

# Questions Arising from Inquiry

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**DATE** 21<sup>st</sup> November 2023

**SUBJECT** Questions Arising from Inquiry

**REFERENCE** Appeal Reference: APP/E3715/W/23/3322013: Coventry Stadium, Rugby Road, Coventry

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## The Relationship Between Brandon Estates and St Philips Ltd

In cross examination, Gareth Hooper referred to St Philips being the ‘delivery partner’ for the appeal site, indicating that this meant that implementation of the appeal proposals would not be delayed by Brandon Estates having to market the site to secure such a party. SCS asked why, if this was the case, they were not shown as having an interest in the site and not being party to the proposed Planning Agreement.

St Philips Ltd, the parent company of St Philips Land Ltd, a land promotion company and St Philips Homes Ltd, a regional housebuilder has been involved with Brandon Estates Ltd in respect to the Appeal site since 2017 with a view of developing the appeal proposals.

St Philips Ltd involvement in the site dates back to 2017 and includes planning and technical support, informing the proposal to arrive at a viable and desirable development. Later involvement extended to safety works on site and the incorporation of detail relating to Sitting, External Appearance and Means of Access within the Application to facilitate the quickest possible start to delivery.

St Philips Ltd is in joint ownership with the ultimate owner of Brandon Estates Ltd, the joint venture promoting over fifty potential development sites throughout the country and the development of over 5,000 homes.

The Appeal Proposals would form part of the joint venture, remaining within Brandon Estates Ltd with St Philips Homes carrying out the development. As such, there is no need for any further contractual arrangements or changes in ownership given the joint control of St Philips Ltd. There is not a need for St Philips to have an interest in the Property or be a party to the application to secure the right to carry out the development.

## Distances to 3G Sports Pitches

The Table below sets out the distances and drive-times to the clubs identified in the KKP evidence.

SCS questioned the source of the distances and drive-times used. KKP have confirmed that these are derived from GIS software called Routefinder Pro, which is an industry-wide used source. The distances are by road rather than ‘as the crow flies’.

Finally, SCS questioned the St Finbars distance. KKP have confirmed that this is the distance from Blue Coat Church of England School rather than St Finbars Sports Ground. The use of that location is because that is where the club predominately trains as well as playing youth matches from. Given the need identified for additional training facilities for youth teams, KKP maintain that this is the appropriate relationship to be measured.

Club	Distance	Distance (drive time)
Alvis Juniors FC	6.1 miles	14 minutes
Christ the King FC	6.6 miles	16 minutes
Coventry Copsewood FC	3.1 miles	12 minutes
Lawford United FC	5.4 miles	14 minutes
St Finbars FC	4.9 miles	15 minutes
Coventry Sphinx FC	3.9 miles	14 minutes
Binley Woods Junior FC	0.7 miles	3 minutes
Chapelfield Colts FC	7.2 miles	17 minutes
Whitley Juniors FC	3.8 miles	13 minutes
Mount Nod FC	7.4 miles	20 minutes

**The Level of Discount for the proposed ‘Affordable’ Housing**

In cross examination, SCS asked Gareth Hooper about the level of ‘discount’ for the ‘affordable housing’ element of the appeal proposals. The draft S106 Agreement confirms that affordable rent dwellings offered and occupied via an Affordable Housing Provider shall be let at a rent not exceeding 80% of the local market rent (including service charges, where applicable) in accordance with Annex 2 of the National Planning Policy Framework