



Developments Affecting Trunk Roads and Special Roads

Highways England Planning Response (HEPR 16-01)

Formal Recommendation to an Application for Planning Permission

From: Catherine Brookes (Divisional Director)
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To: **Coventry City Council – Nigel Smith**

CC: transportplanning@dft.gsi.gov.uk
growthandplanning@highwaysengland.co.uk

Council's Reference: **OUT/2019/0484**

Referring to the planning application referenced above, consultation dated 7 March 2019, **OUTLINE PERMISSION FOR THE ERECTION OF UP TO 500 RESIDENTIAL DWELLINGS WITH ALL MATTERS RESERVED WITH THE EXCEPTION OF ACCESS AND COMPRISING OF: THE DEMOLITION OF THOMPSONS COTTAGE AND ASSOCIATED BUILDINGS; PROVISION OF GREEN INFRASTRUCTURE INCLUDING STRATEGIC OPEN SPACE, SUSTAINABLE URBAN DRAINAGE, GREEN NETWORKS, PLAY SPACE AND ASSOCIATED STRUCTURAL AND GENERAL LANDSCAPING; A VEHICULAR ACCESS POINT AND EMERGENCY ACCESS POINT ONTO BENNETTS ROAD NORTH; NETWORK OF PEDESTRIAN AND CYCLE ROUTES; AND ALL ASSOCIATED INFRASTRUCTURE AND ENABLING WORKSPLANNING APPLICATION DESCRIPTION**, on Land at Thompsons Farm, Thompsons Road, Coventry, CV7 8JW, notice is hereby given that Highways England's formal recommendation is that we:

~~a) offer no objection;~~

~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);~~

- c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);
- d) ~~recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B is not relevant to this application.¹

This represents Highways England’s formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should you disagree with this recommendation you should consult the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via transportplanning@dft.gsi.gov.uk.

Signature: 	Date: 27 March 2019
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¹ Where relevant, further information will be provided within Annex A.

Annex A Highways England recommended further assessment required

HIGHWAYS ENGLAND (“we”) has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This response represents our formal recommendations with regard to the above referenced planning application and has been prepared by Richard Timothy, Asset Manager for Highways England. The SRN in the vicinity of the application site is the M6 Motorway with Junction 3 located approximately 2 miles from the site.

This planning application forms part of the wider Keresley Sustainable Urban Extension (SUE), which is now allocated in the Coventry City Council Local Plan 2011-2031 (adopted 2017) and is listed under Policy DS4 (Part A) – General Masterplan Principles and Policy DS4 (Part C) – Keresley SUE Specific Masterplan Principles that relate to any development proposals on the site. The wider SUE (Site Allocation reference H2:1) is to consist of up to 3,100 new dwellings, education facilities, two local centres and accompanying infrastructure.

Highways England has been involved in pre-application discussions with the applicant and has provided advice in relation to the potential traffic impacts of the development in the context of the SUE. During our engagement various comments have been made regarding the potential impacts of development at Junction 3 of the M6 in particular, which is already noted for severe levels of congestion at times.

It is considered that each individual application that comes forward as part of the Keresley SUE allocation should take account of the cumulative impact of the wider SUE, whilst also taking account of the potential implications of the new Link Road proposed as part of the Keresley SUE development. It is also noted that Highways England requires an understanding of the cumulative effects of other sites allocated within the adopted Coventry City Council Local Plan (including the Eastern Green SUE) on M6 Junction 3.

Through our review of pre-application scoping information we raised concerns that the potential number of trips being distributed to the SRN at M6 Junction 3 appeared low and we asked that the applicant consider sensitivity tests that include the full buildout of the Keresley SUE, and the inclusion of the proposed Link Road that is proposed to be delivered as part of the SUE development.

The Transport Assessment provided in support of this application is predominantly based on the methodology agreed during the pre-application scoping stage. Upon review we consider the methodology appropriate as a basis and matters regarding the influence of the proposed link road on the profile of development traffic distribution to be robust.

However, while scenarios including some of the land parcels that will make up the overall SUE development have been considered, these do not appear to reflect the full 3,100 dwelling Keresley SUE as allocated within the adopted Coventry City Council Local Plan. We would also like confirmation that the assessments take account of other Local Plan allocated sites nearby (including the Eastern Green SUE) to ensure the impact of the Thompson Farm on the Local and Strategic Road Network is robustly assessed.

We welcome the principles as set out within the proposed Travel Plan to support sustainable travel, however, we invite further discussion with the applicant on the above points. We consider these matters need to be addressed to ensure the application is fully assessed in accordance with DfT Circular 02/2013 *Strategic Road Network and the Delivery of Sustainable Development*.

On the basis of the above, Highways England recommends that permission should not be granted for a period of up to three months from the date of this response to allow time for further discussion with the applicant on these matters.