

For the attention of: Vanessa Morgan
Senior Planning Officer
Lichfield District Council
Development Control Team (Planning)
District Council House
Frog Lane
Lichfield
Staffordshire
WS13 6YY

Date: 20th November 2020

LPA Ref: 20/01178/FULM
PDR Ref: PDR20-05

Dear Ms Morgan,

Application No: 20/01178/FULM

Applicant: Vistry Homes Ltd / Greenlight Developments Ltd

Location: Land Off Horner Avenue, Fradley, Lichfield, Staffordshire

Proposal: Full planning application for a residential development with associated works and public open space, and access from Horner Avenue and Ward Close

We refer to Fradley and Streethay Parish Council's comments contained within their letter of the 7th October 2020 to this planning application.

This response has been prepared by PDR Planning on-behalf of Vistry Homes Ltd / Greenlight Developments Ltd.

In order to help with the points raised by the Parish Council we thought it would be useful if we clarified the applicant's position in relation to the points outlined.

We will provide comments in the same order (citing the relevant paragraph numbers) as they have been outlined by the Parish Council in their letter:

- **Loss of Employment Land**
3. For completeness, please find enclosed a full copy of the 28th February 2020 email contained within Appendix 7 of the Planning Statement. This email was informed by lengthy discussions that had taken place Greenlight Developments and Avison Young (acting on-behalf of L&G). L&G are not prepared to permit any type of access via the land it controls in Fradley Park. When one reads the evidence contained at Appendix 7 of the Planning Statement, one will note that L&G were, firstly, not interested in acquiring the application site to expand their own employment portfolio of sites; and secondly, were not even prepared to permit a temporary construction access over their land into the site (traffic types and movements more akin to a commercial operation), let alone a permanent access solution. Access into the application site, via Fradley Park, is simply not available.
 4. As explained at Paragraph 4.20 of the Planning Statement, the TRICs database does not provide a standalone B1(c) (light industrial) land use category. The TRICs database does include sites defined as 'Industrial Estate' and the sites selected within this category contain B1(c) ancillary office use. It is under the 'Industrial Estate' land use that the concerns listed within the Planning Statement refer to HGV vehicles utilising residential roads and an increase of heavy vehicles.

In terms of B1(a) offices, this is dealt with separately at Paragraph 4.22 of the Planning Statement. HGVs are not mentioned within this land use; the concerns raised being an increased risk of highway safety as a result of higher traffic flows, which as quantified, are significantly higher than for the proposed residential use.

5. To calculate the trip generation potential of the proposed development of the site for B1(a) and B1(c), B2 and B8 land uses an assessment has been undertaken utilising the TRICs database. TRICs is used to do this, as it uses a range of trip generation rates that provide an estimate of the likely activity at a development, which can then be used in a Transport Assessment.

In terms of the evidence to inform the two alternative commercial uses being proposed as developments for the site, the applicant had two separate commercial development schemes prepared for the site; both of which are appended to the Mode Technical Note (at Appendix 3 of the Planning Statement). The first scheme is a commercial development for a B1(a) office development comprising 161,276sqft (14,983 sqm) and 501 car parking spaces on the site. The second scheme is a commercial development for a B1(c) light industrial development of 104,765sqft (9,733sqm) and 326 car parking spaces on the site.

With regards to the pre-application meeting that took place with Highways Officers at Staffordshire County Council, Greenlight Development's notes of this meeting are attached at Appendix 1 of the Planning Statement.

The evidence being presented in-relation to highways is done so to satisfy the relevant 'test' as set out in Policy EMP1 of the Local Plan Allocations Document, under the third alternative; namely, that development of the site for employment uses (B1, B2 and B8) would lead to site specific environmental problems; these being, unacceptable levels of traffic type and generation. These problems can be avoided by developing the site for housing, thereby realising the environmental benefits that would arise from avoiding an employment use of the site.

7. The lack of demand for office space does not form part of the applicant's principal case in this planning application. We note the reference at Paragraph 4.18 of the Planning Statement to the loss of the existing offices at Wellington Crescent, Fradley Park, in favour for a storage and distribution development; this was mentioned, to reaffirm that storage and distribution (B2/B8 uses) is the most attractive type of use to the market in this location, which, in our opinion, cannot really be disputed.

In terms of the principle of residential development on the site, the applicant's case is made under the third alternative of Policy EMP1 of the Local Plan Allocations Document, as set out in the preceding paragraph (under the section dealing with Paragraph 5 of the Parish Council's letter).

- **Biodiversity Net Gain**

8. The applicant is aware of the comments made by the Council's Ecology Manager (dated, 14th October 2020), and they are looking to address these. It is anticipated that this additional work will also satisfy the points raised here by the Parish Council.

- **Open Space Provision**

11. The Parish Council clearly recognises here that the existing ribbon development of intended public open space has been making little contribution if any to the existing provision of public open space in the area, thus reaffirming the applicant's understanding, and in turn reinforcing the applicant's intentions to improve/enhance and bring this land into meaningful use as public open space; a benefit, in our opinion, of this planning application.

12. The onus to demonstrate whether or not a local need for allotments exists, we would suggest, rests with the Council, and does not rest with the applicant. No such evidence has been identified to the applicant.
13. The public open space to the south-east of the site is not the only parcel of public open space within the proposed development. This area measures 0.25 hectares (0.6 acres), with the total amount of public open space (excluding the ribbon of open space running along the north-eastern boundary of the site) equating to 0.52 hectares (1.3 acres). There are two other parcels of public open space in central regions within the proposed development, which equate to a further 0.27 hectares (0.7 acres) of public open space. These areas will also act as ground detention basins as part of the development's sustainable drainage systems, but they will be landscaped into public open space (as confirmed at Paragraph 3.20 of the BWB Consulting prepared Sustainable Drainage Strategy that accompanies this planning application).
14. Enclosed with this letter is a further Note from the applicant's acoustic engineers, AEC; we are of the opinion, that this Note adequately deals with this point and confirms that all dwellings with the appropriate levels of mitigation, will be afforded acceptable levels of residential amenity.
15. This being the public open space that the Parish Council in Paragraph 11 of its letter confirms is difficult to be enjoyed by the public, which this planning application intends to rectify; a benefit, in our opinion, of the proposed development.

- **Housing Need**

16. Policy FRAN12 of the Fradley Neighbourhood Plan is worded to simply say, "*the provision of dwellings that demonstrably meet the needs of older people or are capable of adaptation to meet such needs will be supported.*" It does not say that, dwellings that do not will not be supported.

The relevant Local Plan Strategy policy, Policy H1 (A Balanced Housing Market) actively promotes the delivery of smaller properties including two bed apartments and two and three bed houses to increase local housing choice and contribute to the development of mixed and sustainable communities. To achieve this Table 8.2 of the Local Plan Strategy provides an indicative housing mix, which includes 5% one bed, 42% two bed, 41% three bed and 12% four bed plus properties. The housing mix for the proposed development aligns with this indicative housing mix, and is therefore considered by the applicant to be policy compliant.

- **Highway Matters (including Appendix: Report on Road Safety Problems Caused by the Proposal)**

Enclosed with this letter is a detailed Technical Note from the applicant's transport consultants, Mode. We are of the opinion, that this Technical Note adequately deals with the points raised (at Paragraphs 17 - 21) in the Parish Council's letter.

- **Noise and Odours**

Enclosed with this letter is a further Note from the applicant's acoustic engineers, AEC. We are of the opinion, that this Note adequately deals with the points raised (at Paragraphs 22 – 25) in the Parish Council's letter and confirms that all dwellings with the appropriate levels of mitigation, will be afforded acceptable levels of residential amenity.

26. Enclosed with this letter is a brief Note from the applicant's air quality consultants, RPS. We are of the opinion that this Note adequately deals with the point raised in-relation to unpleasant odours from a nearby sewage pumping station. There is a recommended cordon sanitaire around pumping stations from habitable buildings of 15 metres.

The closest dwelling's perimeter is 16 metres from the perimeter of the pumping station, greater than this recommended distance. Therefore, future occupiers of the development are not expected to be affected by odours arising from the pumping station.

▪ **Other Matters**

27. This was a drafting error. Please find enclosed an updated version of drawing reference: JSL.3588-RPS-XX-EX-DR-L-9001 Rev P04, which shows the Parish Council owned land outside of the red-line boundary removed.
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We trust that the above information is of assistance to both the Local Planning Authority and Fradley and Streethay Parish Council, and provides the necessary information to demonstrate that all of the points raised in the Parish Council's letter of 7th October 2020 have been considered and addressed within this current planning application.

Yours sincerely



Philip Rawle BSc(Hons) MA DipTP MRTPI
Director

- Enc.
 1. Email of 28th February 2020 (Appendix 7 of Planning Statement)
 2. Mode Technical Note
 3. AEC Note (Noise)
 4. RPS Note (Air Quality)
 5. Deatiled Soft Landscape Proposals 1/5 JSL.3588-RPS-XX-EX-DR-L-9001 Rev P04
- Cc
 - Clare Orme – Clerk/RFO to Fradley and Streethay Parish Council
 - Alex Carlin – Vistry Homes
 - Matt Gallagher – Greenlight Developments
 - Councillor Cross – Lichfield District Council
 - Councillor Wilcox – Lichfield District Council
 - Councillor Wilcox – Lichfield District Council