

# **OUTLINE PLANNING APPLICATION FOR ERECTION OF UP TO 500 RESIDENTIAL DWELLINGS**

## **PLANNING STATEMENT**

### **LAND NORTH OF THOMPSONS FARM, KERESLEY**

#### **ON BEHALF OF LIONCOURT STRATEGIC LAND**

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

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## 1. INTRODUCTION

1.1 This Planning Statement has been prepared on behalf of Lioncourt Strategic Land Ltd and Bluemark Developments Limited and supports an outline planning application on land north of Thompsons Farm, Thompsons Road, Keresley, Coventry. The planning application seeks outline approval for the development of the site with reserved matters of scale, appearance, layout and landscaping for approval at a later date. The current application includes consideration of access. The description of development is as follows:

*Outline permission for the erection of up to 500 residential dwellings with all matters reserved with the exception of access and comprising of:*

- *The demolition of Thompsons Cottage and associated buildings;*
- *Provision of green infrastructure including strategic open space, sustainable turban drainage, green networks, play space and associated structural and general landscaping;*
- *A vehicular access point and emergency access point onto Bennetts Road North;*
- *Network of pedestrian and cycle routes; and*
- *All associated infrastructure and enabling works.*

1.2 This Statement is designed to set out the content of the planning application and proposals in a clear and informative way. The Statement will assess the merits of the planning application against prevailing planning policies at both the national and local level, as well as considering policies and guidance emerging in new policy documents, and other material considerations.

1.3 The application site forms part of the wider allocation known as the Keresley Sustainable Urban Extension (SUE). This allocation removed all the land subject to the allocation from the Green Belt and allocated it for residential development to deliver 3,100 new homes across the allocation.

1.4 The application has been considered by Coventry City Council to require an Environmental Impact Assessment (EIA), the scope of which has been agreed with the Council. The EIA process has been undertaken and the application is

supported by an Environmental Statement (ES). This comprehensive document includes many of the specific reports which would normally be expected to accompany a planning application of this type. The Transport Assessment, Travel Plan, Flood Risk Assessment and Drainage Strategy, Noise Assessment, Air Quality Assessment and Lighting Assessment are all provided as appendices to the ES.

1.5 This proposal was subject to a public consultation exercise which included a public exhibition held in December 2018. Details of the consultation exercise are summarised in the accompanying Consultation Statement.

1.6 In addition to the ES and Appendices the following reports form part of the planning application:

- Planning Statement
- Design and Access Statement
- Statement of Community Involvement
- Energy Statement
- Health Impact Assessment Screening Report
- Agricultural Land Considerations
- Arboricultural Statement

1.7 This Planning Statement will assess in detail the planning and sustainability aspects associated with the proposals for the application site. It will be shown that the proposals are in accordance with national and local planning policies and the presumption in favour of sustainable development. Accordingly, it is respectfully requested that planning permission be granted.

## 2. SITE AND SURROUNDING AREA

- 2.1 The site is located in the north of Keresley SUE allocation. To the east and south the site adjoins existing development on Bennetts Road North and Thompsons Road respectively. On the southern boundary, the land forming the curtilage of Thompsons Farm and the adjoining property is excluded from the application site. The northern boundary is marked by a hedgerow and adjoins Keresley Rugby Club. This boundary also forms the administrative boundary between Coventry City Council and North Warwickshire Borough Council. To the west the boundary is marked by a hedgerow to the adjoining field. The site has an area of 20.7ha and is currently in agricultural use for arable farming.
- 2.2 To the east of the site, on the opposite side of Bennetts Road North, is an area of existing residential development constructed during the early twentieth century period. This is predominantly two-storey semi-detached properties however there are some small terraces. Further to the south and east of this area of housing is the Prologis Industrial Park.
- 2.3 Along the sites southern boundary on Thompsons Road there is existing ribbon development of inter-war housing which is predominantly two-storey semi-detached properties with some smaller terraces. There are some larger, more modern detached properties at the end of Thompsons Road where it becomes Thompsons Lane.
- 2.4 The immediate area has various local facilities including a primary school, community centre and library. There is a parade of shops immediately adjoining the sites eastern boundary which includes a pharmacy, post office/village shop and a fish and chip shop.
- 2.5 The northern boundary is defined by hedgerows and trees and marks the boundary between the site and the adjacent Keresley Rugby Club. The existing public footpath M310 also runs along this boundary.
- 2.6 To the west of the site is more open and is characterised by a mix of agricultural land and woodland. This area of land is included within the SUE allocation but is not proposed to be developed as part of the Council's Indicative Masterplan.

- 2.7 The general surrounding area is characteristic of an urban fringe with various areas of residential development, notably Keresley Newland, along with employment development, notably Prologis Industrial Park.
- 2.8 The site itself is gently undulating with the low point located towards the middle of the eastern boundary. The site contains one existing pond, located in the centre of the site with an associated copse. The pond and copse will be retained as part of the proposed development within the open space. The site is subdivided into smaller fields by a number of hedgerows with associated hedgerow trees. These are proposed to be retained wherever possible and have informed the shape of the development parcels.

### 3. THE PROPOSED DEVELOPMENT

3.1 The application is for outline planning permission therefore the detailed design of the proposed development has not yet been fixed. This will be subject to future reserved matters planning applications in due course.

3.2 The proposed development will comprise of the following:

- Up to 500 residential dwellings with a mix of size, tenures and type;
- Public open space and green infrastructure including a children's play area, informal and incidental open space, retained and new landscaping;
- Vehicular access to Bennetts Road North, including secondary emergency access;
- Associated infrastructure including surface water attenuation features, foul drainage and retained pond.

#### Residential

3.3 The proposed development will provide residential units across a range of dwelling types, sizes and tenures. Due to the site's location on the edge of Coventry there is an ambition that the SUE will deliver 'aspirational housing' meaning that the eventual mix should include large 3 and 4 bedroom properties. The exact housing mix will be fixed at detailed design stage but will reflect the following:

- 25% of the total dwellings to be affordable;
- The 25% affordable component to be split between social rented, affordable rented and intermediate housing (shared ownership);
- Affordable housing to be delivered via a Section 106 Agreement.

3.4 The dwellings will vary in heights but will generally be between two and three storeys. The taller buildings will be located in key locations within the site, such as corners, in order to enhance legibility and create an interesting, varied streetscene. The proposed maximum heights for buildings in different areas of the site is shown on the Building Heights Parameter Plan. Additional information

and explanation is set out in the accompanying Design and Access Statement (DAS).

### **Public Open Space and Green Infrastructure**

- 3.5 The proposed development will provide a network of open space across the site, informed by the existing landscape of the site. The focus of the network is a linear area of green space from the centre of the site to the eastern boundary. The retained pond and copse forms the central feature of the open space along with a proposed play space. The central location of the play space has been chosen to maximise accessibility from all parts of the site.
- 3.6 The northern and western boundaries have landscape buffers to provide a gentle transition to the adjacent open land. It is also anticipated that these buffers could accommodate a 'trim trail'. Existing trees and hedgerows have been retained wherever possible and have been used to shape the proposed development parcels.
- 3.7 There are three proposed surface water attenuation areas, the largest of which is located in the linear open space adjacent to the eastern boundary. It is proposed that this feature would have some permanently wet areas which would enhance the biodiversity value of the site. Smaller attenuation features are located in the north-eastern and south-western corners of the site and will provide additional open space.
- 3.8 There is one existing public right of way (PRoW) running through the site along the northern boundary (M310b) which will not be affected by the proposed development. In addition, a new pedestrian link is proposed along the western boundary which would link the existing PRoW to the pending PRoW (CAP 264) along Thompsons Lane. This will enhance pedestrian connectivity and facilitate access to the adjacent open countryside.

### **Vehicular Access and Circulation**

- 3.9 The primary access route will run east-west broadly across the centre of the site from the access point on Bennetts Road North with a loop to access the south-eastern land parcel. The residential development parcels will be served via secondary roads linked to this. A proposed secondary access for emergency

vehicles only is shown on Bennetts Road North which connects to the primary road and loop separately.

### **Drainage and Flood Risk**

3.10 A Flood Risk Assessment has been prepared in support of this application in accordance with national guidance. A copy of this is included in the Appendix to the ES. It addresses, identifies and quantifies the risk from various sources. This confirms that the site is in Flood Zone 1 and therefore is at the lowest risk of flooding however there are a number of ditches and small watercourses within and adjacent to the site.

3.11 The proposed development includes measures to mitigate any potential flood risk, including:

- Limiting post development discharge rates to exiting annual run-off rates less 20% and including the 1 in 100 year plus 30% event.
- Surface water drainage system will incorporate SuDS techniques to store and treat surface water run-off.
- On-site attenuation in the form of three attenuation ponds.

### **Construction Phasing of the Development**

3.12 Given the strategic nature of the project it is anticipated that construction of the proposed development will be phased over a number of years, in tandem with the wider allocation. As set out in the accompanying ES, it is assumed that construction would commence on site 2020/2021 and last for approximately 10 years with complement circa 2031.

#### 4. RELEVANT PLANNING POLICY

4.1 In accordance with Section 38 of the Planning and Compulsory Purchase Act, applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise.

##### Development Plan

###### Coventry Local Plan

4.2 The Coventry Local Plan (adopted December 2017) sets out the core planning policies against which planning applications are assessed. The relevant policies of the Local Plan are outlined below.

4.3 **Policy H2** Housing Allocations identifies the sites allocated for housing development alongside essential details that will support the principles of sustainable development. This site is part of the H2:1 Keresley SUE allocation which is identified to deliver a total of 3,100 total dwellings. Essential site-specific requirements are identified as retail space within local centres, distributor link road, junction improvements, 2FE primary school, retention of important ecological features, a green corridor along Hall Brook, protection of Jubilee Woodland and appropriate screening to existing residential development.

4.4 **Policy DS4** General Masterplan principles sets out the general principles that should be adhered to when master planning any major development. The SUEs have specific Masterplan policies, for the Keresley SUE **Policy DS4 (Part C)** sets out the relevant requirements for the SUE as follows:

- Incorporate the recommendations of the Council's SUE Design Guidance SPD;
- Ensure that the planned local centres are located at separate ends (north and south) in accordance with Policy R1;
- Ensure the new defensible boundaries to the Green Belt are clearly supported on the western side of the site to Tamworth Road and to the north around Thompsons Lane;
- Establish a comprehensive green and blue infrastructure corridor around the Ancient Woodlands, Hounds Hill and the Hall Brook. This corridor

should run north-south between the Burrow Hill Fort to the north and the Jubilee Woodland to the south-east; and

- Identify clear access points to the site and make appropriate provisions for new transport infrastructure and highway improvements to support the comprehensive delivery of the site. This should include:
  - The provision of a new Link Road in accordance with Policy H2. The Link Road should be operational to traffic prior to the full completion of all development components within the SUE;
  - The delivery of the Link Road should not be to the detriment of Pro-Logis Park; and
  - The management of the existing highway junctions at Bennetts Road, Tamworth Road, Fivefield Road, Sandpits Lane, Thompsons Lane, Long Lane and Watery Lane to ensure they continue to operate in a safe and appropriate way.

4.5 **Policy DS1** Overall Development Needs sets out the levels of different types of development required across the plan period and identifies a minimum of 24,600 additional homes to be provided. This policy notes that Coventry's objectively assessed housing need 2011-2031 is at least 42,400 additional homes however it was not possible to deliver this within the City Council's boundaries. The shortfall is to be met through neighbouring authorities through the Duty to Cooperate.

4.6 **Policy H1** Housing Land Requirements elaborates on this and sets out that provisions will be made for a minimum of 24,600 additional dwellings between 2011 and 2031 through a stepped trajectory:

- 2011-2016: 1,020 homes per annum
- 2017-2031: 1,300 homes per annum

The Council is now in the second phase and needs to deliver 1,300 homes per annum to maintain a continuous 5 year supply of housing land.

4.7 **Policy DS3** Sustainable Development Policy states that the Council will take a positive approach when considering development proposals that reflects the presumption in favour of sustainable development as contained in the National

Planning Policy Framework (NPPF). It continues that planning applications that accord with the policies in the Coventry Local Plan (and, where relevant, with policies in supporting plans) will be approved without delay, unless material considerations indicate otherwise.

- 4.8 **Policy H4** Securing a Mix of Housing sets out that the Council will require residential proposals to include a mix of market housing which contributes to a balance of house types and sizes across the city in accordance with the latest Strategic Housing Market Assessment (SHMA).
- 4.9 **Policy H6** Affordable Housing states that schemes of 25 dwellings or more than 1ha will be expected to provide 25% of all dwellings as affordable housing. The tenure split depends on the area of the city the site is located in. This site is located in within an area of existing low concentration and so should make the following provision:
- 15% social/affordable rental provision
  - 10% intermediate provision
- 4.10 **Policy H9** Residential Density sets out that residential development must make the most effective and efficient use of land whilst ensuring compatibility with the quality, character and amenity of the surrounding area. Development on greenfield sites should achieve a minimum of 30 dwellings per hectare (net).
- 4.11 **Policy R1** Delivering Retail Growth allocates sites to support the provision of retail floor space across Coventry. There are two allocations within the Keresley SUE; New Keresley Local Centre South and New Keresley Local Centre North. These should provide a local centre to include a range of small scale units providing a range of local community uses and top up provisions.
- 4.12 **Policy GB1** Green Belt and Local Green Space identifies land within the Green Belt and land which has been removed from the Green Belt in order to accommodate future development needs. This site, part of the wider area referred to as Land at Keresley, has been removed from Green Belt to facilitate residential development.
- 4.13 **Policy HW1** Health Impact Assessments (HIA) requires all major developments to demonstrate that they would have an acceptable impact on health and

wellbeing through either a HIA Screening Report or HIA Assessment in accordance with the relevant SPD.

4.14 **Policy GE1** Green Infrastructure states that new development should make provision for green infrastructure to ensure that the development is integrated into the landscape and contributes to improvements in connectivity, public access, biodiversity, landscape conservation, design, archaeology and recreation.

4.15 **Policy GE3** Biodiversity, Geological, Landscape and Archaeological Conservation states that proposed development on sites not subject to statutory designations, having biodiversity or geological conservation value, will be permitted provided that they protect, enhance and/or restore habitat biodiversity. Development proposals will be expected to ensure that they:

- Lead to a new gain of biodiversity, where appropriate, by means of an approved ecological assessment of existing site features and development impacts;
- Protect or enhance biodiversity assets and secure their long-term management and maintenance;
- Avoid negative impacts on existing biodiversity; and
- Preserve species which are legally protected, in decline, are rare within Coventry or which are covered by national, regional or local Biodiversity Action Plans.

Where this is not possible, adequate mitigation measures must be identified. If mitigation measures are not possible on site, then compensatory measures involving biodiversity offsetting will be considered, but only in exceptional circumstances.

4.16 **Policy GE4** Tree Protection states that development proposals will be positively considered provided there is no unacceptable loss of, or damage to, existing trees or woodlands during or as a result of development, any loss should be supported by a tree survey. Trees not to be retained as a result of the development should be replaced with new trees as part of a well-designed landscape lane and that existing trees worthy of retention are sympathetically incorporated into the overall design of the scheme.

- 4.17 **Policy DE1** Ensuring High Quality Design sets out the Councils approach to urban design. It advises that all development proposals must respect and enhance their surroundings and positively contribute towards the local identity and character of an area. Development will be expected to follow a set of key principles such as responding to physical context, considering local distinctiveness and seeking high quality design. This policy, and the proposed development's response to it, is set out in greater detail in the accompanying Design and Access Statement.
- 4.18 **Policy HE2** Conservation and Heritage Assets seeks to sustain the historic character, sense of place, environmental quality and local distinctiveness of Coventry. It states that proposals likely to affect the significance of a heritage asset or its setting should demonstrate an understanding of such significance using currently available evidence.
- 4.19 **Policy AC1** Accessible Transport Network states that development proposals which are expected to generate additional trips on the transport network should:
- Integrate with existing transport networks including roads, public transport and walking and cycling routes to promote access by a choice of transport modes;
  - Consider the transport and accessibility needs of everyone living, working or visiting the city;
  - Support the delivery of new and improved high quality local transport networks which are closely integrated into the built form; and
  - Actively support the provision and integration of emerging and future mobility infrastructure, including electric vehicles charging points, Car Club schemes and bicycle hire.
- 4.20 There are various policies to support the above including; **Policy AC2** Road Network which states that new developments should mitigate and manage traffic growth, **Policy AC3** Demand Management which requires the submission of Transport Assessments and Travel Plans, **Policy AC4** Walking and Cycling which encourages the provision of walking and cycling routes as part of new development, and **Policy AC5** Bus and Rapid Transit which states new development should have safe and convenient access to the bus network.

- 4.21 **Policy EM1** Planning for Climate Change Adaptation states that development is required to be designed to be resilient to, and adapt to the future impacts of, climate change through the inclusion of the following adaptation measures:
- Using layout, building orientation, construction techniques and materials and natural ventilation methods to mitigate against rising temperatures;
  - Optimising the use of multi-functional green infrastructure, including tree planting for urban cooling, local flood risk management and shading;
  - Incorporating water efficiency measures;
  - Minimising vulnerability to flood risk by locating development in areas of low flood risk and including SUDS;
  - Seek opportunities to make space for water and develop new blue infrastructure to accommodate climate change.
- 4.22 **Policy EM2** Building Standards sets out that new development should be designed and constructed to meet the relevant Building Regulations as a minimum.
- 4.23 **Policy EM4** addressed Flood Risk Management and states that all major developments must be assessed in respect of the level of flood risk from all sources and the Flood Risk Assessment should be proportionate to the scale and nature of the proposed development.
- 4.24 Following from this **Policy EM5** deals with Sustainable Drainage Systems (SuDS) which states that all developments should apply SuDS and should look to manage surface water run-off as close to source as possible, in accordance with the SuDS hierarchy. The policy advises that maintenance arrangements for SuDS should be agreed with the relevant managing authority.
- 4.25 **Policy EM7** Air Quality states that major developments will require the submission of an Air Quality Assessment and promote the shift to the use of sustainable low emission transport.
- 4.26 **Policy EM8** Waste Management sets out the Council's waste management strategy and that development proposals should demonstrate measures to

minimise the generation of waste and promote more sustainable approaches to waste management.

- 4.27 **Policy IM1** Developer Contributions for Infrastructure sets out that developments will be expected to contribute towards provision of measures to directly mitigate its impact and make it acceptable in planning terms, and physical, social and green infrastructure to support the needs associated with the development.

### **Other Material Considerations**

#### *Supplementary Planning Documents*

##### SUE Urban Design Guidance SPD (Draft, February 2019)

- 4.28 This document has not been adopted by the Council at time of writing and remains in draft form. The document expands on the Masterplan policy set out in the Local Plan and provides best practice examples and technical guidance to support the delivery of high quality developments primarily within the planned urban extensions at Eastern Green and Keresley.
- 4.29 The document includes sections on the Arden building characteristics, housing design, street hierarchy, parking, public realm and landscaping. Further details regarding this is set out in the accompanying Design and Access Statement.
- 4.30 Appendix 1 of this SPD deals specifically with the Keresley SUE. This sets out the site-specific requirements of the allocation policy and the Masterplan policy. It also includes an Indicative Masterplan drawn up by the Council showing how they envisage the Keresley SUE being developed and has informed the production of the Indicative Concept Masterplan and Parameters Plans forming part of this planning application.

##### Health Impact Assessments SPD (Adopted January 2019)

- 4.31 This document provides guidance on how to assess the impact of the proposed development on health and wellbeing. This includes a screening process to determine if a full HIA is required to support an application. This application is supported by a Screening Assessment which demonstrates that a full HIA is not required.

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Coventry Connected SPD (Adopted January 2019)

- 4.32 This document provides guidance on how to model and assess the impacts of development on the local highway network and how to maximise the benefits of public transport. It provides additional information to support the policies of the Local Plan and guidance on how the Council's key objectives can be delivered. This document has informed the production of the accompanying Transport Assessment.

Air Quality SPD (Draft, January 2019)

- 4.33 This document aims to simplify the consideration of air quality impacts associated with development schemes and focus on incorporation of mitigation at design stage, countering the cumulative impacts of aggregated developments, providing clarity to developers and defining of sustainability in air quality terms. The document also sets out the types of development that require further air quality assessment work and what mitigation should be considered. This document has been considered further as part of the Air Quality Assessment undertaken as part of the EIA associated with this application.

**National Planning Policy**

*National Planning Policy Framework (NPPF) 2019*

- 4.34 The NPPF sets out the Government's planning policies for England and how these should be applied.
- 4.35 Paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development. This has three inter-related objectives that are set out at paragraph 8:
- An **economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
  - A **social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a

well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

- An **environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

4.36 At the heart of the NPPF is the 'presumption in favour of sustainable development'. Paragraph 11 sets out that for decision-taking, this means *"approving development proposals that accord with an up-to-date development plan without delay."*

4.37 Section Four covers decision-making and paragraph 38 clarifies that local planning authorities should approach decisions on proposed development in a positive and creative way and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of an area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

4.38 Paragraph 47 continues that applications for planning permission be determined in accordance with the Development Plan unless material considerations indicate otherwise and that decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed.

4.39 Section Five addresses delivering a sufficient supply of homes and paragraph 59 reiterates the Government's continued objective of significantly boosting the supply of homes. Paragraph 72 sets out that delivering a large number of new homes can often be best achieved through planning for larger scale development, such as significant extensions to existing villages and towns.

4.40 Section Six focuses on building a strong and competitive economy. Paragraph 81 states that planning policies should, amongst other things, seek to address potential barriers to investment such as inadequate infrastructure, services or housing, or a poor environment.

4.41 Section Eight is concerned with promoting healthy and safe communities. Paragraph 91 states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

- Promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;
- Are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and
- Enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

4.42 Section Nine considers highways matters. Paragraph 109 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

4.43 Section Eleven is concerned with making effective use of land in meeting the need for homes and other uses. Paragraph 122 sets out that planning policies and decisions should support development that makes efficient use of land, taking into account:

- The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- Local market conditions and viability;

- The availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- The desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
- The importance of securing well-designed, attractive and healthy places.

4.44 Paragraph 123 notes that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.

4.45 Section Twelve addresses design and sets out that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve and that good design is a key aspect of sustainable development.

4.46 Paragraph 127 sets out that planning policies and decisions should ensure that developments:

- Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

- Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- Create places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity for existing and future users, and where crime and disorder, or the fear of crime, do not undermine the quality of life or community cohesion and resilience.

4.47 Section 14 addresses meeting the challenge of climate change, flooding and coastal erosion. Paragraph 148 states that the planning system should support the transition to a low carbon future, taking full account of flood risk and coastal change. In terms of flooding, paragraph 155 states that inappropriate development in areas at risk of flooding should be avoided by directing it away from areas at highest risk.

4.48 Section 15 sets out the planning policies and decisions should contribute to and enhance the natural environment. Paragraph 175 states that when determining planning applications, local authorities should apply the following principles:

- If significant harm to biodiversity resulting from development cannot be avoided, adequately mitigated or, as a last resort, compensated for, then planning permission should be refused.
- Development on land within or outside of a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of SSSIs;
- Development resulting in the loss or deterioration of irreplaceable habitats should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be

encouraged, especially where this can secure measurable net gains for biodiversity.

## 5. ASSESSMENT OF THE PROPOSED DEVELOPMENT

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section of the Planning Statement assesses the proposed development against the policies of the Adopted Local Plan, the NPPF and other material considerations.

### The Principle of Development

5.2 As discussed in the above section, the adopted Local Plan removed the site from the Green Belt and allocated it for residential development as part of the H2:1 Keresley SUE Allocation. This establishes that the Council have accepted the principle of residential development on this site and consider that it should contribute towards meeting the housing needs of Coventry.

5.3 Policy DS1 sets out the need to deliver a minimum of 24,600 additional homes over the Plan period. It also notes that Coventry's objectively assessed housing need is 42,400 additional homes however these cannot be accommodated within the City Council's boundaries and will instead be provided through the duty to co-operate. It is important for the Council that sites identified as capable of accommodating residential development, and subject to allocations, should deliver the additional homes required by the City.

5.4 Policy H1 elaborates on the above and sets out the housing requirement of 24,600 additional homes will be delivered via a stepped approach as follows:

- 2011-2016: 1,020 homes per annum
- 2017-2031: 1,300 homes per annum

The Council is now in the second phase and needs to deliver the higher annual requirement to maintain a five-year housing land supply. The wider Keresley SUE allocation (H2:1) is the largest single allocation in the Local Plan (total 3,100 homes across the allocation), as such, it is vitally important that this is delivered in order to meet the City's housing need.

5.5 In terms of the proposed site, the Council's Indicative Masterplan for the Keresley Allocation, makes explicit that the Land North of Thompsons Farm is identified for new housing development. This demonstrates that the Council consider that this

part of the allocation is suitable for residential development. The Council's Indicative Masterplan does not indicate how many dwellings each development parcel could accommodate. This application submission, including the supporting Environmental Statement, demonstrates that this site can accommodate up to 500 dwellings. Currently, 800 dwellings have outline consent (OUT/2014/2282) and two outline applications for 40 dwellings (OUT/2018/3080) and 550 dwellings (OUT/2019/0022) are currently pending consideration by the Council. A screening response has been issued further to a proposal for 450 dwellings (SCR/2018/0468). It can be seen that even if all these proposals come forward the site would still only be delivering 2,340 dwellings against an allocation of 3,100 dwellings. This represents only 75% of the anticipated delivery of the Keresley SUE. The shortfall in the anticipated delivery against the actual allocation of 3,100 dwellings is a material consideration in the determination of future applications.

Policy HS:1 Keresley SUE

- 5.6 Policy H2:1 sets out the essential site-specific requirements and other uses required to deliver the allocation. Each is addressed in turn below:

*Retail space within the local centres (Policy R1)*

- 5.7 Policy R1 sets out that there should be two new local centres, one in the south of the allocation (included on the approved outline OUT/2014/2282) and one in the north. The Council's Indicative Masterplan does not show where these local centres should be located. Discussions with the Council have concluded that this site is not required to deliver a local centre. The site itself is not suitable for the development of a Local Centre as it lacks any road frontage and consequently would not be visible to passing traffic on Bennetts Road North. The nature of the site, having no road frontage to any main thoroughfare weighs significantly against any retail allocation. Furthermore there is an existing parade of shops next to the site fronting Bennetts Road North which would be in competition with any new retail provision.

*Distributor link road connecting Long Lane and Winding House Lane*

- 5.8 The proposed link road is shown on the Council's Indicative Masterplan and runs through the southern part of the wider allocation. The Land North of Thompsons Farm site is located a significant distance from the proposed link road and so is

unaffected by it. A reasonable contribution towards the link road will be included as part of a Section 106 Agreement.

*Surrounding junction improvements*

- 5.9 The accompanying Transport Assessment identifies where junction improvements will be required as a result of the proposed development, both in isolation and in combination with the wider allocation. Contributions towards required improvements will be provided as part of a Section 106 Agreement.

*Provision of 1 x 2FE primary school and contributions towards a 8FE secondary school*

- 5.10 The approved outline in the south of the allocation provided land for the required 1 x 2FE primary school. This site is therefore not required to provide a primary school. Contributions towards education will be provided as part of a Section 106 Agreement.

*Retention of medieval fishponds, ancient woodlands, important (ancient) hedgerows*

- 5.11 This site does not contain any medieval fishponds, ancient woodland or important (ancient) hedgerows. The existing pond and hedgerows will be retained as part of the proposed development and have helped shape the layout, particularly informing the development parcels.

*Creation of a publicly accessible green corridor along the Hall Brook and enhanced connectivity between ancient woodlands*

- 5.12 As discussed above, the site does contain any ancient woodland nor is it is close proximity to Hall Brook. There is one public right of way (PRoWs) within the site which runs along the northern boundary. This will be retained and enhanced as part of the proposed development. There is also a pending PRoW application along Thompsons Lane on the southern boundary. The proposed development would not prejudice the delivery of this new PRoW. As part of the proposed development, a footpath running along the western boundary is proposed which will link the existing and proposed PRoWs providing greater accessibility and connectivity.

*Protection of Jubilee Woodland*

5.13 The proposed development would have no impact on Jubilee Woodland.

*Inclusion of appropriate screening to existing residential areas*

5.14 As this is an outline application, with landscaping as a reserved matter, the detailed design is not available at this stage, however the land use parameters plan demonstrates that there is a significant amount of landscaping proposed throughout the site. In terms of screening existing residential areas, it is envisaged that rear gardens would back on to the rear gardens of existing properties on Thompsons Road and Bennetts Road North. This would allow for separation distances to be achieved in order to safeguard residential amenity and provide a secure rear boundary. The gardens backing on to the properties to Thompsons Road could include an additional privacy buffer by creating longer gardens on the proposed development which would provide further screening for the existing residential properties.

Policy DS4 (Part C) Keresley SUE Specific Masterplan Principles

5.15 In addition to the above, Policy DS4 (Part C) Keresley SUE Specific Masterplan Principles provides specific guidance for the allocation. This generally reinforces the requirements discussed above, with the addition of:

*Incorporate the recommendations of the Council's SUE Design Guidance SPD*

5.16 This application is for outline consent so the detailed design, for example of specific housetypes, is not available. However, the design of the Masterplan for this site has followed the key principles set out in the SPD, particularly the street hierarchy and design principles such as location of landmark buildings and identifying specific character areas. Further detail is provided in the accompanying Design and Access Statement.

*Ensure the new defensible boundaries to the Green Belt are clearly supported on the western side of the site to Tamworth Road and to the north around Thompsons Lane*

5.17 Through the Local Plan process the whole allocation was removed from the Green Belt and boundaries of the Green Belt were amended. This site adjoins the amended Green Belt on its northern boundary which also forms the administrative boundary with North Warwickshire Borough Council. The proposed

development retains the majority of the vegetation on this boundary, including hedgerows and trees, and provides a significant landscape buffer in order to provide a transition between the development and the Green Belt. Keresley Rugby Club is located adjacent to northern site boundary which, as a sports and recreation use, is appropriate within the Green Belt. It is considered that the landscape proposals form a clear and defensible boundary to the Green Belt as well as providing a soft transition between the development and the adjoining Green Belt land.

### Residential Use

- 5.18 The site is part of a wider allocation for residential development and proposes to deliver 500 dwellings of the allocation total of 3,100 dwellings. As the application is in outline form, the precise mix and design of the proposed housing is not yet available however, in line with Policy H4 and the general aspiration that the allocation should deliver aspirational housing, it is anticipated that the site would deliver a mix of housing including a significant proportion of larger, family dwellings.
- 5.19 In terms of affordable housing, the proposal would provide for 25% affordable housing (125 dwellings) in accordance with Policy H6. It is envisaged that these would be split 15% social/affordable rent (75 dwellings) and 10% intermediate provision in the form of shared ownership (50 dwellings) in accordance with local policy. The 10% to be provided as shared ownership accords with the requirements of the NPPF that 10% of proposed residential dwellings should be available for affordable home ownership. This would be secured via a Section 106 Agreement.
- 5.20 In terms of density, the proposed scheme delivers 37.5 dwellings per hectare (net). This is generally in accordance with the minimum requirement of providing 30 dwellings per hectare (net) figure set out in Policy H9. This ensures that development makes efficient use of land whilst considering the existing context.

### Highways and Access

- 5.21 In accordance with Policy AC3 a Transport Assessment has been submitted in support of this application as an Appendix to the ES. The development proposes a single point of access via a roundabout on Bennetts Road North which leads to a main distributor road to access the individual development parcels. A

secondary access is provided for emergency vehicles only via Bennetts Road North, to the south of the of the main site access. This has been discussed as part of the pre-application process and modelling has been provided to demonstrate that a single access with emergency access is sufficient to serve the proposed development. The proposed access roundabout will also act as a traffic calming feature on Bennetts Road North and encourage motorists to adhere to the 30mph speed limit.

- 5.22 The development proposals retain both the existing and pending public footpaths running along the northern and southern site boundaries respectively and proposes an additional footpath to connect the two.
- 5.23 In terms of sustainability, the site is located in close proximity to existing bus stops on Bennetts Road North, Howat Road and Exhall Road. These are served by the number 16 and 55 buses which provide connections to Coventry, Binley and Keresley.
- 5.24 The TA sets out that the proposed development would generate 315 vehicle trips in the AM peak (08:00-09:00) and 360 vehicle trips in the PM peak (17:00-18:00). A total of 7 junctions have been assessed in accordance with the Coventry Area Strategic Model and included various development scenarios. The assessment confirmed that all junctions would operate with significant reserve capacity with the exception of the Bennetts Road/Sandpits Lane junction which would operate at capacity during the AM peak. However, the proposed development would have a negligible impact on this junction and junction improvements are proposed as part of the existing outline consent (OUT/2014/2282) within the wider SUE.
- 5.25 The Transport Assessment confirms that the trips generated as a result of the construction and operation of the proposed development will have a negligible impact on the local highway network. It is therefore considered that there are no highways grounds on which to withhold planning consent.

#### Flood Risk and Drainage

- 5.26 The site is located entirely within Flood Zone 1, the lowest risk of flooding. There are a number of ditches and small watercourses within and adjacent to the site, including a pond at the centre of the site.

- 5.27 Local watercourses will be the eventual outfall for all surface water discharged from the proposed development. Infiltration tests have been undertaken and have demonstrated that this is not viable on the site. In order to achieve the required run off rate, on-site storage ponds with flow control features are proposed. The ponds are located in the north-east, south-west and centre of the eastern site boundary which reflects the site topography. SuDS features have been included in the design of the scheme, including permeable paving and trapped gullies, which will be effective in preventing any polluted run-off reaching areas where infiltration could occur.
- 5.28 In terms of foul water, it is proposed to connect to the existing sewer network. As this is an allocated site, Severn Trent Water have a duty to undertake any necessary capacity upgrade work.

#### Ecology, Trees and Open Space

- 5.29 A Phase 1 Habitat Survey and Phase 2 Faunal Surveys has been carried out on site which confirmed there are no statutory ecological designations within the site. The site is dominated by arable land of negligible ecological value with boundary hedgerows, trees and a single pond with associated vegetation providing greater ecological value at the local level, the majority of which are proposed to be retained. In terms of protected species, survey work has indicated an offsite badger sett and on-site nesting birds along with evidence of limited use by foraging and commuting bats.
- 5.30 Ecological mitigation has been 'designed-in' to the proposals, particularly the retention of existing hedgerows to demarcate development parcels and the pond as a central feature of the development. Mitigation for minor habitat loss as a result of the development will be provided through substation new habitat creation within open space/green infrastructure areas whilst enhancements relating to bats, badgers and birds, such as nest and bat boxes, are proposed to mitigate any residual effects.
- 5.31 A technical note has been provided setting out the 'biodiversity impact' of the proposed development calculated using the most recent spreadsheet tool and based on the submitted parameters plans and associated indicative masterplan. The calculations show that the proposed development would result in a minor biodiversity loss of less than approximately 3 units. This calculation does not

take into account the potential to incorporate faunal enhancements. Furthermore, the majority of existing habitats of significant ecological value have been retained as part of the proposed development. Overall, it is considered that suitable offsetting could be secured through financial contribution in order to facilitate habitat creation. It is recommended that this be secured at Reserved Matters stage and/or through an appropriately worded condition.

#### Noise

- 5.32 Noise surveys were undertaken in November-December 2017. The main noise source affecting the site is traffic noise from the M6, located some 700m to the north with additional noise from intermittent vehicle noise on local roads and birdsong. Various mitigation measures have been designed in to the proposed development, for example the inclusion of landscape buffers between proposed housing and roads and further mitigation can be included at detailed design, for example solid garden fences and appropriate specification of glazing.
- 5.33 Traffic noise generated by changes to local traffic flows have been assessed for both construction and operation of the proposed development. Although a general increase in traffic flows is expected, the increases are not sufficient for the corresponding noise increases to cause a significant effect. Any noise and vibration arising during the construction period can be suitably mitigated through use of good practice mitigation.
- 5.34 Overall, it is considered that there are no planning reasons to withhold consent due to noise.

#### Air Quality

- 5.35 The Air Quality Chapter of the ES considers the existing situation and both the construction and operational phases of the development in terms of impact on air quality. In terms of construction, with appropriate mitigation measures in place any potential adverse impacts from dust soiling during construction would be minimised and would not have a significant effect.
- 5.36 In terms of the operational phase, concentrations of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> are unlikely to exceed AQS objectives in all development scenarios and effects at receptors are expected to be negligible. It is therefore considered that the proposed development is unlikely to have a significant effect on local air quality.

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### Ground Conditions

- 5.37 The site is currently in agricultural use however it comprises Agricultural Land Classification Subgrade 3b which is poorer quality land in the context of the NPPF and does not fall within the Best and Most Versatile (BMV) land classification. Historic mapping indicates that the site has been in agricultural use since the earliest available mapping in 1887. Overall, there are no significant issues regarding ground conditions at the proposed site and mitigation can be provided through compliance with the relevant legislation, regulations, best practice guidance and pollution prevention methods. The details of this can be provided as part of a Construction Environmental Management Plan which can be secured by condition.

### Landscape

- 5.38 A Landscape and Visual Appraisal has been carried out and is included as part of the ES. The site is located within the Arden National Character Area which has informed the principles set out in the SUE Design Guide SPD.
- 5.39 The proposed development is adjacent to existing residential development at Keresley End and will appear as an extension to this. The proposed development includes several areas of green infrastructure and open space which will act as a landscape 'buffer' along the northern boundary, providing a set-back from Keresley Rugby Club.
- 5.40 The extent of the proposed development has been informed by landscape considerations, such as the set-back on the northern and western boundaries. The field adjacent to the site to the west is shown on the Council's Masterplan as undeveloped to protect views across the ridge to Burrow Hill Fort. The proposed development includes a buffer and lower density development along this boundary to provide an appropriate transition.
- 5.41 The landscape strategy for the proposed development will retain the majority of existing vegetation wherever possible and will provide additional planting to enhance existing vegetation. In particular, the majority of the existing hedgerows will be retained and these have been used to guide the development parcels which will ensure the proposed development retains the scale and pattern of the site in the context of the wider landscape. Significant areas of open space are proposed, with the retained pond and associated trees acting a focal point

alongside the proposed play space. Linked to this, a linear open space runs west-east to the eastern boundary and accommodates the drainage pond. This area will be landscaped to provide an attractive, linear open space running through the site.

- 5.42 A Lighting Assessment has also been provided in support of this application. This report notes that the rugby club is separated from the application site by an existing landscaping buffer including significant hedgerows and trees which are proposed to be retained. It is considered that the existing vegetation provides effective screening and would minimise any potential light spill/glare effects.

#### Sports Provision

- 5.43 It is not proposed to provide any on-site formal sports provision as the topography of this site is undulating rather than flat as is required for sports pitches. Furthermore, there are existing sports facilities in close proximity to the site notably Keresley Recreation Ground which is located to the east of the site on Howat Road and includes publicly accessible playing pitch facilities along with other facilities including a Multi-Use Games Area (MUGA), equipped play area and bike track. Furthermore, Keresley Rugby Club is located immediately adjacent to the site to the north and includes playing pitch and club facilities, though not publicly accessible. To the south of the site beyond Thompsons Lane is the former Colliery Club which included playing pitches.
- 5.44 As discussed previously, the SUE as a whole is not currently delivering the housing numbers set out in the allocation. The provision of on-site sports provision would undermine the delivery of housing and the efficient use of land, particularly as there is land within the SUE which has previously been used as playing fields and remains set out for this purpose.
- 5.45 It is anticipated that discussions will be held with the Local Planning Authority to discuss new/improved facilities in accordance with Local Plan policy and Sport England requirements. This is reflected in the Draft Heads of Terms set out at Section 6.

#### Sustainability

- 5.46 As discussed above, the NPPF sets out that there are three objectives to consider as sustainable development and that all three should be pursued through the

planning system. This Statement and the supporting documentation demonstrate that this proposal will deliver sustainable development.

- 5.47 In terms of economic benefit, new residential development is acknowledged to have direct economic benefits. In terms of the construction phase, which it is assumed will last 10 years, this will support around 47 direct on-site construction jobs per annum. It is generally accepted that housebuilding has knock-on effects for other sectors, through this it is considered that the proposed development could support an additional 82 jobs per annum in the wider economy. Once operational, the increased population could generate an annual household expenditure of approximately £12.3 million which would provide significant benefits to the local economy.
- 5.48 In terms of social benefits, the planning application will deliver a significant number of dwellings on an allocated site which will provide a significant contribution towards meeting the city's housing needs. Furthermore, the application includes provision for 25% of the dwellings to be affordable which will contribute to providing housing for those in the local area who cannot afford to purchase market housing.
- 5.49 The proposals will deliver environmental benefits through the landscaping strategy which includes a significant portion of the site as green infrastructure and open space. In particular, the proposed development includes significant landscape buffers on boundaries adjoining undeveloped land.
- 5.50 Overall, it is clear that there are significant economic, social and environmental benefits arising from the proposed development and therefore it fulfils the need to deliver sustainable development.

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## 6. Draft Heads of Terms

6.1 The following items are proposed to be addressed via a legal agreement where matters cannot be addressed by the planning application:

- Affordable housing (policy requirement 25% to be split 15% social/affordable rent and 10% intermediate provision)
- Education
- Link road contribution
- Public right of way contribution
- Health (NHS)
- Off-site sports provision

## 7. CONCLUSIONS

- 7.1 This Planning Statement and the accompanying application documents consider the matters relevant to the consideration of the application proposals. The proposed development comprises of 500 residential dwellings (25% of which are to be affordable) with associated access. The application is for outline consent with matters related to layout, scale, appearance and landscaping reserved for future consideration.
- 7.2 The site is allocated in the adopted Local Plan as part of a wider allocation (H2:1) to deliver a total of 3,100 dwellings. The whole allocation has been removed from the Green Belt and forms the largest single allocation in the Local Plan to meet the City's housing needs. This demonstrates that the Council have accepted the site is suitable for residential development and the principle of development is established.
- 7.3 The Council have produced a draft Urban Extension Design Guide SPD and associated Indicative Masterplan for the Keresley SUE. The supporting Design and Access Statement and Parameters Plan demonstrate that the site can accommodate the proposed development in accordance with the principles set out in the SPD to deliver high-quality development.
- 7.4 The application submission demonstrates that there will be considerable economic, social and environmental benefits that mean that the sustainable development will be achieved.
- 7.5 This Statement has demonstrated that the proposed development is in accordance with the adopted Plan and therefore should be approved without delay to assist in the delivery of this allocation and allow the site to contribute towards meeting the housing needs of the City.