

Objections to

OUT/2022/0712, Land between Bennetts Rd and Fivefield Rd, next to Bunsons Wood and  
and OUT/2022/0713 Land west of Bennetts Rd [ behind Manor Farm].

I object to these two developments on the following grounds

- On the census figures, the homes are not needed – It is premature to consider an application ahead of the imminent review of the local plan scheduled to start in November 2022 which must consider the much smaller than expected population of the city. The plan could not be more out of date and inaccurate, in breach of policy DS1.
- The cumulative impact of traffic has not been assessed – The airport, HS2 Hub, and Amazon warehouse were all omitted from the CASM traffic models which as a result, systematically underestimate future traffic.
- Even with mitigation, and even with models that underestimates future traffic, local junctions are forecast to be over 100% of capacity in a few years– leading to severe cumulative congestion. 0.85 Ratio of Flow [RFC] to capacity is the maximum acceptable. Going above this can lead to “exponential” increases of congestion.
- the buffers for the ancient woodland are too narrow. Policy GE3 requires adequate protection.
- The Burrow Hill Fort was not considered in the landscape assessments, and not given the “great weight required by the NPPF, despite the concerns of Historic England and the Keresley Masterplan SPD. The Setting of a national historic asset will be damaged.
- There is no health impact assessment contrary to policy HW1. UHCWT and SWHT are both running at 100% of capacity. Adding population without permanent increases to capacity is reckless, putting public safety at risk.
- Ancient hedgerows, 4-600 years old are being removed contrary to policy H2:1
- Brownfield options have not been utilised, contrary to national government policy. 195 hectares of brownfield land remain in Coventry, as at Sept 2021. As such it is premature to consider development on green field and green belt.

Further, I reconfirm all of the objections to these applications made in May 2022

1. Population and prematurity – The council leader George Duggins, the Cabinet Member for development, David Welsh, and the strategic lead for planning, Rob Back, have all publicly given great weight to the importance of the “census” and “definitive” “accurate” evidence while local plan policy DS1 requires a review “when the Plan, [is] significantly out of date”. The census has eviscerated all the assumptions made about population growth. The Local Plan could not be more out of date. Growth, and the need for homes, has been half of what was assumed in the local plan

It is premature to consider granting permission, when the Council is about review it's local plan, starting in Nov 2022. Given the vast shortfall in the population growth of Coventry revealed by the recent census, these homes are not needed. It is not sustainable, and not consistent with the NPPF or the precautionary principle to destroy historic Arden Landscape, important archeological remains, and biodiversity, when the homes are not needed.

Further, there is no danger of the city failing to maintain a 5 year land supply. The

city has already provided for 25,000+ homes, exceeding the 24,600 target within the city boundary in the 2017 local plan] – The 25,000+ comprise 12000 net already completed since 2011, according to MHCLG live table 122, and 13,000+ under construction or with outline permission [according to CCC 2021 annual monitoring report]

2. The council has given great weight to the census. In Dec 2020, Leader of the Council George Duggins promised, at an official cabinet meeting, that the council would not go ahead if the evidence showed the city had not grown as assumed in the Local Plan. Here is what he said

<https://www.youtube.com/watch?v=mSV1i-7XB6Y>

26.45 on the tape.

‘I’ve not seen anywhere that the ONS figures [used in the local plan] are wrong. We wouldn’t be proceeding if they were.’

3. Rob Back on 27 May 2021, said the Council needed “definitive” evidence of the shortfall in growth identified by the OSR May 2021 Investigation . We now have that evidence: the census. The real population growth of Coventry was half of what the local plan assumed. Far from being in the premier league ie the 2<sup>nd</sup> fastest growing city or town in the country, Coventry was number 84, somewhere down in the Conference leagues for population growth.
4. Cllr David Welsh, Cabinet Member for Development also committed in 2020, to the critical importance of the census, saying “we would wait for the change in the census figures as that will be the most accurate point for us to do a review.”

Given the weight that Cllrs Duggins and Welsh have given to the the census, and given the very adequate supply of housing up to 2031, it would be premature and wrong to grant permission for homes that are not needed. It would be an unsustainable use of precious agricultural land, landscape, biodiversity, and historical resource.

5. Transport – None of the transport assessments have assessed the full cumulative impact of traffic as required by the NPPF. Traffic is already very bad in the area – traffic can back up for a mile or more along the Tamworth Rod from Long Lane in the morning and be bad along Bennetts Rd and the Radford Rd which will take traffic from the SUE into the city center. . 3100 more homes will lead to severe cumulative congestion. All of the CASM models since 2013 have ignored the impact of the new HS2 station and passenger growth at Birmingham airport – they have been left off of the list of committed sites considered by the model. Such omissions are irrational and unreasonable because,
  - a) in 2014, Coventry Council themselves vehemently protested to Parliament about the serious effect which the New HS2 station would have on Coventry roads – they wrote,
    23. “The HS2 Interchange Station will also increase traffic on surrounding major road corridors”....”Your Petitioners are concerned that traffic access to HS2 will over burden already constrained urban junctions and absorb capacity provided by already identified improvement opportunities which are required to support planned growth.”
    - b) In Keresley, the new link road will draw traffic from the HS2 hub and the airport towards M6 J3 – this has not been included in the CASM model. Highways England wrote to the council city on 27 Jan 20: “[Re]... 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. “

- c) The CASM model affirms that it complies with the DfT TAG unit M4 guidance which requires airports to be included in the modelling. The CASM TDM report states:

“the CASM TDM is Department for Transport(DfT) Transport Analysis Guidance (TAG) compliant and fit for purpose”

The DfT TAG M4 guidance says,

“7.3.9 Surface travel demand for airports should be considered for all schemes,”

Leaving out the airport is a significant and gross omission. Passenger numbers are forecast to double from 9 million in 2013 to 18 million in 2031<sup>1</sup>! with 72% of passengers arriving by car<sup>2</sup>, this will put huge pressure on the roads. No doubt many will take a route towards Leicester and the Northeast, via the A45 and the new Keresley link road to the M6 – none of this traffic was considered in the various CASM models commissioned in recent years.

- d) None of the CASM models considers the Amazon warehouse as a source of traffic. Lorries from the warehouse already are using city streets as cut throughs and rat runs to get to the M6. City Highways engineers have confirmed to us that there will be no restrictions on lorries using the link road. It invites yet more misery, this time in Keresley, where residential homes, and residential side streets will face into a link road carrying juggernaut lorries.

The Amazon Warehouse will not be included in the 2013 baseline counts for CASM because the site was inactive in that year – the Jag Brownslane Factory had closed, and Amazon had not yet commenced.

6. Transport 2 – There will be severe cumulative congestion contrary to NPPF. The existing traffic models – even though they have omitted traffic from the airport and HS2 – show junctions over 100% capacity even with mitigation, at Penny Park Lane and Bennetts Rd, and at Exhall Rd and Bennetts Rd. No more than 85% capacity is acceptable to Highways Engineers. [See for example the Mode report for the Bellways Tamworth Rd [OUT/2019/0022] Transport Assessment which states

6.5.3 When assessing junction capacity, it is generally accepted that, a Ratio of Flow to Capacity (RFC) value of below 0.85 represents a junction that is considered to be operating satisfactorily (within practical capacity). At junctions operating at or close to zero theoretical reserve capacity, which equates to an RFC value of approximately 1.00 or above, small reductions in capacity may result in exponential queuing and/or delay results. Therefore, junctions operating close to or above 1.00 should be carefully reviewed to ensure that queuing and delay is not significantly impacted upon, and to ensure that the new development will not have a ‘severe’ or detrimental impact upon the existing highway infrastructure”.

7. A 30m buffer does not protect Ancient Woodlands, as required by policy GE3. The Woodland Trust recommends a minimum buffer of 50m and preferably 100m. A narrower buffer will encourage , littering, fly tipping, vandalism, motorbike intrusion, arson, and cats and dogs disturbing ground nesting birds.
8. Historic England was not consulted. . Keresley was deemed, by Coventry Council, the best remaining piece of the Arden Landscape in Warwickshire in the 1995 Arden Design Guidelines, which remain in effect. It would be contrary to Policy GE3 which requires that “important landscape features will be protected”. Building unneeded homes, on the best remaining piece of the Arden landscape breaches the requirement to protect “important landscape features”

**“The area ...Keresley, Allesley and Coundon Wedge ....has been identified ....as Ancient Arden. This landscape is considered to be especially important as it is now the only remaining unspoilt area of ancient countryside left in Warwickshire”**

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<sup>1</sup>Birmingham Airport master plan 2018, pg 17

<sup>2</sup>Ibid, pg 37

**[emphasis added by Coventry Council] [emphasis in the original council document ](pg 7) of the 1993 CCC Ancient Arden Design Guidelines**

Historic England wrote on 26 Feb 2016, to CCC, “ Historic England note the proposed allocations but remain to be convinced that the “essential site specific requirements” in table 4.2 [of the local plan] address the critical heritage matters . . .Local Plans need to demonstrate ...**great weight** to the conservation of heritage assets. Development will be expected to avoid or minimise conflict between any heritage assets conservation and any aspect of the proposal. Harm should always be avoided”

re H2:1 Keresleyt. Historic England wrote, in 2016 “ No evidence appears to be available to demonstrate how an understanding of the site’s contribution to the setting of Burrow Hill Fort Scheduled Monument and the Listed Buildings on the southern tip of the allocation has informed the principle of development ....the plan and its evidence ...should demonstrate that **great weight** has been afforded to the conservation of affected heritage assets, including their setting.

An important historic landscape and a scheduled ancient monument are not protected in breach of Policy GE3. In 2016, Historic England [HE] expressed concerns about the effect on the scheduled ancient monument at Corley Rocks and specified that “great weight” should be given to conservation of affected heritage assets including their setting. The Landscape assessment, at 5.4.77 of the Environmental Statement , specifically excludes any examination of the Burrow Hill Fort in direct breach of the obligation to give it “great weight”. The LVIA states

5.4.77 Two key viewpoints are identified at Burrow Hill Fort and Burrow Hill Fort which the SPD [Coventry City Council Urban Extension Residential Design Guide SPD (August 2019)] states “*are considered of strategic importance linked to the setting of the SAM.*” [Scheduled Ancient Monument]. However, these viewpoints are not on public footpaths so have not been considered within this LVIA.”

It is incompatible with the SPD the Historic England 2016 consultation response, and the NPPF, to exclude the burrow hill fort from the LVIA. It is impossible to give “great weight to a scheduled ancient monument, if you exclude it from the assessment.

Walkers, proceeding along the blue and green corridors and the public footpaths southwards from Corley Rocks, specified in policy H2:1 will experience a highly degraded Arden Landscape.....- In an undulating landscape, we assert that the experience of a walker, proceeding southwards from Corley Rocks, along the new green and blue corridors, will define the setting of the monument – not just the view from the monument itself.

HE guidance, does not define setting by the view available, as the LVIA appears to do it through a Zone of Theoretical Visibility. HE use a more inclusive definition

“Setting is defined in the National Planning Policy Framework (NPPF) as “The **surroundings** in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. t<sup>3</sup>

Otherwise, the valleys and hollows of a hilly landscape would always be unprotected.

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<sup>3</sup><https://historicengland.org.uk/advice/hpg/has/setting/#Section10Text>

Historic England was not consulted about this application and the effect on the Hill Fort. It is inconceivable that one could claim to “give great weight” to the local heritage assets – as Historic England and the NPPF require - and fail to consult the regulator, Historic England

9. Health needs have not been adequately provided for. Local Surgeries are at capacity, as is the UHCW hospital. They are running at 100%. There is no Health Impact Assessment.
10. We are unable to see and know how the parts of the SUE will relate to each other, and what the total impacts will be. - whether or not people will be able to easily walk or cycle or take a bus to shops, schools, and surgeries, how biodiversity will be protected in the SUE as a whole, how connectivity between parts of the SUE will be enhanced, what the total flood risk will be, what the total traffic impacts will be, and what the total air quality impacts will be, what the landscape effects will be of the SUE.
11. Landscape. The Indicative Masterplan for the SUE has not considered the effect on the total landscape, and especially not considered the effect on the Scheduled Ancient Monument at Corley Rocks. Historic England was not consulted either for the parts of the SUE, nor for the SUE as a whole.
12. The masterplan needs to include deadlines for the provision of schools, and surgeries. If they are not provided early in the plan, there is a high risk, that all the fine plans for people walking and cycling to school, and the shops, and surgeries, will fail and there will once again be hordes of cars driving children to school in other neighbourhoods – recent experience in Coventry, at Banner Lane and the Grange in Binley, (the old Marconi site) shows that hypothetical schools, included in masterplans and planning permission, do not get built – even years later, after the completion of the estates. Once patterns of travel are established in the early phases of an estate, it is very difficult to get people to switch modes of travel. For example, the new Coundon cycle way is very very little used. People are not switching to it.
13. Air quality status- (a) Coventry is one of the 30 worst places in the country, and has the most polluted road in the West Midlands (Holyhead road). It is not sustainable to build large suburban developments, on the periphery of the city because they inevitably aggravate traffic congestion and pollution both coming into the city centre, and on commuter routes to other towns in the region – Census data confirm that very large numbers of Coventry residents commute out to other locations. People living in the new luxury developments in Keresley are likely to commute to the economic growth areas of the regions: Stratford, Warwick, Solihull, and Tamworth.
14. Hedges. At manor farm, Hedges which are 4-600 years old, aged by Hoopers Law, are to be removed, in breach of policy H2:1 which requires retention of ancient hedges. Local people surveyed them as

follows in May 2022:

		Hedgerow			
species	H2	H3	H4	H8	
blackthorn	x	x	x		x
dog rose	x	x			x
hawthorn	x	x	x		x
oak	x	x			
elder	x	x	x		x
hazel	x	x	x		
ash	x				x
holly	x	x	x		x
field maple		x	x		
crab apple		x	x		
honeysuckle					x
average no woody species per 30m, May 2022	5.2	5.2	3.6		4.4
for the whole hedge, number of species, May 2022	8	9	7		7
Wharton Tree study, number species	5	4	7		5
<b>age by hoopers law, years, from the may 22 survey/30m</b>	<b>572 yrs</b>	<b>572 yrs</b>	<b>393 yrs</b>		<b>484 yrs</b>

Note: the wharton study does not give sufficient data to age the hedges.