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17th February 2019

Re planning application **OUT/2019/0022**

Location: Land at Fivefield Road and Tamworth Road Keresley

Proposal:

Outline application for the demolition of all existing buildings and the erection of up to 550 dwellings and creation of associated vehicular accesses to Tamworth Road and Fivefield Road, pedestrian/cycle and emergency accesses, diversion of public rights of way, highway improvements to Fivefield Road, parking, landscaping, drainage features, open space and associated infrastructure, with all matters to be reserved except access points into the site.

Access points into the site.

Tamworth Road – Small parcel 3.02 ha site

Fails to meet the requirements of the **Trees & Development Guidelines for Coventry SPI** for ancient woodland buffer zones around Pikehone Wood & The Alders

Tamworth Road – Large parcel 24.28 ha site

Fails to meet the requirements of LOCAL PLAN Policy H3: Provision of New Housing for bus routes

Fivefield Road – Large parcel 24.28 ha site

Fails to meet the requirements of LOCAL PLAN Policy H3: Provision of New Housing for bus routes
Fails to protect existing rights of way

General comments

Item 15 of the Application Form has not been completed yet item 26 checklist is ticked to confirm that the application form completed and signed at 27. The application has been validated by CCC.

Fails to take into account requirements of existing draft SPDs

Fails to take the Link Road into account for noise and air quality

No primary school development plan currently available

No Link Road or road junction improvement plans development plan currently available

All Keresley SUE developments need to have the infrastructure needed for roads, education and healthcare, fully funded and approved prior to any housing development taking place.

Keresley Parish Council does not support the application in its current state

Councillor James Passmore
Councillor Chris Wood

On behalf of **Keresley Parish Council**

PLANNING STATEMENT - DECEMBER 2018

Healthy Development Template Land at Keresley Bellway

Supplementary Planning Documents

As the Local Plan has only recently been adopted, there are no up-to-date Supplementary Planning Documents in place at present. However, the Council are preparing an SUE Urban Design Guidance SPD which has been the subject of public consultation in 2018. The planning application has been prepared in accordance with the Draft SPD, and the applicant has engaged with the Council officers in its formation.

The documents for the application use the Draft SPD for the SUE. Since the applicant is prepared to use draft documents in their application there can be no reason not to use all those available in 2018 such as those prepared for the **Greenbelt Strategy** and the **Trees & Development Guidelines** amongst others.

Development adjacent to ancient woodland

Design and Access statement December 2018

Hatched zones showing 15m buffer zones for ancient woodland

Planning statement December 2018

P10 Green Environment, Design and Heritage Policies

4.9 The proposed green infrastructure includes a 15m buffer to the Ancient Woodland to avoid root damage and ensure the trees are protected in accordance with Policy GE3.

COVENTRY CITY COUNCIL - Local Plan 2017

Policy GE3ancient and newly-planted woodlands, ancient hedgerows and heritage assets of value to the locality, will be protected against loss or damage.

Policy GE4: Tree Protection

Further details will be provided in a Tree Protection Supplementary Planning Document.

Trees & Development Guidelines for Coventry SPI December 2018 Clause 2.13

As a precautionary principle, a minimum 50m buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice.

PLANNING STATEMENT - DECEMBER 2018

Healthy Development Template Land at Keresley Bellway

Green Environment, Design and Heritage Policies 4.8

The proposed green infrastructure includes a 15m buffer to the Ancient Woodland to avoid root damage and ensure the trees are protected in accordance with Policy GE3. The size of the buffer accords with Government Guidance updated in November 2018.

Landscape and Visual Effects Table 2.2 - Summary of Public Consultation Comments

The protection area around the ancient woodland should be greater than 15m.

Whilst the requirements of the **Trees & Development Guidelines for Coventry SPI** was brought to the attention of the developers at a public consultation no heed was paid to it.

No account has been taken of Policy GE4. Whilst the Trees & Development Guidelines for Coventry SPI December 2018 clearly calls for a 50m buffer between ancient woodland and any development, only a 15m buffer is proposed. No justification for this smaller buffer zone has been put forward. The buffer zone has been increased to 50m or an adequate demonstration by the applicant can show very clearly how a smaller buffer would suffice and has been agreed by the Coventry City Council tree officer.

Planning consent should not be given since the SPD has not been adhered to.

Public Rights of way

Design & access statement - Revision A

P48 Habitat Creation

Amenity/footpath zone (minimum 2m wide)

P48 Rights of Way

..... enhancing existing rights of way.....

Planning statement December 2018

P6 3. DESCRIPTION OF THE PROPOSAL

Existing rights of way along the Hall Brook corridor will be retained, with other routes diverted to align with green infrastructure corridors;

Draft Illustrative Masterplan C006 Rev-D :

Path M315 is shown as being extinguished where it crosses the new link road.

Path M313 in the Fivefield Road plot is shown as being extinguished, with walkers being directed along one of the roads.

Environmental Statement Volume 3 - Appendices Appendix 5 – Flooding, Hydrology and Water Resources ES Appendix 5-1 - Flood Risk Assessment_Part 5

MEC Drainage Strategy drawing 23541_01_230_02 dated 04.01.18

Existing wooden footbridge to be retained. - Annotation text on the map

Thus the existing 1m wide wooden footbridges across the Hall Brook are shown as being retained and not upgraded to a width of 2m mentioned in the Design and Access Statement

Appendix 1- Indicative Keresley Masterplan

Item 10 states:

..... it will be important to ensure pedestrians, vehicles, cyclists and public transport can move in and out of the site as well as through it in a clear and coherent manner.

Thus parts of the existing footpaths M313 and M315 are being neither enhanced nor retained. Until it can be shown that footpaths are at least 2m wide along their entire length, as stated in the Design and Access Statement, and that the only breaks in the path are to cross internal development roads no planning consent should be given.

The Link road

Below are extracts from **Appendix 1- Indicative Keresley Masterplan**

The Keresley Link Road.

The link road is considered important to helping manage traffic distribution through and around the site. The intention has always been to run the link road between Long Lane and Winding House Lane, although the exact route is not yet finalised.

The transport modelling which underpinned the Local Plan highlighted the importance of focusing the initial delivery of the road towards the western side of the site, with the full completion to the east necessary by the end of the SUE's development programme (expected to be approximately 2031). This is also expected to link in with wider highway improvements to the A444 and M6 Junction 3.

In the December 2016 **Transport Modelling Report** prepared for the Coventry Local Plan section 10 is devoted to a Keresley Link Road Assessment. Part of the conclusion states:

The assessment without the Keresley Link Road has indicated there are some parts of the highway network which experience an increase in traffic which increases the V/C ratio. These include B4076, Bennetts Road and Brownhill Green.

With the Keresley Link Road in place there is a reduction in traffic flow on Tamworth Road, Sandpits Land and Bennetts Road, with some reduction on Watery lane.

The statement mentioning the importance of the link road to the SUE seems to conflict with the fact that the route is not yet finalised and that completion would not be until 2031.

The roads mentioned, Tamworth Road, Sandpits Land and Bennetts Road, already suffer from congestion at peak periods. With the development of additional housing without the link road this can only get worse.

The Transport Modelling Report and other documents have always shown roundabouts to link to the new developments yet the plans in the application show a 'T' junction!

Public footpath M315 is cut through by the link road. The **Appendix 1- Indicative Keresley Masterplan** item 10 states:

..... it will be important to ensure pedestrians, vehicles, cyclists and public transport can move in and out of the site as well as through it in a clear and coherent manner.

In order for this to happen pedestrian/cycle bridges must be constructed over the link road.

For many years Keresley Parish Council have lobbied Coventry City Council for improvements to the junctions on Sandpits Lane. Whilst there is S106 money shown as becoming available for this road from the Lioncort development no concrete plans have been put forward.

Until it can be shown that fully funded plans are in place, including definite start dates, for both the link road and the Sandpits Lane junction improvements, no planning consent should be given for development, neither access nor housebuilding.

Transport assessment

Coventry Connected

(Transport and Accessibility) Supplementary Planning Document July 2018

3.2. Policy and Guidance Overview

DCLG: Travel Plans, Transport Assessments and Statements (2014)

It is important to give appropriate consideration to the cumulative impacts arising from other committed development (i.e. development that is consented or allocated where there is a reasonable degree of certainty will proceed within the next 3 years). At the decision-taking stage this may require the developer to carry out an assessment of the impact of those adopted Local Plan allocations which have the potential to impact on the same sections of transport network as well as other relevant local sites benefitting from as yet unimplemented planning approval.

Environmental Statement

9.0 Traffic and Transport

9.3.3 Assessment Methodology

The 2026 Do Something 2 (DS2) scenario includes all 2026 Do Something 1 scenario demands and also includes two further development sites within the Keresley Sustainable Urban Extension (SUE) as follows:

*Lioncourt – circa 800 dwellings; and
David Wilson Homes – circa 450 dwellings*

The transport assessment requires appropriate consideration to the cumulative impacts arising from other committed development i.e. development that is consented or allocated where there is a reasonable degree of certainty will proceed within the next 3 years. Coventry City Council is committed to the Keresley Sustainable Urban Extension (SUE) with an allocation of 3100 dwellings.

Only two additional developments are mentioned, taking into account of only 1250 dwellings out of the 3100 dwelling proposed for the whole of the Keresley Sustainable Urban Extension (SUE).

Traffic from the development site to the north of Fivefield Road is likely to want to travel to the completed link road. Some of this traffic is likely to want to travel along the Primary Road from Fivefield Road to the Link road. There is no indication of this scenario in the transport assessment as to the vehicle numbers that would be generated by this traffic.

It is also not clear if the transport assessment takes into account traffic generated from the Eastern Green Sustainable Urban Extension (SUE).

Since the transport assessment is lacking in clarity as to the scope upon which the conclusions are based , planning consent should not be given. Access for construction of this plot should only be from a completed link road.

Bus routes

LOCAL PLAN - Policy H3: Provision of New Housing

When considering public transport options in particular new homes should comply with the TfWM's access standards of 400m to a bus stop and seek to maximise connectivity to the existing network and facilitate extensions to this

Policy DE1 Ensuring High Quality Design

o) Support the integration of through routes for public transport and incorporate suitable bus priority measures as appropriate;

Public Transport (P144)

To ensure bus travel is an attractive and convenient option, new development must comply with TfWM access standards and be expected to have access to a bus stop within 400m, with regular service patterns serving the city centre.

PLANNING STATEMENT - DECEMBER 2018

Accessibility Policies

4.20 A Public Transport Strategy is appended to the Transport Assessment which demonstrates how safe and convenient access to the existing bus network could be achieved through re-routeing existing services on Tamworth Road into the proposed development in accordance with Policy AC5.

Travel Plan

Proposed Access to Bus Services

4.4.4 As part of the PTS, the 735 and 17B bus services could be extended and re-routed into the application site

Policy H3 requires the developer to 'to maximise connectivity to the existing network and facilitate extensions to this'. The proposal does nothing to achieve this. 17B is non-existent and 735 is currently operated by **Travel De Courcey**, tickets purchased would only be valid for buses operated by this company to the City Centre and not allow travel on the extensive **National Express** services in Coventre and the West Midlands. The requirement is to 'to maximise connectivity to the existing network'. In order to do this the bus service would need to be operated by **National Express Coventry**.

The Transport Assessment document 3.7.3 states that the stop in Bennetts Road is 350m to the north-eastern boundary of the site. Thus to meet the 400m access requirement for all dwellings buses would need to have access to the Fivefield Road plot. It is suggested that buses could use the Primary Road and Fivefield Road, even though it is known that a weight limit of 7.5 tonnes exists on this road. Not suitable for 12 tonne double decker buses with 12 movements an hour. A bus loop is thus required at the northern end of the primary road unless Fivefield Road is upgraded and the junction with Bennetts Road improved to be suitable for double decker buses.

Since no sustainable proposals have been submitted for public transport bus routes, planning consent should not be given.

Education

Design & access statement - Revision A (P12)

The City Council have already granted planning permission for the development of the land to the south of this area for 800 dwellings, a Local Centre (including a convenience store and shop units), primary school, and public open space

Lioncourt S106 agreement

f) provision of a 1.8ha school site

The Owner shall prior to the commencement of development submit for the Council's written approval details of the proposed extent and location of the Free School Site

The provision is for a Free School. This to be has to be set up by a body other than Coventry City Council and built by a contractor appointed by that body.

Until it can be shown that this primary school is to be built, any person buying a property built before that time will have no guarantee that the facility will be available for their children.

This application should be refused until such time that a fully funded planning application is received for this primary school, and no housebuilding should take place.