

Consultation Response from
Keep Our Green Belt Green, Coventry and Warwickshire
Campaign against Non Sustainable Urban Extensions
Merle Gering Chair

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

1. 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)
2. 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. They note that J3 M6 is already severely congested, as is J6 M42 (which will be used by traffic from Keresley to Birmingham). They are concerned that the Keresley Link Road, may never be completed, but that if it is, it may open up a whole new traffic profile for NW Coventry. HE concerns were first expressed in Dec 2018, and are still not resolved. The route of the Keresley Link Road is undetermined. There is not sufficient certainty about the impacts of this application for it to be decided.

In "Connecting Coventry", the council states 2.4.1 "The north western side of the city suffers from significant congestion as a result of a road network that was never designed to accommodate current levels of demand. Potential future housing and employment growth in this part of the city will be hindered or create unacceptable impacts to local access without a long-term solution to increase the capacity of the road network between the A4114 Holyhead Road corridor in the west and the A444 Jimmy Hill Way corridor in the north. "

3. 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.
4. 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].
5. Archaeology: The site contains important remains. Ground penetrating radar shows the presence of a possible pre-Saxon Barrow off Edward Road. [photos available] 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!

6. Demography. Building on former greenbelt is not necessary. 9 years into the local plan period, there no sign of the promised population boom. A review of the latest Office of National Statistics data and research - which has been provided to the city council by Keep Our Green Belt Green, - shows no sign of a spike in a wide range of indicators, including: Gas and Electric consumption, electoral roll, births, school admissions, car registrations, jobs growth, house prices, house building, state pensions and ESA benefits claimed, and domestic waste tipped into bins. If people are pouring into Coventry, they are ghosts or vampires who leave no trace. The council should put a moratorium on any building in former greenbelt until a review of the local plan is carried out. The chancellor has just announced that he expects the economy to shrink radically. Following the pandemic, any assumptions in the local plan about jobs growth and the housing provision consequently needed, can no longer be valid. For the avoidance of doubt, our latest slide show presentation of the administrative data is attached. Despite the claims of George Duggins and Mark Andrews, there is no requirement that ONS numbers must be followed; the NPPF and guidance only state that the ONS numbers are a starting point and that local authorities should have regard to “market signals and local knowledge” Deviation from the ONS estimates is acceptable where justified. Here is what planning guidance says:

“If authorities use a different method how will this be tested at examination?”

Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.

Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination.

<https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

7. 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.
8. Biodiversity. the development will reduce biodiversity. 13 or 19 specialist farmland birds, 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.
9. 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.

10. 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.
11. 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 currently congested junctions, such as Sandy Lane/Bennetts Road or Scotch Hill/Tamworth Road.
12. 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.

Comments from Peter Maddock

The Nhs

The NHS has already responded to planning applications for both Keresley and Eastern Green by saying that capacity does not exist to be able to treat the additional patients that would flow from large population expansion.

The Covid -19 pandemic clearly illustrates that the local NHS has not got the capacity to respond to such an emergency without stopping all routine surgery and Cancer treatments, as well as postponing many cancer treatments. Infra structure planning for the NHS is vital needed before any more major planning applications are considered. The NHS reports there will be a backlog of 8 million operations in the country following the pandemic. . This strain on capacity should all be part of a fundamental review of the Local plan.

in the Times today. NHS waiting lists to surge up 8million people waiting.
A huge backlog that we will not have capacity to tackle.

https://www.thetimes.co.uk/edition/news/coronavirus-hospitals-face-capacity-squeeze-while-waiting-lists-surge-to-8m-9sktpvswh?utm_source=newsletter&utm_campaign=newsletter_144&utm_medium=email&utm_content=144_9412531&CMP=TNLEmail_118918_9412531_144

COVID-19 Local Plan implications

The pandemic has seen an unprecedented impact on the Economy, the Governor of the Bank of England predicts a down turn of 14% for 2021.

Therefore, the economic assumptions for jobs and economic growth that underpin the Local Plan that was approved in 2017 are no longer valid.

The climate emergency that has occurred and been recognised since 2017 means that the housing proposals outlined are no longer fit for purpose, and would exacerbate the problems. It should be noted that during the COVID lockdown seeming impossible Environmental Improvements have been achieved, the vital role that Green spaces and Trees have played in our Physical and Mental wellbeing has been immense. These Green spaces must be maintained and expanded and we should be planning for many more cycle ways and walk ways, not more cars and more roads.

13.

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.

Figure NTS2 Site features and surrounds

