



BUBBENHALL PARISH COUNCIL

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Bubbenhall Parish Council Respondent ID 14083

Matter 6 Sub-Regional Employment Site

Questions:

2) What is the current situation regarding the planning history and status of the site?

On 26 April 2016 Warwick District Council Planning Committee voted to grant planning permission to Coventry City Council and Jaguar Land Rover to develop the so-called 'Whitley South', an area of Green Belt which forms part of the proposed Sub-Regional Employment Site. Although the matter was said to be 'urgent' because of JLR's perceived needs, the application has yet to be determined, with the dates by which this was to be accomplished having been set and missed. The latest target date is 14th September. The District Council chose to do this in advance of their own Local Plan and against the recommendation of the Secretary of State for Communities and Local Government in February 2015, following a public inquiry into the Coventry and Warwickshire Gateway, an application for a major employment site on exactly the same area of land as the proposed sub-regional employment site. The then Secretary of State rejected the application for an employment site in Green Belt (the 'Gateway'), advising that this should be determined in the Local Plan.

3) What would be the effect of the proposal on the purposes of including land within the Green Belt?

In our earlier representation on DS 16 Bubbenhall Parish Council argued that the proposed sub-regional employment site did not constitute the 'very special circumstances' required to justify development on Green Belt, particularly as Green Belt parcels 9 and 10, part of Broad Area 3, were designated 'higher performing' Green Belt in the Joint Green Belt Review of 2015. This document is listed as part of the Evidence Base for the Local Plan, but virtually no cognisance of it has been taken.

4) What would be the effect on the openness of the Green Belt?

In the Parish Council's view the proposed sub-regional employment site would cause immense harm to the openness of the Green Belt and would have a negative impact on the villages of Baginton and Bubbenhall.

7) What is the evidence in terms of the need for such a site? And specifically in this location? How would it relate to wider employment land needs, other sites in the sub-region and economic strategies?

The parish council along with many other objectors has consistently pointed out that there are alternative employment sites in the sub-region. The creation of this massive (235 hectare) employment site is designed to fill Coventry's unmet need for employment land, not that of Warwick District, whose employment land needs can be met by other sites in Warwick District. Each of the other district councils has similarly accommodated their employment land needs within their own districts.

In our submission under Matter 4 we point out that calculations of employment land needs were undertaken before the June 23 referendum on the European Union and do not factor in the

likely downturn in the economy and with it the effect on the need for employment land. The proposed site is therefore unjustified.

13) Would the proposal be realistically viable and deliverable? What are the potential constraints to the development and infrastructure requirements and how would these be overcome?

Part of the site south of Coventry Airport (Zone A of the Coventry and Warwickshire Gateway application) is contaminated. The costs of reclamation are extremely high, making the costs of development disproportionate to the value of the site. The applicants for the Coventry and Warwickshire Gateway argued that Zones A and B of the Gateway could only be developed together; that there was a synergy between the two which was essential to the development of the site. However, as Warwick District Council is minded to grant planning permission for the original Zone B, ("Whitley South") to satisfy JLR's needs, with no regard for the supposed essential synergy with Zone A, the two areas are obviously separate and can be treated separately. Given the high costs of remediation of the land, the development of the southern half of the proposed employment site is neither viable nor deliverable.

Conclusion:

There has been no adequate public consultation on this key proposal at a stage when the District Council was open to considering changes to its proposals. The consultation process has not allowed effective engagement of interested parties. This process is seriously flawed and does not comply with the necessary procedures for preparation of a Local Plan. Lack of adequate consultation renders this element of the plan legally non-compliant.

The proposed sub-regional employment site in this location is not justified.