The Rt Hon Robert Jenrick, MP

Secretary of State for Housing, Communities

and Local Government

4th Floor, Fry Building

2 Marsham Street

London

SW1P 4DF

*BY EMAIL AND POST*

*7th February 2020*

Dear Secretary of State

**PLANNING APPLICATIONS to WARWICK DISTRICT COUNCIL and COVENTRY CITY COUNCIL, FOR 2500 DWELLINGS, PRIMARY SCHOOL, SECONDARY SCHOOL AND DISTRICT CENTRE, ON LAND AT KINGS HILL LANE, STONELEIGH, WARWICKSHIRE (WDC reference W 18 / 0643, linked to Coventry CC reference FUL/2018/0842)**

I am writing on behalf of CPRE WARWICKSHIRE to request that you urgently ‘call in’ for your consideration, or for reference by you to a public inquiry, the planning applications now before Warwick District and Coventry City Councils which have been passed by Planning Committees under resolutions to grant permission subject to completion of Section 106 Agreements. The resolutions are to grant planning permission for a first tranche of 2,500 new homes, schools and associated development at Kings Hill, south of Coventry, to be built over the next 15 or more years.

Furthermore, we strongly urge you to use your powers to place a temporary direction that would prevent permission being granted for other applications for thousands more new homes at locations around Coventry [see attached map and list]both within Coventry and in the adjoining areas of Warwick DC and Nuneaton and Bedworth BC, until urgent issues about population growth and air quality can be resolved.

The Case for Call-In

The case for call in is a regional case based on the population figures in and around the Coventry area. The various local plans (Warwick, Coventry, Nuneaton and Bedworth) were all predicated on the basis of population growth projections of 100,540 in Coventry, over the period 2011-2031. These population figures affect several local planning authority areas including Coventry, Warwick Nuneaton and Bedworth, Rugby, and North Warwickshire as housing need which Coventry could not accommodate was placed in the neighbouring areas.

It might be suggested that the correct process is waiting for the appropriate reviews of local plans. That would be much too late as by then there is the potential for various different planning permissions to have been granted already which would effectively defeat the object of a review. A

detailed scrutiny of housing numbers and population figures is required urgently and cannot be delayed. In the table attached (see below) the various pending applications and anticipated applications in the various local authority areas are listed. It is therefore crucial that proper independent scrutiny takes place without delay.

In the case of Kings Hill there are many site specific issues to be considered in a call in but there is one other very major area which requires independent assessment and that is the issue of air quality in and around the Coventry area. Later in this letter I deal with both population figures and air quality.

We are also seriously concerned that Warwick District Council has allowed a time limit of 15 years for settling ‘reserved matters’ relating to the Kings Hill development, instead of the normal three years. It is entirely conceivable that commencement of development would not take place until well after the plan period has ended (2029) and development of 2500 houses may take 10, 15 or 20 years thereafter. This does not accord with proper planning and again needs independent assessment.

**Bearing in mind that the National Planning Policy Framework allows planning decisions to be made contrary to Local Plans when "material considerations indicate otherwise", CPRE believes there are key issues that require your consideration.**

1) Population numbers

The inclusion of the land at Kings Hill and at other sites around the south, west and north of Coventry included in the Warwick, Coventry and Nuneaton and Bedworth Local Plans, relies on an assessment of housing needs based on population projections by the Office of National Statistics – but CPRE Warwickshire is firmly of the view that the ONS projections seriously overstate Coventry population growth and, therefore, the requirement for new homes, especially in the green belt (or what was green belt until the latest Local Plans were adopted).

There is conclusive new population data that was not available to the inspectors or the councils when they adopted their Local Plans. This data results from very detailed analysis (which is summarised in the attached presentation) of official government administrative data. More information can also be found at www.coventrygreenbelt.org/

Leading demographic experts have endorsed the analysis, saying the “evidence” is “compelling” and they would be “happy to recommend” the study, which clearly demonstrates the inaccuracy of the ONS projections, principally because the ONS has assessed likely growing numbers of overseas students at Coventry and Warwick Universities but failed to take into account that around 97 per cent of them leave within six months of their courses ending.

2)Air quality – already worst in West Midlands – will be worsened

The developments on the edge of Coventry will greatly increase traffic flows and resulting pollution at a time when the city has still failed to agree an Air Quality Acton Plan as required by DEFRA back in 2017.

As recently as 27 January 2020,‘Cities Outlook 2020’, an annual study by the Centre for Cities charity, reported that one in 20 people in Coventry now die from pollution-related illnesses, and the city has a higher proportion of deaths connected to long-term pollution exposure than anywhere else in the West Midlands region.

3) Climate Crisis

In the present climate emergency, it is a grave mistake to put large developments, like Kings Hill, on the edges of cities – because they can have a carbon footprint per person four times bigger than city centre homes

4) Traffic

CPRE is also concerned that Highways England, which manages the Strategic Road Network, has expressed continuing concerns about increased traffic to be generated by major developments around Coventry – including along the A45 corridor and especially by a suggested link road between the M6 at junction 3 and the A45 near Eastern Green, which Highways England says “could potentially affect the strategic traffic profile for the whole of Coventry”. The agency also says there is “severe congestion” at junction 6 of the M42 where it intersects the A45, and at junction 3 of the M6 where the impact “will likely be compounded by further Local Plan growth set out in the emerging Nuneaton and Bedworth Local Plan.” See attached letters from Highways England for their comments.

With their concerns about planned housing developments around the south and south-west of Coventry, Highways England has also stated that “additional junction modeling scenarios may also be required at key junctions along the A46 corridor, in particular Stoneleigh, Thickthorn (Kenilworth) and Toll Bar junctions.” Such further junction enhancements are a serious concern as the Toll Bar junction has only recently undergone a major upgrade and work on a new improved junction at Stoneleigh is beginning currently.

Conclusion

CPRE Warwickshire requests that that you ‘call in’ for a public inquiry and your own determination the planning applications before Warwick District Council (ref: W 18 / 0643) and Coventry City Council (ref: reference FUL/2018/0842) for the Kings Hill site. We recommend that this be preceded by initially, and urgently, initially by issuing a Direction that would prevent these authorities granting permission – which they are able to do once the S.106 Agreements under negotiation are signed – and requires them to send the plans, supporting documents, Committee Reports and resolutions, and representations received to the applications to you for your consideration.

Secondly, we ask that you use and, pending your determination, you direct Coventry City Council, Warwick District Council, and Nuneaton and Bedworth Borough Council to not to grant permission for any applications currently before them relating to the sites listed in the appendix to this letter.

We ask you to issue these Directions not to grant permission to applications on these sites, using your powers under Article 31 of the Town & Country Planning Development Management Procedure Order 2015 (S.I. 2015 no 595).

In conclusion, the cumulative effect of the flawed ONS assessment, the traffic congestion in the immediate vicinity and the Air Quality is such as to render the proposed application(s) unsustainable in the immediate and foreseeable future.’

Yours sincerely,

Sir Andrew Watson

Chairman

CPRE Warwickshire.

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Copies to:

Esther McVey, MP,Minister of State for Housing and Planning

Andy Street, Mayor, West Midlands Combined Authority

Jeremy Wright, QC, MP

Zarah Sultana, MP

Taiwo Owatemi, MP for Coventry North West

Craig Tracey, MP for North Warwickshire & Bedworth

Marcus Jones, MP for Nuneaton

Mark Pawsey, MP for Rugby

Saqib Bhatti, MP for Meriden

Andrew Gwynne MP, Shadow Secretary of State for Communities and Local Government.

The Rt Hon James Brokenshire MP, Ministerial Champion for the Midlands Engine

Simone Hines, Chief Executive, Nuneaton & Bedworth Borough Council

The Rt Hon Theresa Villiers MP, Secretary of State for Environment, Food and Rural Affairs

Chris Elliott, Chief Executive, Warwick District Council

Martin Reeves, Chief Executive, Coventry City Council