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Customer reference:

Our reference:

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## **Response to Baginton and Bubbenhall Neighbourhood Plan**

Dear Sir / Madame,

Thank you for providing Coventry City Council with the opportunity to comment on the proposed Neighbourhood Plan (NP) for Baginton and Bubbenhall. Please accept this letter as an officer response, submitted on behalf of the City Council. Should it be deemed necessary as part of the on-going examination of the NP for this letter to be formally ratified by the City Council we will endeavour to complete this exercise at the earliest convenience.

You will be aware that Neighbourhood Plans should be a suitable vehicle by which the local community can shape development that is happening in their area; they are not a means by which development can be halted or rejected. The Government has made quite clear that this is not the function of a NP. It is rather a way of supporting and positively influencing development which is taking place and in the best examples, suggesting additional development in their area. Furthermore, you will also be aware that in order to be successful and deliverable a NP should be developed in conformity with the overarching Local Plan (LP) and should not be in direct conflict with it.

Having reviewed this draft NP we have serious concerns about its aims, objectives and policy proposals and therefore raise objections to the NP as currently presented. Our concerns and objections relate to the following key areas:

1. The NP clearly conflicts with the emerging LP for Warwick District Council (WDC) and fails to recognise proposed allocations and approved planning permissions in so far as they relate to strategic employment and housing allocations in and around Baginton and Bubbenhall.

2. In this context, the WDC LP includes strategic amendments to the Green Belt boundaries within the Parish area, removing land from the Green Belt to facilitate essential development that will support the economic growth of the City, the District and the area as a whole. The NP includes policies and objectives that seek to protect this Green Belt designation and the land it covers regardless of the proposals made in the LP. Such an approach within the NP is therefore inappropriate, unjustified and fails to have regard to the most up to date planning position.
3. Furthermore, the overarching aim of the NP appears to be one of a barrier to the development proposals allocated and permitted for the area, especially the land adjacent to Coventry airport. It is clear that the proposed allocation within the WDC LP and indeed the approved planning consent which already exists could not meet some of the requirements of the NP. Such an approach is not the intention of neighbourhood planning and again places the NP in direct conflict with the WDC LP.
4. In addition to being in conflict with the WDC LP, we would also highlight that the strategic employment allocation situated adjacent to Coventry Airport is recognised within the City's own Local Plan which is now approaching adoption. Indeed, through the development of our own Local Plan and the Employment Land Memorandum of Understanding (MOU) (agreed by all planning authorities within Coventry and Warwickshire) the delivery of this site has been recognised as a key component to meeting employment land needs and supporting the economic growth of the area. This NP seeks to put the work undertaken through the Duty to Cooperate and within our own Local Plan at risk.
5. Local Plans aside, the proposed development of land adjacent to Coventry Airport is also a strategic priority for the Coventry and Warwickshire Local Enterprise Partnership (LEP) and a key component of the Strategic Economic Plan. The NP fails to recognise this.
6. It is our understanding that the Neighbourhood Group have been advised on a number of occasions through their joint working with WDC that negativity and constant references to matters applicable to the LP process rather than the NP should not be included and should be removed before submission. This is something we would wholeheartedly agree with. Such advice however has clearly been ignored. As a result there is a genuine risk that public resources will be wasted by the continued progression of this Plan as currently drafted.

In summary, it is our view that the NP as currently presented is fundamentally flawed. It is in direct conflict with its immediate higher level LP for WDC and sets out aims, objectives and policy proposals that are unjustified, undeliverable and inappropriate within the context of neighbourhood planning. Furthermore, it fails to reflect the aims and objectives of the emerging Coventry LP, the MOU for employment Land delivery across Coventry and Warwickshire or the LEP's Strategic Economic Plan. As such, not only does it show a blatant disregard for the relevant guidance and regulations that govern the neighbourhood planning process, it is contrary to the very legislation that allows NP's to exist in the first place. We would therefore recommend that the Plan be significantly altered prior to being submitted for examination with a view to addressing the issues we have raised in our response.

Should the NP continue to examination regardless of our concerns however, we would confirm that we are happy to attend any public examination to expand upon our objections and support the nominated Examiner in reaching their conclusions and recommendations.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Mark Andrews', with a horizontal line underneath.

Mark Andrews  
**Planning and Housing Policy Manager**  
Coventry City Council