

# Eastern Green

## Planning Statement

Including Affordable Housing

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Hallam Land Management Limited

# Planning Statement

October 2018

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## **1.0 INTRODUCTION**

- 1.1 This Planning Statement is submitted in support of an outline planning application for the development of a mixed-use sustainable urban extension (SUE) on land at Eastern Green, Coventry on behalf of Hallam Land Management Ltd ('HLM') and The Trustees of the Eastern Green Land Pool Trust (collectively referred to as 'the applicant').
- 1.2 The application proposes up to 2,625 dwellings, in excess of 10ha of strategic employment land, a 10,000 sq.m. Major District Centre, community uses, green infrastructure and sustainable drainage features. The scheme also proposes a new grade separated junction to the A45. A more detailed description of development is included in Chapter 2 of the Environmental Statement (ES), and also in Section 3 of this Planning Statement.
- 1.3 The application is submitted in outline with all matters reserved for future approval, with the exception of the means of access which are submitted in detail.
- 1.4 The application is submitted following the adoption in December 2017 of the Coventry City Local Plan (2011-2031). Within this Plan, the application site is allocated as part of a mixed use SUE having been removed from the Green Belt. The Eastern Green SUE is one of three large-scale SUEs which are of strategic importance to the delivery of the Local Plan as a whole.
- 1.5 The submission of this application aligns with the government's drive to boost the supply of new homes set out within the updated National Planning Policy Framework (July 2018), and emphasised though the Housing White Paper (February 2017). It also accords with the principle of 'plan-led' planning which forms a key component of national planning policy and guidance.
- 1.6 Notwithstanding the Local Plan examination process, and the extensive consultation by Coventry City Council undertaken regarding preparation of the Local Plan and strategic site allocations within it, the application has been assembled following further site specific local public consultation undertaken by the Applicant. The application has also been informed by pre-application discussions with the City Council and other consultees, as well as technical input and evidence on a range of environmental matters. This forms part of the application, including an Environmental Statement (ES), and reference is made to relevant parts of that evidence base in later sections of this Planning Statement.
- 1.7 Through design and mitigation measures as set out in the ES and as identified within the various plans and documents submitted, the application seeks to strike an appropriate balance between the need to provide housing with the need to protect and, where possible, enhance the existing environment. This Statement explains how this is achieved and how the proposals accord with relevant national policies, as well as considering the proposal in the context of the adopted Local Plan.

1.8 This Statement describes the site and its surrounding context, sets out details of the application proposals, identifies relevant planning policy and guidance and goes on to appraise the suitability of the proposals having regard to these policies. It also outlines the main items anticipated as heads of terms for a Section 106 Agreement.

1.4 As referred to above, the Environmental Statement (ES) submitted as part of the planning application provides a technical evidence base which has informed and influenced the proposal. The topics covered by the ES are:

- *Planning Policy*
- *Socio-Economics*
- *Landscape & Visual Resources*
- *Ecological Resources (including Arboriculture)*
- *Water, Hydrology & Drainage*
- *Ground Conditions*
- *Agricultural land quality*
- *Cultural Heritage & Archaeology*
- *Noise*
- *Air Quality*
- *Transport*
- *Cumulative Effects*

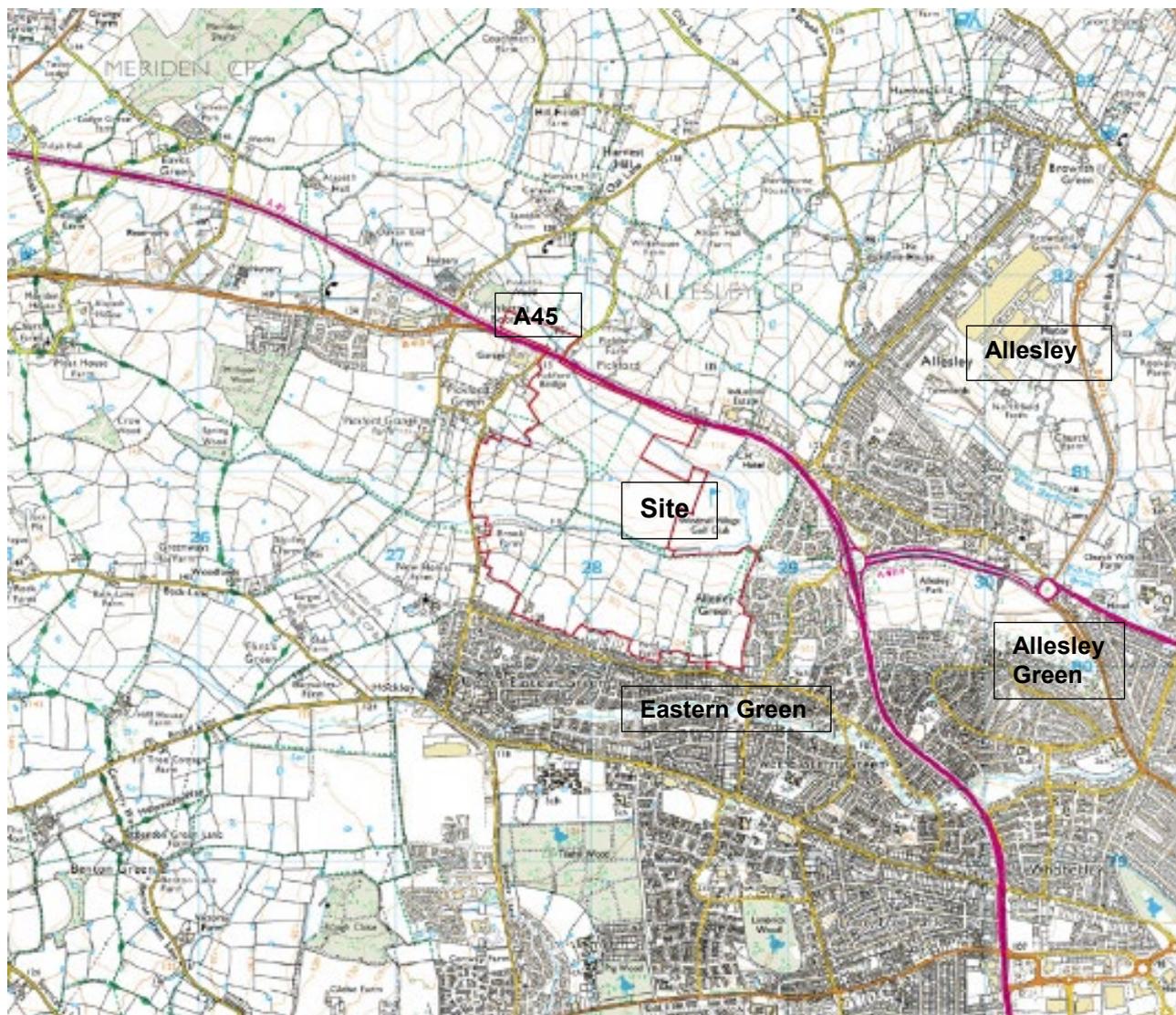
1.5 In addition to the ES, the application is supported by a number of other documents, including the following:

- A Design and Access Statement
- Health Impact Assessment
- Statement of Community Involvement.

## **2.0 THE SITE AND SURROUNDING AREA**

- 2.1 The site is located adjacent to the western edge of the built-up urban area of Coventry City in the West Midlands, and is located within the administrative area of Coventry City Council. The A45 trunk road forms the site's northern boundary, with Pickford Green Lane and existing homes and associated gardens located along parts of the road containing the site to the west. The southern boundary of the site is formed by properties located on Upper Eastern Green Lane, with the neighbourhood of Eastern Green further south and west.
- 2.2 The Allesley Green area of Coventry is located to the immediate east of the site, with the Best Western Plus Windmill Hotel and golf course located to the north-east of the site, between the site boundary and the A45. The golf course site also forms part of the 'Eastern Green' SUE allocation, and is being promoted for redevelopment separately by the landowners.
- 2.3 The application site has an area of approximately 142ha. It is currently largely in agricultural use, but also includes small groups of trees, and numerous hedgerows. The site is largely open, but also includes a small number of agricultural buildings. The north-western corner of the site includes over-head pylons which run diagonally from Pickford Green Lane and over the A45.
- 2.4 The sites topography is gently rolling and includes two distinct, shallow valleys. A combination of landform and existing vegetation means the site is largely visually contained from the surrounding landscape and nearest communities. As described in further detail in later sections of this statement and in the DAS, the proposed masterplan seeks to maximise the value and opportunities associated with this natural topography.
- 2.5 The site includes a number of public rights of way which connect the site and nearby communities to each other, and which form part of the wider network of rights of way.
- 2.6 The site contains existing watercourses – Pickford Brook and Slipperside Brook and associated tributaries – which provide habitat and amenity interest. These features also create a relatively small area of higher flood risk within the site associated with the existing natural drainage regime. This is referred to in further detail later in this Statement, with technical information provided in the ES.
- 2.7 As described above, the surrounding area is largely residential, although there are some commercial and other uses nearby. For example, in addition to the existing hotel and golf course to the north-east, to the immediate west of the site there is a car dealership adjacent to the A45 (and accessible via Pickford Green Lane), and there are employment sites nearby further east along the northern side of the A45.

**Site Location Plan:**



### **3.0 THE PROPOSAL**

#### **Development vision and principles**

- 3.1 The vision is to create a high-quality, green infrastructure led new mixed-use community for Coventry. The planning application seeks to respond positively, and in full, to the requirements of the Coventry City Local Plan (adopted December 2017) which allocates the site for mixed-use development.
- 3.2 The application site will add to the housing and employment 'offer' of Coventry, providing an aspirational new neighbourhood which delivers a range of homes and jobs to meet local needs and which will also strengthen Coventry's role as a key City within the West Midlands.
- 3.3 The development parameters proposed for the site, as well as the Illustrative Masterplan, reflect and incorporate the existing topography and landscape, and are sympathetic to existing natural features, and to nearby residents and communities.
- 3.4 As described in Section 2.0, the site is well defined by existing highways infrastructure to the north and west, with existing roads providing a clear and robust definition to the site. The new community will face towards and be physically and functionally integrated with the existing urban area, and the nearby communities of Eastern Green and Allesley Green through retaining existing rights of way, and creating new walking and cycling links which will connect the site to its surroundings.
- 3.5 Public transport routes will also serve the site, further creating new links and integration between the new and existing communities, aided by the presence of new, high-quality open-spaces, local retail, and education provision on-site.
- 3.6 In brief, the proposals are to deliver:
- Approximately (up to) 2,625 new homes, including up to 25% affordable housing and specific provision for the elderly through 'extra-care' provision (use C2 and/or C3);
  - The provision of a new grade separated junction with the A45;
  - A new employment/business area of approx. 10.25ha for a mix of research and development (B1b), light industrial (B1c)/industrial (B2) and distribution (B8) uses within the site located close to the A45, with new employment also provided created via the local and District Centre.
  - A new two form entry primary school on-site;
  - Publicly accessible green corridors along the Pickford Brook and tributaries with new drainage features provided, as well as green open spaces, play areas, allotments and sports facilities;

- Local and neighbourhood shopping facilities in the local centre on site, as well as a larger District Centre to provide 10,000 sq.m. of retail and other facilities for the wider community.
- 3.7 It is important to note that the application would deliver site-wide infrastructure and key components required by the Local Plan allocation for the Eastern Green allocation as a whole. Specifically, facilities such as the primary school, the District Centre, Local Centre and any health facility, and the package of highway works (including local mitigation measures off-site), are provided to bring forward, and serve, the whole allocation.

### **Description of Development**

- 3.8 The proposals accord with the relevant policies in the adopted Local Plan, including but not limited to the site specific elements of the Plan, such as Policy DS4 (part D) regarding *Masterplan Principles*, Policy JE2 *Provision of Employment Land and Premises*, and Policy H2 (H2:2) *Housing Allocations*. Further explanation of how the proposals accord with local plan policies is provided in Section 5.0 of this Planning Statement.
- 3.9 Following from the key components and vision set out above, and in accordance with the submitted Parameters Plan, the outline planning application for the development of the sustainable urban extension at Eastern Green comprises:

#### Residential

- 3.10 The development will provide a maximum of 2625 dwellings distributed across the site in a range of development blocks as shown on the Parameters Plan. Residential development is proposed on approximately 69ha (gross). The dwellings will range in type, size and tenure and 25% of the dwellings will be provided as 'affordable' properties as required by adopted local planning policy (described in Section 4.0).
- 3.11 The detailed mix of unit sizes is not fixed at this stage, and reserved for future approval, but regard has been had to the Council's desire to see more 'aspirational' family housing. An assumed overall mix incorporating a range of primarily 1-5 bed homes is anticipated, although a mix incorporating only larger (3, 4 and bed) homes is assumed in the TA to ensure the assessment of likely traffic is robust and 'worst-case'. Residential development will not exceed 2.5 storeys close to the local centre, with the majority of the site up to 2 storey (including around the edges of the site).
- 3.12 The proposals include 'extra-care' provision as encouraged by the Local Plan to deliver accommodation to meet the housing and care needs of older people as part of the mixed new community envisaged. The 'Extra-care' provision may be up to 4 storeys, and is proposed close to the District Centre and employment area where higher maximum heights are assumed overall.

### Employment Area

- 3.13 The development will provide in the order of 10.25ha of employment land (B1b research and development, B1c light industry, B2 general industrial, and B8 distribution uses) to be located in the north of the site close to the A45 in accordance with the local plan allocation and policies.
- 3.14 The total floorspace provided on-site remains unconfirmed, as are the number and layout of individual buildings, with details to be agreed in due course, but the Transport Assessment assumes up to 60,000 sq m. as part of a worst-case assumption in traffic terms. Maximum height parameters are assumed and fixed at this stage at a maximum of 23m.
- 3.15 The Business Park, once complete, could accommodate around 1500-2000 jobs<sup>1</sup> depending on the final mix of employment uses. Further job creation would be provided within the school and retail areas proposed (district and local centres).

### District Centre

- 3.16 The development will incorporate a District Centre of up to 10,000 sq.m. positioned close to the employment area, and in the northern part of the site. The district centre could accommodate the following uses to meet on-site but also wider retail needs:
- Retail uses (A1-A5) including a food-store of approx. 5,000sq.m., and 4000 sq.m. of 'bulky retail' space;  
Local retail space of up to 1000 sq.m.
- 3.17 The number and size of buildings is not confirmed, and would form part of reserved matters, with height parameters fixed at this stage at a maximum of 3 storey (16m).

### Primary School

- 3.18 A two-form entry primary school is included as part of the development, as shown on the Parameters Plan and Illustrative Masterplan. This is proposed in a broadly central location within the site, close to the proposed local centre.
- 3.19 The site included is sufficient to incorporate associated outside play areas, including playing fields, the details of which will be agreed with the education authority. Similarly, the mechanism for delivery is also to be agreed through detailed negotiation with the City Council, with the developer expecting to be engaged in either direct delivery of the school, or making a contribution secured via the Section 106 to enable another body to deliver the school.

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<sup>1</sup> Based on standard employment densities and the assumed mix of employment uses as required by Local Plan Policy

#### Local Centre ('Community Hub')

- 3.20 In addition to the District Centre, the Proposed Development includes provision of a smaller Local Centre.
- 3.21 This would contain local convenience retail only, and is proposed within the southern part of the site to enable easy access by new and existing residents, and would be complimentary to the retail facilities provided within the District Centre.
- 3.22 The Local Centre also has the potential to include a new Community Hall or similar to provide an additional community facility which will help provide a focal point for the new and nearby existing community alike. This is a direct response to suggestions and comments made by local people during the pre-application consultation process.
- 3.23 There is also scope to make provision for a new GP surgery on-site, subject to further confirmation of interest and need from the Clinical Commissioning Group for Coventry.

#### Transportation and Access

- 3.24 There will be three points of vehicle access to the site. These will comprise a new grade separated access from the A45, and two secondary points of vehicular access from Pickford Green Lane.
- 3.25 The new access direct to and from the A45 will provide a key gateway to the new employment and district centre which form part of the new community proposed at Eastern Green. This junction has received provisional government grant (Housing Investment Fund) to assist early delivery.
- 3.26 The provision of a direct access with the A45 is important in terms of ensuring that key flows of traffic to and from the City are able to use the appropriate routes, and to help minimise the likelihood of significant 'rat-running' traffic via local routes through largely residential areas. The submitted Transport Assessment (TA) provides an analysis of the likely transport effects, and the key likely effects are also presented in ES Chapter 13.
- 3.27 Although the application site does not represent the full extent of the Local Plan allocation, the transport infrastructure proposed, including the new A45 junction, will enable and accommodate delivery of the full site in due course. This includes off-site highways mitigation measures proposed in the TA, with improvements identified at four local junctions – the TA and Chapter 13 provide further details.

#### *Public Transport*

- 3.28 The new access from the A45 provides opportunities for passing bus services to serve the site. The proposals are for existing services 900 (National Express), 82 and 10 (Diamond

Bus) services to be extended into the site. Dialogue with the operators have suggested that ultimately a 10 minute frequency peak service would be provided in the long-term.

- 3.29 These existing bus services already run close to the site both along Eastern Green Lane to the south and on the A45 to the north of the site. In addition to the likely diversion into the site, focused on the primary highway route within the site, residents of the site will also be able to reach these via the pedestrian links provided to Eastern Green Lane.
- 3.30 The City Council also has aspirations to deliver a ‘rapid transit system’ across the City. At present there are few details about either the route, or about the specifics of the likely technology, but if delivered, this future network could enable high-frequency public transport connectivity from close to, or within, the Eastern Green site to the City Centre, and enable easy access from other parts of Coventry to both the District Centre and employment provided on-site.

#### *Pedestrians and Cyclists*

- 3.31 The layout of the development and highway network will be designed to include cycleway and footway connections to all parts of the development from the local road and footpath network. The pedestrian and cycle network will permeate through the site, providing access to other parts of the site itself and to surrounding areas. This is shown on the Parameters Plan and Illustrative Masterplan, with details to be secured through reserved matters applications in due course.
- 3.32 Existing public rights of way will be retained and enhanced where possible, and the Parameters Plan and illustrative masterplan show how many of these routes can be incorporated within the proposed, extensive, green infrastructure and open space on-site.
- 3.33 Additional points of pedestrian and cycle access will also be provided via a connection to Eastern Green Lane in the south, and to Woodbridge Road via an area of existing open space to the east. The new junction with the A45 will also enable pedestrian and cycle access over the dual carriageway.
- 3.34 A new footway is proposed along the eastern side of Pickford Green Lane as part of the improvements to local accessibility for pedestrians.

#### Green Infrastructure

- 3.35 The development will provide strategic green infrastructure in accordance with the Parameters Plan, and as illustrated on the submitted Illustrative Masterplan. This will comprise:
- Generous landscaped buffers to the site perimeter to retain a green edge to the site for existing residents.

- Retained and proposed trees and native woodland.
- Wetland grassland and tussock mixture to ephemeral or permanent wetland areas.
- Open grassland and recreational areas
- Paved footpaths/cycle paths along green links within or adjacent to development plots.
- Paved footpaths/cycle paths within parkland areas, planted with species rich meadow grassland.

3.36 In addition to the strategic green infrastructure the development will incorporate green corridors through the development, informal open space and formal (equipped) play areas in accordance with the adopted standards and requirements of the City Council.

#### Sustainable Drainage Features

3.37 The proposed development includes a comprehensive sustainable drainage strategy which utilises storage throughout the site to attenuate surface water run-off flows to greenfield rates.

3.38 A series of balancing ponds as well as upstream swales will provide at least a two stage treatment train before discharge to the Pickford Brook.

3.39 As described in further detail in the *Water, Hydrology and Drainage* chapter (Chapter 7) of the Environmental Statement, the strategy proposed will deliver betterment as compared to the existing baseline conditions, with reduced risk of surface water flooding on-site and downstream of the site as a result of the proposed regime of water storage and managed release of water into the drainage network.

#### **Phasing and delivery**

3.40 The site will make a significant contribution to the delivery of housing in Coventry City across the plan period, delivering in the relatively short-term as well as meeting housing needs over the longer-term.

3.41 The planning application includes indicative information about phasing and delivery of the site. The detailed timing and phasing of delivery will be informed by the strategies of the developers which are not known at this stage, but the Applicant's expectation is that distinct parts or phases of the site will be taken forward by individual housebuilders and other developers. The scale of the scheme will enable multiple housebuilders, and it is anticipated that there could be three or four house builders involved simultaneously in delivery of the site.

3.42 The proposal is for work to begin on delivering the A45 access in tandem with ground works and site preparation to enable the earliest phases of residential development on-site which is expected to begin in advance of the new A45 junction being complete. The Applicant expects to deliver the key site infrastructure – including key accesses and primary road routes, as well

as the site drainage infrastructure – with parcels of development land sold to developers. The intention is for the first dwellings to be delivered in the western part of the site with access via Pickford Green Lane.

- 3.43 The Local Plan refers to a limit of the occupation of 250 dwellings before the new A45 access is operational, unless a different trigger for completion of the road is agreed with the City Council.
- 3.44 Following a successful bid for national infrastructure (Housing Infrastructure Fund, 'HIF') funding, there is an opportunity to deliver the A45 grade separated junction earlier than would have been possible if it were to be funded solely through the development process. The application documents assume delivery of the junction will form part of early phases, with completion indicatively in 2020/2021.
- 3.45 Each house builder is likely to complete around 40-50 dwellings per year depending on the specific market conditions. Therefore based on an outline planning permission granted in 2019, and allowing a further year for detailed consents and start on site, the first dwellings are likely to be completed during the second half of 2021.
- 3.46 In the 5 year period from outline planning permission being granted and based on an average completion rate of 150 - 200 dwellings per year, and allowing for the delay between outline consent and reserved matters approval, the Eastern Green site could deliver in the order of 450 - 600 dwellings, making a very significant contribution to meeting the short-term housing needs of the area.
- 3.47 The Section 106 agreement will include triggers and 'backstops' for delivery of key site-wide infrastructure, including the primary school. Some of these triggers are expected to reflect the content of the adopted Local Plan, others subject to negotiation between the applicant and the City Council.

### **Planning Obligations – anticipated S106 Heads of Terms**

- 3.48 It is anticipated that the application will be subject to a Section 106 Legal Agreement. The draft Heads of Terms are submitted separately as part of the application, and expected to include the following:
- Affordable housing provision;
  - Delivery of highway works;
  - Travel Plan, and public transport provision;
  - Provision of a two form entry primary school;
  - Community open space & Green Infrastructure provision, including maintenance/management;
  - Community Hall, and potential Health Care provision;
  - Local Employment and Training initiatives (construction).

## 4.0 RELEVANT PLANNING POLICY AND GUIDANCE

### National Policy

4.1 The National Planning Policy Framework (NPPF) was published in July 2018 and updated the NPPF of March 2012. It states at paragraph 7 that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 explains that there are three objectives associated with sustainable development; economic, social and environmental. These three objectives are ‘interdependent’ and to be pursued in an integrated way.

4.2 The NPPF introduces the presumption in favour of sustainable development. Paragraph 10 states that this is “*at the heart of the Framework*”. For decision taking paragraph 11 explains that this means approving proposals, without delay, that accord with the Development Plan. Where the Development Plan is absent, silent or where relevant policies are out of date, permission should be granted unless

*“adverse impact would significantly and demonstrably outweigh the benefits” or*

*“the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed”*

4.3 Paragraph 59 states that Government’s objective is to “*boost significantly the supply of housing*” by identifying and allocating sufficient land to meet a range of housing needs of different groups (Para 61). Additional buffers are applied where there is a record of persistent under-delivery.

4.4 In the context of policy guidance relating to ‘decision-taking’, paragraph 38 of the NPPF reinforces the Government’s desire for the presumption in favour of development to be applied positively. It states that:

*“local planning authorities should approach decision-taking in a positive and creative way”* and

*“decision-makers at every level should seek to approve applications for sustainable development where possible”.*

4.5 The NPPF is structured around a series of numbered thematic sections which provide policy on a range of planning and land-use related issues. The following paragraphs of this chapter provide a summary of the contents of the NPPF in each of the key sections of relevance to the Project.

4.6 In **Section 5** (*‘Delivering a sufficient supply of homes’*) the NPPF is clear about the important role the planning system plays in ensuring an appropriate supply of new homes,

and this is an area of policy which receives significant emphasis. A specific objective of Government policy is to “*boost significantly*” the supply of housing (stated at paragraph 59).

4.7 The objective assessment of housing need is a key component of this approach and the NPPF introduced a standard methodology.

4.8 The NPPF requires delivery of a wide choice of high quality homes, including planning for the needs of different groups in the community, including families and older people (paragraph 61).

4.9 The potential role of large-scale development including “*extensions to towns*” to deliver large number of new homes as well as “*necessary infrastructure and facilities*” (para 72).

4.10 **Section 6** of the NPPF (***Building a strong, competitive economy***) includes the statement that “*significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development*” (NPPF, para 80). Local planning policies are required to:

- *Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth;*
- *Set criteria, or identify strategic sites, for local and inward investment;*
- *Seek to address potential barriers to investment, such as inadequate infrastructure, services, or housing;*
- *Be flexible enough to accommodate needs not anticipated in the plan.*

4.11 It is explicit that a lack or shortage of housing can represent a ‘barrier’ to investment in the economy, and is something which should be addressed through planning policies.

4.12 **Section 8** promotes ***healthy and safe communities*** including development which:

- *provides opportunities for places for people to meet;*
- *create safe and accessible environments, including high quality public spaces which encourage the active and continual use of public areas;*
- *Enable and support healthy lifestyle, through green – and encouraging walking and cycling.*

4.13 The ‘health’ agenda cuts across a range of issues, and the NPPF refers to a number of other policy themes, with relevant planning issues including the use of mixed use developments to help enable and encourage walking and cycling, but also the provision of infrastructure and other facilities to support use of these modes.

- 4.14 Similarly, the broader ‘design’ agenda is of direct relevance with regard to the ease of access to green infrastructure and open spaces for recreation and associated activities. Also, access to high quality open places and homes or other buildings has a direct relationship to the wider health agenda.
- 4.15 Paragraph 94 also refers to the importance of sufficient school places as part of this “*healthy and safe*” theme of national policy.
- 4.16 **Section 9** of the NPPF (*‘Promoting sustainable transport’*) encourages patterns of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. It requires decisions to take account of:
- *the opportunity for sustainable transport modes;*
  - *the need for a safe and suitable access;*
  - *improvements to the transport networks that cost effectively limit significant impacts. Development should only be prevented or refused on transport grounds where the residual impacts of development are severe.*
- 4.17 **Section 12** of the NPPF sets out the Government’s approach to **achieving well-designed places**. It states that the Government attaches great importance to the design of the built environment and that good design is a key aspect of sustainable development. It states that planning decisions should aim to ensure developments:
- *function well and add to the quality of the area;*
  - *are visually attractive;*
  - *sympathetic to local character while not preventing appropriate innovation;*
  - *establish a strong sense of place;*
  - *optimise the potential of the site and create an appropriate amount and mix of development;*
  - *create safe and accessible environments;*
- 4.18 The NPPF emphasises tailoring policy and - to local - to provide a forecast for “*creating distinctive places, with a consistent and high quality standard of design*” (para 126)
- 4.19 Design proposals which have been prepared and evolved with regard to input from the community are encouraged and the NPPF said should be “*looked on more favourably*” (paragraph 128).
- 4.20 **Section 13** of the NPPF sets out the Government’s policies on the **Green Belt**. It explains that the Government attach great importance to Green Belts and that their essential characteristics are their openness and their permanence.

- 4.21 Although their ‘permanence’ is defined as one of the essential characteristics of Green Belts, the NPPF policy is clear on the importance of the Local Plan preparation or review process as the appropriate route for undertaking reviews of Green Belt boundaries. Although alterations are not expected to be frequent, the NPPF identifies the role of making changes to Green Belts as part of the need to promote sustainable patterns of development and identifying defensible boundaries which will endure beyond the end of the plan period.
- 4.22 While most forms of built and other development are considered inappropriate in Green Belts, there are some exceptions. Paragraph 146 of the NPPF states:
- “Certain other forms of development are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it. These are:*
- *Local transport infrastructure which can demonstrate a requirement for a Green Belt location;”*
- 4.23 This component of national Green Belt policy is of direct relevance to the Project given the Council’s proposal that part of the new access infrastructure to provide a junction and link to the A45 is located north of the A45 in land which would remain in the Green Belt.
- 4.24 Policies dealing with ‘**Climate change, flooding and coastal change**’ are set out in **Section 14**. This includes: an emphasis on the role of ‘planning’ in supporting the transition to a “*low carbon future*” (para 148). The NPPF requires new development to deliver key components of the broader environmental component of sustainable development with regard to a range of energy, and resource efficiency agendas.
- 4.25 This climate change and resource efficiency agenda has direct links to other aspects of NPPF policy, including with regard to the importance of good quality design and layout which enable walking and cycling, as well as the provision of a mix of uses as part of major development to limit the need to travel. The NPPF refers to many detailed planning and design related issues, including supporting use of energy efficient design and materials.
- 4.26 Development is also directed away from areas at high risk of flooding, with new planned development to help improve resilience and reduce vulnerability as a result of climate change, including with regard to flood-risk. Opportunities should be taken to reduce the causes and impacts of flooding where possible (paragraph 157).
- 4.27 **Section 15** includes policies which seek to **conserve and enhance the natural environment** by:
- *protecting and enhancing valued landscapes, geology and soil;*
  - *recognising the intrinsic character and beauty of the countryside and the wider benefits of eco systems services;*
  - *minimising the impact on biodiversity and providing biodiversity net ensuring development is not at unacceptable risk from pollution (soil, air, water or noise) pollution or land instability.*

- 4.28 The need to take into account noise, air quality, and lighting is set out briefly in paragraphs 180-181 with an emphasis on minimising effects. These issues clearly have a direct relationship with design and layout, and are often key issues with regard to reserved matters as opposed to outline applications. The ES contains chapters regarding *Air Quality*, and *Noise*. Lighting is referred to in the context of the *Landscape & Visual Impacts* chapter, and in the DAS, with a detailed lighting strategy to be prepared as part of detailed design and layout.
- 4.29 Guidance regarding air quality refers to complying with EU or national objectives for pollutants, taking into account the presence of any Air Quality Management Areas, with an emphasis on mitigating impacts through measures such as “*traffic and travel management, and green infrastructure provision and enhancement*” (paragraph 181)..
- 4.30 **Section 16** of the NPPF provides policy with regard to ‘**Conserving and Enhancing the Historic Environment**’, and refers to the need for the submission by Applicants of appropriate desk-based assessments, and potentially other information, in support of applications on sites which are of potential archaeological interest (paragraph 189). This also requires consideration of the potential for effects on heritage assets or features off-site, or their ‘setting’.
- 4.31 The extent and nature of the evidence required is directly related to the likely importance of the assets affected, and the likely impact upon those assets, with much of the emphasis on the importance of designated assets. Chapter 11 of this ES considers in more detail the relevant issues relating to heritage and historic environment issues.

#### **Adopted Coventry City Local Plan Policies – Local Plan, December 2017**

- 4.32 This section provides an overview of the Coventry City Local Plan which allocated a Sustainable Urban Extension (SUE) at Eastern Green, and on adoption of the Plan in December 2017 removed the allocation site from the Green Belt.
- 4.33 The application site includes the majority, but not the entire Local Plan allocation site. The existing golf course site is excluded from the application, and is being promoted by separate landowners. A separate planning application is expected, and would need to have regard to the same policies as this application by HLM. It is understood that the golf course would be accessed from the same new primary access infrastructure as the application site, with the new grade separated access with the A45 serving the whole SUE. This will help to ensure an integrated approach to site access across the two parts of the allocated site. With both applications ensuring that the requirements of the Local Plan policies are delivered, there will be an appropriate level of consistency in the masterplanning of the SUE as a whole.
- 4.34 The Plan includes a number of policies of direct relevance to this planning application and to the SUE as a whole, and these are described below. The text and content of Policy DS4 provides an overview of the design and masterplanning requirements for the Eastern Green

SUE as a whole. The other key policy of relevance is Policy H2 which defines the development envisaged, and sets a number of key requirements of the Eastern Green SUE.

- 4.35 This policy includes cross-reference to a number of other policies which provide further detail about a number of key elements of the allocation. The Local Plan is based around a housing delivery approach underpinned by a Memorandum of Understanding with neighbouring authorities which are delivering some of Coventry's unmet housing needs. The City has identified a need for at least 42,400 homes between 2011 and 2031, but has a capacity to deliver 24,600 homes within the City's administrative area. The remainder is to be met outside of the City. The Eastern Green SUE allocation is one of several strategic allocations included within the Plan to deliver housing growth within the City.
- 4.36 Policy H2 requires the SUE to provide:
- *2250 new dwellings (minimum);*
  - *15ha of employment land*
  - *A major district centre*
  - *A 2 form-entry Primary School*
  - *A new grade-separated junction with the A45 as the primary site access*
  - *Open Space and Green Infrastructure along the Pickford Brook corridor*
  - *Retention of medieval moat at Pond Farm on the site and of important hedgerows*
  - *Screening and buffering to protect the transition to the wider Green Belt to the west.*
- 4.37 Jobs and Economy **Policy JE2** provides more detail about the employment space required by the City Council at the Eastern Green allocation site as a whole. It confirms the 15ha allocation of B1b (research and development) & B1c (light industrial), B2 industrial, and B8 warehousing and distribution employment land. The text in support of the policy refers to the site's relative proximity to the 'UK Central' initiative associated with the HS2 rail link proposed at Solihull.
- 4.38 Other policies of the Local Plan make it clear that office development is considered to be centred on the city centre, and is not envisaged as being located elsewhere at any scale at other locations in the City's administrative area.
- 4.39 **Policy R1** requires retail space in the form of a 'Major District Centre' at the Eastern Green SUE. Up to 10,000 sq.m. gross is allocated to the SUE, with up to 5000 sq.m. specified for a "superstore" (understood to refer to a food retail supermarket), 4000 sq.m. of predominantly "bulky goods" retail, and up to 1000 sq.m. small scale local retail provision.
- 4.40 The requirement of Policy R4 *Out of Centre Proposals* is understood not to apply given the Local Plan allocation for additional retail at the SUE as part of ensuring a sustainable, and mixed-use new community, with the provision planned as being complimentary to the city centre offer.

- 4.41 **Policy DS4 General Masterplanning Principles** relates to all major developments, and provides generic policy content regarding issues such as:
- Having regard to the phasing of infrastructure;
  - Having regard to comprehensive planning and adjoining land parcels;
  - Delivering higher density residential and mixed use developments on public transport corridors;
  - Responding to market and commercial needs and opportunities;
  - Locating social and community facilities within mixed-use hubs or centres, easily accessible by a range of modes of transport;
  - Respond to local context and characteristics to create well designed new developments;
  - Sympathetic integration of existing landscape, biodiversity, and historic features into the development, taking opportunities to protect and enhance;
  - Integrated, multi-functional green and blue infrastructure, providing routes and spaces for people and recreation;
  - Masterplans should be informed by consultation with local communities.
- 4.42 As referred to above, **Policy DS4 (Part D)** provides guidance regarding the design and phasing of the masterplan and access infrastructure at Eastern Green. This policy is consistent with the general design policies of the Local Plan, but also provides some site specific design principles intended to guide the preparation of site masterplans. Part D of Policy DS4 therefore provides a context and a framework for the two distinct parcels of the SUE allocation – the HLM Eastern Green (application) site, and the golf course – to come forward separately, but in a consistent and aligned manner.
- 4.43 Specific elements of Policy DS4 (Part D) to note include a need to have regard to:
- ii. *Responding to the transport and economic opportunities associated with the planned HS2 interchange to the west;*
  - iii. *Ensure that the employment provisions and Major District Centre are located towards the north of the site and accessed from the A45;*
  - iv. *Occupation of no more than 250 homes until the A45 junction is fully operational, unless otherwise agreed in writing in response to a robust TA;*
  - v. *Ensure new defensible boundaries to the Green Belt to the west and the north;*
  - vi. *Provide appropriate green infrastructure along the western edge to blend and integrate with the wider countryside;*
  - vii. *Establish a comprehensive green and blue infrastructure corridor focused along the Pickford Brook and its tributary, from Pickford Green Lane in the west linking to existing corridors off-site (e.g. Westridge Ave, and Parkhill Drive);*
  - viii. *Identify clear access points and make appropriate provisions for new transport infrastructure;*
  - ix. *Manage existing highways junctions at Pickford Green Lane and Brick Hill Lane with the A45 to ensure they are either integrated into the new junction or safely retained within the highway network;*

- x. *Make appropriate provision to aid future integration of the new rapid transit route once the final route is known.*
- 4.44 **Policy DE1** *Ensuring High Quality Design* provides more general policy on design overall, with some common themes to those provided by Policy DS4.
- 4.45 Several other policies are also of relevance, including regarding **Policy HW1** which requires Health Impact Assessments (HIA) for all major development proposals, in order to demonstrate that they would have an acceptable impact on health and wellbeing.
- 4.46 **Policy H4** *Securing a mix of housing* requires new development to contribute towards a balance of house types and sizes across the City as a whole. A mix of market housing types and sizes is required from new developments, based around evidence from the Strategic Housing Market Assessment. Similarly, **Policy H6** *Affordable Housing* also refers to the importance of a mix of housing, and major sites are required to deliver up to 25% of housing as affordable homes. The mix of types (tenures) of affordable homes varies across the City, with 'low concentration' areas, such as the application site, required to make provision for 15% Social/Affordable Rent homes, and 10% Intermediate housing provision. The detail of provision is also to be informed by viability assessments where an alternative or lower level is proposed. Affordable units are to be integrated across sites.
- 4.47 The supporting text of **Policy H8** refers to the Council's desire to see 'Extra Care Housing' on strategic sites, and explicitly "*encourages*" provision of such development within the Eastern Green urban extension. The Local Plan suggests such uses are best located close to local or district centres with convenient access to local facilities.
- 4.48 Although in part a design issue, **Policy H9** provides policy regarding *Residential Density*. This refers to sites outside of the ring road (A4053) being required to deliver a minimum of 35 dwellings per hectare (net), with greenfield sites expected to achieve a minimum of 30 dwellings per hectare. The application site clearly fits within both of these categories – design and density issues are referred to in Section 5 of this Statement, and in the Design & Access Statement.
- 4.49 **Policy GE1** *Green Infrastructure*, and **GE2** *Green Space* relate to other policy issues regarding design, sustainability, accessibility, and health. They require a comprehensive approach to the design and provision of new or retained green infrastructure and open spaces within development sites, with references to the landscape, biodiversity, heritage and recreational benefits of good quality green (and 'blue') spaces. The policy refers to the need for a network of formal and informal green infrastructure across the City, integrating new and existing communities and natural or countryside areas, including as part of sustainable transport strategies. This includes formal sport and recreational provision.
- 4.50 The policies refer to the importance of effective management of spaces or features.
- 4.51 Related in part to the above, **Policy GE3**, and **GE4** refer to biodiversity, geological, landscape and archaeological conservation, including tree protection. This requires development to avoid negative impacts on biodiversity and other features of interest, with mitigation and design measures taken to minimise or off-set any residual adverse effects.

- 4.52 **Policy HE2 Conservation and Heritage Assets** requires development to consider the relationship with existing heritage assets or features, including Conservation Areas and Listed Buildings. With regard to unregistered and non-designated features affected by development proposals, appropriate recording and documentation of the significance of any such features is required prior to development.
- 4.53 Accessibility policies are contained in Section 10 of the Local Plan. The policy content cross-refers to many issues found in other sections of the Local Plan, including design, health, and air quality. Key policies include **Policy AC1 Accessible Transport Network** which requires developments to integrate with existing transport networks across all modes, consider the transport and access needs of all residents and visitors, and support the delivery of new and improved high-quality local transport networks.
- 4.54 The Local Plan describes some of the strategic evidence base and assessment work undertaken in preparing the Local Plan, including the modelling undertaken using the City's strategic transport model CASM.
- 4.55 **Policy AC2 Road Network** requires developments to mitigate and manage traffic growth, ensuring no unacceptable impacts on congestion safety, or air quality. This includes an emphasis on 'demand management' (**Policy AC3**) with provision and encouragement of sustainable transport modes, and a requirement to produce Travel Plans. Highway capacity improvements are to be informed by Transport Assessments. **Policy AC4** seeks to encourage and enable *Walking and Cycling*, with reference to the environmental and health advantages and benefits. Infrastructure and connectivity is required to be designed into new schemes.
- 4.56 **Policy AC5 Bus and Rapid Transit** refers to the City Council's aspirations for a new rapid transit network to enable and support growth across the City. In the more immediate term, the emphasis is on development proposals providing safe and convenient access to existing bus networks, with bus infrastructure and services integrated into sites sometimes required to ensure suitable connectivity and accessibility.
- 4.57 A *Coventry Connected* SPD is expected on the transport and accessibility agenda, with a draft emerging at the time of writing (October 2018).
- 4.58 Section 11 of the Local Plan refers to 'environmental management' issues, including a focus on climate change. Through various policies the Local Plan this addresses issues associated with resilience through planning and design (**Policy EM1**) and requiring development to meet relevant building standards as a minimum with a view to maximising resource efficiency and recycling, and minimising waste. The Local Plan also contains more specific policies regarding renewable energy generation (**Policy EM3**) and flood-risk management (**Policy EM4**). Policy EM4 requires major developments to be assessed in respect of flood risk from all sources, and to take all opportunities to reduce flood risk in the surrounding area, including through creating additional flood or water storage capacity. A Flood Risk Assessment is required where the development is within 20 metres of a watercourse, or in an area where there may be surface water or other drainage issues. **Policy EM5** encourages use of Sustainable Drainage Systems (SuDS).

- 4.59 **Policy EM7** refers to *Air Quality*, with reference to the importance of assessing the likely effects of major developments on air quality, and the promotion of low emission vehicles as well as walking, cycling and public transport.
- 4.60 *Waste Management* issues are included within **Policy EM8**, including with reference to minimising construction waste, and planning for the storage and collection of waste through design and layouts.
- 4.61 Section 13 of the Local Plan relates to infrastructure delivery, implementation and monitoring. This includes a requirement for development to provide or contribute towards provision of infrastructure or mitigation measures to minimise impacts, and meet the needs of the development. Delivery or contributions could relate to on- and off-site actions to ensure that developments are acceptable, with reference to developer obligations, or Community Infrastructure Levy (CIL). A CIL has not yet been introduced in Coventry, but an Infrastructure Delivery Plan does form part of the Local Plan.

## **5.0 APPRAISAL OF THE APPLICATION**

- 5.1. In assessing the application proposals regard has been had to section 38(6) of the Planning & Compulsory Purchase Act 2004 which requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF is also clear about the importance of a 'genuinely plan-led' planning system.
- 5.2. The adopted development plan (the Coventry City Local Plan) allocates the application site for development, and creates a clear framework and context for the planning application.
- 5.3. Therefore, this section of the Planning Statement sets out how the application will deliver and accord with the requirements and policies of the Local Plan for development of this site as part of the Eastern Green SUE. This includes reference to headings of the NPPF to enable more direct comparison with national policy.
- 5.4. As a context for this appraisal, in summary the Local Plan allocates the site for the following uses, and sets the following requirements of development:
- *A minimum of 2250 new dwellings;*
  - *15ha of employment land;*
  - *A major district centre and local retail provision;*
  - *A 2 form-entry Primary School;*
  - *A new grade-separated junction with the A45 as the primary site access;*
  - *Open Space and Green Infrastructure along the Pickford Brook corridor;*
  - *Retention of medieval moat at Pond Farm on the site and of important hedgerows;*
  - *Screening and buffering to protect the transition to the wider Green Belt to the west.*
- 5.5. As set out below, the application, which relates to most but not all of the Eastern Green allocation site, will make a direct and significant contribution to delivering these and other Local Plan policy requirements, and will enable delivery of the wider allocation as a whole.

### **Housing**

- 5.6. The NPPF requires local authorities to 'boost significantly the supply of housing' and to maintain a supply of deliverable housing sites to meet objectively assessed housing needs.

- 5.7. The adopted Coventry Local Plan of December 2017 was informed by an up to date evidence base regarding housing need, and the Plan allocates a number of strategic sites to ensure an appropriate supply of housing over the plan period within the City. This forms part of a wider strategy based around cooperation with surrounding local authorities, as referred to in Section 4 of this Planning Statement. This Local Plan is clearly up to date and relevant. The principle of residential led mixed-use development on this site is established by the Local Plan.
- 5.8. The Eastern Green SUE allocation includes a requirement to deliver a minimum of 2250 homes. The outline planning application is for up to 2625 homes. This proposal follows an infrastructure (transport) and design led approach to the site, including with regard to relevant design and other policies of the Local Plan, including with reference to densities (referred to below). The site is sufficiently large that it can accommodate in excess of the minimum 2250 dwellings for the allocation as a whole while delivering an attractive scheme which provides the mix and quantum of development required by the policies, as well as a green infrastructure led masterplan which incorporates the Pickford Brook corridor and retention of the vast majority of existing hedges and trees.
- 5.9. The application is in outline, but as submitted assumes a mix of housing to respond to local market needs as well as a proportion of affordable housing (up to 25%) in accordance with the Local Plan. This forms an additional area of benefit delivered by the scheme alongside wider investment in the local highways infrastructure, and local education provision, with further dialogue expected with the local authority in the context of a S106 agreement.
- 5.10. The higher maximum housing provision figure for the site has also formed the basis of the Environmental Statement, and the likely impacts on a range of environmental receptors and features considered. The Parameters identified, and the Illustrative Masterplan, have had regard to the relevant parts of Policy DS4 regarding the key masterplanning principles.
- 5.11. The application does not seek to deliver the Local Plan allocation in full – it relates to all of the land under the control of the applicant, but excludes land being promoted by a third party. However, the likely development of that remaining parcel of land has been considered through the assessment of likely cumulative effects in the ES, with worst case assumptions made about the likely residential capacity of that site. The site road infrastructure as shown on the Parameters Plan, and on the Illustrative Masterplan, makes provision for future direct connections into that 3<sup>rd</sup> party land, enabling an integrated and coherent approach to development of the site as a whole in due course. The Transport Assessment and consideration of transport and traffic effects assumes the full allocation site is developed, with appropriate mitigation measures proposed.
- 5.12. Given that the Local Plan explicitly encourages the employment uses to be located to the north of the site, close to the A45, the application seeks to deliver 10 hectares of the allocated 15 hectares of employment land. The remaining 5ha can be delivered close to the A45, with

good access to the new junction with the A45, on the adjoining land. This is discussed in further detail below with regard to economic development and employment issues.

- 5.13. The application therefore accords in full with the Local Plan. It would deliver a high-quality mixed use housing led development, ensuring that the minimum levels of housing development required by Policy H2 are delivered, and enabling an integrated, comprehensive approach to the development of the site as a whole.

### **Promoting Sustainable Travel**

- 5.14. The application site is in a sustainable location on the western edge of the urban area of Coventry. The site already contains a number of rights of way which will be retained largely on their existing alignments, with some diversions required to accommodate development and the efficient use of land on the site. These rights of way form a key component of the masterplan and accessibility strategy with opportunities taken to maintain the existing physical connections between the site and surrounding areas, as well as provision of new links. These will enable walking and cycling to and from the site, enabling existing residents to access the on-site facilities, as well as enabling new residents to reach existing facilities and destinations within Eastern Green and Allesley Green, and the countryside beyond the site.
- 5.15. The approach to the site access arrangements, together with the design framework for the site, also provides a suitable and sustainable approach to vehicular access. The proposals would deliver a new grade separated junction with the A45 as the primary access to the site, and this along with the secondary access points with Pickford Green Lane to the west would also enable bus access, as well as cycling and car access to the existing highway network. Dialogue with bus operators has indicated a willingness to direct services into the site, with buses already serving Eastern Green Lane to the south of the site, as well as the A45 to the north.
- 5.16. Housing Infrastructure Funding has been secured by the City Council and Applicant to enable earlier delivery of the junction than would be possible if funded solely from development receipts. This therefore further increases the likelihood of being able to take an infrastructure led approach to the development of the site, and helps address potential short-term local transport issues.
- 5.17. The mixed use nature of the site also enables access via sustainable modes of travel to the new employment, education, retail, and other community facilities proposed on-site. The on-site facilities will all be connected via pedestrian and cycle links and will reduce the need to travel off site, helping to create a sustainable and vibrant new community.
- 5.18. The Transport Assessment submitted in support of this application concludes that beyond the immediate area of the site the transport effect of the proposal will not be significant or severe.

Traffic resulting from the completed site will be mitigated by the proposed Highway and Public Transport improvements, which would be funded and implemented as part of the delivery of development on the site. This includes proposed highways improvements at four local junctions in response to the anticipated increases in traffic.

- 5.19. The application therefore accords with the requirements of the Local Plan policies, as well as Section 4 of the NPPF. The site would be integrated into the existing highways network with opportunities to connect into the public transport networks. The site is sufficiently large that there also remains potential for future integration with the aspirational rapid transit network being explored for Coventry City as and when route and other details are available.

### **Building a strong, competitive economy**

- 5.20. The proposal is a mixed-use development, including new, a high-quality area of new employment land close to the strategic road network, and accessed via the new junction proposed with the A45. As required by Policy JE2, the site will provide land and premises for a mix of B1b research and development, B1c light industrial, B2 industrial, and B8 distribution employment. The proposed Business Park would provide for a range of employment in a high-quality setting and environment which will help form part of a new 'gateway' to the western side of Coventry.
- 5.21. The provision of 10ha of employment land will increase the opportunities for existing and new residents to work close to where they live, reducing the need for them to travel, and creating the potential for increased travel by sustainable modes, including walking and cycling. A further 5ha is anticipated on the remaining allocated golf course site within the Local Plan allocation.
- 5.22. The location, scale and type of employment land proposed responds directly to the Local Plan, focused on the northern part of the site as required by Policy H2. The location of the proposed employment land would make it easily accessible to existing sources of labour, as well as residents of the new housing. The location of the site also provides opportunities for synergy and investment related to the future HS2 link and interchange at Solihull.
- 5.23. The detailed mix and nature of the employers which will locate on the site is unknown, but as referred to in the Socio-Economic Assessment of the ES, the site could deliver in the region of 2000 jobs once fully occupied, including at the retail areas and school.
- 5.24. The proposal would therefore make a direct and positive contribution towards the NPPF's requirement that planning policies and decisions should support economic growth and development, as well as enabling sustainable patterns of travel. It will fully accord with the

Local Plan policies regarding the provision of new employment space in support of the wider economic growth vision for the City as a whole.

### **Requiring Good Design**

- 5.25. The approach to the design and layout of the site is set out in the Design and Access Statement. The application is in outline, but the design framework for the site seeks to respond positively to the character of the area by forming a strong landscape structure to provide a suitable transition between the development and surrounding countryside.
- 5.26. The vision is to create a high-quality, sustainable new community in an attractive landscaped setting and to ensure that the layout, scale and density of development is appropriate to the overall character and quality of the area while also creating a new and attractive community in its own right.
- 5.27. At this outline planning stage, a number of important parameters are defined for the site which will create the framework for future details, including with regard to the structural landscaping and green infrastructure, and the disposition of key uses within the site. Maximum height parameters for the built development, including the employment buildings, are also proposed at this stage, enabling the landscape and visual assessment to consider the likely impacts of the scheme.
- 5.28. However, key design details, including layout and appearance will be submitted for approval as reserved matters. This is to include details of such issues as materials, the detailed arrangement of individual homes and gardens, the detail of on-site roads and driveways, and lighting details.
- 5.29. The design framework seeks to ensure that the proposal will provide high quality green spaces, accessible to future and existing residents use with appropriate planting and creates a safe and accessible environment with its own sense of place. Importantly, the design framework seeks to ensure that the proposal will be visually attractive both from within the site and from views to the site from the surrounding area. In particular the quality and quantity of green space, and approach to the western edge of the development, will ensure that the development can be integrated sympathetically and provide an attractive and pleasant place to live.
- 5.30. The landform of the site will be altered, but the overall undulating nature of the site will be retained. This and the retained trees and other established vegetation within the site will help to screen and filter different parts of the site from many viewpoints, and soften the visual impact of the development on nearby areas including longer-distance views of the site.

- 5.31. It is considered that the proposals represent sustainable development in accordance with the requirements for good design set out in the NPPF, as well as the requirements of the Local Plan (including Policies DS4, and DE1). Further design details will be provided as reserved matters applications following approval of the outline application.

### **Promoting Healthy Communities**

- 5.32. The health agenda is of relevance to a range of different planning and design issues, and has been considered in a number of ways through the application, A separate Health Impact Assessment has been submitted as part of the planning application, as required by the Local Plan (policy HW1).
- 5.33. The proposals relate to the health promotion agenda through access to recreational facilities as well as access to an extensive area of green infrastructure and public open spaces. New and improved access to open space within the site, and to the surrounding countryside beyond, will directly contribute to supporting local health of new and existing residents. Integrated walking and cycling routes, including many retained rights of way within the site, will enable travel by sustainable modes as well as providing convenient and high-quality recreational exercise.
- 5.34. The site will also include provision of new formal children's play facilities and sports pitches to provide more organised forms of recreation and exercise, as well as a network of less formal open spaces distributed around the site as a whole.
- 5.35. Local food growing will be enabled through the provision of allotments, which can also form part of recreational and social activity for residents.
- 5.36. Furthermore, the provision of new, high-quality and resource efficient homes will make a direct contribution to the wider health agenda through enabling a healthy living environment, with good access to local facilities, including potential to enable new provision of a health facility or surgery, subject to confirmation of need from the relevant authorities and bodies. This is expected to feature in continuing dialogue post-submission of the application.
- 5.37. Consequently, the approach accords fully with the requirements of the NPPF, as well as with Policies of the Local Plan.

### **Climate Change and Flooding**

- 5.38. As referred above, the application site is in a sustainable location where it provides the opportunity for future residents to access jobs, services and facilities by modes of transport other than the private car, including walking and cycling. In addition to the sustainable location, the mixed-use nature of the proposals also reduces the need to travel, and creates

- opportunities for increased walking and cycling, and reduced reliance on the car. These characteristics are of direct relevance to meeting the challenge of climate change.
- 5.39. The Design and Access Statement explains that the site provides the opportunity for high quality sustainable buildings which will meet the high standards of energy efficiency and reduced carbon use.
- 5.40. The site as a whole is not at risk of flooding, but there are localised issues associated with the Slipperside Brook and Pickford Brook and their tributaries, as well as local topographical challenges which has seen some surface water drainage issues in the past. The ES contains a Flood Risk Assessment (FRA) and drainage strategy, with the latter focused on the brook corridors which run through the site. The FRA and drainage strategy take future climate change into account when calculating the likely water storage volumes on-site. A network of new attenuation features will help manage and control water flows from the developed areas, helping control and limit the rate of release of water into the drainage network, while also maintaining water quality. These features will also create new wetland habitats with benefits for biodiversity as well as amenity value.
- 5.41. The ES refers to the potential to deliver significant betterment to downstream off-site areas, with reduced likelihood of surface water flooding as a result of the drainage strategy proposed.
- 5.42. As an outline application, the details of the built form such as materials and detailed design are not included, but the site will accord with the requirement to deliver, as a minimum, the building regulation standards regarding energy and resource efficiency as set in local policy EM2.
- 5.43. As a result of this package of measures the proposal will meet the requirements of Section 10 of the NPPF, and the Local Plan, by responding to the issues of climate change and flooding in a sustainable way and bringing about significant benefits to the local area by reducing the risk of flooding.

### **Conserving and Enhancing the Natural Environment**

- 5.44. A number of assessments have been undertaken to assess the impact of the proposal on the natural environment, these form part of the Environmental Impact Assessment reported in the Environmental Statement. These include a Landscape and Visual Impact Assessment, Ecological Assessment, an Assessment of Ground Conditions and assessments of Air Quality and Noise.

- 5.45. The Landscape and Visual Impact assessment (Chapter 5) describes the site and surrounding landscape character and features, recognising the variations in topography and landscape within the site as a whole.
- 5.46. Albeit an outline application, the proposals are designed to maximise the integration with both the existing urban area, and the countryside beyond. Significant landscaping and open space as part of a new green edge to the settlement will provide a new area for recreation use, and also limit the impact of the proposal on views and on the character and appearance of the countryside. This responds fully to local policy GE1, and to the NPPF.
- 5.47. The masterplan seeks to avoid direct and significant impacts on the most sensitive landscape elements. As referred to above in the context of design, the natural topography and landform of the site will help to screen many parts of the site from different local viewpoints and receptors.
- 5.48. The Geo-Environmental site investigation report (Phase 1) shows that ground conditions at the site includes nothing which would preclude development. Based on the assessments undertaken, there will negligible impacts related to the ground conditions on site.
- 5.49. The noise and air quality assessments conclude that there will be no significant residual effects as a result of the Proposed Development. The main effects relate to the traffic generated by the development and the change in traffic flows that will result from the development, including construction traffic associated with the development process. The assessment work undertaken concludes that the likely changes are not such that noise and air quality levels will rise to an unacceptable level, with only one existing residential location identified as seeing relatively high levels of air pollution in the short-medium term. That receptor already experiences challenges with air quality, and even here over the longer-term the assessment is for a positive effect. Overall, air quality and noise effects are likely to be minor or negligible. Mitigation measures are proposed to minimise air quality effects from the construction process, including those associated with dust, which will form part of a Construction Environmental Management Plan (CEMP) which will also cover noise and other issues associated with the construction process. The layout of the site established through the Parameters will ensure that new residents of the site do not experience significant issues with noise, and no specific noise mitigation or design measures are considered necessary.
- 5.50. The new access with the A45 will have significant benefits in terms of enabling a redistribution of traffic, enabling residents and employees based on the site to access the new homes and workplaces without having to use existing local roads and junctions.
- 5.51. As an outline application, layout and other design details are not yet known, or included. However, layout will be informed by consideration of noise and lighting issues with regard to potential effects on the amenity of nearby residents, and on on-site ecological features. There

are clear British Standards with regards to lighting strategies and detail, and lighting technology is increasingly able to ensure minimal light-spill or 'sky-glow'. Planning conditions are anticipated as part of a planning permission to require details of lighting to be agreed in writing with the local planning authority as part of reserved matters.

- 5.52. The Ecological Assessment concludes that the site is currently of relatively low ecological value supporting few protected species and largely comprising a range of agricultural habitats. There are no statutory sites of international nature conservation importance (e.g. Special Protection Areas (SPAs), Special Areas of Conservation (SACs) or Ramsar Sites) present within the Project site or within a 5km radius of it. There are also no statutory sites of notable ecological interest of National Importance within the site.
- 5.53. However, the application site includes Local Wildlife Sites (Pond Farm Pasture, Pickford Brook Meadows) in the south and east of the site. These areas are to be retained and undeveloped, forming part of the network of green infrastructure and open spaces proposed as part of the application.
- 5.54. The proposed scheme has been designed to retain features of ecological interest including the hedgerow, ponds and the watercourses. Connectivity of habitats across the site will be maintained through the creation of significant GI corridors which use existing ecological features of interest. The Assessment shows that the Green Infrastructure provided will include a greater range of habitats of greater structural and species diversity than currently present. This will mitigate for the relatively minor loss of existing habitats and provide long term biodiversity benefits. Open spaces will be designed that will enhance the value of the site for a range of local native fauna, and new wildlife corridors will be created to improve connectivity within the site and link to the wider countryside.
- 5.55. Approximately 105ha of the best and most versatile agricultural land will be lost as a result of the proposals. This is not an environmental effect which can be mitigated, although much of the soil resource will be protected and re-used on-site to help support landscaping and garden areas.
- 5.56. This approach to the 'natural environment' is sustainable, in accordance with the NPPF and policies of the Local Plan and will introduce benefits to the quality of the environment on site. Inevitably the proposal will result in the loss of countryside and will therefore result in a change to the character and appearance of the area. However, the layout and landscaping of the site, in particular the extensive Green Infrastructure and introduction of new public open spaces will contribute significantly towards mitigating the impact of development and ensuring that the proposal does not detrimentally affect the local character of the wider area. The limited harm that would occur would in any event be significantly outweighed by the urgent need for housing and the other benefits of the proposals.

- 5.57. The approach, with extensive green and blue infrastructure running throughout the site, including incorporating the Pickford Brook and Slipperside Brook corridors, and with the retention of the majority of existing hedges and trees, directly and fully accords with the adopted Local Plan policies (including policies EM4 and EM5) and with the NPPF.

### **Conserving and enhancing the historic environment**

- 5.58. An assessment of the effects of the application on the historic environment has been undertaken and forms part of the Environmental Statement. This relates both the designated heritage assets – which are the most sensitive and important receptors – as well as undesignated assets. The assessment considers the existing built heritage on and off-site, as well as any on-site archaeological assets or features.
- 5.59. There are no Conservation Areas, Scheduled Monuments, Registered Parks and Gardens, and Registered Battlefields either within or in the surroundings of the site.
- 5.60. The assessment has been informed by geophysical surveys on-site as well as desk-based assessment, and has involved direct dialogue with the local planning authority. The evidence suggests that the site has a high potential for archaeological remains dating to the early prehistoric (Mesolithic/Neolithic) period across the ridgeline in the centre and east of the site. A moderate potential for Roman remains in the east of the site and high potential for Medieval remains along the southern boundary of the site has been assessed. The recorded earthwork remains of ridge and furrow within the site are evidence of the latter. A low potential for Saxon/Early Medieval and Post-Medieval /Modern periods has been identified for the entire site. There is low/nil potential for archaeological sites or deposits dating from the later prehistoric (Bronze Age/Iron Age) period. It is considered unlikely that any archaeological remains, if present, would be of more than local importance and would therefore not require preservation in-situ.
- 5.61. As summarised above, there are few existing heritage receptors on-site or of direct relevance to the site. However, discussions have been held with the archaeological advisor to Coventry City Council and confirmed that some additional intrusive evaluation trenching may be required during determination of the application in order to more fully assess the presence/absence of any archaeological remains. The scope of any evaluation trenching, likely to be targeted at key features of potential interest, will be discussed and agreed prior to any work being undertaken. Such investigations can be undertaken and recorded prior to development.
- 5.62. There are a selection of listed buildings relatively close to the site in Pickford Green in particular. Including a number of Grade II listed buildings either within close proximity to the site boundary or immediately adjacent to it, such as Brook Farmhouse which lies immediately to the west of the site, Pickford Grange Farmhouse located around 200 m to the west of the

site, and Pickford Farmhouse (situated c. 400 m to the north of the site). The potential for harm to the setting of the closest listed buildings is to be mitigated through the approach to the masterplanning and layout of the site, with a landscape buffer proposed to filter views to and from them.

- 5.63. The overall likely residual effects on the designated assets have been considered, and are assessed as minor adverse, with no material effect on their significance. The residual effects on non-designated assets, following the mitigation referred to above, will be negligible. Many historic features – such as hedgerows and field boundaries – are proposed for retention as part of the development as shown on the Parameters Plan, and on the illustrative masterplan. This includes the area which may contain a possible moated site north of Pond Farm, referred to in local policy HE2.
- 5.64. Having undertaken these assessments, and having proposed appropriate mitigation measures the application fully accords with the NPPF, and with local policies (including GE3), by seeking to ensure new development is sympathetic and sensitive to the historic environment, and will ensure the significance and setting of key assets are protected.

## **6. CONCLUSIONS**

- 6.1. Coventry City Council has recognised the need to plan positively and proactively to meet the long-term housing and development needs of the City. In December 2017 the City Council allocated land at Eastern Green for development to provide a mixed-use residential led urban extension in the new Local Plan which covers the period to 2031.
- 6.2. The site's allocation was examined as part of the Local Plan, and was included as a sustainable location for new, strategic growth. It is well related to the existing urban area of Coventry, with clear and robust boundaries on all sides. On adoption, the application site and remainder of the allocation was removed from the Green Belt.
- 6.3. This planning application relates to the majority of the land within that allocated site, and would deliver a mix of residential development, employment development, retail and community facilities, and green infrastructure, as required by the Local Plan.
- 6.4. The application is supported by an Environmental Statement (ES), the scope of which was agreed with the City Council. This further confirms the site's suitability for development, and has helped inform some aspects of the proposals in order to minimise or eliminate any likely significant environmental effects.
- 6.5. The application proposal is a sustainable form of development, meeting not only the requirements of the NPPF but also of the Local Plan. The proposals would deliver a range of benefits in the context of the aspirations and objectives of the Local Plan including delivering a range of new homes to meet a range of local housing needs. Through a design and infrastructure led approach to development, the proposals would exceed the minimum number of new homes allocated to the site. This will maximise the efficient use of land while ensuring a high-quality development and new residential environment.
- 6.6. Around 2000 new jobs will also be enabled and accommodated through the employment area proposed on-site, and at other non-residential uses proposed, including the retail areas, and the school.
- 6.7. A new grade separated junction with the A45 would contribute towards the strategic infrastructure of the City as a whole, and align with broader strategic aspirations and objectives regarding connectivity and accessibility. The site will be served by public transport services, and will deliver new facilities easily accessible by foot and cycle, including the new employment opportunities.
- 6.8. Community facilities, in the form of built facilities and open space and recreational facilities will also be delivered to the benefit of new residents and existing nearby communities alike.
- 6.9. The proposals are shown to have relatively limited residual environmental impacts which are outweighed by the range of environmental and other benefits the proposals would bring,

including new biodiversity features and public open space provision. However, the development of this site as allocated by the Local Plan would result in the loss of farmland, and of a largely open agricultural landscape. The changed character of this currently green and open site will also be balanced by other benefits of the proposal including improvements to road accessibility and reliability as a result of the new A45 junction, and improvements at key local transport junctions close to the site.

- 6.10. Notwithstanding the allocation of this site for development in an up to date Local Plan, in summary it is of value to present the conclusions of this Planning Statement with reference to the NPPF's three principles of sustainable development. As set out below in high-level terms, the proposals will deliver sustainable development as defined by the NPPF:

*An economic role:*

- new development and investment to support the delivery of local economic vision and objectives with land and premises 'in the right place at the right time' in accordance with the NPPF and Local Plan;
- bring new investment to Coventry City, helping support and enhance local services and facilities, and provide new, quality employment land to support economic growth;
- contribute to improving the strategic highways infrastructure and accessibility in the City;

*A social role:*

- support strong and healthy communities by providing new housing to meet identified and urgent needs;
- create a high quality built environment, accessible to local services and facilities;
- create a sustainable new community, with new community services and facilities, including a new school, community hall, health centre and retail.
- support the health of the local community by providing extensive new open space, footpaths and children's play facilities;
- provide development in a location and manner which will encourage sustainable travel, be acceptable in traffic terms and provide a safe and secure access.

*An environmental role:*

- limit the harm to the environment by placing development in a location well-related to the urban area, by providing extensive landscaping around and within the site, and mitigating the impacts on views and the wider landscape;
- protect and enhance key features, including enhancing biodiversity and Green Infrastructure features;
- provide development in a manner and location which can adapt to climate change, ensuring that flood risk is not increased off-site.

- 6.11. As described in this Planning Statement, the application proposes delivery of site-wide infrastructure and key components required by the Local Plan allocation for the Eastern Green allocation as a whole. Specifically, facilities such as the primary school, the District Centre, Local Centre and any health facility, and the package of highway works (including local mitigation measures off-site), are provided to bring forward, and serve, the whole allocation. This will help ensure delivery of the Local Plan's policy requirements and policies for the site, but also ensure a sustainable, high-quality and integrated approach is taken to the development of this strategic site.