



BUBBENHALL PARISH COUNCIL

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Development Policy Manager
Development Services
Warwick District Council
Riverside House
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29th July 2013

Dear Sir

Local Plan Consultations in Warwick District - Revised Development Strategy

We write in response to the Revised Development Strategy for the New Local Plan which is currently out for consultation. Bubbenhall Parish Council would like to comment in particular on Warwick District Council's policy on employment land, and the proposals for 'a major sub-regional employment site' in the north-east of the district.

Section 4.3 of the *Revised Development Strategy* states that it is WDC's aim to protect Green Belt from development where alternative non-Green Belt sites are available. Further, we are told that it is the Council's aim to avoid development in locations that could 'potentially lead to the coalescence of settlements'. Your policy on employment land is in direct opposition to both those aims.

The policy outlined in Section 4.3.9, of releasing existing employment land for housing development is unjustified. The proposal to remove 'poorer quality areas' of employment land for other uses (4.5.19) leads to the need for 22.5 hectares of new employment land as set out in RDS6. Having demonstrated in Table 4 that 36 hectares of employment land are required, and 48 hectares exist, a surplus of 12 hectares, this surplus is translated into a deficit of 22.5 hectares, by removing existing employment land from the portfolio and adding an excessive margin to provide 'flexibility'.

The solution, outlined in 4.6.5, is a sub-regional employment site in the Green Belt adjacent to Coventry airport, the details of which are closely aligned with a planning application which was due to be considered by the WDC Planning Committee on 12 June 2013, *after* the document was published. The proposed employment site is 'primarily to meet the needs of the sub-region'. The RSS, which proposed such a site for the Coventry and Nuneaton Regeneration Zone, has been abolished. The long established economic partnership in the region is CSW, Coventry, Solihull and Warwickshire. Instead WDC has chosen to align itself exclusively with the interests of the Coventry and Warwickshire LEP and the Coventry and Warwickshire City Deal.

Section 5. 5 sets out the criteria for the new employment site, viz (b) to minimize environmental impact and c) the 'very special circumstances' which supposedly justify this major development in Green Belt. The latter include 'a lack of alternative sites available and suitable' and 'delivery of other community and environmental benefits'.

Bubbenhall Parish Council challenges those 'very special circumstances'. We have done so in our submission of 8 November 2012 in response to planning application W/12/1143. Along with Baginton and Ashow and Stoneleigh Parish Councils we have continued to oppose this development in a series of joint letters published on the WDC planning department website. We reiterate that there ARE alternative sites available for both the proposed technology park and the logistics zone, that the projected job numbers cannot be substantiated, and that the environmental impact will be SEVERE.

Contrary to your own policy, the sub-regional employment site will result in the *coalescence* of Coventry and the village of Baginton. The measures outlined in 5. 5. 10 'to minimize the impact of the new buildings in the openness of the Green Belt' will be ineffective against the massive buildings on the scale proposed in the planning application.

The largest areas of unemployment in the region are in Coventry, Rugby and the area to the north. This proposed employment site is situated in an area without adequate public transport. There will be comparatively little benefit for Warwick District in terms of employment, a supposed 1230 jobs, should the site be developed to full capacity by 2028, as estimated in the G L Hearn report (April 2013). Moreover there will be a massive detrimental impact in terms of traffic and environmental damage, and a knock on impact in situating massive house building on brownfield sites south of Warwick and Leamington, which will bring with it additional problems.

Bubbenhall Parish Council urges the District Council to rethink its policy on employment land, to redevelop and reinvigorate existing brownfield sites in areas most likely to benefit Warwick District and to encourage the utilization of existing employment sites such as Ansty, Birch Coppice, Ryton and others in the wider region that have had public investment and have spare capacity.

Yours faithfully

A solid black rectangular box redacting the signature of Rosemary Woodforth.

Rosemary Woodforth
Bubbenhall Parish Clerk