

JMW/WMCC1204
31 October 2018

(7 addresses)

(By post or email)

Dear (Mr/Mrs/Ms.....)

CONSULTATION EXERCISE – ROOKERY FARM, WATERY LANE, COVENTRY

**RESPONSE TO PRE-APPLICATION COMMENTS IN RESPECT OF A PROPOSED
OUTLINE PLANNING APPLICATION FOR RESIDENTIAL DEVELOPMENT**

**PROMOTED BY NEWCORE CAPITAL MANAGEMENT (ON BEHALF OF J G GRAY LTD,
GILLITT PROPERTIES LTD AND THE NEWCOMBE ESTATES COMPANY LTD)**

Thank you for taking the time to respond to the recent consultation in connection with the above. Of the 500 leaflets distributed, 7 responses were received. These have been considered by the development project team, and given that a number of similar comments were made, we have decided to prepare a single, comprehensive response to all of the points raised, and send this out to each of you.

Green Belt and Housing Allocation

The application site was taken out of the Green Belt through the Coventry Local Plan process, along with the much larger areas of proposed housing around Tamworth Road/Bennetts Road, and the Jubilee Wood and adjacent land at President Kennedy School. The Local Plan was adopted in December 2017, and these areas are now part of a Sustainable Urban Extension known as the Keresley SUE. We would hope that you were aware that this has been coming forward as a potential major housing-led development for a number of years. Certainly this area was well represented by residents, the Parish Council, politicians and others at the examination hearings in connection with the Plan's former iteration as the Core Strategy in 2009, and again in 2016/2017 as the Local Plan.

The Keresley SUE is therefore now allocated for residential development in the Local Plan. Policy H2:1 expects the delivery of 3,100 homes during the period 2011-2031 within the SUE, together with supporting facilities and infrastructure. These include shops, schools, new link road and other junction improvements, as well as retention and protection of ancient woodlands and hedgerows, and the creation of a publicly accessible green corridor along the Hall Brook. The protection of the Jubilee Wood is also a requirement.

Given that the Rookery Farm site is physically detached from the main housing areas of the SUE (and relates more to the existing urban edge of Keresley, bounded on three sides by existing development) it would be understandable if residents had not realised that this specific site was included in the SUE. Council Planning Officers have advised, however, that residents of Watery Lane (and beyond) had been made aware of the proposed inclusion of this site for some time.

Housing Need

The arguments for the extent of housing needed and its distribution are set out in detail in the Local Plan. The objectively assessed housing need for Coventry is at least 42,000 homes during the period 2011-2031, however the Council has identified that the city only has capacity for a maximum of 25,000 homes. The Local Plan has therefore made provision for a minimum of 24,600 additional dwellings during this period, resulting in the requirement for the remaining 17,400 dwellings to be accommodated within neighbouring authorities in Warwickshire (namely, Nuneaton & Bedworth, Rugby and Warwick).

Whilst it is not the remit of the developer of the Rookery Farm site to explain or defend the Council's position in relation to overall housing numbers, it is relevant to set out the context within which new housing sites are coming forward. Clearly, the planning application for Rookery Farm should be considered on its merits, bearing in mind the use for which the site has been allocated and other material considerations. Its contribution towards the Keresley SUE housing requirement is extremely modest, at approximately 1¼%.

Affordable Housing

The Local Plan requires that 25% of dwellings should be affordable homes (on sites of 25 dwellings or more, or greater than 1 hectare) and this is reflected on the Indicative Masterplan. Whilst the ultimate site layout is likely to be different to the indicative version submitted for illustrative purposes as part of the outline planning application, it will still need to provide for 25% affordable homes. In this post code, the current requirement is that such dwellings should be split into intermediate and social rent, on a 50/50 basis.

Loss of views and Wildlife

Regrettably, views will inevitably change when development takes place on a previously undeveloped site. The view has already changed to some extent, now that the school redevelopment has taken place, including the large 3-storey building that runs parallel to the north-east boundary of the application site. The existing trees and hedgerows that are located around the site boundary help to screen/soften the building, and the vast majority of these will be retained as part of the application proposals. Additional planting will be undertaken around the periphery, to fill gaps, and further landscaping will take place within the site itself. Council officers undertook an assessment of the site before confirming its suitability in principle for housing development (as they did for all Local Plan sites). Furthermore, they did not request that a Landscape & Visual Impact Assessment be carried out as part of the application preparation works. Such assessments would usually only be required in wider areas of landscape quality or conservation areas.

The application site has been subject to an ecological appraisal, and was found to be largely of low ecological value. Nonetheless, the loss of the field will result in some loss of biodiversity, which will require mitigation. New native planting will increase the value, but further off-setting is likely to be required.

Flood Risk and Drainage

The drainage strategy has been designed in accordance with the principles outlined within the national Standards for Sustainable Drainage Systems, in short ensuring that the post-development discharge rates and volumes do not result in an increase in the equivalent greenfield drainage conditions. Furthermore, the City Council's Strategic Flood Risk Assessment states a requirement for discharge rates to be reduced by an additional minimum of 20% upon the existing greenfield conditions. All drainage features proposed are designed not to pass on flood risk elsewhere beyond the development. Any proposed structures, such as attenuation ponds, will incorporate an element of freeboard (additional capacity over the design requirements), ensuring that generated surface water is contained within the development.

Therefore, the proposed drainage strategy provides an improvement on the existing natural drainage regime. As drainage will now be controlled, flooding to Watery Lane will not be exacerbated by the development and in fact will likely result in a reduced contribution to flooding in Watery Lane.

Traffic and Access

It has been calculated that the proposed development will give rise to 27 two-way vehicle movements during the morning peak hour and 30 during the evening peak hour. In traffic generation terms, this is considered to be low and will not have an adverse impact on the surrounding highway network.

Speed surveys have been undertaken on Watery Lane, and the speeds recorded demonstrated that 85% of people were driving at speeds of 32.7 mph or less (south-eastbound) and 33.7 mph or less (north-westbound). Based on the Manual for Streets guidance, this has determined the required horizontal visibilities in each direction from the access into the site, and the access arrangement has been design accordingly.

The Council's Indicative Masterplan for the whole of the SUE shows an arrow to indicate access to the Rookery Farm site in a fairly central location along the site frontage. Initial iterations of the layout of the application site showed the access to be opposite Hall Brook Road. When considered by the project team's highway engineers, however, concerns were raised over potential vehicle conflict. In addition, the creation of an access in that location would result in the loss of a high quality oak tree (the only tree assessed as 'high quality' on the site by the team's arboriculturalist in the Pre-Development Tree Survey undertaken as part of the supporting evidence to the planning application). The alternative location for the access, as now identified on the application drawings, has been subject to a Road Safety Audit and the detailed access drawing has taken the advice of the Safety Audit on board.

In relation to car parking within the site, the housebuilder will be required to comply with the Council's Parking Standards. The Council, as Local Highway Authority, will consider all aspects of road safety, including whether it will be necessary to restrict on-street parking in the vicinity of the site access. In addition, a new footpath will be provided on the south-east side of the site access, culminating in a dropped kerb crossing point across to the existing footway on the opposite side of Watery Lane (where a new dropped kerb crossing point will also be provided).

We understand that the temporary access road to the school will be removed 'soon' but clearly we have no control over this.

Schools

One of the matters raised during the consultation exercise related to the problems of local schools being over-subscribed. The Local Plan requires the provision of a 2 form entry primary school within the SUE, and contributions towards an 8 form entry secondary school. This is aimed at dealing with the educational requirements generated by the SUE; we do not know how the Council is dealing with problems of insufficient school places in existing schools (this would need to be raised with the Council direct, as Local Education Authority).

Construction Impacts

Clearly, it is not possible to guarantee that there will be no impact whatsoever during the construction period. Assessments of potential impacts are routinely undertaken, and submitted as part of planning applications, which include construction effects. The aim is to achieve no adverse impacts (which may include mitigation measures). If planning permission is granted, it is usual for conditions to be attached which may require further detailed information (such as a construction management plan) and compliance with certain restrictions (such a working hours). Many constructors have signed up to the Considerate Constructors Scheme, which aims to improve the image of construction workers and foster better relationships with local communities.

We acknowledge that you have concerns regarding the development proposals in Keresley. Whilst the proposals for Rookery Farm form a very small part of a much larger scheme, it was important to us to consult the local community, and whilst the response level was very low, we appreciate your contributions. We hope you have found this letter informative, in the circumstances.

The planning application will be submitted shortly to Coventry City Council. They will notify properties that they consider may be affected by the proposals, but responses will be accepted from anyone who wishes to comment. If you want to be notified, please contact the Council by email at planning@coventry.gov.uk or by phone on 7683 1109. Once the application has been registered, information relating to the application will be available to view online at <http://planning.coventry.gov.uk/portal> or at Broadgate House, in Broadgate.

Yours sincerely



Julie Warwick

(acting for Newcore Capital Management on behalf of J G Gray Ltd, Gillitt Properties Ltd and The Newcombe Estates Company Ltd)