material suppliers to develop a programme of 'just in time' deliveries, where possible, to minimise the amount of materials that are held on site at any one time. A further advantage associated with 'just in-time' is that it reduces the amount of storage space required on site, therefore minimising ecological impact.
- 3.73 The construction companies will also collaborate with relevant stakeholders where possible to reduce the volume of cut-offs through simpler design; ensure that the team has the appropriate tools, allowing greater flexibility and the avoidance of over specification; and, use prefabrication units and standardised components in standard product sizes (e.g. plasterboard panels, windows, doors). As these are made in a factory-controlled environment, they tend to generate less waste and if standard product sizes are made use of this minimises the off-cut wastage on site.

Waste & Recycling

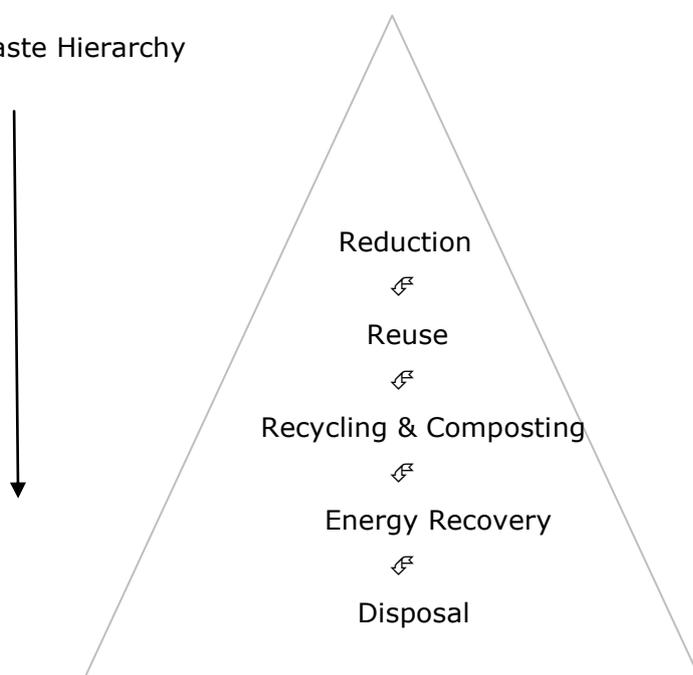
The Waste Strategy for England 2007 summarises the problem of waste:

"Each year, we generate about 100 million tonnes of waste from households, commerce and industry. Most of this ends up in landfill where the biodegradable part generates methane (a potent greenhouse gas) while valuable energy is used in extracting and processing new raw materials."

3.74 The development industry produces a variety of different waste types including soil and rubble from ground excavation and waste generated from the development process, in addition to the waste created during operation of the residential dwellings.

3.75 In accordance with the principles of the waste hierarchy, shown below, the proposed development will aim to minimise waste through both the construction and operational stages.

The Waste Hierarchy



3.76 The sustainable use of resources is key to minimising waste during construction. This concept not only minimises waste (from off-cutting etc) but can also result in financial savings as it minimises the need to over order materials through the efficient use of resources.

3.77 Proper storage and handling of materials to avoid damage, accurate quantity estimates and efficient purchasing arrangements to avoid over ordering, will form part of the best practice guidance and Construction Environmental Management Plan (CEMP) employed during construction.

3.78 Construction: It is proposed that measures will be implemented to reduce waste and encourage effective recycling. The use of reclaimed materials and recycling opportunities will be maximised where possible, and as previously indicated the

use of prefabricated units and standardised components and product sizes will also help to generate less waste.

- 3.79 Operation: With regard to household waste, it is proposed that new households will be served by the kerbside recycling and refuse collection operated by Coventry City, which consists of brown (garden waste), blue lid (recyclable material) and green (general waste) wheelie bins. Space will be provided for each new house and apartment building to store the recycling containers provided by the local authority
- 3.80 It is also proposed that space for composting facilities within the residential units with private gardens will be available, which will be included in the detailed design of plots.
- 3.81 It is anticipated that these measures will substantially reduce the amount of waste generated by the development which goes to landfill. In addition dwellings will be provided with facilities to recycle.
- 3.82 The proposed development is therefore compliant with both the NPPF and Policy EM9 of the Development Plan.

Water

- 3.83 Water is an important and precious resource which needs to be used in a sustainable manner to ensure ecosystems, populations and future generations are not affected by misuse. In this proposed development, sustainable water resource management initiatives have been incorporated into the design in order to effectively manage this resource.

The initiatives include;

- Sustainable drainage schemes to accommodate surface water run-off;
- Adoption of best practice techniques to ensure there are no impacts on water quality during construction; and
- Proposals for water efficient appliances to be fitted in the new dwellings

3.84 There will also be a conscious effort to minimise any potential contamination of water sources during construction. Protective measures will be incorporated into the Construction Environment Management Plan to minimise any potential impacts on surface and ground water during construction.

3.85 In order to reduce household water consumption each unit will be fitted with internal demand management devices. The mandatory water efficiency standard of 125 litres/person/day came into force via the Building Regulation Part G in April 2010, however the Code for Sustainable Homes (Level 3) encourages a standard of 105 litres/person/day. Lioncourt Homes are committed to achieving a reduction in mains water consumption across the site in accordance with the Code Level at the time of implementation. Savings will be achieved through the installation of water saving appliances in all new buildings. These are likely to include:

- Low capacity or dual flush toilets
- Aerated or flow regulated taps
- Showers with low flow rates
- A and B rated washing machines and dishwashers

3.86 All the above steps to reduce water usage and make efficient use of this resource are important in achieving a sustainable development.

Management

3.87 In order to ensure that the site is managed in an environmentally, socially considerate and accountable manner, the developer will endeavour to meet best practice criteria of nationally or locally recognised schemes. The site will also be managed in a way that mitigates environmental impacts and be guided by a CEMP. Over the longer term, in order to ensure the high quality amenity space proposed is well maintained, the public areas will either be offered for adoption or maintained by an appropriate management company.

Conserving and Enhancing the Historic Environment

3.88 The ES includes Archaeology and Cultural Heritage Chapters which provides a detailed assessment of the proposal and concludes that with suitable mitigation the proposal will not result in material harm.

4. CONCLUSIONS

4.1 This Sustainability Statement reviews the sustainability principles of the proposed development of Land at South Keresley, Coventry and is based on the pertinent issues identified in relevant national and local policy and guidance.

4.2 Lioncourt recognise and acknowledge that they have a responsibility to ensure that the environmental impacts of their developments are minimised, and are well managed where they cannot be avoided. This statement has therefore reviewed the sustainability credentials of the proposed development against a variety of themes as identified in the above documentation and other general national sustainability guidance and goals. The topics covered have included:

1. Building a strong, competitive economy
2. Promoting sustainable transport
3. Delivering a wide choice of high quality homes
4. Requiring good design
5. Promoting healthy communities
6. Meeting the challenge of climate change, flooding and coastal change
7. Conserving and enhancing the natural environment, and
8. Conserving and enhancing the historic environment

4.3 As discussed in this statement, the proposed development is considered to offer a good degree of sustainability by virtue of its location and design. The site is located with good accessibility to alternative modes of transport to the private car and the proposed development has been designed to minimise transport impact and maximise sustainable travel, there is, as outlined above, good access to a range of services and facilities within close proximity to the site. The design of the proposals also aims to increase the biodiversity of the site through enhancement, provision and maintenance of open space and green infrastructure links. Construction will also achieve nationally recognised standards, minimising thermal loss which will result in a lower demand for energy heating. In addition, the statement has also demonstrated how careful consideration has, and will be, given to the use of materials, including waste and water, in both the construction and operational phases. The proposals therefore meet with the adopted Development Plan Overall Strategy Policy 4 (OS4) as they:

- Ensure efficient use and re use of land;
- Encourage rational modes and patterns of travel; and
- Promote good stewardship of the natural and built environment.

4.4 The proposals also meet with the broad assessment criteria as outlined within the SPD 'Delivering a More Sustainable City' .

4.5 Through the review and discussion of the NPPF themes and Development Plan Policies, this statement demonstrates how the principles of sustainable development have and will continue to influence the design, construction and operations of the proposed scheme, which will enable future occupants to incorporate sustainable living patterns in order to achieve reduced energy.