

**444 homes planned between Watery Lane, Penny Park Lane, and Bennetts Rd**  
FUL/2020/0748

**Chair of the UK Statistics Authority, agrees the population figures are wrong! There is no need for these homes.**

1. Grave doubt about the population forecasts for Coventry, and any need for this housing. The Chair of the UK Statistics Authority Sir David Norgrove (the official regulator of government statistics) agreed with complainants CPRE and KOGG “**it looks as though on the face of it, they have a strong case**”. See his email, in the appendix, obtained through FOI. He asked ONS to tell him why CPRE and KOGG might be wrong. ONS never answered his query. Do they have an answer?
2. On the Precautionary Principle it would be reckless to make decisions now, on bad data, ahead of the census, which will very shortly resolve the matter.
3. Pandemic: The local health facilities can't cope. UHCW has objected that they don't have the capacity to accommodate 3000 more houses, let alone 42400 envisaged for the whole Coventry area. No one has consulted the ambulance service, the GP service (the CCG) or the mental health service. Local GP surgeries are bursting. The pandemic shows us that having overloaded services, without spare capacity, is reckless and dangerous. (See more detailed remarks at end).
4. Traffic: Highways England (HE) are concerned that the Keresley SUE, in total 3100 homes, will make bad congestion even worse on the strategic road network, especially at J3 M6 where there is already “severe” congestion. Warwickshire County Council too have expressed “serious concerns regarding the performance of the junction of Winding House Lane and Wheelwright Lane” which will take traffic from the link road towards J3, M6 “ They [Warwickshire Highways] have an idea but **that won't come near to mitigating the whole SUE**” [email of 21/11/2019 10:28 – see appendix.
5. Climate Change: This proposal is in the wrong location, on the periphery of Coventry, for climate change. Research shows that suburban developments have 2 to 4 times the carbon footprint/person as more central sites. According to the latest published brownfield register, (Sept 2017) there are plenty of alternative sites, sufficient for 8000+ homes, on brownfield land. There is no need to build in Keresley.
6. Landscape: the development will destroy an important remnant of the Ancient Arden Landscape. The area is "especially significant" as "the only remaining area of relatively unspoilt ancient countryside left in Warwickshire." [the quotation is from the 1995 Coventry Arden design guidance which remains in effect].
7. Archaeology: The site contains important remains. Ground penetrating radar shows the presence of a possible pre Saxon Barrow off Edward Road. [aerial photos in the appendix]. A Charles the Bold doubloon was found near the barrow. Aerial photos show the presence of a complete medieval village just across Bennetts Road, behind the Beechwood Hotel. The whole area is significant. The former Coventry Planning Archaeologist, Chris Patrick, writes “we always felt that it [Keresley] was a totally inappropriate site for housing. You also have an earlier prehistoric landscape, there was a lot of evidence for Mesolithic (middle stone age) activity on Hounds Hill and is a good illustration of where Mesolithic sites occur in Warwickshire, on high ground overlooking a stream, quite amazing to think that 5,000 years ago men, women and children would have stood there fundamentally looking at the same

view!" Photos of the Saxon Barrow and the Charles the Bold Doubloon are in the Appendix.

8. Cycling/Sustainability: The development does not meet the principles which are set out in the adopted Coventry local plan and national planning policy in respect of sustainability. There is no comprehensive master plan as required by the adopted plan. The route of the link road is still a mystery. There are paltry provisions for cycling – there is no acceptable cycle route from the development to the centre of town, the universities, hospitals, or JLR. People are not going to go miles out of their way to get to a cycle route in Coundon, or on the canal. They need a direct route into the centre.
9. Biodiversity: the development will reduce biodiversity. 13 of 19 specialist farmland birds, [on a Natural England list of birds of concern in their Stewardship Guidance] including skylarks, barn owl, and lapwing, live and breed in the area. Such birds have suffered catastrophic losses - down 70% in the last 40 years, according to Natural England. These birds will all be gone, once the houses are built. They are not suburban birds.
10. Local Traffic Local roads cannot take the traffic from 3100 new homes in the Keresley area. Bennetts road and the Radford Road are already badly congested in the mornings. North Warks council has objected that the small country roads nearby will be used as rat runs and are entirely unsuitable.
11. Air Quality. The draft Air quality plan, which will close off the Holyhead Road and Coundon Road, will force more traffic, coming from the A45, into the Keresley Road/Radford Road corridor, which will combine with traffic from this development.
12. Cumulative Effect. Taken as a whole, with all the 42400 homes planned in or near Coventry, there will be a highly adverse effect on air pollution. Already Coventry is one of the 30 worst cities in the country for air quality and it has the worst polluted road in the West Midlands. Air pollution needs to be considered "cumulatively," (in the words of the EU Air Quality Directive) not piecemeal. Far more people die from air pollution in Coventry than from road traffic fatalities. No air quality monitoring has actually been carried out at currently congested junctions, such as Sandy Lane/Bennetts Road or Scotch Hill/Tamworth Road.
13. Infrastructure. there is no assurance that schools and GP surgeries will be built in time, if ever. At Banner Lane, 10 years ago, a surgery and a primary school were promised but they are still not built. In 2018, Mark Andrews promised at planning committee for the Sandpits lane Taylor Wimpey development, that the council would find an academy to run the primary school and it would be built, 4 years on, and the Council has still not found a sponsor.

## Appendix

### Lack of need: The Precautionary Principle - Discussion.

There is abundant evidence that the population forecasts for Coventry, are wrong. On the Precautionary Principle, which is law in the UK under the Aarhus convention, it would be reckless to make planning decisions on the basis of highly questionable figures, when authoritative data from the latest census, will be published in just a month or two – ONS have promised results by “early summer”.

Sir David Norgrove, Chair of the UK Statistics Authority has agreed, in a recently obtained email, (in the appendix) that there appears to be a “strong case” against the Coventry population numbers. See below.

The sole reason which the inspector gave for removing land from green belt was alleged exceptional population growth. Coventry Council is well aware of expert evidence, previously submitted, that the claimed extraordinary growth has not happened. As such, there is no reason for building unneeded homes on land which Coventry Council described as the best remaining piece of unspoiled landscape in Warwickshire (in the 1995 Coventry Arden Design Guidelines, which remain in effect).

In May 2021 A lengthy investigation from the Office of Statistics Regulation (the official regulator of government statistics) cast considerable doubt over the ONS population forecasts for Coventry, finding

“the population estimates for some cities such as Coventry, did seem to be inconsistent with, and potentially higher than, local evidence would suggest. This also appeared to be the case in a number of smaller cities with large student populations.”

Coventry Council responded, in May 2021 that the findings were “not definitive”. While the findings did not give a precise number for the current population of Coventry, this does not invalidate the regulator’s strong doubts about the improbability of the existing ONS population figures. They wrote:

“it is disappointing to hear that our findings are not being considered sufficiently within the council discussions. While it may not feel like it, I would echo Ed’s sentiment that our report was one of our more hard hitting pieces

we are convinced that there is an issue with Coventry’s figures and that **local sources of data are clearly inconsistent with the ONS figures**, email of Elise Baseley, Statistics Regulator, OSR, 2 June 2021

The regulators first draft of their report, obtained through FOI, was even stronger

“fixes have not done enough to address the overestimation of these groups in some areas. **This has led to an over reliance on insufficiently robust data to inform local planning decisions such as**

## the need to build additional schools and housing.

### Traffic – more detail

The Traffic modelling systematically underestimates future traffic

1. Traffic on the Tamworth Road and Bennetts Road is already bad, with long queues in the mornings. The cumulative effect of the SUE, including this development, will make it worse. Even with mitigation, the Hub study still shows traffic over 100% capacity at some junctions.
2. The baseline Automatic Traffic Counts in the HUB study for this development (the latest iteration of the traffic modelling) were done in June/July 2021, when traffic was suppressed by covid and people working from home – around 10% below previous levels. If the baseline is too low, then all future forecasts of growth, using Temprow and NTEM, will also be too low. The traffic modelling needs to be redone, with traffic counts from a normal time.
3. The modelling failed to include major sources of traffic:
  1. the new HS2 station, which will have 7,500 parking spaces, 100,000 new jobs, and 4,000 new homes – in 2014, Coventry Council complained in a petition to Parliament about the damaging effect of HS2 traffic on Coventry roads.
  2. Passenger growth at the airport – forecast to more than double, from 11m/year to 27m/yr. DfT TAG M4 guidance on traffic modelling requires airports to be included in the modelling, in addition to the use of NTEM and TEMPRO..

### **“Adjusting NTEM data to take account of surface transport for air passengers**

7.3.9“**Surface travel demand for airports should be considered for all schemes**, [emphasis added] but where there is no major airport within or near to the study area, it may be sufficient to assume that such travel is minimal and make a case to the Department for not analysing it explicitly.”

3. A new corridor from the A45 to the M6.  
Highways England anticipated that the Keresley link road could open up a whole new traffic profile

“In summary, Highways England has recommended that consideration should be given to other planned growth including Local Plan allocated development (with the Eastern Green SUE being the most prominent), as well as the inclusion of the proposed Keresley SUE Link Road. **The introduction of this would provide a new corridor for traffic to the west of the city and could potentially affect the strategic traffic profile for the whole of Coventry.**”

4. The traffic impacts need to be re-evaluated. The traffic studies use invalid and misleading standards: the 1993 IEMA guidance. Relying on it, the studies ignore impacts less than 30%. This is misleading. The report itself states that this rule is not applicable to matters of highways “capacity” or “operation”. Current guidance in both Northern Ireland and Scotland states that a 5% impact is significant and on busy roads, even a 1% change can be significant.

3.18. It should be noted that the Department of Environment suggests in Planning Policy Note 13 (DOE 1988) that **increases of traffic of 5% are**

**likely to be considered as significant by the Dept of Transport. The context of such a statement relates to the operational and capacity criteria of a highway** and not its environmental impacts. It is suggested that the criteria set out in these paragraphs are more relevant to assessment of the environmental impacts and hence the higher thresholds are more relevant” [from the 1993 IEMA guidance].

It is not assured that the Keresley Link Road will ever be built in full. Highways England has expressed doubts. “the purpose of the additional modelling is to ensure that, from an SRN perspective, we are not committing to a position that relies upon on a final stage of a Link Road scheme that may not come forward but had been demonstrated to be necessary in traffic terms.”

If this came to pass, traffic skirting the north west of Coventry, could end up rat running through the streets of Keresley and Holbrooks to get to Junction 3, M6.

### **Initial Comments from Keresley Parish Council**

With regard to the Penny Park Lane development our initial look reveals three points of concern.

1)

In the initial Scoping Request access in the north was shown as coming from the link road roundabout with the link road passing through the development.

The application FUL/2020/0748 now shows access from Bennetts Road and the link road not part of the development.

In the SPD and in an email last year it was stated that developers would be responsible for the construction of the link road.

This now appears to show that the construction of the link road will either be delayed or never happen!!

2)

The application FUL/2020/0748 shows the public footpath from Watery Lane being blocked by housing. The Highways department, in a document for the Fivefield Road development, stated that no footpaths should be blocked by housing development but rather follow the correct line and be enhanced with a proper green corridor.

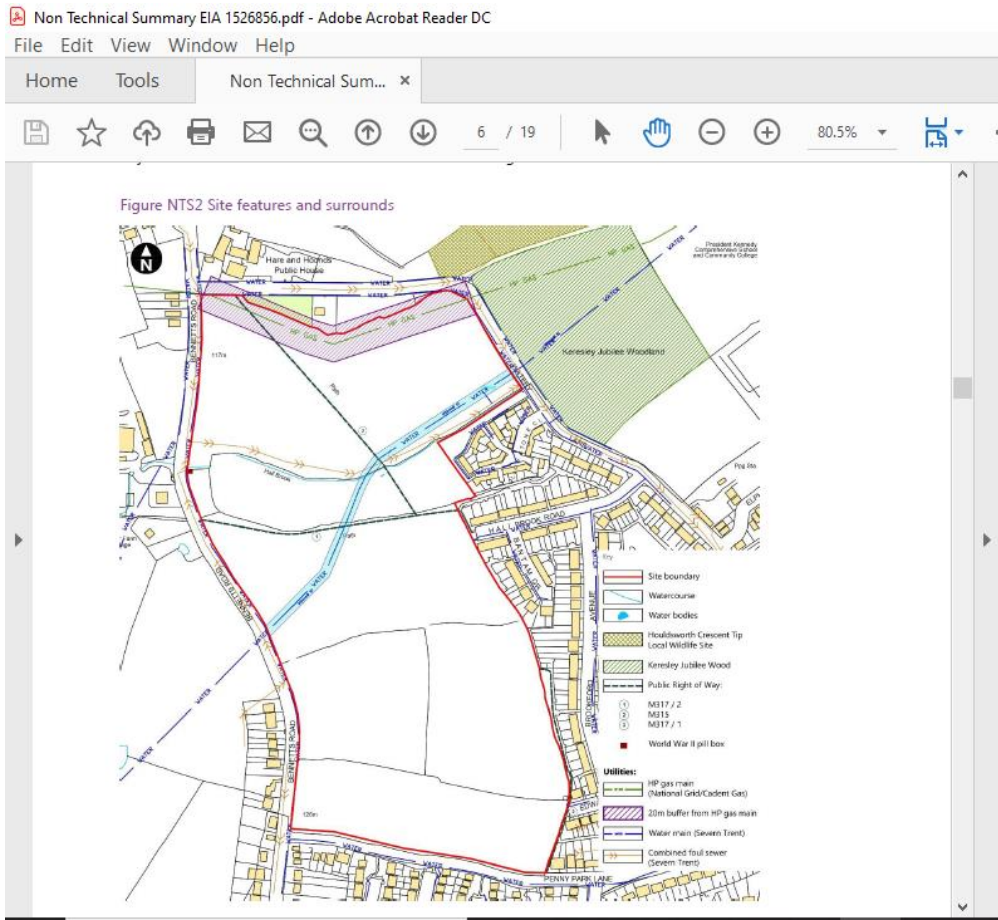
3)

The central site entrance, whilst being offset from the Taylor Wimpey site entrance opposite, does not show any ghost lane for turning right into the site as was required for the Thompsons Road development by Grove Lane.

The design and access statement mentions new bus stops, yet none are shown on this plan.

We have yet to carry out a more in-depth analysis.

This is a FULL application so everything needs to be looked at in detail.



winding house lane / wheelwright lane junction

Redacted @coventry.gov.uk>

Thu 21/11/2019 10:28

To: >Redacted

Cc:

Morning,

As you may know, **Warwickshire County Council** have serious concerns regarding the performance of the **junction of Winding House Lane and Wheelwright Lane and have objected to the planning application from Bellway (2019/0022).**

Earlier this week, myself and CCC Highways had a discussion with WCC Highways and the outcome is as follows:

WCC confirmed that there is no current scheme drawn out. They have an idea which may mitigate a small amount of impact (banning a right turn from Winding House Lane to Wheelwright Lane) but that won't come near to mitigating the whole SUE.

Given the uncertainty as to whether the link road will be required all the way (as opposed to just to Watery Lane) in the event of the Coventry North package coming forward, it is considered that two possible schemes are required. One with the link road going all the way and one with it just going to Watery Lane. WCC said they are happy to work with the various developers to agree the schemes, which can then be costed. They agreed to treat it as a priority. Therefore we would like the developers (Bellway, Lioncourt and David Wilson Homes) to work together (with WCC) to come up with the two schemes. Then a s106 could allocate monies towards either Scheme 1 or to 'Scheme 2 plus Coventry North package'. I can also advise that we will not be compulsory purchasing houses in Coventry to facilitate the junction improvements. WCC agreed to investigate land ownership around the junction.



I've sent the same e-mail to the other two affected developers this morning. Please could you confirm that your client is willing to participate in the work?

Kind regards

Senior Planning Officer, North Team

Development Management

Coventry City Council

Aerial photo, showing crop mark of the Saxon Barrow



Aerial Photo, The Saxon Barrow, near the western end of Edward Road. (the junction above shows Edward Rd joining Brookford Ave, next to the development site)

The Charles the Bold Doubloon, found in the field near the end of Edward Road.



not to scale

Charles the Bold double petard (15th century) from Keresley. Courtesy/photo: Allan Owen

Warwickshire County Council have serious concerns about the junction of Wheelwright Lane and Winding House Lane



[REDACTED]@coventry.gov.uk>

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To: [REDACTED]>

Cc: [REDACTED]

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Kind regards

[REDACTED]  
Senior Planning Officer, North Team  
Development Management  
Coventry City Council

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**From:** David Norgrove [REDACTED]@me.com>

**Sent:** 19 November 2020 10:25

**To:** Tivey, Ross [REDACTED]@Statistics.gov.uk>

**Cc:** Norgrove, David [REDACTED]@Statistics.gov.uk>; Humpherson, Edward

[REDACTED]@statistics.gov.uk>

**Subject:** Re: Coventry population

It looks on the face of it as though they have a strong case and it is the kind of thing where ONS should be engaging, especially given the weight that MHCLG are putting on these numbers. But I also have a concern that too much weight is being put on those numbers even with the change you mention.

I guess the first thing is to ask ONS for their response. Why is the analysis in the letter incorrect?

Depending on the answer I might then reply as a covering letter to a report by OSR.

There's a more general point too. One of the recommendations from the exam algorithm review is that they should have looked at outliers and done a sense check. Should ONS have processes for sense checking these kinds of projections, especially if it looks as though the Coventry concern is justified?

David

On 18 Nov 2020, at 20:43, Tivey, Ross [REDACTED]@Statistics.gov.uk> wrote: