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12/05/2022

Re: Planning Application (Reserved Matters (Major)) RMM/2022/0633

Location: Land at Fivefield Road and Tamworth Road, Coventry,

Proposal: Submission of Reserved Matters for 284 dwellings off Fivefield Road, for all matters outstanding pursuant to permission OUT/2019/0022 granted on 07/02/2022 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, 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

General Comments

1. Woodland Buffer & Diverted Public Right of Way
2. Trees, Hedgerows & Wildlife
3. Roads, Footpaths & Cycleways
4. Air/Noise Assessments & Sustainability
5. Overhead Power Lines
6. Planning Portal Administration Error

1. Woodland Buffer & Diverted Public Right of Way

The size of the Ancient Woodland Buffer bordering with The Alders as portrayed in [Planning Layout \(1:1000\) - Drawing No.1511-02 Rev W](#) is insufficient to protect this ancient woodland.

[Government Guidance](#) 'Ancient woodland, ancient trees and veteran trees: advice for making planning decisions' states:

The size and type of buffer zone should vary depending on the:

- *scale and type of development and its effect on ancient woodland, ancient and veteran trees*
- *character of the surrounding area*

For example, larger buffer zones are more likely to be needed if the surrounding area is:

- *less densely wooded*
- *close to residential areas*
- *steeply sloped*

Some of the bullet points above sanction the requirement for a much larger buffer.

Marrons Planning stated 'The City Council require a buffer of 30m between built development and the edge of the woodland' ([Statement of Community Involvement, dated February 2022](#)). As per 2.41 of the [Trees & Development Guidelines for Coventry SPD](#), Coventry City Council are aware of advice from The Woodland Trust recommending buffer zones in excess of 50m. Case studies in [Planning for Ancient Woodland](#) by The Woodland Trust present examples of where buffers of 50m have been justified.

The proposed diversion of M315 Public Right of Way is not a good solution. It severs the ancient woodland buffer at about 15m from the boundary. As well as considering tree roots, it is just as important to consider the natural habitats which very much rely on a sufficient buffer for foraging where there is minimum footfall/trampling. The [Government Guidance](#) states '*Indirect effects of development can also cause the loss or deterioration of ancient woodland, ancient and veteran trees by increasing damage to habitat, for example trampling of plants and erosion of soil by people accessing the woodland or tree root protection areas*'. A revised diversion is required for M315.

2. Trees, Hedgerows & Wildlife

The loss of a Pedunculate Oak tree (7090 – Category A Quality, High Value) near a balancing pond is not welcome. There is a discrepancy in the documents about the fate of this tree. The [Detailed POS Landscape Proposals - Sheet 1 of 4 - Drawing No.P21-3416-03](#) state it is to be removed. Whereas [Tree Protection Plan Over Layout - Sheet 2 - Drawing No.37-1044.06](#) have stated it is to be retained with a no dig zone around it when building plots 84-95. See APPENDIX 1. No reason has been stated for its removal. For the sake of making foundations easier to dig, it does not justify the removal of this tree.

Whilst there is a local policy for tree replacement on a two for one basis, this will not compensate for trees that have been growing for many years, removing much more CO2 from the air, being aesthetically pleasing in the local landscape and very important for wildlife. Some of these trees proposed for removal could outlive the lifespan of the proposed development and therefore should be treated with the utmost respect. No Category A or B tree should be removed in vain (proposed to be removed: 2 and 85 respectively).

1275 metres of hedgerow is proposed to be removed across whole development. This is a staggering amount and a tremendous shame that it hasn't been incorporated into the development. For reference, another development in the Keresley SUE has successfully managed to retain most of the existing external and internal hedgerows and will conduct gapping up activity to allow them to thrive and look visually attractive. What will be done to compensate for the loss of these hedgerows? It is impossible to replace something that has taken years to establish and the habitats it contains.

In [Tree Protection Plan Over Layout - Overview Sheet](#) there are multiple comments that state '*Hedge face to development to be trimmed back to provide clearance*'. This may create scars in established hedgerows, exposing habitats to predators and take a long time to recover. This comment is used along the diverted footpath M315 towards the North of the site. If a section of hedgerow is required to be cut back, will this distort a clear view through the length of the Public Right of Way and could that be a safety concern? It suggests too much is trying to be squeezed into the space available.

Hedgerows are critical to act as corridors for wildlife allowing them to travel safely across land, it is important for them to flow and be continuous as far as possible. Hedgerow removal must be restricted to absolute bare minimum.

It is worth being aware that the landscape drawings have proven difficult to interpret due to the lines and colours identified in the Key not being applied properly. The brown dotted line denoting trees and vegetation to be removed is very hard to see as it is thin and often overlaps with another colour. In some instances as shown in APPENDIX 2, the brown dotted line is not present at all, masking the fact that a large amount of hedgerows are to be removed.

These drawings need to be reviewed and revised to accurately reflect the exact amount of trees and hedgerows that are being proposed for removal.

Finally, please do follow the recommendations of the [Landscape and Ecology Management Plan \(LEMP\), dated 1st November 2021](#) regarding *Habitat Enhancement Features for Fauna*, such as birds, bats and hedgehogs. Bat boxes incorporated into buildings, which require no maintenance are a great way to help support habitats, despite development.

3. Roads, Footpaths & Cycleways

There are four junctions to Fivefield Road from this development as shown in [Planning Layout \(1:1000\) - Drawing No.1511-02 Rev W](#), each have their own concerns and questions.

Regarding Road No. 1 junction, there are plans mentioned in [OUT/2022/0712](#) about changes to traffic priority on Fivefield Road as well as a future plan for Fivefield Road to be stopped up as part of the Bellway development. This is not mentioned at all in this application (RMM/2022/0633). This will influence how traffic flows through the Bellway development. The '*proposed alignment to provide priority between development site access and Bellway site access*' as per [Proposed Fivefield Road Site Access Junction - Drawing No.T21517 – 009](#) suggests there will be a higher level of traffic will flow between the developments than on Fivefield Road. What will stop this becoming a rat run? Please clarify intentions. Proposals about site boundaries need to be clear and consistent between different applications. What provision will there be to allow vehicles to turn around safely at each side of the stop? Might these dead ends attract antisocial behaviour?

There is a 3.7m wide Emergency Link on Road No. 8. What will stop this from being used as a shortcut?

Finally, regarding the two Private Drives for plots 521-524 and 541-544. How will refuse and other large vehicles manoeuvre safely into and out of these areas? [Refuse and Fire Tender Vehicle Tracking - Drawing No.23541-02-010-04.2 Rev A](#) defines no route for these areas. There is no visibility splay marked on the drawings for these Private Drives in [Planning Layout \(1:1000\) - Drawing No.1511-02 Rev W](#). The junction at the Private Drive for 521-524 is still showing hedgerows going across it on multiple drawings. Intentions for any hedgerow removal need to be absolutely clear.

The stretch of Fivefield Road that borders with the development has no footpaths or cycleways, so does not allow a safe network for pedestrians or cyclists. Please ensure any footpaths and cycleways are designed whilst considering the surrounding areas, ensuring they link up seamlessly and safely to neighbouring footpaths and cycleways. This will provide strong pedestrian and cycleway networks.

Provision for encouraging cyclists is limited in this development, which is disappointing. Segregated cycleways are being retrofitted in areas of Coventry at great expense, as the benefits should outweigh the cost. This development is being designed from scratch and so has the opportunity to have a really ambitious cycling infrastructure.

It is a shame that Public Right of Way M313 is not segregated from the road along the whole length and in effect has just become a roadside footpath. The diverted footpath (M315) has been discussed above.

4. Air/Noise Assessments & Sustainability

There appears to be no Air Quality Assessment including mitigations attached. This is very important and should consider developments and infrastructure that is not yet in existence (e.g. Keresley Link Road). The [Baseline Noise Assessment, dated 12th August 2021 - Report Ref:Rev. 1](#) does not mention the Keresley Link Road, which will be a noise source to consider. It does not even reflect in *Section 3* that this development will have junctions with the Keresley Link Road.

Electric Vehicle (EV) charging capability has been included in most properties as per [Planning Layout \(1:1000\) - Drawing No.1511-02 Rev W](#), but does not appear to be being installed in affordable housing. The new law will require all new homes in England to have EV chargers. There also appeared to be a lack of details regarding on-street charging.

<https://www.which.co.uk/news/article/new-homes-in-england-to-have-electric-car-chargers-by-law-aFrhJ1r3xw57>

According to [Coventry City Council](#), '47% of all UK CO2 emissions are linked to the construction and operation of buildings – both housing and commercial'. *Coventry Local Plan, Policy EM2: Building Standards* states ways in which carbon reduction targets can be met, such as renewable energy generation – photovoltaic solar energy and geothermal energy to name a couple. For the sake of protecting the world and tackling climate change, developers should be looking to exceed minimum requirements laid out in policy to reduce carbon footprint.

Coventry is renowned for its innovation and ingenuity. Should the loss of green space for housing be absolutely necessary and inevitable, the Keresley SUE should be the opportunity to champion new sustainable technologies, construction methods and ways of living that are affordable. The developments in Keresley start from blank canvases, so there is no excuse not to be ambitious in exploring affordable, sustainable solutions to minimise impact on the environment.

Developers could offer space to allow for allotments to be enjoyed and used by the local community. There has been an increase in popularity of allotments since the pandemic; food miles, cost of living, community development, physical and mental wellbeing to name a few reasons why. Across the country, waiting lists are long, so there is the opportunity here to support the local community with this initiative.

<https://www.bbc.co.uk/news/uk-england-somerset-61161477>

<https://www.bbc.co.uk/news/uk-england-cumbria-61242601>

5. Overhead Power Lines

Overhead Power Lines run across this development. The opportunity should have been taken to reroute overhead power lines underground within Keresley SUE to make the area more visibly appealing. If rerouting underground was not possible, some pylons in the UK are being upgraded to a new more visually appealing T shape design.

Have National Grid been consulted about this development? What was their response? They advise '*Where high voltage overhead lines are present on a site, it is recommended that National Grid is consulted at the earliest possible opportunity in order that advice and guidance on development near high voltage overhead lines may be taken into account*'.

<https://www.nationalgrid.com/sites/default/files/documents/Sense%20of%20Place%20-%20National%20Grid%20Guidance.pdf>

6. Planning Portal Administration Error

It should be pointed out that [Drainage Design & SUDS Management Strategy – October 2021](#) is actually titled on the Planning Portal *Arboricultural Impact Assessment, Arboricultural Method Statement and Tree Protection Plan, dated September 2021 - Report Ref:CC37-1044* (of which there are two attachments on the Planning Portal with the same title).

**Keresley Parish Council ask that application RMM/2022/0633 in its current form, be
REFUSED.**

Signed

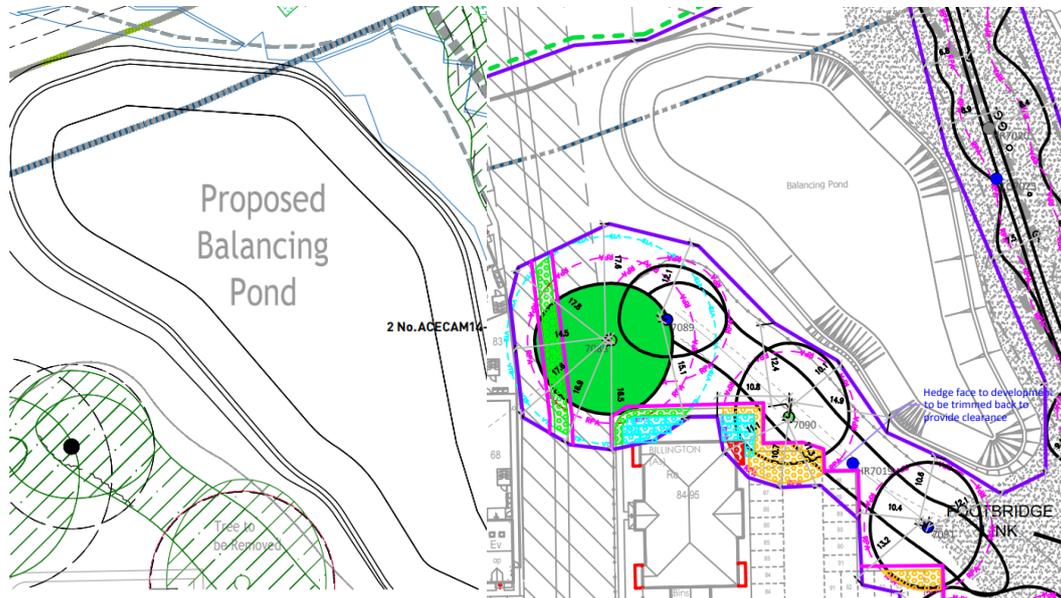
Councillor Matthew Dille – Planning Committee Member

Councillor Nukey Proctor – Planning Committee Member

On behalf of Keresley Parish Council

APPENDICES

APPENDIX 1:

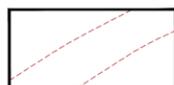


Discrepancies regarding 7090 tree removal (Pedunculate Oak – Category A Quality, High Value)
[Detailed POS Landscape Proposals - Sheet 1 of 4 - Drawing No.P21-3416-03](#)
[Tree Protection Plan Over Layout - Sheet 2 - Drawing No.37-1044.06](#)

APPENDIX 2:



Existing trees and vegetation to be retained



Existing trees and vegetation to be removed

Incorrectly labelled diagrams – vegetation not marked with brown dots where it is earmarked to be removed

[284 Unit - Detailed POS Landscape Proposals - Sheet 1 of 4 - Drawing No.P21-3416-03](#)
[284 Unit - Detailed POS Landscape Proposals - Sheet 2 of 4 - Drawing No.P21-3416-04](#)