



***Planning application
response***

RM/2020/2399



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23rd November 2020

Re: Planning application **RM/2020/2399** from the developer Taylor Wimpey Ltd. and their agent the Pegasus Group, the application being dated 15th October 2019

Location: Land bound by Bennetts Road, Sandpits Lane and Tamworth Road

Proposal: Full Reserved Matters application for a residential development of 397 dwellings (C3), public open space, landscaping, drainage attenuation areas, access from Bennetts Road, land safeguarded for a new school, and other associated works.

Comments from Keresley Parish Council regarding this application are below.

1. Keresley link road

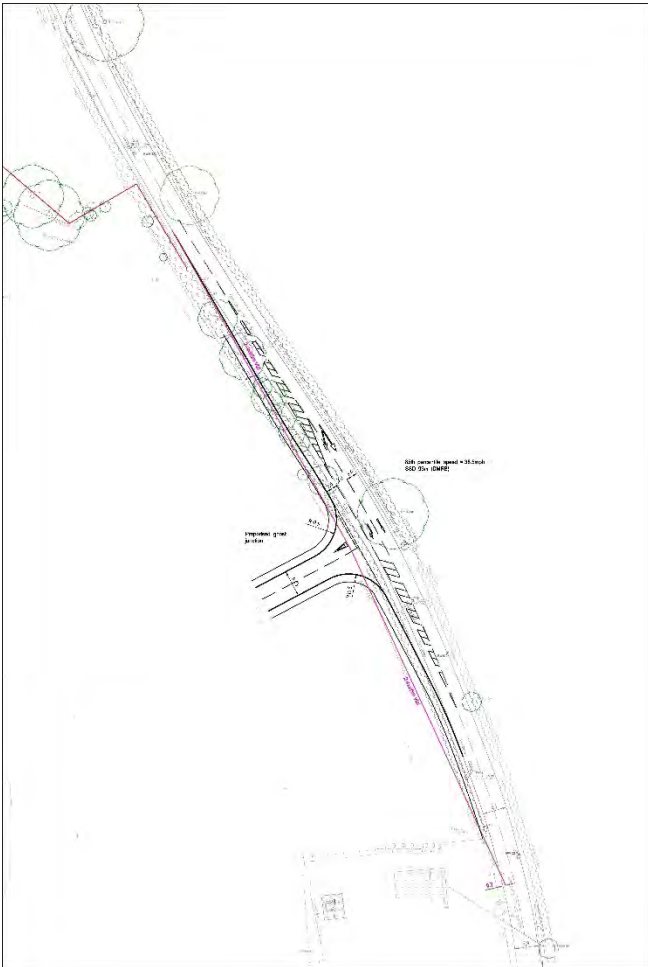
Keresley Parish Council consider the provision of the link road within the SUE, as required in the Local Plan, to be of prime importance in enhancing the local road infrastructure.

At peak hours traffic tailbacks occur within Keresley. The addition of dwellings in any part of the parish as part of the SUE can only make this situation worse. Stationary vehicles within these tailbacks will inevitably reduce the air quality within the parish.

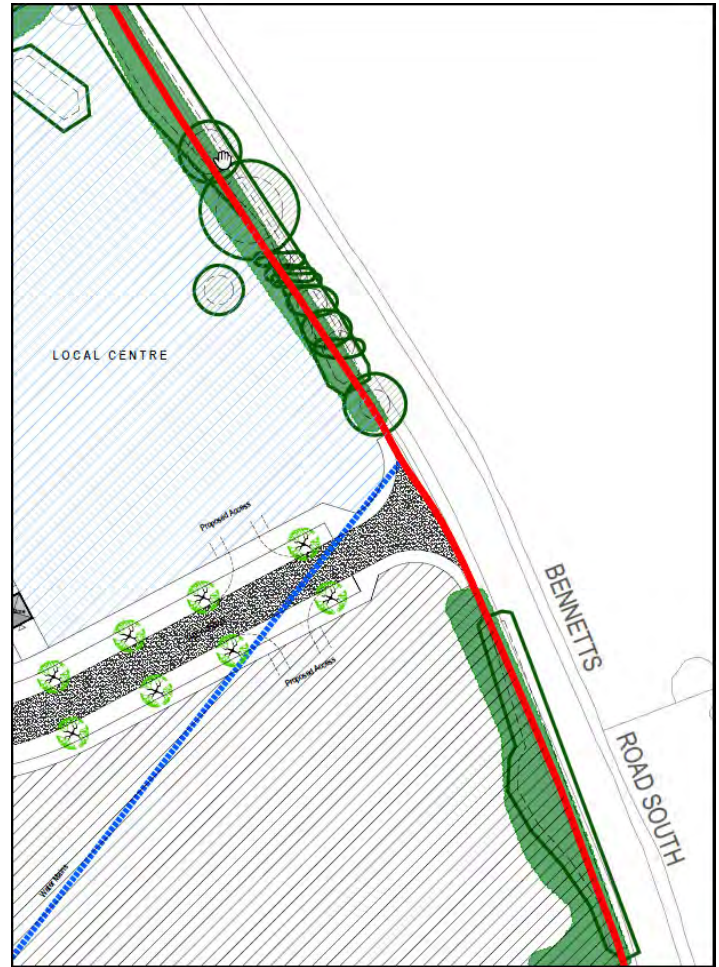
Since there is still no published plan available for the Link Road, or any guaranteed funding for the provision of the completed Link Road, Keresley Parish Council ask that the application be REFUSED.

2. Bennetts Road Access point

The design for the access road onto Bennetts Road shown in plan - **Proposed Site Layout - Phase 2A and 2B Drawing 100 Rev I**, shows a simple T junction. It fails to abide by the condition detailed in the outline planning application approval to use that shown in drawing **968-02 Rev C**.



Access drawing 968-02 Rev C



Access drawing Drawing 100 Rev I

The drawing 968-02 Rev C includes for a ghost lane for traffic turning right into the development. The Taylor Wimpey proposal fails to implement this access road plan.

Since the proposed design fails to abide by the use of plan 968-02 Rev C for the Bennetts Road entrance, as required in Condition 5a of the approval for OUT/2014/2282, Keresley Parish Council ask that the application be REFUSED.

3. Provision of a Local Centre

On the Taylor Wimpey website the following claim is made with regard to infrastructure:

Making a difference - Sustainability Report 2019

Page 17 - Infrastructure and facilities

Increasingly, we aim to install infrastructure at an early stage. This can help in the successful development of a new community, increase sales by making new developments more desirable to prospective buyers and provide new facilities to benefit existing residents.

The drawing B0263-6-1E, from the approved outline application OUT/2014/2282, shows the indicative layout for the site with the provision of a local centre. One of the conditions for the approval was that this to be abided by when a Reserved Matters application is submitted.

Drawing B0263-6-1E is one of the drawings listed in section 5 of this Reserved Matters application and shown on page 6 of the Design Compliance Statement, showing that Taylor Wimpey are aware of this.

In the absence of any plans for the Local Centre being shown in the plan **Proposed Site Layout - Phase 2B 101 of 6th April 2020**, it is clear that the *provision of infrastructure at an early stage* for this development would not take place should this application be approved!

Since the proposed design fails to show plans for the Local Centre at the Reserved Matters stage, a requirement of the conditions with the approval of OUT/2014/2282, Keresley Parish Council ask that the application be REFUSED.

4. Provision of a school

On the Taylor Wimpey website the following claim is made with regard to infrastructure:

Making a difference - Sustainability Report 2019

Page 17 - Infrastructure and facilities

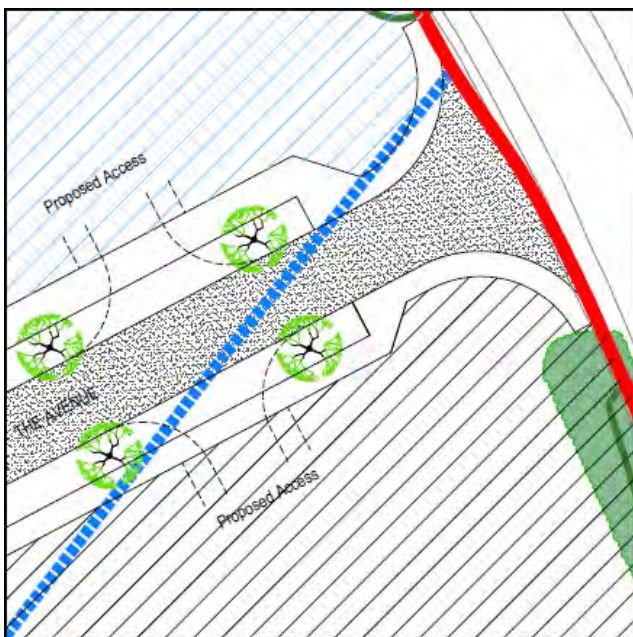
Increasingly, we aim to install infrastructure at an early stage. This can help in the successful development of a new community, increase sales by making new developments more desirable to prospective buyers and provide new facilities to benefit existing residents.

The drawing B0263-6-1E, from the approved outline application OUT/2014/2282, shows the indicative layout for the site with a site for a school.

Taylor Wimpey state that the installation of infrastructure at an early stage can help the successful development of a new community.

Whilst it is appreciated that the obligation upon Taylor Wimpey is only to provide the safeguarded land, the developer should be shown to be active in the procurement of school for this site.

The Parish Council is aware of other developments within the city where land was put forward for school development by a developer yet still remains vacant, no school having been constructed.



The proposed vehicle access to the school is shown as being opposite that of the Local Centre.

To the Parish Council having a vehicle entrance for the school at this location appears to be a dangerous proposal.

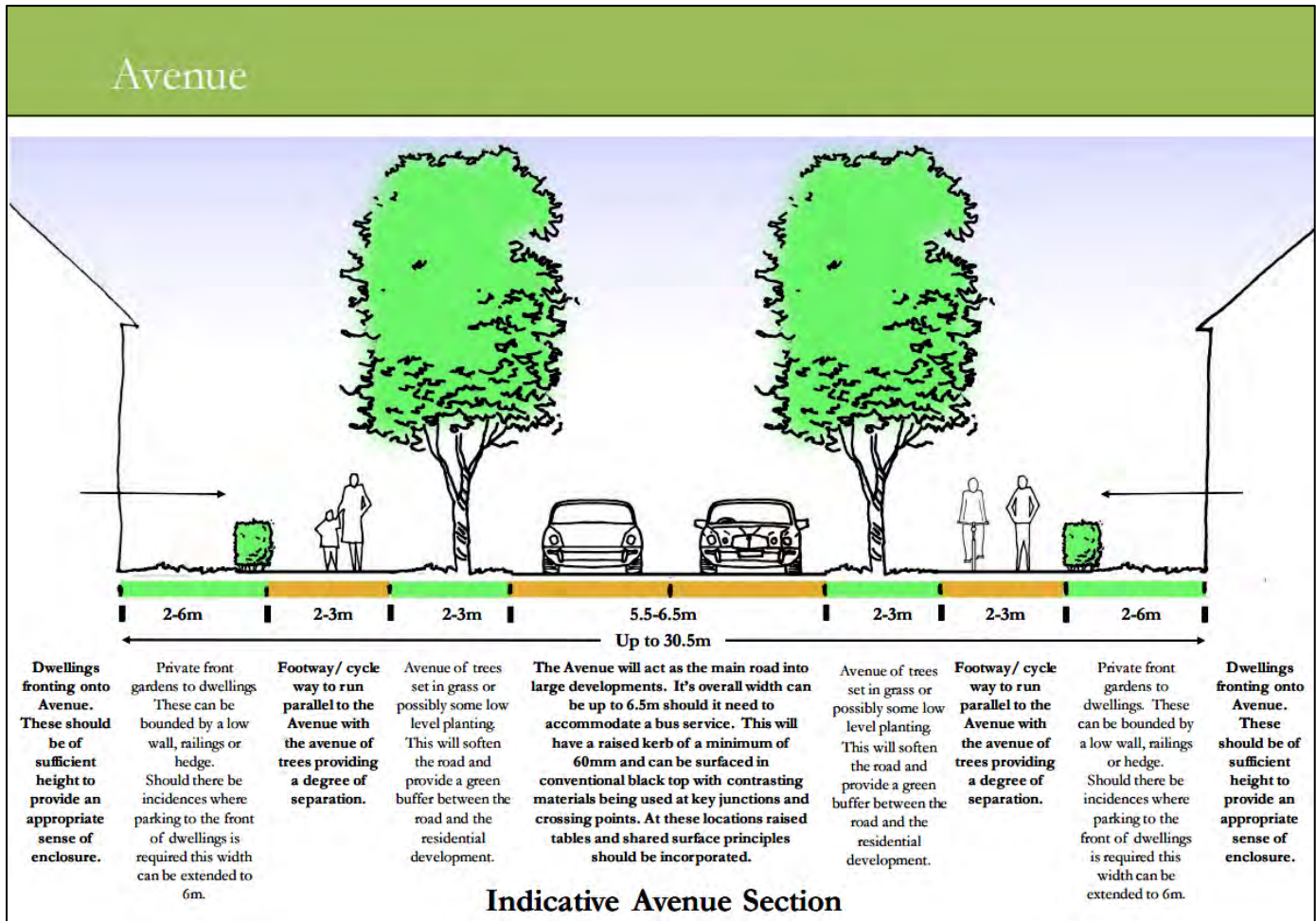
A more appropriate position might be from the Internal Road which leads from the Focal Junction 4.

The masterplan drawing B0263-6-1E showed a roundabout where Focal Junction 4 is now shown.

A roundabout here might be more appropriate for a vehicle entrance to the school.

Since the school infrastructure is not being provided at an early stage of the development, one of the declared aims of Taylor Wimpey, Keresley Parish Council ask that the application be REFUSED.

5. The Avenue



The **Coventry City Council - Urban Extension Design Guide SPD**, approved in August 2019, provides guidance for the design of the Keresley SUE.

This SPD is intended to provide a clear guide and steer for how new larger developments within the area should be designed and delivered.

The image above shows a cross section of an Avenue road type detailed on page 40 of the SPD. This details a Footway/Cycleway on both sides of the Avenue spine road,

However, the design implementation by Taylor Wimpey, as shown in **Proposed Site Layout - Phase 2A and 2B - Drawing 100 Rev I** drawing, only implements the provision of a Footway/Cycleway on one side of the road.



To the left is an extract of the Avenue from the plan road,

The design implementation by Taylor Wimpey, **Proposed Site Layout - Phase 2A and 2B - Drawing 100 Rev I**, shows the Avenue road, 6.5m wide.

To the northwest a 3m wide footpath/cycleway.

To the southeast a 2m wide footpath.

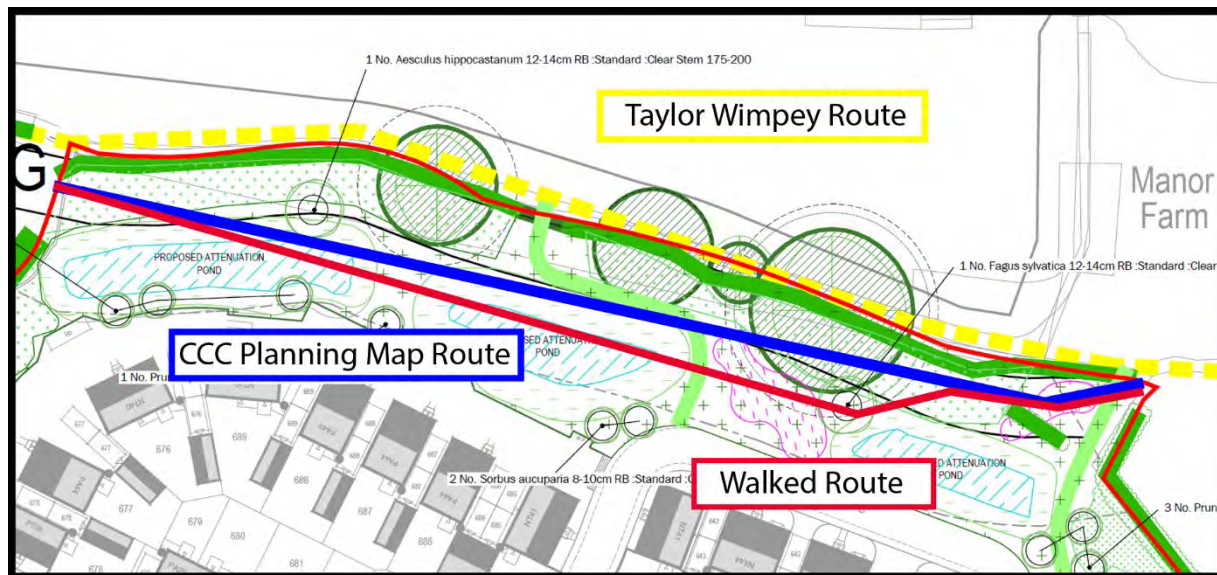
The SPD drawing shown previously details the Avenue as needing a footpath/cycleway on both sides of the road.

Private front gardens to the dwellings is shown as around 1.2m in depth. Again, the SPD drawing shown previously details this as needing to be a minimum depth of 2m.

Since the proposed design fails to implement the SPD requirements for a combined Footway/Cycleway to be provided on both sides of the Avenue spine road, and a distance from this Footway/Cycleway the distance from its edge to dwellings to be at least 2m, Keresley Parish Council ask that this application be REFUSED.

6. Public Rights of Way

Below is an extract from the *environmental dimension partnership drawing Landscape General Arrangement – Phase 2* (edp4592_d013i Sheet 6 dated 16th September 2020) showing, in yellow, the public right of way (PRoW), in the North of the site near Manor Farm. Two additional path routes are shown in blue and red.



In **yellow** is the Taylor Wimpey interpretation of the route of the ProW where one is expected to walk through hedgerows and tree trunks, the route being shown as being outside or on the border of the proposed development area.

In **blue** is the route of the ProW as shown in the Coventry City Council planning map.

<http://maps.coventry.gov.uk/connect/analyst/mobile/#!/main?mapcfg=planning>

The **red** route of the ProW is the one actually used by walkers in order to avoid the low crown of the Oak tree in the hedgeline.

In the Taylor Wimpey plan the actual public right of way route is shown as being blocked by areas of bulb planting, wild flower grassland, wetland shrubs, a *Fagus sylvatica* (Common Beech) tree and attenuation ponds. All of these environmental proposals are desirable but they should not be blocking a ProW.

The **Design Compliance Statement** section 4.9 states: *Existing Public Right of Ways will be retained*

Since the proposed design shows the ProW being blocked rather than retained, Keresley Parish Council ask that this application be REFUSED.

7 Footpaths and cycleways

The drawing B0263-6-1E, from the approved outline application OUT/2014/2282, shows the indicative layout for the site. One of the conditions for the approval was for the Reserved Matters application to abide by this general layout. It is one of the drawings listed in section 5 of this Reserved Matters application.



Page 14 of the **Design compliance statement** details a single footpath/cycleway along the northern side of the Avenue plus pedestrian paths. To the north a pedestrian path is shown, See section 6 above,

The mown path is shown in drawings for **Landscape General Arrangement – Phase 2** running in a north/south direction along the Eastern Green. It is likely that this would be used by cyclists, and in wet weather become a muddy path to the detriment of pedestrians.

The extract from that drawing, shown on the left, shows two proposed routes, outlined in red, for a footpath/cycleway each running in a north/south direction. The longer of these is shown exiting in Sandpits Lane opposite the Cardinal Newman school.

One definition of a network is: *A system of lines or channels that cross or interconnect.* Thus, with only a single route, no network exists.

In 2019 the government published **Future of Mobility: Urban Strategy** Within this is the statement:

1.3 However, if technological changes are not effectively managed, they could have undesired effects, such as increasing congestion or reducing sustainable travel.

One of these likely changes is to the increased use of E-scooters. Coventry recently started trials for these. Countries such as Germany and Singapore already allow their use in cycle lanes.

In the UK their general use is being looked into within the recent government document **Future of Transport Regulatory Review**.

Since the proposed application fails to provide a suitable Footpath/Cycleway network, using the links shown in indicative layout for the site, and takes no account whatsoever of the likely changes in the changes in mobility, Keresley Parish Council ask that this application be REFUSED.

8 Public transport

The **Design Compliance Statement** makes no mention of public transport.
No **Transport Assessment** has been put forward with this Reserved Matters application.

The outline application, OUT/2014/2282, contained the following statement:

Framework Travel Plan June 2014

5.5 Public Transport Initiatives

5.5.1 Due to the location of the site, it is considered highly appropriate that public transport is routed through the site to ensure it is the key alternative mode for people travelling to, and from, the development. The Spine Road running through the site will be designed to an appropriate standard to accommodate buses. The proposed location of bus stops within the site will be carefully selected to ensure that a high proportion of the dwellings are within a 400m radius of a bus stop.

Action: Detailed design of internal spine road to be designed to accommodate buses, details of the carriageway design are to be submitted to and approved by CCC prior to first occupation of the development.

Action: Bus stops to be located within the site to maximise the number of dwellings within 400m of a bus stop.

Building for Life 12 states in 3.Public Transport

We recommend that you avoid - Thinking about development sites in isolation from their surroundings. For example, bus only routes (or bus plugs) can be used to connect a new development to an existing development and create a more viable bus service without creating a 'rat run' for cars.

The **Local Development Plan** Policies DS3 & DS4 requires access to sustainable modes of transport and that dwellings be within 400m of a bus stop having regular service patterns into the city.

An earlier report prepared for the Keresley SUE recommended that bus stops be ...*within 250m of each dwelling.* (**Keresley SUE Sustainable Transport Strategy May 2009 – WSP Development and Transportation**)

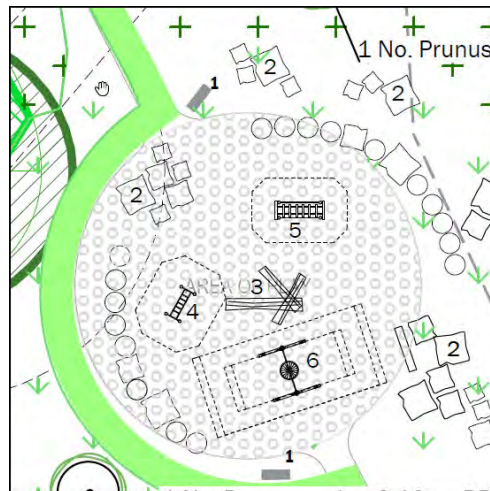
Like the initial plan provided for Phase 1, this phase 2 plan makes no provision for buses neither at the Bennetts Road entrance nor along the spine road. Whilst the outline application

Since the application fails to provide a **Transport Assessment**, and no public transport links within the development, Keresley Parish Council ask that this application be REFUSED.

9 Area of Play

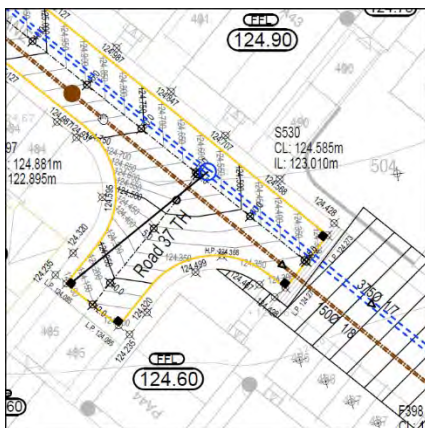
The Play Area shown in drawing **Landscape General Arrangement – Phase 2** (edp4592_d013i Sheet 7 dated 16th September 2020) is adjacent to an Internal Road. It is shown to have no boundary fencing in drawing **Boundary Treatment Phase 2B Drawing 108 Rev D**.

This is an Internal Road so traffic could be light. This may lull children into a false sense of security who then fail to observe the rules for crossing the road when needed. A roadside boundary fence is needed for the safety of children playing.



Since the design proposes an unsafe environment for children, Keresley Parish Council ask that this application be REFUSED.

10 Drainage



Several of the gully drains shown in the **Engineering Layouts** are shown unconnected to the main pipework.

Since the application details a number of drains unconnected to the pipework, which may result in flooding of that area, Keresley Parish Council ask that this application be REFUSED.

11 Trees

The Taylor Wimpey website the company make statements about the environment and sustainability:

We want to help you get out and enjoy nature, so we're putting wildlife and green space at the centre of our development planning.

<https://www.taylorwimpey.co.uk/why-choose-us/we-build-greener-healthier-homes>

and

Reducing our impact on the environment is very important to us, so we consider it at every stage of our operations.

<https://www.taylorwimpey.co.uk/corporate/sustainability>

Does the company actually practice what they preach?

Coventry City Council has recently ratified their policy document –

Trees & Development Guidelines for Coventry SPD – October 2020

This SPD requires the Construction Exclusion Zone (CEZ) to take into account the Root Protection Area (RPA) of all trees.

Avoiding Damage to Existing Trees

4.3. Trees' roots are fragile; careful consideration must therefore be given to ensuring that trees and hedges, which have been identified for retention, are not directly or indirectly damaged by any proposed works. This can be done by paying attention to the Tree Survey and constraints information which enables a Construction Exclusion Zone (CEZ) to be determined based on the RPA

For root protection the policy states:

4.27. Potentially damaging operations include;

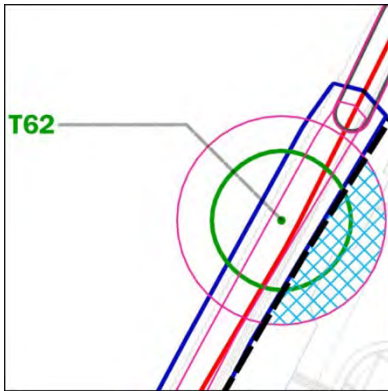
- *Excavation within the rooting zone,*
- *Raising or lowering of ground levels.*
- *Compaction of the soil by construction works, machinery or vehicles and the storage of materials and debris*

Within the Tree Protection Measures (TPM) it specifically states that these measures:

*must also contain at least the area of the exclusion zone previously identified by reference to the TPM of the Tree Survey. The **Arboricultural Method Statement edp4592-r003** details the need for root pruning in clause 5.36 with table EDP 5.3 listing a total of 21 trees for which this would be needed. The work proposed requires excavation with likely changes in level of the ground plus possible soil compaction.*

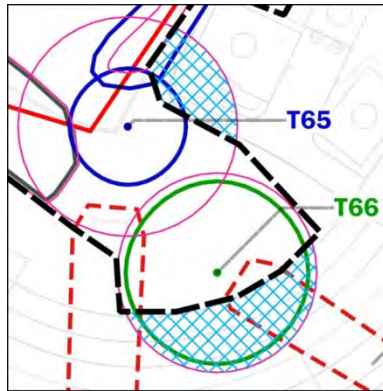
The **Tree Protection Plan** plans drawn up by the *environmental dimension partnership*, (edp4592_d0038 Sheets 1 to 8 dated 14th September 2020), now details 12 occasions where it is proposed to ignore the RPA of a tree on the site and work within what should be part of the exclusion zone. (A reduction from the 21 initially proposed.)

Extracts from the plans show in blue proposed work within the RPA zones of the trees:



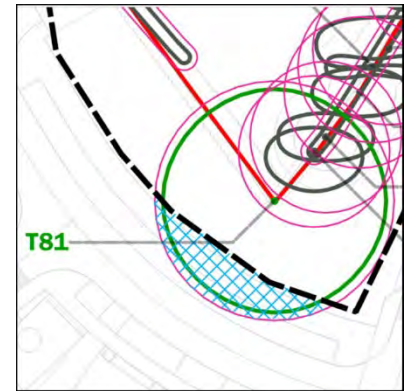
T62 – Oak

*Encroachment into RPA
by access drive*



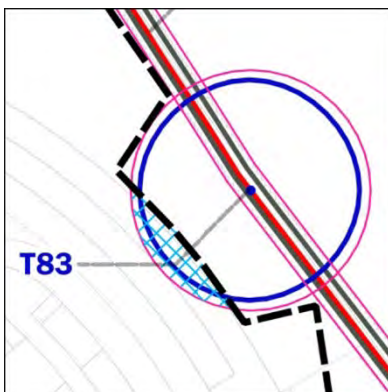
T65 – Ash T66 – Oak

*Encroachment into to
RPA by residential unit
(T65) and road (T66)*



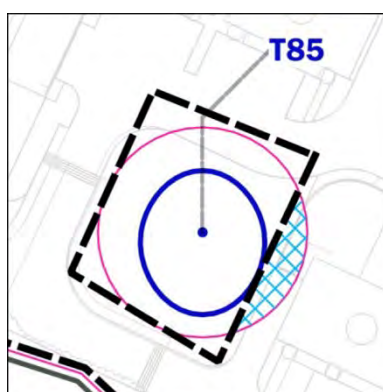
T81 – Oak

*Encroachment into RPA
by road*



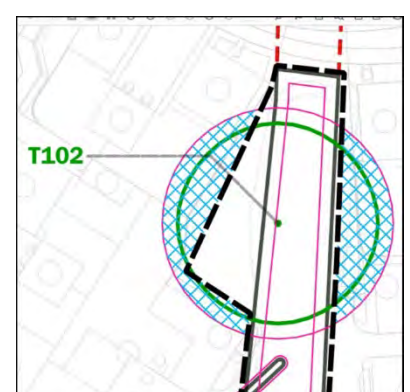
T83 – Ash

*Encroachment into RPA
by road*



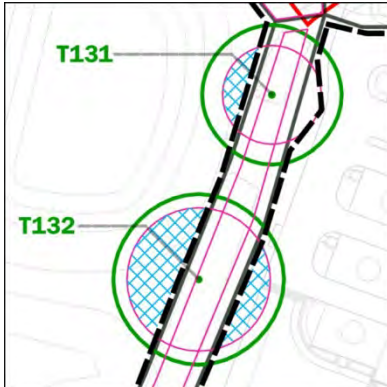
T85 – Oak

*Encroachment into to
RPA by residential unit
and access drive*

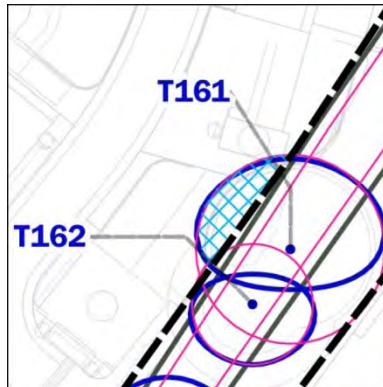


T102 – Oak

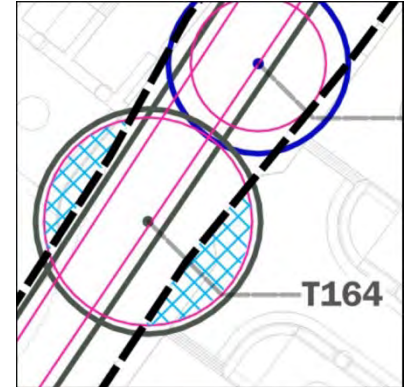
*Encroachment into to
RPA by residential unit
and access drive*



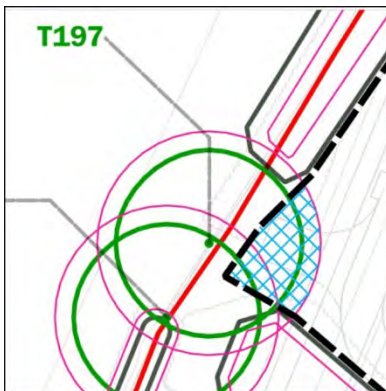
T131 – Oak T132 – Oak
*Encroachment into RPA
by SUDs feature*



T161 – Oak
*Encroachment into to
RPA by residential unit*



T164 – Ash
*Encroachment into to
RPA by residential unit
and access drive*



T196 – Oak T197 – Oak
*Encroachment into RPA
by access drive*

The proposal by Taylor Wimpey to work within the Root Protection Area (RPA) of trees, to their likely detriment, seems diametrically opposed to the declarations given on their website:

we're putting wildlife and green space at the centre of our development planning

Reducing our impact on the environment is very important to us

It is difficult to understand how work such as this in a green space could ever be considered to reduce the impact of the development on the environment !!

The **Arboricultural Method Statement** prepared by the *environmental dimension partnership* contains the following recommendations:

6.3 The adequate protection of retained trees on development sites is of paramount importance if they are to be retained successfully.

6.5 Excavation under the canopies of trees to construct roads or other paved areas, with their associated kerb drainage and service runs, can seriously affect tree health.

These statements, within the statement commissioned by Taylor Wimpey, emphasise the need to avoid work within the RPA of trees. This should include the placing of the RPA within the gardens of housing plots which is likely to lead to the disturbance of the roots by the house owner or suggestions that the tree must be felled.

It is perfectly feasible to produce plans which do not intrude into the RPA of any trees and abide by these recommendations for the health of the trees.

The proposal to work within the Root Protection Area (RPA) of trees is likely to increase the impact upon the environment rather than reduce it, Keresley Parish Council ask that this application be REFUSED.

12 Wildlife Site

The *environmental dimension partnership* drawing Landscape General Arrangement – Phase 2 (edp4592_d013i Sheet 6 dated 16th September 2020) shows details of the fencing to surround this site.

Fencing

The fencing is described as:

Proposed Post and Wire Fencing - Stock netting with 2 x strands plain high tensile wire above, treated softwood posts at 4m centres

It is felt that the proposed fencing, that normally used by farmers for fields having cows or sheep, is totally inappropriate for a nature reserve.

Sites of this type managed by Coventry City Council and the Warwickshire Wildlife Trust use a more rustic type of fencing, a Sweet Chestnut Cleft Post & Rail type. This being much more in keeping with the wildlife site and will allow larger animals to enter the site from the surrounding hedgerows, unlike stock fencing designed to prevent animals from passing.

Access gate to Sandpits Lane

The proposal:

Proposed Gate in Post and Wire Fencing - 3.6m, 1.5m or 1.2m width to suit access requirements

Wildlife sites of this type will normally have two gates, not a single gate as proposed. A farm gate used for access for the management of the site, and one for pedestrians.

Access from the development site

The drawing B0263-6-1E, from the approved outline application OUT/2014/2282, shows the indicative layout for the site. One of the conditions for the approval was for the Reserved Matters application to abide by this general layout. It is one of the drawings listed in section 5 of this Reserved Matters application. This details a footpath/cycleway crossing the site.

Since the proposed design shows that the fencing and access proposals are unsuitable for the site, Keresley Parish Council ask that this application be REFUSED.

Summary

The following statements summarise all the previous comments:

FAILURE to ensure the **Link Road** will be constructed along with this development

FAILURE to provide **Access** in line with the approved drawing 968-02 Rev C

FAILURE to provide a suitable design for the **Local Centre**

FAILURE to ensure that the **School** infrastructure is provided

FAILURE to provide the required cycleways within the **Avenue**

FAILURE to respect the route of a **Public Right of Way**

FAILURE to provide a **Footpath and Cycleway** network

FAILURE to ensure **Public Transport** is provided within the site.

FAILURE to provide a safe **Play Area** within the site.

FAILURE to provide suitable **Drainage**

FAILURE to suitably protect the **Trees** within the environment of the site.

FAILURE to provide a **Wildlife Site** with a footpath/cycleway across the site.

Keresley Parish Council ask that the application RM/2020/2399, in its current form, be REFUSED.

Signed

Councillor James Passmore

Councillor Chris Wood

Councillor Steve Redhead

On behalf of Keresley Parish Council