

Keresley Parish Council

Coventry Local Plan Review – Main Modifications Consultation

Representation in relation to Policy DS4 Part C – Keresley SUE Specific Masterplan Principles

Keresley Parish Council welcomes the opportunity to respond to the Coventry Local Plan Review Main Modifications consultation.

The Parish Council understands that this consultation is specifically concerned with the proposed Main Modifications and that it is not an opportunity to reopen the principle of the Keresley Sustainable Urban Extension (SUE), the overall allocation or the housing numbers already considered through the examination of the Plan.

Our comments are therefore focused on the proposed modification to Policy DS4 Part C and, in particular, whether the policy provides sufficient confidence that the infrastructure required to support the Keresley SUE will be delivered alongside the development.

However, the Parish Council also considers it important that the Inspectors are aware of the experience of the existing community. The concerns set out below are not theoretical concerns about what might happen in the future. They reflect matters that residents are already bringing to the Parish Council and issues that the Parish Council is already having to deal with.

The scale of development in Keresley has resulted in significant change to the area. Residents understand that development brings change, but they are increasingly concerned that housing is being delivered faster than the infrastructure and services needed to support the growing population.

The Parish Council believes that this experience is relevant when considering whether the proposed modification to Policy DS4 Part C provides sufficient safeguards for the future.

Concerns raised by Keresley residents

Residents have consistently raised concerns about the effect of development on the local area.

These include:

- increased traffic and congestion on local roads;
- additional pressure on Bennetts Road and Bennetts Road South;
- concerns regarding Fivefield Road and the use of local roads by heavy vehicles;

- concerns about Tamworth Road, Watery Lane, Thompsons Lane, Sandpits Lane and Long Lane;
- drainage and surface water problems;
- flooding and concerns about the capacity of existing drainage infrastructure;
- sewage and wastewater problems;
- concerns about the impact of development on existing watercourses and surrounding land;
- concerns about the availability and timing of school provision;
- pressure on public transport;
- concerns about the availability of shops and other local services;
- concerns about when the proposed Local Centre and community facilities will actually be delivered;
- concerns about the cumulative effect of development by a number of different developers; and
- concerns that the existing community is being asked to accommodate further development before the necessary infrastructure is in place.

These concerns should not be considered in isolation. They are connected to the overall scale and pace of development and the ability of existing infrastructure to cope with the additional demand.

Transport and local roads

Transport is one of the issues most frequently raised by residents.

The existing road network is already experiencing increased pressure as development progresses. Residents have raised concerns about traffic movements, congestion and the use of local roads by construction and other heavy vehicles.

The Parish Council has received particular concerns relating to Fivefield Road, including the effect of heavy vehicles and the condition and suitability of the road for the level of traffic associated with development.

Residents have also raised concerns regarding Bennetts Road, Bennetts Road South, Tamworth Road, Watery Lane, Thompsons Lane, Sandpits Lane and Long Lane.

The Parish Council recognises the proposed Keresley Link Road as an important part of the planned infrastructure. However, residents need confidence that the road will be delivered at the point when it is needed and that the existing network will not be left to carry increasing levels of traffic while development continues.

The Parish Council therefore considers that there needs to be a clear relationship between the delivery of housing and the delivery of the Link Road and other necessary highway improvements.

Simply identifying the Link Road as part of the development does not, in itself, resolve the concerns being experienced by residents.

Drainage, flooding and sewage

Drainage, flooding and sewage are particularly serious concerns for Keresley residents.

The Parish Council has dealt with a number of concerns raised by residents regarding drainage and flooding, and has been involved in discussions with Coventry City Council and Severn Trent Water regarding issues affecting the area.

There have also been concerns involving sewage, including incidents affecting private land and a watercourse.

These matters are of particular concern because they are not simply questions about future development. There are existing issues which residents are already experiencing.

There is understandable concern about whether the existing drainage and wastewater infrastructure has sufficient capacity to accommodate the additional demand created by thousands of further homes.

The Parish Council accepts that individual planning applications will need to consider drainage and wastewater requirements. However, the Parish Council does not believe that considering each application separately is sufficient to understand the overall pressure created by the Keresley SUE.

The cumulative effect of development needs to be properly considered.

There should be clear evidence that the necessary wastewater and drainage capacity is available before further development places additional pressure on infrastructure that is already causing concern.

Education and school provision

Education provision is another issue which residents regularly raise.

As more homes are occupied, the number of children living in the area will increase. Residents reasonably expect the education provision required to support this growing population to be available when it is needed.

There is concern about the timing of the proposed school provision and whether education infrastructure will keep pace with the number of homes being occupied.

The Parish Council believes that the delivery of housing and education provision should be properly coordinated.

It would not be reasonable for a significant number of homes to be occupied while existing schools and neighbouring schools are left to absorb additional demand because the planned education provision has not yet been delivered.

The Parish Council therefore considers that Policy DS4 Part C should provide greater certainty about how education provision will keep pace with housing delivery.

Section 106 and infrastructure delivery

Residents also have concerns about the relationship between development contributions and the infrastructure being delivered on the ground.

The Parish Council understands that Section 106 agreements are separate legal agreements and that this consultation is not intended to determine how individual contributions are spent.

However, from the perspective of residents, the issue is straightforward: development is taking place and residents want to know when the infrastructure needed as a result of that development will be delivered.

There needs to be greater transparency about the infrastructure requirements associated with the wider Keresley SUE, what contributions have been secured, what infrastructure has been delivered, what remains outstanding and when it is expected to be provided.

The Parish Council believes that infrastructure delivery should be properly monitored across the whole SUE rather than being viewed only through individual developments.

Green and blue infrastructure

The Parish Council notes the proposed provisions relating to the green and blue infrastructure corridor around the Ancient Woodlands, Hounds Hill and Hall Brook.

This is an important part of Keresley's environment and also has relevance to drainage, biodiversity and the wider character of the area.

The Parish Council considers that green and blue infrastructure needs to be planned and delivered as part of a connected network across the whole development.

It should not simply consist of separate areas of open space delivered independently by different developers without regard to how those areas connect with one another.

The existing landscape and important environmental features need to be protected and properly incorporated into the development as a whole.

Local Centre, public transport and community facilities

Residents have also expressed concern about the timing of local facilities.

A development of this scale will create a substantial new community. Residents need access to shops, services, public transport, community facilities and other everyday amenities.

There is concern that homes may continue to be occupied while the facilities intended to serve those residents remain unavailable or are delayed.

The Parish Council considers that the Local Centre and other planned community facilities are an important part of making the development work for the people who will live there.

They should be delivered at a stage that reflects the growth of the population rather than being treated as something that can be left until the later stages of the development.

The cumulative impact of the Keresley SUE

The Parish Council's overriding concern is the cumulative impact of the development.

The Keresley SUE involves a number of developers and individual planning applications. Residents, however, do not experience these developments separately.

They experience the combined effect of the development on the roads they use, the drainage systems around their homes, local schools, public transport, local services and the surrounding environment.

This is why the Parish Council believes it is important for the Keresley SUE to continue to be considered as a whole when infrastructure requirements are assessed.

A development of this scale cannot be fully understood by looking at each individual planning application in isolation.

The Parish Council is concerned that infrastructure can appear adequate when individual applications are considered separately, while the combined effect of thousands of homes places much greater pressure on the existing area.

The Parish Council's position on the proposed modification

The Parish Council recognises that the Inspectors are not being asked through this consultation to reconsider the principle of the Keresley SUE.

We are not seeking to use this consultation to reopen matters that fall outside its scope.

However, the Parish Council considers that the experience of Keresley is directly relevant to the proposed wording of Policy DS4 Part C is sufficiently robust.

The policy needs to do more than identify infrastructure that is expected to be provided at some point during the development.

It needs to provide confidence that the infrastructure will be delivered when it is needed and that the existing community will not be left carrying the consequences of development while waiting for the necessary improvements.

The Parish Council therefore asks that the wording of Policy DS4 Part C is strengthened to ensure that:

1. The Keresley SUE is considered as a whole when assessing infrastructure requirements and the impact of development.
2. The delivery of housing is properly coordinated with the delivery of the infrastructure required to support that housing.
3. The Keresley Link Road and necessary improvements to the wider highway network are delivered at the appropriate stage of development.
4. Existing drainage, flooding and sewage problems are properly considered when further development is assessed.
5. There is clear evidence that sufficient wastewater and drainage capacity is available to support further development.
6. Education provision is delivered in step with housing so that existing schools and neighbouring communities are not placed under unreasonable additional pressure.
7. Infrastructure contributions, including Section 106 contributions, are properly monitored against the infrastructure requirements created by development.
8. The green and blue infrastructure corridor is planned and delivered as a connected part of the wider SUE.
9. The Local Centre, public transport and other essential community facilities are delivered at an appropriate stage of development.
10. The cumulative effect of the development on the existing Keresley community is properly considered rather than relying solely on the assessment of individual planning applications.

Conclusion

Keresley Parish Council understands the purpose and limits of this Main Modifications consultation.

We recognise that the consultation cannot be used simply to reopen the principle of the Keresley Sustainable Urban Extension or the overall housing allocation.

Nevertheless, the Parish Council believes that the current experience of Keresley is relevant to the consideration of Policy DS4 Part C.

Residents are already living with the consequences of a rapidly changing area. They are seeing more traffic on local roads, raising concerns about drainage and sewage,

questioning the timing of school provision and asking when the facilities and services needed by the growing population will be delivered.

These concerns should not be dismissed as objections to development in general. They are concerns about whether the infrastructure is keeping pace with the development that is taking place.

The Parish Council is not asking for promises that cannot be delivered. It is asking for a realistic and clear relationship between the homes being built and the infrastructure needed to support them.

The Parish Council also believes that residents' experience should carry weight. Where there are already concerns about roads, drainage, flooding, sewage, education and local services, these matters need to be properly understood before further pressure is placed on the area.

Keresley has already experienced substantial development and significant change. The Parish Council therefore asks the Inspectors to take account of the issues being experienced by the existing community and to ensure that the proposed modification to Policy DS4 Part C provides sufficient certainty that infrastructure will be delivered alongside development.

The Parish Council's position is that identifying infrastructure within the policy is not enough. There must be a clear and credible connection between development and the infrastructure required to support it.

Keresley residents should not have to wait for the problems created by development to become critical before the infrastructure needed to address them is provided.

For these reasons, Keresley Parish Council asks that Policy DS4 Part C is strengthened to provide greater certainty around infrastructure delivery, the timing of development and the cumulative impact of the Keresley SUE on the existing community.