

# **MEGGITT NUCARB CVD**

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Planning Statement

**Extension of Unit, Holbrook Lane, Coventry**

July 2019

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**MEGGITT**

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# Section 1: Introduction

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## INTRODUCTION

1. This Planning Statement has been prepared on behalf of Meggitt Aerospace Ltd, who operate at the facility on Swallow Road, Coventry creating and manufacturing aircraft braking systems.
2. This document has been prepared in support of a detailed planning application to extend the unit to improve capacity and operations at the site. The description of the development is as follows:

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*“Erection of extension to building within existing manufacturing facility”*

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3. The remainder of this document is structured as follows:
  - Section 2: Site Location and Description;
  - Section 3: The Proposed Development;
  - Section 4: Planning Policy Context;
  - Section 5: Assessment of Issues and Benefits; and
  - Section 6: Summary and Conclusions.
4. This document should be read in conjunction with the other standalone plans, drawings and documents submitted to accompany this planning application, as set out in **Appendix 1** of this Statement.

## Section 2: Site Location, Site Description and Planning History

### SITE LOCATION AND DESCRIPTION

5. The site is located to the north of Swallow Road a private road accessed off Holbrook Lane to the east, to the north of Coventry City Centre. It comprises an existing collection of manufacturing buildings associated with Meggitt Aerospace. The area subject to this planning application is within this collection of buildings, and identified on figure 1 below. The site and buildings to the south and east are to be demolished which is subject to a separate prior approval notification.
6. Associated car parking is provided to the south and east of the building, with access taken off Swallow Road which is a private road controlled via a manned gate.
7. To the south west of the site is an area of residential development, and to the south east is a cleared site formerly part of Meggitt. To the north is a recreational area and associated playing fields.

**Figure 1: Site Location**



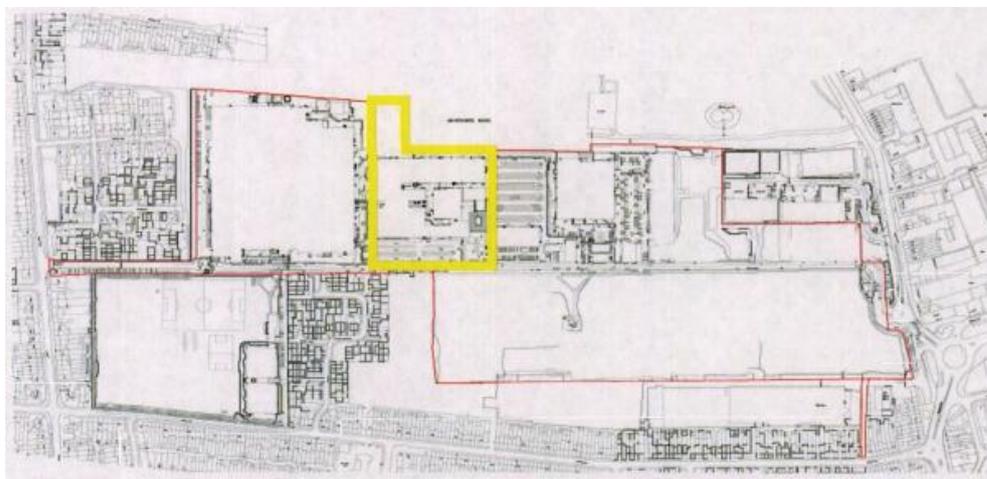
Source: Google Maps with CBRE markup

### PLANNING HISTORY

8. A planning history search has been carried out using the Council’s online planning application search tool. The following applications have been identified:

APPLICATION REFERENCE	DESCRIPTION OF DEVELOPMENT	DECISION AND DATE
SCO/2019/0511	Screening Opinion request for the demolition of buildings and structures and the erection of a mixed-use development up to 550 residential dwellings	28/03/2019

- 9. The online application search tool has not identified any further historical applications.
- 10. The screening opinion request identified in the table above relates to the wider Meggitt site north and south of Swallow Road. The proposed development for the wider site will seek to demolish all of the buildings north of Swallow Road, except for the buildings subject to this current application (highlighted in yellow on the plan below).



Source: EIA Screening Opinion, submitted by Pegasus (Coventry reference SCO/2019/0511)

## Section 3: Description of Development

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### OVERVIEW

11. This application for planning permission is submitted in detailed form. As noted in Section 1 of this Statement, the Development is described as follows:

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*“Erection of extension to building within existing manufacturing facility”*

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12. The proposed development comprises the erection of a replacement building of **1,887 sqm** over two floors that will form an annex to the existing CVD building in Coventry. To accommodate this development, demolition of existing buildings on site (1,377.7sqm) will be carried out. The overall net gain of floorspace on the site will be **509.3sqm**.
13. It is required to house the front end and back end processes for producing the US developed NuCarb on site in Coventry. The development will allow Meggitt to increase the capacity to meet rising demand for carbon brakes. This will allow the capacity of the Coventry CVD factory to increase from around 30,000 to 45,000 discs per year.
14. The new annex to the Coventry CVD facility will contain one NuCarb preforming cell (comprising a FibreVac machine and a needle loom), 2 drying ovens and 4 heat treatment furnaces.
15. The proposed development will be constructed in place of the demolition of a previous building, which was subject to a separate demolition prior notification approval (ref: P/2019/1402).

## Section 4: Overview of the Planning Policy Context

### LOCAL PLANNING POLICY

#### Introduction

- 16. Section 38(6) of the Planning and Compulsory Purchase Act 2004 [and paragraph 11 of the National Planning Policy Framework (NPPF)] requires that proposals should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 17. In this case the Development Plan for Coventry comprises the Coventry Local Plan (2017) and the Coventry City Centre Area Action Plan (2017).
- 18. In addition to the Development Plan, the Council has produced several Supplementary Planning Guidance (SPGs) notes and Supplementary Planning Documents (SPDs).

#### Coventry Local Plan (2017)

- 19. The Coventry Local Plan was adopted in December 2017 and identifies the local policies for the growth of Coventry.
- 20. We consider that the following policies are relevant to the proposals:
- 21. **Policy DS1: Overall Development Needs** identifies the significant levels of housing, employment and retail development required over the plan period which are:
  - a. A minimum of 24,600 new homes;
  - b. A minimum of 128ha of employment land; and
  - c. 84,900 sqm gross retail based floorspace.
- 22. **Policy JE1: Overall Economy and Employment Strategy** states that the Council will work positively and proactively with the business community in the city to support sustainable economic growth and job creation. This includes safeguarding existing employment sites and premises from being lost to non-employment uses, and supporting companies in retaining, expanding and / or relocating their headquarters operations in the city.
- 23. **Policy JE2: Provision of Employment Land and Premises** identifies Whitmore Park as part of a mixed-use site including 8ha of B1b&c, B2 and B8 uses. This is shown on the Local Plan policies map (extract below).



24. **Policy JE7: Accessibility to Employment Opportunities** states that planning application for new employment development (including changes of use and the expansion of existing operations) will be required to demonstrate how job opportunities arising from the proposed development will be made accessible to the City’s residents, particularly those in the most deprived areas of the City and priority groups.
25. **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, consider the transport and accessibility needs of everyone living, working or visiting the city, and support the delivery of new and improved high quality local transport networks which are closely integrated into the built form.
26. **Policy AC2: Road Network** considers that where new development proposals are predicted to have a negative impact on the capacity and / or safety of the highway network should mitigate and manage the traffic growth which they are predicted to generate to ensure that they do not cause unacceptable levels of traffic congestion, highway safety problems and poor air quality.
27. **Policy AC4: Walking and Cycling** considers that development proposals should incorporate appropriate safe and convenient access to walking and cycling routes.
28. **Policy AC5: Bus and Rapid Transit** new major development proposals should have safe and convenient access to the existing bus network and comply with the TfWM access standards.
29. **Policy AC7: Freight** states that new development on sites which generate or are likely to generate significant HGV movements must accommodate appropriate on-site lorry parking and turning facilities to minimise disruptions and safety issues on the public highway.
30. **Policy GE3: Biodiversity, Geological, Landscape and Archaeological Conservation** states that Sites of Special Scientific Interest (SSSIs), Local Nature Reserves (LNRs), Ancient Woodlands, Local Wildlife and Geological Sites will be protected and enhanced. Proposals for development on other sites, having biodiversity or geological conservation value, will be permitted provided that they protect, enhance and/or restore habitat biodiversity. Biodiversity will be encouraged particularly in areas of deficiency, in areas of development and sustainable urban extensions, and along wildlife corridors.
31. **Policy EM1: Planning for Climate Change Actions** requires all development to be designed to be resilient to, and adapt to the future impacts of, climate change through the inclusion of the following adaptation measures:
  - a. Using layout, building orientation, construction techniques and materials and using natural ventilation methods to mitigate against rising temperatures;
  - b. Optimising the multi-functional green infrastructure, including tree planting for urban cooling, local flood risk management and shading;
  - c. Incorporating water efficiency measures, such as the use of grey water and rainwater recycling and low water use sanitary equipment;
  - d. Minimising vulnerability to flood risk by locating development in areas of low flood risk and including mitigation measures including SUDS in accordance with policy EM4;
  - e. Where applicable, maintain and enhance the canal network to reflect the canal’s role in urban cooling;

- f. Seek opportunities to make space for water and develop new blue infrastructure to accommodate climate change.
32. **Policy EM2: Building Standards** states that new development should be designed and constructed to meet the relevant Building Regulations and meet the carbon reduction targets.
33. **Policy EM4: Flood Risk Management** states that all major developments must be assessed in respect of flood risk from all sources.
34. **Policy EM5: Sustainable Urban Drainage Systems (SUDS)** requires all development to apply SUDS and should ensure that surface water runoff is managed as close to its source as possible.
35. **Policy EM6: Redevelopment of Previously Developed Land** considers that development will be permitted where proposals do not have a negative impact on water quality, either directly through pollution of surface or groundwater or directly through the treatment of waste water by whatever means.
36. **Policy EM7: Air Quality** considers that major development schemes should promote a shift to the use of sustainable low emission transport to minimise the impact of vehicle emissions on air quality, and will require the submission of an air quality assessment.

## NATIONAL PLANNING POLICY

### National Planning Policy Framework 2019 (NPPF)

#### Presumption in Favour of Sustainable Development

37. A revised version of the National Planning Policy Framework (“NPPF”) was published on 24<sup>th</sup> July 2018, with further minor alterations issued in February 2019. Paragraph 8 defines the broad economic, social and environmental objectives that the planning system should pursue in order to achieve sustainable development. This includes helping to 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
38. Paragraph 11 goes on to confirm that development should be approved where it accords with the development plan; or where the development plan is absent, silent or out-of-date, permission must be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

#### Decision-making

39. NPPF paragraph 38 considers that local planning authorities should approach decisions on proposed development in a positive and creative way. This includes working proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area.
40. In relation to adopted local plan policies, paragraph 213 states that existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).

### **Building a Strong, Competitive Economy**

- 41. Paragraph 80 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. 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.
- 42. Paragraph 82 notes that policies and decisions should recognise and address the specific locational requirements of different sectors. It also goes on to state that this includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.

### **Other NPPF Policies**

- 43. In addition to the policy areas outlined above, the NPPF also provides policies relating to a range of other thematic issues relevant to the current proposals, including in relation to design, sustainable transport, climate change and flood risk, and protection of the natural environment and heritage.

## **MATERIAL CONSIDERATIONS**

### **Delivering a More Sustainable City SPD (2009)**

- 44. The SPD aims to set out Coventry City Council’s commitment to achieve greater levels of sustainable development through the planning process. It applies to major development.
- 45. It covers the seven key sustainable themes which align with the West Midlands sustainability checklist:
  - a. Energy
  - b. Materials
  - c. Contaminated land
  - d. Travel
  - e. Waste and recycling
  - f. Water
  - g. Air quality.
- 46. Key requirements and questions are provided to be addressed as part of supporting sustainability statements.

## Section 5: Assessment of Issues and Benefits

### INTRODUCTION

47. This section provides an overview of the main issues and benefits arising from the proposals, having regard to relevant planning policies and other material considerations.
48. In the consideration of the proposals provided in this document, reference is made to other plans and documents which have been submitted as part of the application. Regard should be made to these other plans and documents for further details on relevant matters.

### PRINCIPLE OF DEVELOPMENT

49. The proposed development replaces an existing building to provide an appropriate extension to Meggitt's NuCarb CVD. The total floorspace of the extension is 1,887sqm, which when considered alongside the demolition (separate prior approval P/2019/1402) creates a net increase of 509sqm. This extension will enable Meggitt to continue their operation at this location thus retaining, and creating, local jobs whilst the remainder of Meggitt's operations are relocated to Ansty Park.
50. The proposals accord with Local Plan policies JE1 and JE2. The site is located within a wider mixed-use allocation (JE2: Whitmore Park) where it is suggested that the site is redeveloped for residential use with 8ha of B1b&c, B2 and B8 uses. The retention of Meggitt on site contributes towards the mixed-use aspirations. The applicant is also aware of the potential impact of the proposed extension on the future development potential for residential in the vicinity. This has been taken into consideration in the design process and is addressed in the following sections (other technically specific policies are assessed). It is therefore considered that the principle of the proposed development is appropriate in this location.

### DESIGN CONSIDERATIONS

51. The proposed extension has been designed to fit within the existing parameters of the building, and as such does not exceed the existing roofline. It is proposed to be clad in a trapezoidal insulated panels and the roof will be of a similar cladding system and will include roof lights to provide natural daylighting internally. The proposed materials for the walls and roof is light blue to match existing, and the proposed materials for the doors / flashings is dark blue to match existing.
52. The Design and Access Statement submitted with this application explains the approach to design in more detail. It is anticipated that the final materials for the build will be secured via an appropriately worded condition.

### HIGHWAYS AND ACCESS CONSIDERATIONS

53. A Transport Statement has been prepared by David Tucker Associates to support the planning application. Given the small scale of the proposal and the expected limited transport impact, a Transport Statement is considered appropriate in this case.
54. No alterations to the existing access points, parking provision and other road infrastructure will be incurred as a result of the proposal and as such the site will continue to operate effectively in highways terms after the demolition and subsequent extension is completed.
55. Access into and out of the site will remain unchanged from its existing form for both vehicles and pedestrians. The current vehicle access is in the form of a priority T-junction where Swallow Road, the internal service road, runs west bound from Holbrook Lane.

- 56. Over an operational 12-hour period the proposed extension is expected to generate 22 two-way vehicle movements. The numbers represent only a marginal increase compared with traffic generated by the existing site. The proposal will result in a small increase in the number of on-site staff by 6no FTE. Given the significant sustainable credentials of the site, it is anticipated that only a modest proportion would arrive by car, reflective of the forecast vehicular trip rates.
- 57. The Transport Statement concludes that the traffic movements generated by the proposal are negligible and as a result will have no material impact on the wider road network and this level of change will be well within the existing daily flow variations. As such, the proposals accord with policies AC1 and AC2 of the Local Plan 2017.

### **SURFACE WATER DRAINAGE STRATEGY**

- 58. A Flood Risk and Drainage Statement has been provided to support the application to assess the surface water and foul sewerage strategy. A Flood Risk Assessment is not required as the site is in Flood Zone 1 and is less than 1ha in size.
- 59. There are existing surface water and foul water connections from the existing building which is it proposed to re-utilise.
- 60. Sustainable Urban Drainage Systems (SUDS) have been considered however have been discounted for the following reasons:
  - a. SUDS are land intensive, and given that the proposals relate to the redevelopment of the building on the same area of land, and therefore there is no available land for them.
  - b. Underlying ground is clay and therefore unable to infiltrate. Additionally, Building Regulations require infiltration features to be located a minimum of 5m away from the building, and therefore even if the underlying soil conditions were suitable for infiltration, the space is not available.
- 61. As the overall impermeable area is not being increased, and the existing private drainage is to be re-used, flood risk downstream will not be increased. Subsequently Local Plan Policies EM4 and EM5 have been appropriately addressed.

### **ENERGY, CLIMATE CHANGE AND SUSTAINABLE CONSTRUCTION**

- 62. The Energy Statement submitted with this planning application assess the energy credentials of the proposed development in line with Local Plan policies EM2 and EM3. A separate Sustainability Statement is also provided, drawing together the fundamental sustainability components of the supporting documents.
- 63. The total calculated carbon reduction is 10% and the total calculated energy usage reduction is 19.5% when compared against the Notional Benchmark Building. This meets Coventry City Council’s target to reduce carbon emissions.
- 64. The Sustainability Statement addresses the seven key themes of the West Midlands sustainability checklist as set out in the ‘Delivering a More Sustainable City’ SPD. It is therefore considered that Local Plan Policy EM1 has been appropriately addressed and the proposed development is sustainable in all possible aspects.

### **ECOLOGY**

- 65. A Preliminary Ecological Appraisal (PEA) has been carried out which identified that the habitat within the site is very poor for bats, despite the presence of an area of parkland

to the north of the site. Bat surveys were carried out which did not identify any activity and are therefore highly unlikely to be roosting within the structures on site. No further surveys are recommended for the site.

- 66. The PEA suggests that there is a potential for nesting birds to be present on site, and demolition works should be carried out outside of the nesting season or to be monitored during the works.
- 67. As such, there are no ecological grounds constraining the redevelopment of the site and therefore is not contrary to policy GE3 of the Coventry Local Plan 2017. Given the constrained nature of the site and the type of use, there is limited opportunity to enhance biodiversity on this instance, and will likely result in a neutral effect.

### AIR QUALITY

- 68. The Air Quality Assessment prepared by Syntegra Consulting assesses the demolition, construction and operation phases of development.
- 69. It concludes that during the construction phase of development, there is a potential for air quality impacts as a result of fugitive dust emissions from the site. Good practice dust control measures will be implemented by the contractor and therefore the residual significance of potential air quality impacts from dust generated by demolition, earthworks, construction and trackout activities is expected to be not significant.
- 70. Due to the low number of vehicle trip anticipated to be generated by the proposals, negligible impacts are predicted. Therefore the proposals accord with policy EM7 of the Local Plan 2017.

### S106 OBLIGATIONS AND COMMUNITY INFRASTRUCTURE LEVY

- 71. The Council’s approach to S106 contributions is set in Local Plan **Policy IM1: Developer Contributions for Infrastructure**. It states that development will be expected to provide, or contribute towards provision of:
  - a. Measures to directly mitigate its impact and make it acceptable in planning terms; and
  - b. Physical, social and green infrastructure to support the needs associated with the development.
- 72. It also states that the Council will, where appropriate, seek to secure site-specific infrastructure investments as / or contributions and well as off-site contributions and / or investments.
- 73. The proposed development is anticipated to create only a minor increase in traffic (e.g. 22 two-way vehicle movements per operational 12 hour period) and therefore have a de-minimis impact upon the local infrastructure. As such it is not expected that the proposed development would be required to contribute towards any S106 obligations.
- 74. Coventry City Council does not yet have a Community Infrastructure Levy, and therefore there is no requirement for CIL charges.

## Section 6: Summary and Conclusions

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- 75. This Planning Statement has been prepared on behalf of Meggitt Aerospace Ltd for the redevelopment of part of the existing facility at Swallow Lane, Coventry.
- 76. The principle of the proposed extension is appropriate in this context, as it replaces an existing built form and will enable Meggitt to continue to carry operating here retaining local employment. The extension, when considered alongside the demolition of the building and surrounding building, creates a net floorspace gain of 509sqm.
- 77. The proposed development is sustainable and results in a carbon reduction of 10% thus meeting Coventry City Council’s target to reduce carbon emissions.

# Appendix 1: Planning Application Deliverables

## Planning Application – Forms and Certificates

PLAN NAME	LOCATION IN APPLICATION
Application Form	Standalone Document
Ownership Certificate and list of Persons Served Formal Notification	Standalone Document
Application Fee	-

## Planning Application – Plans and Drawings

PLAN NAME	LOCATION IN APPLICATION
Location Plan	Standalone Plan
Site Plan	Standalone Plan
Existing Site Plan	Standalone Plan
Proposed Site Plan	Standalone Plan
Existing Ground Floor	Standalone Plan
Existing Elevations	Standalone Plan
Existing GA Sections	Standalone Plan
Proposed Ground Floor Plan	Standalone Plan
Proposed First Floor Plan	Standalone Plan
Proposed Roof Plan	Standalone Plan
Proposed Elevations (sheet 1 of 2)	Standalone Plan
Proposed Elevations (sheet 2 of 2)	Standalone Plan

## Planning Application – Supporting Documentation

DOCUMENT NAME	LOCATION IN APPLICATION
Planning Statement	Standalone Document
Design and Access Statement	Standalone Document
Transport Statement	Standalone Document
Preliminary Ecological Appraisal	Standalone Document
Flood Risk and Drainage Statement	Standalone Document
Ventilation Extraction Statement	Standalone Document
Energy Statement	Standalone Document
Sustainable Construction Statement	Standalone Document
Air Quality Assessment	Standalone Document