From: NATS Safeguarding [mailto:NATSSafeguarding@nats.co.uk]
Sent: 17 May 2018 09:49
To: Planning Department <Planning@coventry.gov.uk>
Subject: FW: CCC - External Consultation memo (email) [Our Ref: SG26272]

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company (“NERL”) has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours Faithfully

NATS Safeguarding

D: 01489 615752
E: natssafeguarding@nats.co.uk
4000 Parkway, Whiteley, Fareham, Hants PO15 7FL
www.nats.co.uk

**Please note:** NATS Safeguarding email address has changed to: NATSSafeguarding@nats.co.uk
To: gmb-bdn-000913  
Subject: CCC - External Consultation memo (email)

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

Please find attached document.

---

This e-mail and any files transmitted with it are confidential and are intended solely for the use of the addressee. If you have received this e-mail in error, you are requested to contact the sender. All e-mails are monitored by Coventry City Council's ICT Security, using Mimecast. The views contained in this e-mail are those of the author and not necessarily those of Coventry City Council.

If you are not the intended recipient, please notify our Help Desk at Email Information.Solutions@nats.co.uk immediately. You should not copy or use this email or attachment(s) for any purpose nor disclose their contents to any other person.

NATS computer systems may be monitored and communications carried on them recorded, to secure the effective operation of the system.

Please note that neither NATS nor the sender accepts any responsibility for viruses or any losses caused as a result of viruses and it is your responsibility to scan or otherwise check this email and any attachments.

NATS means NATS (En Route) plc (company number: 4129273), NATS (Services) Ltd (company number 4129270), NATSNAV Ltd (company number: 4164590) or NATS Ltd (company number 3155567) or NATS Holdings Ltd (company number 4138218). All companies are registered in England and their registered office is at 4000 Parkway, Whiteley, Fareham, Hampshire, PO15 7FL.

CONSULTATION UNDER TOWN AND COUNTRY PLANNING ACT 1990

Proposal: Demolition of existing buildings and erection of two buildings for a residential development up to a maximum height of 5 storeys and 16 storeys and plant, providing 167 dwellings including retail and/or cafe use (Use Class A1 and/or A3) at ground level, with associated car parking, cycle parking, highways works, landscaping and other associated works.

At: Elliotts Car Accessories Gulson Road Coventry CV1 2JP

The application will be available to view online by holding down the control key and clicking here to view.
Or paste the link below into your internet browser
http://planning.coventry.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=796260

In line with established practice you are requested to respond with your comments, using the pro forma below, within 21 days of the date of this notice.

Please email complete pro forma response to planning@coventry.gov.uk IN CASE THE MEMBER OF STAFF IS OUT OF THE OFFICE. THANK YOU

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If you require any further information please contact the case officer:

Nigel Smith
Tel: 024 7683 1246
Email: nigel.smith@Coventry.gov.uk
<table>
<thead>
<tr>
<th>Comments from: National Air Traffic Services</th>
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<tr>
<td>Re: FUL/2018/1300</td>
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</table>

| No Comments | |
| No Objection | |
| No Objection Subject to Conditions | |
| Objection | |

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<th>Amendments Recommended (if any)</th>
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Please email response to planning@coventry.gov.uk
PLANNING STATEMENT
EDUCATION MATTERS
FUL/2018/1300
Elliotts Car Accessories, Gulson Road, Coventry, CV1 2JP

SUMMARY

Development at Elliotts Car Accessories, Gulson Road, Coventry, CV1 2JP is likely to result in a requirement for contributions towards Early Years / Pre-School provision, Primary provision, Secondary provision, Primary SEN provision and Secondary SEN provision.

The City Council would expect to secure contributions towards education provision as follows:

<table>
<thead>
<tr>
<th>Provision stage</th>
<th>Number of children generated</th>
<th>Provision</th>
<th>Contribution requested</th>
</tr>
</thead>
<tbody>
<tr>
<td>Early Years / Pre-School</td>
<td>9</td>
<td>Increase provision within 2 miles of the development</td>
<td>£114,494</td>
</tr>
<tr>
<td>Primary SEN</td>
<td>1</td>
<td>Towards the commissioning of additional places for pupils with EHC plans.</td>
<td>£18,972</td>
</tr>
<tr>
<td>Secondary</td>
<td>27</td>
<td>Towards expansion of Blue Coat School, Stoke Park, or another project in the South Eastern area of the city.</td>
<td>£446,540</td>
</tr>
<tr>
<td>Post 16</td>
<td>5</td>
<td>Towards expansion of Blue Coat School, Stoke Park, or another project in the South Eastern area of the city.</td>
<td>£94,764</td>
</tr>
<tr>
<td>Secondary and Post 16 SEN</td>
<td>1</td>
<td>Towards the commissioning of additional places for pupils with EHC plans.</td>
<td>£21,539</td>
</tr>
</tbody>
</table>

| Total Contribution          | £696,309                     |

1. Introduction and context

1.1. This planning statement sets out the reasons for seeking a financial contribution towards additional education provision from a development at Elliotts Car Accessories, Gulson Road, Coventry, CV1 2JP.
2. Education Sufficiency Duties

2.1. The City Council has a statutory responsibility under the Education Act 1996 to provide a school place to all of its school-age resident children.

2.2. This responsibility still remains despite the recent direction of government policy towards giving schools more autonomy. As a result, all schools, including Academies and Free Schools, are considered equally in the City Council’s planning of school places. The consequences of the City Council not meeting this duty are serious and would involve considerable financial costs as explained below:

- Parents can exercise their right to complain to the Local Authority.
- Where it is considered that the Authority is in breach of its legal duty to secure sufficient school places, affected persons (e.g. parents) could pursue Judicial Review proceedings in the High Court. Apart from the cost implications of the Court ordering the Authority to comply with their statutory duty under section 14 of the Education Act 1996 to provide sufficient school places, the Authority would normally have to pay the legal costs of the parents as well as its own legal costs.
- Parents can appeal to Independent Admission Appeal Panels if the admissions authority refuses a child admission to a school. If the shortage of places leads to Independent Appeal Panels upholding more appeals, this could lead to already oversubscribed schools having to admit even more pupils. If Panels uphold infant class size appeals, the admission authority will normally be required to take measures for the following year to ensure that the class falls within the infant class size limit, for example, by providing a new teacher or a new classroom. The potential cost implications could be significant.

2.3. Even when a place can be found, if it is not close enough to home – i.e. within a 2 mile walk for primary-age pupils and within a 3 mile walk for secondary age pupils – the local authority is liable for the cost of transporting the child to and from school each day for the length of time they are at the school.

3. General School Place Planning Context

3.1. Coventry’s school age population has been changing significantly over the past few years as a result of demographic change and government policy. As with many parts of the country, Coventry, particularly in urban areas, has seen an upturn in the number of births each year following a drop in numbers some years ago. As a result there is localised pressure on primary school places, and
many secondary schools are starting to see the larger primary cohorts moving through placing pressure on Secondary School places across the city.

3.2. **Primary Schools**: Current pupil forecasts show the overall numbers of Primary school children will continue to grow until September 2018, as larger birth cohort’s work their way through. Without any further housing development within the city, Primary numbers should begin to stabilise for the year groups entering Reception from September 2018 onwards. However any new housing development will offset this.

3.5. **Secondary Schools**: The picture for secondary schools is more complex. Some schools currently have some level of surplus capacity whilst others admit pupils over their published capacity. Without any further housing development within the city, overall numbers in secondary schools will grow from September 2017 onwards as larger cohorts transfer from primary schools, expecting to peak, and stabilise from that point, in September 2022 to correspond with the Reception peak seven years earlier. Therefore, the current capacity in Secondary schools will be taken up as primary age pupils already in the system roll through to secondary school. The LA is preparing plans to provide additional secondary school places from September 2018 onwards to cope with the anticipated impact of housing exacerbating the growing pressure on pupil places.

3.6. **Post-16**: The number of pupils accessing post-16 provision will be influenced by the demographic changes outlined above. However, a further consideration is the recent legislation around Raising the Participation Age, which requires all 17 and 18 year olds to continue in education or training. With this in mind Post-16 provision includes Sixth forms, Further Education Colleges and Post-16 SEND provision.

3.7. **Early Years / Pre-School**: Under the Childcare Act 2006, the LA has a statutory duty to secure sufficient childcare and free Early Years provision for eligible young children. This Early Years education and childcare is provided across Coventry in nursery schools and school nursery classes as well as in private nursery settings. The demographic changes outlined above have an impact on Early Years provision first; however, recent changes in legislation are adding to these pressures, particularly the statutory requirement to secure sufficient early education places for eligible 2 year olds. Approximately 40% of two year olds in Coventry qualified for this scheme in 2014, a further 1,200 places.

3.8. The Government has increased entitlement for 3 to 4 year olds from 15 to 30 hours per week for working parents from September 2017. This entitlement will require significant growth from the sector to meet demands from the current
population. Therefore, further investment and growth will be needed to absorb the impact of any new housing.

3.9. **SEND Provision:** The recent demographic changes have also affected Special School numbers, which have gone up by 10% since 2010. There is significant pressure on special schools with increasing numbers of pupils having to be placed out of city at considerable cost to the local authority. There will continue to be a need to increase the level of SEND provision in the City with additional places at special schools and the expansion of existing and development of new resourced provision within mainstream schools.

4. **Requirements for Contributions**

4.1. A contribution towards increased education facilities is sought when the predicted impact of a new housing development creates a shortfall in provision.

4.2. This is assessed by looking at current capacity and forecast demand using birth data from the health authorities, the school census and data on parental preferences and housing numbers. Where the additional pupil numbers brought to the area may be partly accommodated, the level of contribution requested would be adjusted accordingly. The additional demand, net of any capacity that might be available, informs the request for contributions.

4.3. To allow for flexibility in the system to meet parental preference, enable in-year transfers and help families moving to an area find a place for each of their children at the same school. The target for Coventry is for the supply of places to exceed demand by approximately 4% with as even a spread across the City as possible. Therefore, maintaining this level of surplus will also be considered when looking at current capacity and the impact of housing development in an area.

5. **Key Place Planning Assumptions**

5.1. Due to the importance of providing sufficient school places, the local authority is required to strategically plan as far in advance as possible. The existence of capacity at a particular point in time does not mean that it will still be available for the duration of the planning period. For example, where there is an increasing birth rate, schools will fill from the youngest year groups up and through the school. Any current capacity in older year groups will clearly be required to accommodate pupils from younger year groups as they progress through the school. It would therefore be unreasonable to assume that any
current capacity in older year groups could be used to mitigate the impact of a housing development.

5.2. The LA has a statutory duty to meet parental preference wherever possible under Section 86(2) of the School Standards and Framework Act (1998). Whilst Coventry generally operates catchment areas, it is not always possible to increase a specific school to be able to accommodate all children within its agreed catchment area. Catchment areas are simply a mechanism to determine who should be offered places at a school in the event that they are oversubscribed. As a result there is complex pattern of movement between catchment areas that sees no school take all of its pupils from its own catchment area.

5.3. If places are available at a school at the time of an application then the admission authority for the school may not refuse to offer a place regardless of where the children live. Once those children have been admitted, they may not be removed from the school.

5.4. Families moving to a new development may find that places have been taken by children from further afield. There is no mechanism available (or desirable) to move children attending a school but living outside of the priority area back to their local school. It is therefore important to consider the sufficiency of provision within a reasonable area rather than a single school unless there are no reasonable alternatives.

5.5. Reasonable, in this case, may be defined as within the government guidelines on walking distances to school (2 miles for primary age pupils and 3 miles for secondary age pupils) assuming there is a safe walking route. Where pupils are placed at schools further afield than these distances (i.e. where those pupils have not chosen to attend that school but have been allocated a place at that school), the LA would have a duty to fund home to school transport.

5.6. In addition to the use of catchment areas, the admission system in Coventry uses straight line distance from home to school as a ‘tie-breaker’ when deciding who should be offered places. On this basis, it is reasonable to assume that, in time, at normal points of transfer (e.g. starting primary or secondary school) children moving to a new development built very near to a school site would gain priority for admission over children living further away. However, it is important to consider the wider, knock-on impact this would have in terms of displacing pupils who would otherwise have been able to attend the school.

5.7. It is the Department for Education’s view that development should mitigate impacts that arise as direct result of the new development and that displacing
pupils from one full school to another should be considered as such even though that other school may not be local to the development site.

6. Requirements for Elliotts Car Accessories, Gulson Road, Coventry, CV1 2JP:

6.1. Early Years/Pre School: By calculation, Coventry City Council would anticipate that 115 homes at Elliotts Car Accessories, Gulson Road, Coventry, CV1 2JP would create a demand for, 9 children aged 0-4 who might require Nursery Education Funded (NEF) nursery / pre-school provision.

6.1.1. Local authorities are required by legislation under the Childcare Act 2006 to secure sufficient free early years provision for eligible young children. All children are currently entitled to free early education for 15 hours per week for 38 weeks per year from the start of their 3rd birthday until they start school. From September 2017, the Childcare Bill doubles free childcare available for working parents of 3 to 4 year olds from 15 to 30 hours per week. In addition to this, from 2013 Councils were also required to provide free early education places for eligible 2 year olds for 15 hours per week for 38 weeks per year. In Coventry, this equates to 40% of two year olds qualifying for this entitlement.

6.1.2. There are currently 10 pre-school/nursery settings within a kilometre radius of this development. These settings range in the type of provision they provide and the age range of the child they can cater for.

6.1.3. As at May 2018, these settings were currently operating at an overall capacity of approximately 89%.

6.1.4. Over the next five years development in this area could bring approximately 200 children aged 0-4 into the vicinity of this application site. Therefore, in order to help increase sufficiency of nursery educated funded provision in the area, a contribution is requested towards increasing nursery/pre-school provision within two miles of the development site.

7. Secondary Schools

7.1. By calculation, Coventry City Council would anticipate that 115 homes at Elliotts Car Accessories, Gulson Road, Coventry, CV1 2JP would create a demand for 27 Secondary School places and 5 Post 16 places. Secondary age includes children across the 11-16 age range, Post 16 includes children 16-19, it is assumed an even split over all year groups.

7.2. 

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1 Pupil yield based on dwellings with two or more bedrooms. Calculation for application FUL/2018/1300 provisionally based on Elliotts Car Accessories, Gulson Road, Coventry, CV1 2JP dwellings
7.2.1. There are 3 secondary schools within the planning area of the location of the development.

7.2.2. The next couple of years will see a significant growth in pupil numbers as a result of larger primary cohorts moving through and the high level of housing anticipated in the area.

Table 1:

<table>
<thead>
<tr>
<th>Year</th>
<th>Total Capacity</th>
<th>Forecast Pupil numbers</th>
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<tbody>
<tr>
<td>2017</td>
<td>2305</td>
<td>2195</td>
</tr>
<tr>
<td>2018</td>
<td>2305</td>
<td>2416</td>
</tr>
<tr>
<td>2019</td>
<td>2305</td>
<td>2594</td>
</tr>
<tr>
<td>2020</td>
<td>2305</td>
<td>2774</td>
</tr>
<tr>
<td>2021</td>
<td>2305</td>
<td>2976</td>
</tr>
<tr>
<td>2022</td>
<td>2305</td>
<td>3170</td>
</tr>
</tbody>
</table>

7.2.3. As illustrated in Table 1, as the housing builds out it is anticipated that available capacity in the area will be utilised over the next couple years and additional pupil places will need to be provided.

7.3. If development at Elliotts Car Accessories, Gulson Road, Coventry, CV1 2JP is permitted then the City Council would expect to secure contributions towards secondary school provision at Blue Coat, Stoke Park, or other such secondary school.
CONSULTATION UNDER TOWN AND COUNTRY PLANNING ACT 1990

Proposal: Demolition of existing buildings and erection of two buildings for a residential development up to a maximum height of 5 storeys and 16 storeys and plant, providing 167 dwellings including retail and/or cafe use (Use Class A1 and/or A3) at ground level, with associated car parking, cycle parking, highways works, landscaping and other associated works.

At: Elliotts Car Accessories Gulson Road Coventry CV1 2JP

The application will be available to view online by holding down the control key and clicking here to view. Or paste the link below into your internet browser http://planning.coventry.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=796260

In line with established practice you are requested to respond with your comments, using the pro forma below, within 14 days of the date of this notice.

Please email complete pro forma response to planning@coventry.gov.uk

IN CASE THE MEMBER OF STAFF IS OUT OF THE OFFICE. THANK YOU

The Personal Data being provided to you via this link is being disclosed to enable you to fulfil your role as a member of the Council. Please remember that Personal Data should only be used in accordance with the requirements of the Data Protection Act 1998 and related regulations.

If you require any further information please contact the case officer:

Nigel Smith
Tel: 024 7683 1246
Email: nigel.smith@Coventry.gov.uk
Public Health are pleased to see that this has been submitted to CCC in accordance with Policy HW1: Health Impact Assessments (HIA) of the Coventry Local Plan.

At this point in time, the HIA SPD referred to in Policy HW1 has not yet been adopted for the applicant to follow. Nevertheless, the HIA has been submitted as part of the Planning Statement in the format recommended by the draft HIA SPD.

Please email response to planning@coventry.gov.uk
CONSULTATION UNDER TOWN AND COUNTRY PLANNING ACT 1990

Proposal: Demolition of existing buildings and erection of two buildings for a residential development up to a maximum height of 5 storeys and 16 storeys and plant, providing 167 dwellings including retail and/or cafe use (Use Class A1 and/or A3) at ground level, with associated car parking, cycle parking, highways works, landscaping and other associated works.

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If you require any further information please contact the case officer:

Nigel Smith
Tel: 024 7683 1246
Email: nigel.smith@Coventry.gov.uk
Date: 17/05/2018  
Comments from: Coventry Airport  
Re: FUL/2018/1300

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<tr>
<td>Objection</td>
<td>x</td>
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</table>

**Comments**

Please see attached letter requesting additional information needed.

**Amendments Recommended (if any)**

**Conditions Recommended (if any)**

Please email response to planning@coventry.gov.uk
30 May 2018

Dear Sir

I refer to your letter dated 16/05/2018 in which you seek our comments on the title Planning Application.

Unfortunately, you have not provided sufficient information for the Application to be properly considered. We would bring your attention to the Town and Country Planning (Safeguarding of Aerodromes, Technical Sites, and Military Storage Areas) Direction 2002 which, at Annex 1 paragraph 5, lists the information that should be provided.

For this Planning Application the following information is missing:

- OS Grid references of the location to an accuracy of 6 figures each of Eastings and Northings of each corner of each building.
- Elevation of the site Above Ordnance Datum (AOD) to an accuracy of 0.25m.
- Maximum height of building(s) to include any Aerials, lift shafts or similar.

We would also take this opportunity to bring to your attention Annex 1 paragraph 6 of the Direction, which requires that you do not grant permission for a period of 21 days beginning from the date we receive all the necessary information. As this letter indicates, we are not in receipt of all that information, and so the 21 day period cannot be considered to have started.

Yours Sincerely

Andy Hixon
Airport Operations Manager
CONSULTATION UNDER TOWN AND COUNTRY PLANNING ACT 1990

Proposal: Demolition of existing buildings and erection of two buildings for a residential development up to a maximum height of 5 storeys and 16 storeys and plant, providing 167 dwellings including retail and/or cafe use (Use Class A1 and/or A3) at ground level, with associated car parking, cycle parking, highways works, landscaping and other associated works.

At: Elliotts Car Accessories Gulson Road Coventry CV1 2JP

The application will be available to view online by holding down the control key and clicking here to view.
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http://planning.coventry.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=796260

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If you require any further information please contact the case officer:

Nigel Smith
Tel: 024 7683 1246
Email: nigel.smith@Coventry.gov.uk
Date: 18/05/2018  
Comments from: Sustainable Services  
Re: FUL/2018/1300

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<tr>
<td>Objection</td>
<td></td>
</tr>
<tr>
<td>Further information Requested</td>
<td>x</td>
</tr>
</tbody>
</table>

**Comments**

As this is a full application, we require more detail than what is currently given by the Sustainability Statement. For more information about the policy and what is required, please see the Renewable Energy Technical Advice Note.

**Further information (if any)**

- Assessment of the predicted annual energy demand – use benchmarking or other data as described in section 4.1 or, where available, building modelling data (SAP, SBEM, etc.)
- Full assessment of renewable / low carbon energy options considered for the site
- Full details of the selected technology (or technologies), to include:
  - System description, supported by site plans
  - Installed capacity and estimated output

**Amendments Recommended (if any)**

**Conditions Recommended (if any)**

Please email response to planning@coventry.gov.uk
Consultation on Planning Application

From: 
Date: 18th May 2018
Reference:

CONSULTATION UNDER TOWN AND COUNTRY PLANNING ACT 1990

Proposal: Elliotts Car Accessories Gulson Road Coventry CV1 2JP - FUL/2018/1300

At:

The application will be available to view online by holding down the control key and clicking here to view.
Or paste the link below into your internet browser
http://planning.coventry.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=793632

In line with established practice you are requested to respond with your comments, using the pro forma below, within 14 days of the date of this notice.

Please email complete pro forma response to planning@coventry.gov.uk

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If you require any further information please contact the case officer:

Case Officer: Nigel Smith
Tel: (024) 7683
Email:
No Comments
No Objection
No Objection Subject to Conditions
Objection
Further information Requested X

<table>
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<th>Comments</th>
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<tbody>
<tr>
<td>As the proposal is for 167 self-contained apartments located outside the ring road, it is above the threshold for affordable housing. Therefore, a contribution of 25% would normally be required in accordance with Policy H6 in the Local Plan.</td>
</tr>
</tbody>
</table>

The site is in an area where there is a low number of social homes, so the tenure mix in accordance with the policy should be 15% Social Rent and 10% Intermediate Tenure such as Shared Ownership.

The Social Rented properties should be a mix of one and two bedroom apartments, with a larger proportion of one bedroom apartments if possible. As these apartments will be transferred to a Registered Provider, they should be grouped in a way that makes the best sense for RP management and maintenance i.e. close together. Access to these units independent of the rest of the scheme would be preferable, though this may not be easy to achieve.

It is possible that the Intermediate Tenure units will also be transferred to an RP for Shared Ownership, so the same access requirements as for the rented units may be necessary to ensure that the RP can successfully market and subsequently manage the properties.

I note that Appendix 1 of the Planning Statement says “The level of affordable housing provided will therefore be agreed via a viability statement to be submitted to the Council in due course”. The statement appears to reference both the Local Plan and Affordable Housing SPG. Reference is also made to sites inside the Ring Road not contributing affordable housing. For clarification this policy element of the SPG has since been superseded by the new Local Plan and notwithstanding this site sits outside of the Ring Road.

Unless satisfactory evidence is provided to justify a reduction in affordable housing provision or the delivery of an alternative approach to support the delivery of affordable homes in Coventry (as identified in the local plan – supporting text to policy H6) then I would recommend refusal.

<table>
<thead>
<tr>
<th>Further information (if any)</th>
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<tbody>
<tr>
<td>Justification for a reduced level of affordable housing. I reserve the right to revise my comments following receipt of this further information.</td>
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<th>Amendments Recommended (if any)</th>
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Please email response to planning@coventry.gov.uk
EVIDENCE FOR S106 DEVELOPER CONTRIBUTIONS FOR SERVICES

In relation to planning application for: Elliotts Car Accessories, Gulson Road, Coventry

LPA reference: FUL/2018/1300

Definitions

- **Accident and emergency care:** An A&E department (also known as emergency department or casualty) deals with genuine life-threatening emergencies requiring urgent assessment and/or intervention.

- **Acute care:** This is a branch of hospital healthcare where a patient receives active but short-term treatment for a severe injury or episode of illness, an urgent medical condition, or during recovery from surgery. In medical terms, care for acute health conditions is the opposite from chronic care, or longer term care.

- **Clinical Commissioning Group:** CCGs are clinically-led statutory NHS bodies responsible for the planning and commissioning of health care services for their local area.

- **Emergency care:** Care which is unplanned and urgent.

- **PbR:** Payment by Results is a system of paying NHS healthcare providers a standard national price or tariff for each patient seen or treated, taking into account the complexity of the patient’s healthcare needs.

- **PFI:** Private Finance Initiative (PFI arrangement) is a procurement method which uses private sector capacity and public resources in order to deliver public sector infrastructure and/or services according to a specification defined by the public sector.

- **Premium Costs:** The costs incurred for the supply of agency staff.

- **Step change:** The sudden and significant level of change required when a tipping point in additional activity is reached. (In this case, the point at which additional resources and/or clinic capacity is required).

- **Secondary care:** Medical care that is provided by a specialist or facility upon referral by a primary care physician and that requires more specialised knowledge, skill, or equipment than the primary care physician can provide.
Tertiary care: Highly specialised medical care usually over an extended period of time that involves advanced and complex procedures and treatments performed by medical specialists in state-of-the-art facilities. (For example; cancer treatment).

As our evidence will demonstrate, the Trust is currently operating at full capacity in the provision of acute and planned healthcare. It is further demonstrated that although the Trust has plans to cater for the known population growth, it cannot plan for unanticipated additional growth in the short to medium term. The contribution is being sought not to support a government body but rather to enable that body to provide services needed by the occupants of the new development, and the funding for which, as outlined above, cannot be sourced from elsewhere. The development directly affects the ability to provide the health service required to those who live in the development and the community at large.

Introduction to University Hospitals Coventry and Warwickshire NHS Trust

1 University Hospitals Coventry and Warwickshire NHS Trust, ("the Trust") has an obligation to provide healthcare services and manages two hospitals in Coventry and Rugby, being the Hospital of St. Cross, Rugby, and University Hospital, Coventry. Although run independently, the Trust has been set up in law under the National Health Services Act 2006. The primary obligation is to provide NHS services to NHS patients and users according to NHS principles and standards - free care, based on need and not ability to pay. The Trust was established as an NHS Trust in 1993. NHS Trusts are part of the NHS and subject to NHS standards, performance ratings and systems of inspection. They have a duty to provide NHS services to NHS patients according to NHS quality standards, principles and the NHS Constitution. Like all other NHS bodies, NHS Trusts are inspected against national standards by the Care Quality Commission, NHS Improvement and other regulators/accrediting bodies.

2 The Trust is a public sector NHS body and is directly accountable to the Secretary of State for the effective use of public funds. The Trust is funded from the social security contributions and other State funding, providing services free of charge to affiliated persons of universal coverage. The Trust is commissioned to provide acute healthcare services to the population of Coventry and Warwickshire and works as a University Teaching Hospital alongside Warwick Medical School. Acute healthcare services incorporate activities delivered in a hospital setting.

3 The Trust provides a wide range of planned and emergency services to patients across its two hospital sites in Coventry and Rugby (see Appendix 1) It is the major provider of secondary care services to the population of Coventry City and Rugby Borough, and specialist tertiary services including cancer, renal transplant and other specialist services to patients across Coventry,
Warwickshire (including Rugby Borough) and further afield, and is the sole, capable provider of major trauma services in Coventry and Warwickshire and beyond.

4 The facilities at University Hospital, Coventry and the Hospital of St Cross, Rugby will be used by the new occupants of this development.

Who is using the University Hospital?

5 Since 2008, patients have been able to choose which provider they use for their healthcare for particular services. The current NHS Choice framework, published in April 2016 explains when patients have a legal right to choice about treatment and care in the NHS. The legal right to choice does not apply to all healthcare services (for example emergency care), and for hospital healthcare it only applies to first outpatient appointments, specialist tests, maternity services and changing hospitals if waiting time targets are not met. In 2014/15 (the most recent data presently available to UHCW Trust) 88% of Coventry and Warwickshire residents chose UHCW for their first outpatient appointment and UHCW delivered over 92% of Coventry and Warwickshire’s residents' total admissions, including admissions for specialised services (see Appendix 2) The calculations in this evidence base are based upon this percentage share.

Funding Arrangements for the NHS Trust

6. Coventry and Rugby Clinical Commissioning Group (CCG) commissions the Trust to provide acute healthcare services to the populations of Coventry and Rugby under the terms of the NHS Standard Contract. Likewise, South Warwickshire CCG and Warwickshire North CCG commission the Trust to provide acute healthcare services to the populations of their respective geographies in Warwickshire. NHS England (Specialised Commissioning) commissions the Trust to provide certain specialist and tertiary services to the people of Coventry and Warwickshire and beyond. This commissioning activity involves identifying the health needs of the respective populations and commissioning the appropriate high quality services necessary to meet these needs within the funding allocated. These commissioners commission planned and emergency (activity arising from major trauma and A&E), acute hospital medical and surgical care and specialist and tertiary healthcare from UHCW and agree service level agreements, including activity volumes and values on an annual basis. The commissioners have no responsibility for providing healthcare services. They commission (specify, procure and pay for) services, which provides associated income for the Trust. The Trust directly provides the majority of healthcare services through employed staff but has sub-contracted some non-clinical services through its PFI arrangements.
which the Trust is compliant states “The Trust must accept any Referral of a Service User however it is made unless permitted to reject the Referral under this Service Condition”\textsuperscript{1}. There is no option for the Trust to refuse to admit or treat a patient on the grounds of a lack of capacity to provide the service/s. This obligation extends to all services from emergency treatment at Accident and Emergency (A&E) to routine/non-urgent referrals. Whilst patients are able in some cases to exercise choice over where they access NHS services, in the case of an emergency they are taken to their nearest appropriate A&E Department by the ambulance service. In respect of major trauma, all patients who receive their trauma within the boundaries of the UHCW major trauma service (including the whole of Coventry & Warwickshire) will be taken to the University Hospital major trauma centre facilities.

- **Activity Based Payment System Funding**

8 The Trust is paid for the activity it delivers in line with the National Tariff Payment System. In 2003 the Department of Health introduced the National Tariff Payment by Results (PbR) system, an activity based payment system, initially for a small number of common elective care procedures. Over the past decade the scope of services covered by this activity-based payment approach of setting prices for specified treatments has expanded to include Outpatient, Elective, Emergency, Diagnostic and A&E activity. Under the Payment by Results regime, the Trust is paid at a set rate for each PbR-eligible activity it delivers, subject to quality and access time standards being met. Failure to deliver on-time intervention without delay presents the Trust with a risk of financial penalties being imposed by its Commissioners.

9 Payment for emergency admissions is set at 2015/16 activity levels; with any activity over and above this level only attracting 70\% of the tariff value. This represents a marginal cost of delivery only. This means that for each patient receiving emergency care that is above the agreed activity level, the Trust will only receive 70\% of funding towards the costs of the services delivered. Therefore, any activity above this level will not receive the funding to support increased demand for service delivery.

10 The National Tariff is set by the Department of Health, NHS England and NHS Improvement. The process for deriving the tariff involves taking the national average cost base for the delivery of hospital care and factoring in a number of adjustments to take account of cost inflation, efficiency and the Clinical Negligence Scheme for Trusts (CNST). Between 2011-12 and 2015-16, the National Tariff was reduced, on average, by 1.5\% per year, due to the fact that the uplift for cost inflation was less than the efficiency factor. The net change tariff prices over the previous 12 years can be seen in Appendix 4.

\textsuperscript{1} NHS Standard Contract- Service Condition SC7
• Payment By Results

11 The Trust is paid for the activity it has delivered subject to satisfying the quality requirements set down in the NHS Standard Contract. Quality requirements are linked to the on-time delivery of care and intervention and are evidenced by best clinical practice to ensure optimal outcomes for patients.

12 As stated above for emergency admissions the Trust will only be paid a marginal cost of 70% for activity above the 2015/16 baseline. There is no ability to reclaim the 30% of tariff above the baseline for additional activity.

13 The Trust has an annual turnover of c. £608,790M per annum (2016/17). Of this amount, £502,476M relates to Commissioner income and £358,779M of this relates to activity reimbursed at the National Tariff. The remainder of the Trust’s funding is through other sources, including education, training and research monies and contracts with other providers.

14 The Trust is expected to generate surpluses for re-investment to develop local services, or alternatively must seek to secure external financing in the form of loans (although due to the current financial constraints in the NHS, access to such funds is extremely limited). This development will directly impact on the service capacity requirements of the Trust to meet additional demand, against which the Trust will have no means of fully recouping the funds required for reinvestment.

Planning for the Future

15 The Trust understands that the existing population, future population growth and an increased ageing population will require additional healthcare infrastructure to enable it to continue to meet the increasing demands and complexity of the hospital healthcare needs of the local population.

16 It is not possible for the Trust to predict when planning applications are made and delivered and, therefore, cannot plan for additional development occupants as a result. The Trust has considered strategies to address population growth across its area and looked at the overall impact of the known increased population to develop a service delivery strategy to serve the future healthcare needs of the growing population. This strategy takes into account the trend for the increased delivery of healthcare out of hospital and into the community.

17 The funding from the CCG is negotiated on a yearly basis and this will eventually catch up with population growth, but cannot take into account the increased service requirement created by the increase in population due to development, including that from this development, in the first year of occupation.
Current Position

- **Emergency admissions and the direct impact on emergency health care services**

18 Across England, the number of acute beds is one-third less than it was 25 years ago\(^2\), but in contrast to this the number of emergency admissions has seen a 37% increase in the last 10 years\(^3\). The number of emergency admissions is currently at an all-time high. UHCW growth is shown in Figure 1.

<table>
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<tr>
<th>Emergency Admissions</th>
<th>Year</th>
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<tbody>
<tr>
<td>52,706</td>
<td>2014/15</td>
</tr>
<tr>
<td>57,642</td>
<td>2015/16</td>
</tr>
<tr>
<td>58,434</td>
<td>2016/17</td>
</tr>
</tbody>
</table>

Figure 1

19 The Trust’s hospitals are now at full capacity and there are limited opportunities for it to further improve hospital capacity utilisation. Whilst the Trust is currently managing to provide the services in a manner that complies with the Quality Requirements of the NHS and its regulators, there are no sufficient resources or space within the existing facilities to accommodate population growth without the quality of the service as monitored under the standards set out in the Quality Requirements dropping, and ultimately the Trust facing sanctions for external factors which it is unable to control.

20 The Trust’s current ability to cope with the number of A&E attendances and it’s responsiveness to emergency admissions has been specifically commented on by the Care Quality Commission as “Requiring Improvement” in its most recent inspection report. In addition the report identified that the Trust’s performance had consistently fallen below the requirement for patients being discharged from the emergency department in four hours.

21 In order to maintain adequate standards of care as set out in the NHS Standard Contract quality requirements, it is well evidenced in the Dr Foster Hospital Guide that a key factor to deliver on-time care without delay is the availability of beds to ensure timely patient flow through the hospital. The key level of bed provision should support maximum bed occupancy of 85%. The 85% occupancy rate is evidenced to result in better care for patients and better outcomes\(^4\). This enables patients to be placed in the right bed, under the right team and to get the right clinical care for the duration of their hospital stay. Where the right capacity is not available in the right wards for treatment of his/her

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\(^2\) Older people and emergency bed use, Exploring variation. London: King’s Fund 2012
\(^3\) Hospital Episode Statistics. www.hesonline.nhs.uk/Ease/servlet/ContentServer?siteID=1937
\(^4\) British Medical Journal- Dynamics of bed use in accommodating emergency admissions: stochastic simulation model
particular ailment, the patient will be admitted and treated in the best possible alternative location and transferred as space becomes available, but each ward move increases the length of stay for the patient and is known to have a detrimental impact on the quality of care. Consequently, when hospitals run at occupancy rates higher than 85%, patients are at more risk of delays to their treatment, sub-optimal care and being put at significant risk.

Appendix 5 details the Trust’s utilisation of acute bed capacity, which exceeded the optimal 85% occupancy rate for the majority of the year. (UHCW exceeds 100% when required to bed patients in non-inpatient areas, for example, bedding emergency patients overnight in the day surgery unit.) This demonstrates that current occupancy levels are highly unsatisfactory, and the problem will be compounded by an increase in need created by the development which does not coincide with an increase in the number of bed spaces available at the Hospital. This is the inevitable result where clinical facilities are forced to operate at over-capacity. Any new residential development will add a further strain on the current acute healthcare system.

- The direct impact on the provision of emergency healthcare caused by the proposed development

The population increase associated with this proposed development will significantly impact on the service delivery and performance of the Trust until contracted activity volumes include the population increase. As a consequence of the development and its associated demand for emergency healthcare there will be an adverse effect on the Trust’s ability to provide on-time care delivery without delay, this will also result in financial penalties due to the Payment by Results regime.

- The direct impact on the delivery of suitably and safely staffed hospital services, caused by the proposed development

The NHS, in common with public health services in many other countries is experiencing staff shortages. UHCW has a duty to provide high-quality care for all and ensure that it is appropriately and safely staffed in order to manage both the unpredictable demand for major trauma and emergency care and diagnostic and elective care. Rising unplanned demand for care in a hospital setting, often paid for at a Premium Cost, has detrimentally impacted on the financial position of the Trust. To ensure the continuing provision of the highest standard of patient care, the need will arise for the Trust to employ both medical and non-medical agency staff where prospective cover arrangements are not in place. Agency staff play a vital role in the NHS, giving hospitals the flexibility to cope with fluctuating staff numbers and helping Trusts to avoid potentially dangerous under-staffing. Agency staff can be cost effective, because they are only hired when needed and don’t carry the same longer-term costs, as directly employed staff – such as pensions, sick pay and
holiday pay. They are an essential part of UHCW staffing resources presently and with current vacancy rates any expansion in service will require agency staffing at premium cost. As an NHS Trust we are required to manage the value of agency costs within a threshold set by our NHSI. The Trust needs to ensure that the level of services is delivered as required, by the NHS Standard Contract for Services regardless of the increased demand due to the development. To engage agency staff is the only option to keep up with the required standard.

For the additional 739 acute interventions, the Trust will be required to source additional, suitably qualified agency based staff to work alongside the permanent workforce in order to meet this additional demand, until it is in receipt of CCG funding to enable recruitment of substantive posts to manage the additional demand. The normal funding arrangement is only related to the existing staff levels. It does not include the additional staffing demand required to address the required additional service levels.

UHCW has a duty to provide high-quality care for all and ensure that it is appropriately and safely staffed in order to manage both the unpredictable demand for both emergency as well as required elective care. There is no way to reclaim this additional premium cost for un-anticipated activity. The only way that the Trust can maintain the “on time” service delivery without delay and comply with NHS quality, constitutional and regulatory requirements is through developer funding (requiring the developer to meet the 30% funding gap directly created by the development population) due to the nature of the marginal rate operation of the emergency tariff and Premium Cost requirement, thus enabling the Trust to reinvest this to provide the necessary capacity for the Trust to maintain service delivery during the first year of occupation of each unit. Without securing such contributions, the Trust will have no funding to meet healthcare demand arising from the development during the first year of occupation and the health care provided by the Trust would be significantly delayed and compromised, putting the residents and other local people at potential risk.

**Impact Assessment Formula**

27 The Trust has identified the following:--.

A development of 167 equates to 392 new residents. Using existing 2016/17 demographic data as detailed in the calculations in Appendix 3 will generate 739 acute interventions over the period of 12 months. This comprises additional interventions by point of delivery for:

- **121** A&E based on % of the population requiring an attendance
- **58** Emergency admissions based on % of the population requiring an admission
- **7** Elective admissions based on % of the population requiring an admission
Day-case admissions based on % of the population requiring an admission

Outpatient admissions based on % of the population requiring an admission

Diagnostic Imaging based on % of the population requiring diagnostic imaging

Emergency admissions:

For the 58 emergency admissions, representing 15% of the residents, the Trust will have no method of recovering the 30% of tariff needed to invest in the stepped change needed for services.

Formula:

\[
\text{Emergency admissions} - \text{Development Population} \times \text{Average Emergency Admission Activity Rate per Head of Population} \times \text{Average Emergency Tariff} \times 30\% \times \text{Cost per Emergency Admission Activity} = \text{Developer Contribution}
\]

Premium Costs:

For all the 739 anticipated hospital based interventions, the Trust will have no method of recovering the additional Premium Costs needed to ensure the level of service required.

Formula:

\[
\text{Development Population} \times \text{Average Admission Activity Rate per Head of Population} \times \text{Average Tariff} \times \text{proportion of Trust staff cost of total cost (60\%)} \times \text{NHSI Agency Premium Cap (55\%)} = \text{Developer Contribution}.
\]

As a consequence of the above and due to the payment mechanisms and constitutional and regulatory requirements the Trust is subject to, it is necessary that the developer contributes towards the cost of providing capacity for the Trust to maintain service delivery during the first year of occupation of each unit of the accommodation on/in the development. The Trust will not receive the full funding required to meet the healthcare demand due to the baseline rules on emergency funding and there is no mechanism for the Trust to recover these costs retrospectively in subsequent years as explained. Without securing such contributions, the Trust would be unable to support the proposals and would object to the application because of the direct and adverse impact of it on the delivery of health care in the Trust’s area. Therefore the contribution required for this proposed development of 167 dwellings is £86,343.00. This contribution will be used directly to provide additional health care services to meet patient demand as detailed in Appendix 3.

The contribution requested (see Appendix 3) is based on these formulae/calculations, and by that means ensures that the request for the relevant landowner or developer to contribute towards the
cost of health care provision is directly related to the development proposals and is fairly and reasonably related in scale and kind. Without the contribution being paid the development would not be acceptable in planning terms because the consequence would be inadequate healthcare services available to support it, also it would adversely impact on the delivery of healthcare not only for the development but for others in the Trust’s area.

32 Having considered the cost projections, and phasing of capacity delivery we require for this development it is necessary that the Trust receive 100% of the above figure prior to implementation of the planning permission for the development. This will help us to ensure that the required level of service provision is delivered in a timely manner. Failure to access this additional funding will put significant additional pressure on the current service capacity leading to patient risk and dissatisfaction with NHS services resulting in both detrimental clinical outcomes and patient safety.

Summary

33 As our evidence demonstrates, the Trust is currently operating at full capacity in the provision of acute and planned healthcare. It is further demonstrated that although the Trust has plans to cater for the known population growth, it cannot plan for unanticipated additional growth in the short to medium term. The contribution is being sought not to support a government body but rather to enable that body to provide services needed by the occupants of the new development, and the funding for which, as outlined above, cannot be sourced from elsewhere. The development directly affects the ability to provide the health service required to those who live in the development and the community at large.

34 Without contributions to maintain the delivery of health care services at the required quality, constitutional and regulatory standards and to secure adequate health care for the locality, the proposed development will put too much strain on the said services, putting people at significant risk. Such an outcome is not sustainable. Sustainable development is that which provides “accessible local services that reflect the community’s needs and support its health….”: NPPF paragraph 7.

35 There will be a dramatic reduction in safety and quality as the Trust will be forced to operate over available capacity, as the Trust is unable to refuse care to emergency patients. There will also be increased waiting times for planned care and patients will be at increased risk of multiple cancellations. This will be an unacceptable scenario for both the existing and new population. The contribution is necessary to maintain sustainable development. Further the contribution is carefully calculated based on specific evidence and fairly and reasonably related in scale and kind to the developments. Without the contribution the Trust considers that the development is not a sustainable development. Sustainable development is that which provides “accessible local
services that reflect the community’s needs and support its health...”: NPPF paragraph 7. It would not also be in the accordance with Council's development plan policy or emerging local plan policy if these matters were not appropriately addressed.

**Current development plan  June 2001**

Policy OS10 provides:

*Planning obligations and other legal agreement will be used to further the Plan policies to ensure that development contributes to regenerated, sustainable and high quality City, and enable development to proceed which might otherwise be unacceptable. Negotiations will be based on the general principles that:*

*Developers should ordinarily provide or fund additional or improved social, transport and other communal infrastructure, facilities and services in fair and reasonable proportion to the demands arising from the proposed development: and*

*The provision of features of development which are a material consideration in favour of granting planning permission is assured.*

**Emerging Local Plan –Coventry Local Plan Council Publication Draft Local Plan 2016**

Policy HW1 paragraph 3

*Where a development has significant negative or positive impacts on health and wellbeing the Council may require applicants for the mitigation or provision of such impacts through planning conditions and/or financial/other contributions secure via planning obligations and/or the Council’s CIL Charging Schedule*

Further the Planning Practice Guidance states:

“Local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local and neighbourhood plans and in planning decision making. Public health organisations, health service organisations, commissioners and providers, and local communities should use this guidance to help them work effectively with local planning authorities in order to promote healthy communities and support appropriate health infrastructure.”

Paragraph: 001 Reference ID: 53-001-20140306
Conclusion

In the circumstances, it is evident from the above that the Trust’s request for a contribution is not only necessary to make the development acceptable in planning terms; it is directly related to the development; and fairly and reasonably related in scale and kind to the development. The contribution will ensure that Health services are maintained for current and future generations and that way make the development sustainable.

21 May 2018
Appendix 1

Services provided at University Hospital
General Acute Services:
Acute Medicine
Accident and Emergency
Age Related Medicine and Rehabilitation
Anaesthetics
Assisted Conception
Audiology
Breast Surgery
Cardiology Critical Care
Colorectal Surgery
Dermatology
Diabetes and Endocrinology
Ear, Nose and Throat
Gastroenterology
General Medicine
General Surgery
Gynaecology
Haematology
Hepatobiliary and Pancreatic Surgery
Upper Gastrointestinal Surgery
Maxillo Facial Surgery
Neurology and Neurophysiology
Obstetrics
Ophthalmology
Optometry
Orthodontics
Orthopaedics Trauma
Orthoptics
Paediatrics
Pain Management
Plastic Surgery
Renal Medicine
Reproductive Medicine
Respiratory Medicine
Rheumatology
Urology
Vascular Surgery
Specialised Services:
Bone Marrow Transplantation
Cardiothoracic Surgery
Clinical Physics
Haemophilia
Invasive Cardiology
Neonatal Intensive Care and Special Care
Neuro Imaging
Neurosurgery
Oncology and Radiotherapy
Plastic Surgery
Renal Dialysis and Transplantation
Diagnostic and Clinical Support Services:
Dietetics
Echo Cardiology
Endoscopy
Haematology
Histopathology
Medical Physics/Nuclear Medicine
Microbiology
Occupational Therapy
Pharmacy
Physiotherapy
Respiratory Function Testing
Ultrasound
Vascular Investigation

Services provided at Hospital of St Cross
Acute Medicine:
Acute Medicine
Acute Surgery
Ambulatory Care
Breast Screening
Colorectal Cancer Screening Centre
Day Surgery, Overnight Stay / 23 hour Surgery
Endoscopy
Laboratory Services
Macular Unit
Magnetic Resonance Imaging (MRI) Scanning
Outpatients Services
Satellite Renal Dialysis Unit
Scanning, Bone Density
Urgent Care Centre
X-ray including Ultrasound
Inpatient Medical Services
Inpatient Elective Surgery
Inpatient Rehabilitation Service
Intermediate Care
Appendix 2

Coventry & Rugby Residents 1st OP Appointment by Provider 2014/15
Data Source: HES, Coventry & Rugby LSOAs

Coventry & Rugby Resident Admissions/ Discharges by Provider 2014/15
Data Source: HES, Coventry and Rugby LSOAs
Appendix 3

Elliotts Car Accessories, Gulson Road, Coventry
FUL/2018/1300

Application Ref: 
Coventry Please Select
ONS 2016 Population Estimate: 352911

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<th>Activity rate per annum per head of population</th>
<th>Avg Tariff</th>
<th>12 mths Activity for 167 Dwellings</th>
<th>Delivery Cost for 167 Dwellings</th>
<th>Marginal Rate on Emergencies</th>
<th>Premium Cost of Delivery</th>
<th>Cost Pressure (Claim)</th>
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<td>Non Elective Admissions</td>
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<td>Outpatient appointments</td>
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<td>Diagnostic Imaging</td>
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2016/17 M11
Pay 60%
All Other Cost
Total Cost
Marginal Rate on Emergency Admissions 30%
Agency Cap Uplift 55%
Appendix 4

The net change tariff prices

![The net change tariff prices graph](image)

Appendix 5

Bed occupancy rate

![Bed occupancy rate graph](image)
Consultation on Planning Application

From Development Management Date: 16/05/2018
Reference: FUL/2018/1300

CONSULTATION UNDER TOWN AND COUNTRY PLANNING ACT 1990

Proposal: Demolition of existing buildings and erection of two buildings for a residential development up to a maximum height of 5 storeys and 16 storeys and plant, providing 167 dwellings including retail and/or cafe use (Use Class A1 and/or A3) at ground level, with associated car parking, cycle parking, highways works, landscaping and other associated works.

At: Elliotts Car Accessories Gulson Road Coventry CV1 2JP

The application will be available to view online by holding down the control key and clicking here to view.  
Or paste the link below into your internet browser
http://planning.coventry.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=796260

In line with established practice you are requested to respond with your comments, using the pro forma below, within 21 days of the date of this notice.

Please email complete pro forma response to planning@coventry.gov.uk IN CASE THE MEMBER OF STAFF IS OUT OF THE OFFICE. THANK YOU

The Personal Data being provided to you via this link is being disclosed to enable you to fulfil your role as a member of the Council. Please remember that Personal Data should only be used in accordance with the requirements of the Data Protection Act 1998 and related regulations.

If you require any further information please contact the case officer:

Nigel Smith
Tel: 024 7683 1246
Email: nigel.smith@Coventry.gov.uk
Date:
Comments from: West Midlands Fire Service
Re: FUL/2018/1300

<table>
<thead>
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<th>Comments</th>
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<tbody>
<tr>
<td>No Comments</td>
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<td>No Objection</td>
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<tr>
<td>No Objection Subject to Conditions</td>
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<tr>
<td>Objection</td>
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</tbody>
</table>

### Comments

**Objection**

There is reference to access by fire appliances to more than 50% of Blok A & B.

Other than this, no information can be found regarding the facilities and access provisions for the fire service, including rising fire mains.

There is no reference to sprinkler provision.

Water supplies for firefighting should be in accordance with “National Guidance Document on the Provision for Fire Fighting” published by Local Government Association and WaterUK: [https://www.dropbox.com/s/5s5i45fmx3m3hrf/national-guidance-document-on-water-for-ffg-final.pdf?dl=0](https://www.dropbox.com/s/5s5i45fmx3m3hrf/national-guidance-document-on-water-for-ffg-final.pdf?dl=0)

For further information please contact the WMFS Water Office at the address given above or by email on Water.Officer@wmfs.net

The approval of Building Control will be required with regard to Part B of the Building Regulations 2010.

### Amendments Recommended (if any)


### Conditions Recommended (if any)


Please email response to planning@coventry.gov.uk
Please attach to consult responses

regards

Nigel Smith
Senior Planning Officer
Development Management
Coventry City Council

T: 024 76831246
Nigel.smith@coventry.gov.uk

Coventry receives 96% of planning applications online  www.coventry.gov.uk/planning

Our Building Control team is now back in-house and based here at Coventry.
Phone: 024 7683 2057/2058 or email: buildingcontrol@coventry.gov.uk

Nigel,

Application Ref: - FUL/2018/1300
Our Ref: - CV/SS125/18

Subject: Elliott’s Car Accessories, Gulson Road, Coventry, CV1 2JP

The West Midlands Police statistics inform us that 227 crimes have occurred in close proximity to the site in the last 12 months (May 20th 2017 to May 20th 2018) these crimes include Burglary (31) Vehicle Crime (31) Robbery (7) Theft from Shop/Stall (19) Assault (16) Theft other (12) Theft of Pedal Cycle (15) & Malicious Wounding (3)

Please be aware that the quantity of crime will be higher as not all incidents are reported to the police.

There is also the concern that such an expansion will potentially exacerbate these problems due to the expected increase in the levels of people and vehicles that this development will no doubt attract to the area.

With this in mind I would recommend the following:-

There is some concern regarding the lack of vehicle parking available for a development of this scope (43 spaces for 167 apartments, 120 of which offer 2 x bedrooms). Although the DAS states that - the proposal aims to reduce reliance on private car usage by facilitating and promoting the use of sustainable travel modes – I am yet to see evidence that this theory actually reduces vehicle usage.

Gulson Road is already a busy thoroughfare that is regularly occupied with parked vehicles. Taking into account the planned reduction in size of the demanding Coventry University Student car park and the introduction of this proposed structure, I can only foresee added parking congestion/issues along Gulson Road.
The lack of parking opportunities could result in residents / visitors / staff having to park their vehicles some distance away from the address, increasing the vulnerability of the vehicle. The need to find parking may also impact upon the surrounding side roads causing issues away from the site itself.

The above crime statistics inform us that vehicle related offences in the area are high; therefore, any issues could ultimately require a police response.

The development should meet with the design specifications and physical security measures that are outlined in SBD design guides for New Homes 2016 and Commercial Developments 2015 (retail units). This information can be found at:-


I would recommend that the car parks be designed to the British Parking Association ‘Park Mark’ standard. This would also assist in reducing the opportunity for crime and the fear of crime, creating a safer and more secure environment. This information can be found at http://www.britishparking.co.uk/Park-Mark---The-Safer-Parking-Scheme

Parking spaces should be arranged, where possible, in straight rows to aid surveillance and avoid blind spots.

Estate threshold markings like surface designs rumble strips, brick pillars etc. should be introduced as they can act as symbolic barriers. This gives the impression that the area beyond the ‘barrier’ is private to the community. This may help discourage unwanted visitors to the site.

I would advise that the perimeter fencing is a minimum of 2m in height, robust, grounded on a hard surface, pointed and difficult to scale and interfere with. An anti-climb topping could be included.

Expanded Metal, Weldmesh or Paladin (to BS. 1722 Part 14) fencing are the best available options. Chain link and similar low security fencing is boundary demarcation only and should not be used.

Admission to the rear of the site should be restricted by way of an access control system that is robust and vandal resistant.

The vehicle gates must be capable of being operated remotely by the driver whilst sitting in the vehicle, the operation speed of the gates shall be as quick as possible to avoid tailgating by other vehicles.

A separate access controlled point for pedestrians / cyclists should be installed adjacent to the vehicle access point. This scheme must not compromise the overall security of the entrance and must be as robust as the vehicle gates.

The design, height and construction of any gates within a perimeter fencing system should match that of the adjoining fence and not compromise the overall security of the boundary.

It is also important that there are no structures close to or over the fence/gates that will aid climbing, e.g. trees, lamp columns, telecom cabinets or buildings.

A CCTV system should be implemented throughout the site internally and externally. It should be capable of receiving quality coloured images that can be used for evidential purposes. This could help deter possible offenders from committing a host of criminal offences at the location.

Any images captured should be securely held for a minimum of 31 days. Any system should be to Home Office approved standards.

The scheme should be capable of monitoring all entrance points, lobby, stairwells, lifts, corridors, communal space, car parking bays, cycle storage units, refuge areas, all individual building lines, strong rooms and storage areas and any vulnerable spots and blank fascia’s on site. The cameras must also act as an instant deterrent, so they must look like cameras and not blend into the surroundings.

CCTV and 24/7 Security signage should also be introduced as this could deter offenders from entering the location. All signage must look professional and not ‘handmade’, this would give an enhanced sense that the CCTV system is of a high quality.

Any walkways or communal open spaces should be open well lit and be devoid of dark unlit areas, blind corners or narrow secluded pathways.

A lighting plan should be drawn up to provide adequate illumination to allow surveillance opportunities during the hours of darkness and be fitted in accordance with any intended CCTV to ensure best evidence.

The lighting should be carefully designed to cover all vulnerable areas that include the entrance points and pathways. Well-positioned lights could also help deter and reveal potential intruders. Anyone attending the site, especially during the hours of darkness, must also feel safe as they walk towards the facilities.

Building lines should be kept as simple as possible. Complex building shapes create hiding places, which reduces both natural surveillance and the effectiveness of CCTV systems. Recesses create congregation points, which are a focal point for crime and anti-social behaviour, possibly leading to littering, graffiti, vandalism and arson.
All direct footpaths must be separated from the car parks. This again could help prevent any casual intrusion into the parking areas from unwanted visitors.

Deterrent paving or buffer zones should also be located to the front of any building lines or walls that could be targeted for graffiti or vandalism.

Laminated glazing should be introduced to entrance doors, all ground floor and vulnerable windows. This will help prevent burglary and criminal damage issues.

Windows on the ground floor fitted with a restrictor to an opening aperture maximum 100 mm.

If any sills are to be introduced to the development they must be narrow in design or steeply angled to prevent them from being used as climbing aids, seating or litter points.

Over 750 cycles have been stolen in Coventry in 2017. Therefore it is imperative that a development of this nature offers residents the opportunity to store their cycles in a secure unit. Ideally the cycles should be stored from public view in a lockable room or container.

The cycle stores must also be lit at night using vandal resistant, dedicated energy efficient light fittings and energy efficient lamps.

I would also recommend that the cycle stand enables both wheels and the crossbar to a stand to be locked rather than just the crossbar. Minimum requirements for such equipment: Galvanised steel bar construction (minimum thickness 3mm) Minimum foundation depth of 300mm with welded ‘anchor bar’

Bin stores can be vulnerable to arson attacks. Therefore, such units should be capable of being locked and secured. The opportunity to see inside the bin store should also be considered. This would help prevent the store from being used as a hiding spot by unwanted visitors.

I would recommend that 24/7 security be introduced on site. The office for the security staff should be based on the ground floor level of the building and in close proximity to the reception area or entrance point.

If a reception desk is required it should be high and wide, whilst the floor behind the counter may be raised. A personal attack alarm should be fitted behind or beneath the desk.

If a security kiosk or gatehouse is introduced on site it should be certificated to LPS 1175: Issue 7, SR 1 or STS 202: Issue 3, BR 1

All the hard landscaping and street furniture within the communal areas of the ground should be securely fixed down in order to prevent removal, vandalism and/or use as potential ammunition.

Litterbins are the only items that should be capable of being removed from site or locked from use by an authorized person.

Trees when mature should not mask lighting columns nor become climbing aids.

Any specified shrubs and hedges should have a maximum growth height of 1m, whilst all trees should be pruned up to a minimum height of 2m, which maintains a clear field of vision around the site. Trees when mature should not mask lighting/CCTV columns nor become climbing aids.

All external doors should have opaque, vandal resistant, compact fluorescent bulkhead lights, operated by photo-electric cells fixed above them at the highest inaccessible points. No switch should be fitted.

Any street signage advertising the establishment should be installed within a soil based region that can then be protected by some form of low level hostile planting. This would help prevent any signage being targeted for graffiti and posters.

Access control systems must be designed to be as robust as possible and resistant to tampering e.g. proximity tag with secure vandal resistant reader. In certain locations of the campus it may be desirable to incorporate additional layer(s) into the access control system e.g. proximity tag / reader, a biometric based system or a personal identification number (PIN). There is no publicly available standard for such systems, however a number of products have been assessed to the satisfaction of the police service and details may be found on the Secured by Design website.

To prevent issues of tailgating it may also be appropriate to use an ‘airlock’ door system on some entrance points. Two sets of automatic doors are used in this design, the first opening upon the detection of a visitor and the second set, either opening in the same fashion or controlled from an office or reception desk.

All entrance and exit doors to this proposal should also be Secured by Design accredited.

Preferably, Secured by Design accredited doors and windows to be introduced to all separate apartments within the development. These doors should benefit from a viewer and restrictor.

Any staff only areas must be protected by a lockable door of solid construction and capable of withstanding bodily attack and to LPS 1175 SR 2. Individual staff lockers are encouraged to prevent theft.

Communal mail delivery facilities within building entrances serving multiple rooms should be designed to incorporate the following:
Located at the main entrance/exit point of the building within view, within an internal area covered by CCTV or located within an ‘airlock’ access controlled entrance hall, or externally at the front of the building within view of those using the building

The individual letter boxes shall have a maximum aperture size of 260mm x 40mm, have anti-fishing properties and fire retardation where considered necessary. Installed in accordance with the manufacturer’s specifications.

Letter boxes certificated to Door & Hardware Federation Technical Specification 009 (TS 009) offer reassurance that all of the above attributes have been met. In high crime areas TS 009 provides the safest means by which mail can be delivered whilst eliminating the risks associated with letter mail delivery i.e. arson, ‘fishing’ for personal mail.

Bollards should be introduced along the retail/shop frontages and located not more than 1.2m apart. They should also have a crest or protuberance of some description attached to the apex. This is to prevent the bollards being used for seating.

Intruder alarm systems should be installed to monitor the various business units. Roller shutters must be installed to all doors and windows. They must comply with LPS 1175 grade 3. Locks may be applied internally if possible; otherwise a close-shackled padlock to be used. All shutters should have contacts fitted and be linked to the alarm system.

During the redevelopment phase the site may be a focus for anti-social behaviour (ASB) or criminal activity. CCTV / Lighting will be an important element in deterring this activity and detecting it if it occurs. It is important that there is an appropriate response in place to protect against this possibility.

Kind regards,

Shaun Smith
Design Out Crime Officer (DOCO)
Room F18 Crime Reduction Team
West Midlands Police
Willenhall Police Station
Chace Avenue
Coventry
CV3 3PS

External Tel: 02476 539414 (Direct Dial)
Internal Tel: 8343191
Mobile Tel: 07810156352
E mail: shaun.smith@west-midlands.pnn.police.uk

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CONSULTATION UNDER TOWN AND COUNTRY PLANNING ACT 1990

Proposal: Demolition of existing buildings and erection of two buildings for a residential development up to a maximum height of 5 storeys and 16 storeys and plant, providing 167 dwellings including retail and/or cafe use (Use Class A1 and/or A3) at ground level, with associated car parking, cycle parking, highways works, landscaping and other associated works.

At: Elliotts Car Accessories Gulson Road Coventry CV1 2JP

The application will be available to view online by holding down the control key and clicking here to view.
Or paste the link below into your internet browser
http://planning.coventry.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=796260

In line with established practice you are requested to respond with your comments, using the pro forma below, within 14 days of the date of this notice.

Please email complete pro forma response to planning@coventry.gov.uk

IN CASE THE MEMBER OF STAFF IS OUT OF THE OFFICE. THANK YOU

The Personal Data being provided to you via this link is being disclosed to enable you to fulfil your role as a member of the Council. Please remember that Personal Data should only be used in accordance with the requirements of the Data Protection Act 1998 and related regulations.

If you require any further information please contact the case officer:

Nigel Smith
Tel: 024 7683 1246
Email: nigel.smith@Coventry.gov.uk
Date: 30/05/2018
Comments from: Environmental Protection FT
Re: FUL/2018/1300

<table>
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<td>Further information Requested X</td>
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### Comments

#### Air Quality Assessment

With reference to the air quality assessment by WSP reference 70036073-007, I require further information for the modelling. Please ask the consultant to address the following:

- The modelled concentration for location GR1 is a factor of 6 out from the monitored tube result. This is too great a difference and the model should be adjusted until it is more representative.
- Where is the road-NOx adjustment factor of 1.74 derived from?
- Is any CHP proposed for the development? If so, this should be considered in the assessment.

#### Acoustic Report

With reference to the acoustic report by WSP reference 70036073-001, I require the full noise monitoring data to be submitted. Also the report is intended to show the general climate and does not provide full recommendations for glazing across the site. This will need to be provided and can be conditioned.

No reference has been made to the general noise climate. Please can the consultant provide information as to the presence and noise levels of any plant in the general area, including any odour extraction plant from the neighbouring restaurants.

I disagree that the noise levels are not excessive with windows open. In order to achieve the standards in BS8233, the windows must remain closed. As such alternative means of ventilation including purge ventilation will be required. Details of this should be provided to the LPA for approval in writing. This should also include the location of the air intake(s) clearly shown on a plan of the buildings.

Further details of the separating floor construction between the commercial units and the residential units above will be required once the proposed uses of these units is known. A report will be required to provide evidence that the standards in BS8233 can be achieved in the residential units and must consider the commercial uses in full.

### Further information (if any)

### Amendments Recommended (if any)
Conditions Recommended (if any)

Unexploded Ordnance

The recommendations in the detailed UXO report by Alpha Associates reference 70036073-011 should be conditioned.

AIR QUALITY

This location is within our Air Quality Management Area declared for NOx so in line with the NPPF p.124 I would recommend the following conditions:

- In order to minimise the impact of the development on local air quality any gas boilers must meet a dry NOx emission rate of <40mg/kWh.
- A method statement detailing the control of emissions to air during the demolition and construction phases should be submitted to and approved in writing by the Local Planning Authority prior to the commencement of works. This should include the recommendations made in the air quality assessment by WSP reference 70036073-007 and should give the proposed hours of works.
- Electric vehicle recharging points shall be provided at the following rate:
  - minimum of 1 per 10 unallocated spaces
  - 1 per property for allocated spaces

Contaminated Land

The preliminary assessment by RPS recommends an intrusive investigation. As such I recommend the full 1 to 4 contaminated land conditions be placed on any approval.

Plant Noise

In accordance with the findings in the acoustic report by WSP, total plant noise emissions should not exceed 58 dB (day) and 44 dB (night) when rated in accordance with BS 4142:2014. Verification of this should be provided once the plant has been installed and prior to occupation.

Manager sign off NC

Please email response to planning@coventry.gov.uk
From: Busby, Phil  
Sent: 01 June 2018 14:14  
To: Smith, Nigel  
Subject: RE: FUL/2018/1300

Many Thanks Nigel,

Happy with figures provided, and collection points ensure access available without obstruction.

Phil

From: Smith, Nigel  
Sent: 31 May 2018 15:11  
To: Karen Hingley  
Cc: Busby, Phil  
Subject: RE: FUL/2018/1300

Thanks Karen,

Phil – is this ok?

Kind regards

Nigel Smith  
Senior Planning Officer  
Development Management  
Coventry City Council  

T: 024 76831246  
Nigel.smith@coventry.gov.uk

Coventry receives 96% of planning applications online  
www.coventry.gov.uk/planning

Our Building Control team is now back in-house and based here at Coventry.  
Phone: 024 7683 2057/2058 or email: buildingcontrol@coventry.gov.uk

From: Karen Hingley  
Sent: 31 May 2018 14:44  
To: Smith, Nigel  
Cc: Louise Steele; Gavin Gallagher  
Subject: FW: FUL/2018/1300

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

Dear Nigel,
RE: Gulson Road, Coventry

Further to your email to Louise, please find the further information requested below. I trust this is sufficient for the consultee however please advise if not, I could not find an email address to copy the consultee into this email.

Our design was based on the Coventry’s guide calculations as per Planning Technical Advice Note: Waste Storage Requirements for New and Change of Use Developments September 2017 and we have provided two bin chambers. The tower and Block A share one bin chamber. Block B has a separate one.

Tower and Block A have a total capacity of 230 bedrooms which results in 16130 ltr per week of refuse generated. Block B has a capacity of 52 bedrooms which results in 3670ltr per week. Coventry’s calculations indicate a 50:50 split ration of recycling to residual waste and the advised collection streams of weekly for residual and fortnightly for recyclable waste results in a volume of refuse to be provided for of 24195 ltr for the larger chamber and 5505 ltrs capacity for the smaller chamber. Annex 1 of the Coventry’ requirements indicates that minimum bin capacity requirements is the total weekly volume x 0.5.

The total requirements of bin size capacity for which we have provided is, therefore: 12098 ltr for Block A/ Tower and 2753 ltr for Block B.

Currently in the proposed layouts we have shown 15 eurobins (1100ltr) in Block A/Tower chamber and 3 bins (1100ltr) in Block B chamber. This results in capacity of 16500ltr and 3300ltr, exceeding the requirements. The split between recycling and residual bins would be determined as required.

The chamber sizes as designed can easily provide up to 18 bins and 4 bins, in case there is a further requirement in the future for increase in capacity.

In terms of bin collection, there will be a management strategy for the wheeling out of the bins to collection point as per the diagram attached.

With kind regards,

Karen Hingley
BSc (Hons) MSc
Graduate Planner

Oriel House
42 North Bar
Banbury
Oxfordshire
OX16 0TH

Tel: 01295 672310  Fax: 01295 275606
Email: karen.hingley@framptons-planning.com
CONSULTATION UNDER TOWN AND COUNTRY PLANNING ACT 1990

Proposal: Demolition of existing buildings and erection of two buildings for a residential development up to a maximum height of 5 storeys and 16 storeys and plant, providing 167 dwellings including retail and/or cafe use (Use Class A1 and/or A3) at ground level, with associated car parking, cycle parking, highways works, landscaping and other associated works.

At: Elliotts Car Accessories Gulson Road Coventry CV1 2JP

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In line with established practice you are requested to respond with your comments, using the pro forma below, within 14 days of the date of this notice.

Please email complete pro forma response to planning@coventry.gov.uk

IN CASE THE MEMBER OF STAFF IS OUT OF THE OFFICE. THANK YOU

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If you require any further information please contact the case officer:

Nigel Smith
Tel: 024 7683 1246
Email: nigel.smith@Coventry.gov.uk
Notwithstanding the submitted Drainage Strategy and Flood Risk Assessment, we have no objection to the proposals in principle however it is recommended that the following conditions are placed on the application.

**Conditions**

i. A scheme for the provision of surface water drainage, incorporating SuDS attenuation techniques for the management of surface water peak and total flows, in accordance with Coventry City Council’s adopted Supplementary Planning Document for ‘Delivering a More Sustainable City’.

ii. A detailed strategy for the long-term maintenance of the SuDS and other surface water drainage systems on site.

iii. In accordance with point i above, the development discharge rate must be managed to a limiting value of 5.0 l/s offsite.

iv. Provisions must be made for the drainage of the site to ensure there are no temporary increases in flood risk, on or off site, during the construction phase.

v. Evidence that receiving water bodies or sewers are capable of accepting the attenuated flows specified by the Lead Local Flood Authority and that this will not exacerbate the flood risk on or off site. This will include capacity calculations and outcomes, not just the correspondence from Severn Trent Water Ltd in isolation, accepting the point discharges. Evidence of existing sub catchments within the site are needed to support the connectivity survey and confirm the acceptability of proposed point discharges to the watercourses and infrastructure sewers. This must be submitted to, and agreed by, the Local Planning Authority and Lead Local Flood Authority.

vi. The development must be considered for the implementation of permeable paving or similar permeable material for the management of total surface water flows, and water filtering in accordance with Coventry City Council’s adopted Supplementary Planning Document for ‘Delivering a More Sustainable City’.
vii. Evidence to show the management of overland flow routes in the event of exceedance or blockage to the drainage system. Details should include demonstration of how new and surrounding buildings will be protected in such an event and how flows will be contained within the site.

viii. Provisions must be made for the drainage of the site to ensure there is no discharge of surface water to the Public Highway.

ix. Where new or redevelopment site levels result in the severance, diversion or the reception of natural land drainage flow, the developer shall maintain existing flow routes (where there are no flood risk or safety implications) or intercept these flows and discharge these by a method approved by the Local Planning Authority.

x. Foul drainage plans.

Reasons

i. To reduce the risk of flooding from surface water runoff, infrastructure sewers, open water bodies and groundwater by ensuring the provision of a satisfactory means of limiting the peak discharge of surface water.

ii. For enforcement purposes to prevent an increased risk of flooding by ensuring good stewardship and the long-term effective surface water drainage, as well as the safeguarding of water quality in line with the Water Framework Directive.

iii. To ensure surface runoff is not increased, and where there is an existing flooding issue, reduce the runoff to manage flood risk. This is in line with national standards for betterment, and existing rights of discharge do not apply.

iv. To prevent an increased risk of flooding by ensuring the provision of a satisfactory means of surface water disposal during the construction phase.

v. Evidence will need to be submitted to ensure that the receiving infrastructure will not be overwhelmed by the discharges from a site, and cause remote flooding as a result of the development.

vi. To reduce the risk of flooding from surface water runoff, infrastructure sewers, open water bodies and groundwater by ensuring the provision of a satisfactory means of limiting total discharge of surface water, with reference to the Building Regulations Part H. Furthermore, to provide for betterment in watercourse quality, in line with the Water Framework Directive.

vii. To ensure that properties and buildings are protected from flooding in exceedance events, and to ensure that existing land drainage is not adversely affected so as to cause flooding.

viii. Local planning authorities should ensure flood risk is not increased elsewhere, in accordance with paragraph 103 of the National Planning Policy Framework. Also, to prevent flooding of the Public Highway from private land.

ix. To ensure the development does not increase flood risk within the site or off site.

x. To ensure an adequate means of foul drainage.

Please email response to planning@coventry.gov.uk
Mr Nigel Smith  
Coventry City Council  
PO Box 15  
Coventry  
CV1 5RR

Direct Dial: 0121 625 6857  
Our ref: P00902090  
5 June 2018

Historic England Advice

The site lies outside the inner ring road, within a short distance of the Grade I listed Whitefriars building just across Gilson Road (placing it in the top 2.5% of listed buildings). The site is currently occupied by low rise buildings comprising a garage which is mainly of two storeys. To the south of the site the area was developed as two storey terraced housing relatively recently. The elevated ring road lies to the north-west, and to the immediate west of the site is the busy London Road.

The scheme involves placing a 16 storey tower on the Gulson Road frontage with smaller blocks behind.

The Grade I listed Whitefriars has already been impacted upon by the elevated ring road, but that provides a barrier between it and the tall buildings (both built and intended) within the ring road. There is a 14 storey building intended to south-west across the London Road. The separation of the development from the Whitefriars by the road system reduces that impact, and they are all at a greater distance than the proposed tower. As indicated above the massing of the existing developments in the immediate vicinity of the Whitefriars is as described above on a small and complementary scale.

The imagery presented in the supporting documents, particularly the sketch view from the London Road approaching Coventry city centre, shows very clearly how the proposed tower will loom over the Whitefriars site and impinge to a serious degree on the its setting to an unacceptable degree.
A smaller scale scheme should be negotiated for the site which could more respectful of the Grade I listed building.

**Recommendation**
Historic England has concerns regarding the application on heritage grounds.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of the NPPF, particularly with respect to the setting of heritage. In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

Nicholas Molyneux
Principal Inspector of Historic Buildings and Areas
E-mail: nicholas.molyneux@HistoricEngland.org.uk
Hi Nigel,

I have highlighted the following planning applications from the weekly list that falls within the PS 1-6 range as advised. Do you think that these applications would be suitable for consideration of an employment clause?

<table>
<thead>
<tr>
<th>Application Reference :-</th>
<th>Brief Description</th>
<th>PS Code</th>
<th>Application Address Details</th>
<th>Case Officer</th>
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<tr>
<td>FUL/2018/1300</td>
<td>Demolition of existing buildings and erection of two buildings for a residential development up to a maximum height of 5 storeys and 16 storeys and plant, providing 167 dwellings including retail and/or cafe use at ground level, with associated car parking, cycle parking, highways works, landscaping and other associated works</td>
<td>1</td>
<td>Elliotts Car Accessories Gulson Road</td>
<td>Nigel Smith</td>
</tr>
<tr>
<td>FUL/2018/1060</td>
<td>Construction of a new station building, providing a second entrance at the western end of the station, including passenger facilities, pedestrian lift access between concourse levels, staff welfare facilities, with associated lighting, landscaping, services and boundary treatment. Construction of; new and temporary roads; and a new 634-space multi-storey car park above and adjacent to the second entrance building.</td>
<td>6</td>
<td>Coventry Railway Station Station Square</td>
<td>Nigel Smith</td>
</tr>
</tbody>
</table>
Thanks

Charlotte Booth
Economic Growth Officer
Economic Development Services
024 7683 3827
Good Morning Nigel

I have been in touch with the CAA again with regards FUL/2018/1300 with regards whether it is shielded and they have confirmed that it is Shielded by the Chimney at BAR road Whitley. Coventry Airport no longer Objects to the FUL/2018/1300. We will however need to be consulted on any cranes planned be used during construction so we can issue the correct notices.

Nigel if you require anything further from me please ask.

Best Regards

Andy

Andy Hixon
Airport Operations & Accountable Manager

D: 00 44 (0) 2476 308622
M: 00 44 (0) 7904639095
E: ahixon@coventryairport.co.uk
Proposal: Demolition of existing buildings and erection of two buildings for a residential development up to a maximum height of 5 storeys and 16 storeys and plant, providing 167 dwellings including retail and/or cafe use (Use Class A1 and/or A3) at ground level, with associated car parking, cycle parking, highways works, landscaping and other associated works.

At: Elliotts Car Accessories Gulson Road Coventry CV1 2JP

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If you require any further information please contact the case officer:

Nigel Smith
Tel: 024 7683 1246
Email: nigel.smith@Coventry.gov.uk
AIR QUALITY

This location is within our Air Quality Management Area declared for NOx so in line with the NPPF p.124 I would recommend the following conditions:

- In order to minimise the impact of the development on local air quality any gas boilers must meet a dry NOx emission rate of <40mg/kWh.
- A method statement detailing the control of emissions to air during the demolition and construction phases should be submitted to and approved in writing by the Local Planning Authority prior to the commencement of works. This should include the recommendations made in the air quality assessment by WSP reference 70036073-007 and should give the proposed hours of works.
- Electric vehicle recharging points shall be provided at the following rate:
  - minimum of 1 per 10 unallocated spaces
  - 1 per property for allocated spaces

Unexploded Ordnance

The recommendations in the detailed UXO report by Alpha Associates reference 70036073-011 should be conditioned.
Contaminated Land

The preliminary assessment by RPS recommends an intrusive investigation. As such I recommend the full 1 to 4 contaminated land conditions be placed on any approval.

Noise

With reference to the updated noise report, I have the following comments:

1. I understand why the two monitoring locations were chosen for the report. However, I have concerns that these will not provide suitable coverage of the site, particularly for receptors on the corner of London Road and Gulson Road where the noise levels are likely to be higher given the impact from both roads at this point. I will therefore require either a noise model to assess the impact at this point or further noise monitoring to be undertaken.
2. I have concerns that the limited amount of noise monitoring undertaken did not fully cover the existing plant (odour extract systems) in the area and also the comings and goings from the commercial units along the London Road during the evenings / night time when the traffic is quieter. I will require additional monitoring of this.
3. The glazing specifications in the report will need to be updated to reflect the findings of the additional assessment requirements outlined in 1 and 2 above.
4. Given the indicative results of noise monitoring, alternative means of ventilation will be required for habitable rooms fronting onto London Road and Gulson Road. I will require further details of this, including the proposed location of the air intake for this system.
5. Given that plant details are not known at this stage, further assessment of this will be required.
6. Given that occupancy details of the proposed commercial units on the ground floor are not known at this stage, further assessment of the party floor separating these units and the residential accommodation on the first floor will be required.

Manager sign off NC

Please email response to planning@coventry.gov.uk
Hi Nigel,

Sorry for the slow reply. The energy statement provided is really detailed and quite positive. The only issue we have is that all the figures given are in relation to a 10% reduction in regulated CO2 emissions rather than the energy demand in kwh/m² so we just need a bit more detail confirming the contribution solar pv would make towards the development’s annual energy demand.

In addition, the statements states contact has been made with Engie with regard to connecting to district heating – have they received a response?

Kind regards,

Sarah Gill
Sustainability Placement Student

Coventry City Council
02476 785 649
www.coventry.gov.uk
Dear Nigel,

In respect of this application the Highway Authority considers that the impacts of the development are not severe, on the basis that it is situated within close proximity to the City Centre with excellent and easy access to numerous public transport links, and therefore has no objections to the current proposal subject to the following requested conditions and S106 contributions:-

1. Prior to occupation of the development the approved cycle storage shall be implemented, retained therein after and kept available for this use at all times.
   
   Reason: In the interests of encouraging the use of alternative modes of transport with the aim of creating a more sustainable city in accordance with Policies AC4 of the Coventry Local Plan 2016.

2. Prior to occupation of the proposed development hereby approved the access and car parking areas shall be provided in accordance with details to be submitted to and approved in writing by the Local Planning Authority and the car parking areas shall not thereafter be used for any other purpose than the parking of vehicles.
3. Before the development hereby authorised is occupied all redundant existing vehicular accesses onto Gulson Road shall be permanently closed and the footway reinstated in accordance with full engineering details submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the safe and free flow of traffic using the adjoining highway.

4. No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to, and approved in writing by the local planning authority. The Statement shall provide for:

i) the parking of vehicles of site operatives and visitors;

ii) loading and unloading of plant and materials;

iii) storage of plant and materials used in constructing the development;

iv) the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;

v) wheel washing facilities;

vi) measures to control the emission of dust and dirt during construction;

vii) a scheme for recycling/disposing of waste resulting from demolition and construction works.

The approved Construction Method Statement shall be adhered to throughout the construction period for the development.

Reason: In the interests of highway safety and the free flow of traffic

S106 Requirements.

The Highway Authority considers the site location currently to have good accessibility in terms of access or provision for pedestrians, cyclists or public transport users. However, the submitted Walking and Cycling Infrastructure Audit by the applicant has highlighted a number of improvements to the existing subway across Junction 4, however CCC does have a proposed junction improvement at this junction. Whilst the proposed measures are welcomed by the Highway Authority it is requested that the monies needed to provide the suggested measures should be provided as a contribution to the proposed scheme through a section 106 agreement. Therefore the requested S106 sum is £25k.

As part of the application the applicant has failed to adequately demonstrate that the parking levels as proposed, which is a reduction in the required parking levels as stipulated by the Local Plan Policy, Appendix 5 will provide adequate on-site car parking to meet its own needs, and that there will be no adverse effect on highway safety and the environment. On this basis and in accordance with paragraph 1.21 of appendix CCC is requesting that a contribution, through a section 106 agreement, to assist in the operational costs related to the existing Residential Parking Zone. The requested S106 sum is £35k.
Required Informatives

* Section 278 Agreement

- Planning consent is not consent to work on the highway. To carry out any permanent off-site works associated with the planning consent you need approval from the Highway Authority. Approval will take the form of a Section 278 Agreement and you should contact the Highway Authority to instigate the process. It is strongly recommended that you make contact at the earliest opportunity to allow time for the process to be completed as you will not be permitted to work on the highway before it is complete. The developer is responsible for all costs. Commuted sums could be required for specialist material or infrastructure for ongoing maintenance where the item in question is above and beyond what is required for the safe and satisfactory functioning of the highway. Please contact Highway Development Management 02476 833515 or hdc@coventry.gov.uk;

The applicant is also reminded that as the developer or their contractors, they are responsible for contacting the Highway Authority – 02476 832062 to ensure all necessary licenses and permissions are in place. It is an offence under Section 148 and Section 151 of the Highways Act 1980 to deposit mud on the public highway and therefore you should take every effort to prevent this occurring.

Kind Regards

Colin Whitehouse
Highways Development Management, One Friargate
Hi Nigel,

Thanks for this. The energy statement provides the detail we look for however, our requirement is for a 10% reduction in anticipated energy consumption in which case the larger solar pv system would be required. Having said that, if connection to district heating is viable then we would accept the smaller pv system in combination with Heatline.

Would it be reasonable to put a condition on – something along the lines of a revised statement once the viability of Heatline has been established?

Kind regards,

Sarah Gill
Sustainability Placement Student

Coventry City Council
02476 785 649
www.coventry.gov.uk
CONSULTATION UNDER TOWN AND COUNTRY PLANNING ACT 1990

Proposal: Demolition of existing buildings and erection of two buildings for a residential development up to a maximum height of 5 storeys and 16 storeys and plant, providing 167 dwellings including retail and/or cafe use (Use Class A1 and/or A3) at ground level, with associated car parking, cycle parking, highways works, landscaping and other associated works.

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If you require any further information please contact the case officer:

Nigel Smith
Tel: 024 7683 1246
Email: nigel.smith@Coventry.gov.uk
Date: 16th July 2018  
Comments from: Conservation/Archaeology  
Re: FUL/2018/1300

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**Comments**

These comments are an addendum to the comments written on 15th June 2018.

Whitefriars monastery sits within a lower density urban environment adjoined by a number of modern buildings, which although generally larger in scale than the Monastery, are smaller in height than the proposed building. In general these have been brought forward in a relatively sensitive manner to, in part at least, reflect the setting of the monastery. Although the elevated section of the ring road compromises the western side of the monastery, the setting remains more open to the immediate south and the north-east allowing a better appreciation of the Monastery as a separate, discrete building in the urban landscape. Although the setting has evolved since the 14th century, these recent developments have helped ensure the setting of the monastery continues to portray the historic, architectural and artistic interest of the building. In short they are not dominant or oppressive in their relationship to the building. This setting therefore continues to make an important contribution to allow the significance of the heritage asset to be appreciated.

I therefore continue to consider this development to be harmful to the setting of the heritage asset, due to its scale and resulting dominance. While this might be categorised as “less than substantial harm”, the NPPF states that this harm should be weighed against the public benefits of the proposal, (including securing its optimum viable use) and that “when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be”. In my opinion, the harm has not been clearly and convincingly justified (as stated in paragraph 132 of the NPPF) and there is no convincing demonstration of how this harm could be minimised.

I welcome the proposal by the applicant to make S106 contributions towards enhancing the built and natural environment around junction 4 of the Ring Road and the Monastery. My understanding is that this takes the form of contributions towards both highway improvements and public realm enhancements and totals approx. £100k. In my view this would be beneficial to enhancing the setting of the Monastery and therefore provide some benefit. It is also my opinion however that any such contributions (towards both highways and public realm improvements) will not, on their own, deliver sufficient public benefits that outweigh the harm in this particular case.

After discussing the proposals further with the applicant I acknowledge that both parties accept that the proposal will have a degree of harm on the Grade 1 listed Whitefriars Monastery. The difference between my view and that of the applicant is the extent of that harm. In my view the harm will be more significant than suggested by the applicant, and there is not clear and convincing justification for this harm.

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**Manager sign off**

MA

Please email response to [planning@coventry.gov.uk](mailto:planning@coventry.gov.uk)
Consultation on Planning Application

From Development Management Date: 16/05/2018
Reference: FUL/2018/1300

CONSULTATION UNDER TOWN AND COUNTRY PLANNING ACT 1990

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Email: nigel.smith@Coventry.gov.uk
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<td>The proposed tower, along with the under construction London Rd scheme - which has three towers – and the Coventry Boys Club scheme with its 18 and 14 storey towers will create a loose cluster around Junction 4 of the ring road which is a major entrance point to the city centre. Junction 4 is a vast space and needs buildings of scale to provide some sort of spatial containment and create a sense of arrival into the city centre.</td>
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From an Urban Design perspective the proposed tower would share a similar visual relationship with the Whitefriars monastery as these two schemes. The proposed tower would sit to the south of the monastery and whilst closer to the historic building than the other two schemes, would be separated by an area of open space (mown grass) a tree belt comprised of mature trees and the Gulson Rd. The London Rd scheme sits further away to the southwest and is separated by the J4 roundabout and the mature trees upon it. The Boys club scheme sits to the northeast and is separated by the ring road and its slip road – which sit hard against the monastery. To the northeast of the monastery sit the Coventry University Library and engineering buildings and so in almost all views of the monastery there is built development and the extremely close proximity of the ring road has, in my view, certainly compromised the setting of the monastery.

In terms of the architectural quality of the tower, it has a tall and elegant sense of proportion and the facades have been designed with robust, sculptural pre-cast panels which create an expressed grid with extensive floor to ceiling glazing set back in deep chamfered reveals. The extensive glazing will ensure that the building retains a lightweight appearance in-spite of the use of the pre-cast panels. The tower also incorporates masonry (which is expressed in different ways across the scheme) and this picks up on the buildings within the area – namely the recently completed Science and Health Building, the University Library and the William Morris building. The masonry will also ensure that there is a robust but visually interesting and tactile quality to the building at pedestrian level. The chosen materials will also ensure that the building does not age or weather in a visually detrimental manner. Therefore given the quality of the proposal the tower has potential to create a strong positive landmark on one of the busiest routes into and out of the city.

The architectural form and the high quality materials run through the wider scheme and will ensure that the scheme overall has a sense of cohesion set within high quality landscaping.

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