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26920/A3/RPP/sw

19th December 2016

Dear Sir or Madam,

**SUBMISISON OF REPRESENTATIONS TO THE BAGINTON AND BUBBENHALL DRAFT
NEIGHBOURHOOD PLAN 2011-2029**

We write on behalf of our Client, Coventry Airport Ltd, to submit written representations to the Baginton and Bubbenhall Draft Neighbourhood Plan.

Coventry Airport are a key stakeholder in the Neighbourhood Plan area, and Coventry City and Warwick District. It is located to the south east of Baginton village and lies in the northern half of the designated Neighbourhood Plan area as set out in the Draft Plan. Following a review of the draft plan we set out below our client's position and considerations on employment policies.

Objective 7 (Commercial/Industrial Development and Employment) states: *"To ensure that existing businesses operate in an environment that promotes their important community role, and to support new rural enterprises, appropriate small businesses and home working, provided they do not have an unacceptable impact on local residential amenity and the natural or historic environment."*. This objective appears to only support the creation of small business within the Neighbourhood Plan area. Whilst small enterprises should be encouraged generally across all parts of the District, no one area should depend on these types of employers/businesses to be able to provide secure and viable employment opportunities. The Neighbourhood Plan should recognise the existing employers within the area, and the importance of providing opportunities to retain, expand and create new jobs.

General Draft Policy G6 (Additional Business Premises and Employment Opportunities), supports new local employment opportunities within Baginton and Bubbenhall, subject to criteria which, when read as a whole, are again looking to restrict employment growth. Coventry Airport Ltd as an existing commercial/employment enterprise, does not concur with restricting employment growth as part of the Neighbourhood Plan.

The Draft Neighbourhood Plan acknowledges that Coventry Airport is an existing business in the area (supporting text to Objective 7, page 19), and in Section 5 Baginton paragraph 5.17 states that *"The Parish also includes the Middlemarch Business Park and Coventry Airport, both of which provide employment for large numbers of local people."*



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Paragraph 5.51 sets out that "*Baginton has SME (small and medium sized) businesses located in and around the village and the airport. In addition, there larger manufacturing and service enterprises located in the Middlemarch Business Park. Middlemarch Business Park has over 70 business including a major Royal Mail depot, food manufacturing, packaging manufacture, distribution depots etc. There are a wide range of engineering and business support companies as well as a children's soft play business.*"

Whilst there is acknowledgment of the Airport, we do not consider that the level of detail is appropriate. Whilst the Local Plan designates the Site as Green Belt, it is a brownfield site and in active commercial/employment use, and adjoins the proposed RIS (DS16 Warwick Local Plan).

Draft Policy BAG7 (Commercial and Industrial Development and Employment) sets out that:

"Employment related development appropriate to Babington's location as a rural area washed over by the Green Belt will be supported to ensure the Parish remains a sustainable and attractive residential area.

Investment which supports local job creation at Middlemarch is encouraged, in terms of expansion of existing businesses and attracting new enterprises wishing to locate in and around the village.

New employment related development should contribute positively to the local community in Baginton and should not impact adversely on residential amenity and the quality of life enjoyed by residents or the built and natural environment of Baginton and its surroundings."

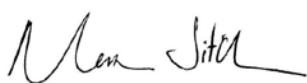
Coventry Airport is located directly adjacent to the to the well-established Middlemarch Business Park. Whilst Policy BAG7 supports the development of new employment related development, which Coventry Airport also supports, the restrictive nature of the policy does not take into account the current JLR Whitley South proposed development; which has a resolution to grant planning permission.

This application was not called in by the Secretary of State, and we would expect this development to be coming forward in due course in order to meet the operational requirements of JLR. By the very nature of a development of this magnitude being approved by both Warwick and Coventry Councils the Secretary of State, the general area in and around the airport is now becoming and will be a hub for employment uses for major national and international employers. We also understand that a revised application is likely to be submitted in due course for the previously refused Gateway South scheme, which if approved will add to the changing baseline position of the area as a whole.

Coventry Airport Ltd's position is that a much more balanced approach should be taken when looking at employment growth and opportunities. Objective 7, General Draft Policy G6 and BAG 7 should as well as supporting rural enterprises, small scale employment and expansion of existing local business/employers, support the development of medium to large scale employment floorspace to respond to market demand and the locational advantages of the area, in or around existing employment sites such as Middlemarch and Coventry Airport.

We would be grateful if you would acknowledge receipt of our representations on the Draft Neighbourhood Plan. In the meantime, if you require any clarification of the above please do not hesitate to contact either Renu Prashar Prinjha or myself.

Yours faithfully,



Mark Sitch
Senior Partner