



LOCAL ACCESS FORUM

For the attention of:

Emma Spandley – Case officer

The Council House

Coventry City Council

P O Box 15

COVENTRY CV1 5RR

01 March 2024

Dear Ms Spandley

Ref: PL/2023/0001205/FULM

Erection of 30 New Industrial Units (Use B1, B2 and B8) and Conversion of a Derelict Former Gatehouse into a Small Office Unit at Alderman's Green Road Coventry.

The Warwickshire Solihull and Coventry Local Access Forum wish to put a holding advice and recommendation for REFUSAL of the above application due to insufficient up to date information and assessments.

While welcoming the proposals to redevelop a derelict building and site and use of energy efficient design we are aware that photovoltaic and thermal solar panel systems are only mentioned as an option on page 11 - 3.6.3 and 3.6.4 of the Sustainability and Energy Statement.

Knowing how invested Coventry City Council is in providing sustainable renewable energy for the City and its residents by promoting solar power we are, therefore, perplexed why the use of solar energy is not at the forefront of this application and is only stated as an option with further consideration given to renewable energy through the detailed design of the development. If solar energy is not brought forward there will be many empty roofs which could all be providing sustainable solar power and heat.

We are also concerned that on page 4 – 2.8 of the Planning Statement it is states that in discussions with the Council it has been **agreed** that the first phase of the redevelopment of the site can be the conversion of the gatehouse to offices and the development of the land allocated for small factory units.

The application is not, as yet, approved.

Our concerns also cover the MGL Design Associates report, dated October 23 which refers to a previous Ground Investigation Report stating and we quote:

*'Nothing has happened on the site since the Ian Farmer Associates report was prepared and it has been **agreed** with the Council that the previous detailed report for the whole site, which includes the factory units site can be submitted with the current application'.*

That report was dated June 2012 some 12 years ago. The report stated and we again quote:

'Made Ground is indicated to cover the site, and is anecdotally understood to include the demolition rubble from the former power station, as well as a quantity of pulverised fuel ash (PFA). Following the demolition of the power station, the site was used as a licenced landfill, which is understood to cover the demolished buildings and cooling towers of the former power station.

Significant geotechnical risks at the site include the potential presence of at least 3 historic coal mine shafts, as well as the potential for significant thicknesses of Made Ground, plus possible buried foundations and obstructions. It is considered that significant possible contamination risks exist on the site associated with its history, including the power station, colliery, and landfill, plus fly-tipping, canal dredgings, and effluent discharge. The vigorous invasive species Japanese Knotweed was also observed at the site.

It is recommended that an intrusive ground investigation be carried out, to include the sinking of boreholes, the excavation of trial pits, and the installation and monitoring of gas and groundwater standpipes'.

The unprecedented number of severe weather events and flooding during the past 12 years have significantly increased the risk of mining subsidence and landfill movement due to excessive rainwater runoff and flooding. The possible dangers from 'significant' contamination and 'significant' geotechnical risks have been exacerbated by extreme weather events caused by Climate Change over the past 12 years.

The Warwickshire Solihull and Coventry Local Access Forum advise and recommend an up-to-date Ground Investigation Report is produced due to the possible dangers on a site which clearly poses significant threats and dangers to human health and welfare.

The report by Banners Gate Transportation Ltd largely relies on information produced for the expired permission FUL/2013/0727.

The report while affirming the content of the out-of-date report Banners Gate appear to ignore the fact that traffic patterns, sizes of vehicles and road conditions have drastically changed, and not for the better, during the past 11 years. Traffic has increased exponentially year on year together with the size of vehicles especially HGVs. Local roads have not changed, however, road conditions have.

In addition, the plan showing the detailed design of the internal site roads appears to confirm movement and maneuvering around the site is confined and could cause dangerous health and safety issues.

We believe an up-to-date traffic and transport report is required.

The Warwickshire Solihull and Coventry Local Access Forum advise and recommend REFUSAL of the above application, at this time, until and when additional vital information and up-to-date reports are produced for public inspection.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sheila Cooper', with a large, sweeping arch over the first part of the name.

Sheila Cooper

Chair Warwickshire Solihull and Coventry Local Access Forum

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