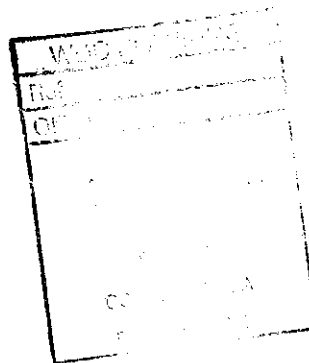


Development Policy Manager
Warwick District Council
Riverside House
Milverton Hill
Leamington Spa
CV32 5HZ



11 December 2014

Dear Sir,

The Local Plan – Objection to:
The W.S.Atkins Strategic Employment Land Study October 2014
The Sustainability Assessment of the Sub Regional Employment Land Site

I wish to register my objection to the above reports as they affect the proposed Local Plan. The reasons for objecting are set out in the two enclosed documents.

I confirm that I wish to make personal representation at the Local Plan Inquiry for both the Local Plan and Sustainability Assessment.

Yours faithfully,

R. W. Fryer

Objections to The Coventry & Warwickshire Strategic Employment Land Study October 2014.

This document was commissioned from W S Atkins by the Coventry & Warwickshire Local Enterprise Partnership. All land is controlled by Coventry and Warwickshire Development Partnership and this report is shaped to support their commercial interests.

When the Secretary of State announced the abolition of Regional Assemblies and the Regional planning system he stated that this would remove remote and unaccountable bodies that had caused people to become disconnected from the planning process. The previous system seems to have been replaced by an even less transparent system that operates behind closed doors. The Local Enterprise Partnerships are unelected and unaccountable groups representing the interests of individual businesses but do not represent the interests of the communities affected by their proposals.

The Atkins study is not an objective inquiry into the land available for development in Coventry and Warwickshire but is an attempt to boost the chances of 760 acres of existing green belt being converted into industrial land by influencing the Secretary of State's decision on the Gateway Planning appeal. All of the reports produced at the planning inquiry (Joint Green Belt Study, G L Hern's employment reports, WDC's planning report etc.) were crafted to prove that this was the only development option available by comparing existing sites with commercial planning consent with an area of Green Belt without consent. This Atkins report repeats the same false path by failing to compare the other Green Belt areas to the north and west of Coventry that have the same green belt status as the Baginton countryside and could be made available as major employment sites. The Gateway Planning Inquiry exposed the fact that the Meriden Gap, the Coundon Wedge and the open land south of the M6 have no more planning protection than Baginton's Green Belt land and they are all much closer to the areas of deprivation.

A review of the data confirms that the greatest need for employment opportunities is in north Coventry and in Nuneaton Bedworth Borough north of the M6. The Atkins report makes reference to Binley and Willenhall Wards high level of worklessness but this does not equate with Coventry City's own figures of unemployed people seeking work, which indicate that the numbers are only a little above the national average. No amount of data manipulation in the Atkins report can obscure the fact that if the Gateway proposed development was intended to be for the benefit of the unemployed residents of Coventry and Warwickshire it is in the wrong location being too far from the areas of greatest need in Foleshill Ward, Nuneaton and North Warwickshire.

The Atkins report does not explain how these areas of deprivation and unemployment that have the lowest rates of skilled/educated workers (Warwickshire Observatory quoting the ONS) will benefit from the presence of high-tech design and research facilities in Zone B. The WCC/ONS data indicates that Warwick District has a very high level of qualified/skilled workers and there is already an unbalance of workers to jobs in the area. WCC/ONS data shows that 6,000 workers commute into the District each day. The addition of 10,000 new jobs which it is claimed that Gateway intends to create will further unbalance the community. The extra commuters will cause even greater traffic problems than currently being experienced and is in opposition to principals of sustainable development.

Accessibility by public transport for the Gateway site is stated by Atkins as 'Good' which is misleading because it makes a claim that future public transport will be good but at present is poor. This claim could be made for any site anywhere as it provides no proof that this will happen and the area's overwhelming reliance on personal car transport will continue.

The G L Hern report to WDC estimates that 6,900 workers will need to travel each day from their place of residence in Coventry. This equates to 600 diesel buses or a minimum of 2,300 cars; but in reality a mixture of both, plus 3,000 residents travelling from Leamington, Warwick and Kenilworth. This is not sustainable development and will hinder Coventry and Nuneaton's attempt to attract more businesses to their areas and relieve their high unemployment rate.

The NPPF clause 14 states "Sustainable development should be seen as the golden thread running through both plan making and decision taking."

The fundamental problems in locating the Gateway development in the small village of Baginton have not been addressed by the Atkins report. The proposed isolation of an industrial employment site for 10,000 workers away from the main source of manpower in Coventry and Nuneaton is in opposition to the Governments stated aims: to reduce the need to travel, reduce energy consumption, reduce CO2 emissions and create sustainable communities.

The Atkins study refers to sub-region needs to justify this new major employment site but it was conceded in the Gateway Inquiry that no sub-regional plan is available for inspection or comment by residents in the district. The current Local Plan proposals do not identify a sub-region or give any chance of commenting upon the proposals but identify Baginton Gateway plan as being a Sub Regional Employment Land Site necessary for sub-regional needs. This is an attempt to mislead the community into thinking the Gateway proposal is something more substantial than an attempt by the Local Enterprise Partnership to generate profit for itself by exploiting Green Belt destruction.

The term 'sub-region' is confusing as there are several descriptions of this area's sub-region with differing definitions. The latest proposal in the press is for Coventry to form a sub-region with Solihull. The only defined region and sub-regional plans in written form are those prepared by the now disbanded West Midlands Regional Assembly in their Regional Spatial Strategy. This sought to stop the outflow of skilled workers and jobs from urban centres to the surrounding rural areas which was creating urban zones of deprivation. The RSS recommended that major new development should be away from Warwick District and into the Regeneration Zones to provide relief for the areas with the highest unemployment.

Warwick District Council and Warwickshire County Council Plans incorporated this laudable aim into their policies only to turn the policy upside down at the behest of the LEP while continuing to claim that the RSS was the evidence base for their decision because it is a material consideration.

Warwick County Council's County Plan industrial employment policy 2000- 2011 Chapter 5. While this is now also out of date, it has not been formally replaced.

"5.1.1 The future employment land requirements for the County to 2011 need to be set within the context of Regional Planning Guidance."

"Regional Policy Context

5.1.4 RPG11 sets out the locational principles for the development in the Region. It identifies two sub-regions within Warwickshire: the Coventry/North East Warwickshire area and the Central Crescent. Employment growth is encouraged in the northern part of the Coventry/North East Warwickshire sub-region, whilst in the Central Crescent employment provision should not be at a level which undermines the regeneration of the metropolitan areas."

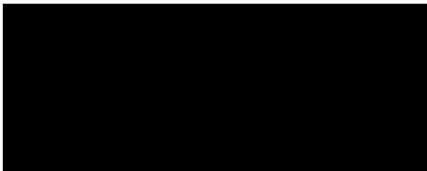
The Warwick District Council Local Plan was claimed to use the Regional Spatial Strategy as the evidence base for approving the Gateway logistics park. The WMRA regional plan considered the need for extra B8 Logistics Parks and concluded that sites for warehouses must be served by road and rail at a transport hub. The Warwickshire County Council county plan in the introduction to its 'Sustainable Freight Distribution Strategy' says "Efficient and sustainable freight distribution is important for the economy and for supporting quality of life." In the conclusion section 18.2.3 it states: "the County Council sees its main role in promoting the transfer of freight from road to rail as being through the land use planning process."

Topographical constraints prevent the B8 logistics park at Gateway from having any possibility of a rail connection. The site would rely on road transport for all freight and is an unsuitable location because it is an energy inefficient site creating unnecessary pollution. The Atkins Report does not address the lack of a rail connection and provides no additional information on this major deficiency.

The claim that the proposed logistics park is part of the automotive supply chain is unsupported and is counter to the evidence of recent industrial development. This shows that Coventry is no longer at the heart of the automotive manufacturing industry which has moved eastwards into the Birmingham / Black Country urban region and will not be tempted back by the presence of empty warehouses on an inconvenient site.

The Atkins report adds no significant new information to that known at the May 2014 Planning Inquiry and does not counter the fact that the proposal in the Local Plan to remove land from the Green Belt at Baginton for a major industrial development is not Sustainable Development as defined in the National Planning Policy Framework and should not proceed. The proposed removal of Green Belt status for land at Baginton should be removed from the emerging Local Plan.

RWF/LP/8Dec 2014



Objections to the Sustainability Assessment Report for the Gateway Site.

1. The Sustainability Assessment Report for Warwick District Council's Local Plan proposal for industrial land at Baginton (the Gateway site) is displayed on website as the "SA of the Sub Regional Employment Land Site". It is a brief and unstructured document that purports to analyse the sustainability of the proposed development and to evaluate the problems created. The comments below deal with the Objectives in consecutive order. The quotations from the report cannot be easily cross-referenced because the report's paragraphs are not numbered and do not deal with the objectives sequentially.

2. SA Report Objective 1 the Economy:

Sustainability Assessment: the development will have a major positive affect on the economy.

Comment: The conversion of any 760 acres of protected green belt land between Coventry and Warwick would make money for the developers, produce a short term boost for the building industry and be able to claim a positive effect on the economy. The likelihood that this speculative proposal will ever be a viable scheme is not considered. The NPPF paragraph 7 'Achieving sustainable development; an economic role' states that there should be sufficient land of the right type in the right places'. Paragraph 88 confirms that 'very special circumstances' must exist for development in the Green Belt. The report fails to comment on these important requirements. The SA Report is inadequate regarding consideration of Objective one.

3. SA Report Objective 2 Sustainable Transport.

Sustainability Assessment: 'minor positive effect through good access to public transport.' (Also see paragraph 4 below for admission of a minor negative effect.)

Comment: the claim of a positive effect is untrue; there is currently not a good public transport service to Baginton Village and this Sustainability Report cannot guarantee that future developers can provide one. The impossibility of Zone A ever being connected to the rail network for sustainable freight movement is not mentioned. The reliance on the use of diesel Lorries for all freight movement to Zone A is not a sustainable transport solution. The requirements of the former Regional Spatial Strategy was for all Regional Logistics Sites to have a rail depot (intermodal transport hub). The Warwickshire County Council Plan in the introduction to its 'Sustainable Freight Distribution Strategy' says "Efficient and sustainable freight distribution is important for the economy and for supporting quality of life." In the conclusion section 18.2.3 it states: "the County Council sees its main role in promoting the transfer of freight from road to rail as being through the land use planning process." Incorporation of the Gateway site into the Local Plan would be a major failure for this sustainable objective. The SA Report is inadequate regarding consideration of Objective two.

4. SA Report Objective 3 Reduce the need to travel.

Sustainability Assessment: there could be a potentially minor negative effect on the SA objectives 2 & 3 because of a lack of rail connection and location of the site.

Comment: The SA Report fails to address the problem of inserting a major employment area for 10,000 workers in a rural site distant from the residential areas that it is claimed to benefit. The unemployed Nuneaton residents from the neediest SOAs would have a daily 32 mile round trip. The NPPF paragraph 34 stipulates "plans should ensure that developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised." The only true answer to this SA Objective is that Gateway, if approved, will result in significantly increasing the need to travel to work which is in opposition to Objective three and the NPPF.

5. SA Report Objective 4 Waste & Recycling.

Sustainability Assessment: that both the construction phase and the permanent development will have a negative effect but suitable mitigation will avoid major negative effects with regard to waste.

Comment: the report ignores the problems of removing the toxic waste deposited in the sludge lagoons. It also ignores the developer's proposal to bury this toxic waste in the earth bunds surrounding the site.

The leaching of toxic water from the bunds into the Avon is not considered. All of these problems were raised during the Gateway Inquiry and are not addressed in this report. The SA Report is inadequate regarding consideration of Objective four.

6. SA Report Objective 5 Prudent Use of land & natural resources

Comment: this objective is not considered in the SA report. The use of a steep slope for Zone B office blocks is a problem that creates the need for extensive earth movement which would be avoided with more prudent site selection for new development. The requirement for high earth bunds to hide the Zone B office blocks from the Lunt monument and the extensive bunds to hide the 22 metre high warehouses in Zone A from the south aspect is not a prudent use of this site. The SA Report is inadequate regarding consideration of Objective five.

7. SA Report Objective 6 natural environment & landscape

Sustainability Assessment: it is considered that with mitigation measures the potential adverse effects on landscape could be reduced to minor negative effect.

Comment: this is not an objective assessment: building over the ancient Dunsmore plateau and installing extensive earth bunds can only destroy the natural environment and landscape; producing a major negative effect on the natural environment. English Heritage's description of the bunds was 'alien land forms' and their impact on the landscape is not assessed. The SA Report is inadequate regarding consideration of Objective six.

8. SA Report Objective 7 built environment

Sustainability Assessment: "there are numerous listed buildings around the site, mostly concentrated in Baginton and Bubbenhall."

"Given the scale of this development the effect on the built environment is uncertain at this stage."

Comment: no assessment is made on how the Villages of Baginton and Bubbenhall will be affected by this scale of development. The SA Report makes no attempt to assess the damage and is inadequate regarding consideration of Objective seven.

9. SA Report Objective 8 Historic environment

Sustainability Assessment: "The most significant heritage concern for development at the site is the affect on the Lunt Fort, in which significant mitigation will be required to ensure negative effects on its setting will not occur."

Comment: this is not an assessment of the scheme but only a hope that damage to the historic environment will not occur. No consideration is given to the historic significance of this Dunsmore plateau which has been a site of human settlement for several thousand years. The SA Report is inadequate regarding consideration of Objective eight.

10. SA Report Objective 9 Air, Water & Soil Quality.

Sustainability Assessment: potential for minor negative effects in long term and on health.

Comment: this is an attempt to misrepresent serious environmental problems as a minor negative effect. The NPPF states in paragraph 2 "Planning policies and decisions must reflect and where appropriate promote relevant EU obligations and statutory requirements." The Government is now legally required to reduce air pollution and the Gateway development is in opposition to this obligation, see paragraph 15 below. The SA Report is inadequate regarding consideration of Objective nine.

11. SA Report Objective 10 Climate Change mitigation.

Sustainability Assessment: the development will lead to a long term minor positive effects on climate change mitigation.

Comment: this is an unsupported claim that ignores the impact of 10,000 workers needing to travel to a rural site and ignores the effect of 1,000 goods vehicles being required every day for freight movement because there is no rail link. Gateway's transport plan is in opposition to the NPPF 'core planning principals' to "support the transition to a low carbon future". The very extensive earth moving required in both Zone A and Zone B will result in excessive CO2 generation which the Government are committed to reduce. The SA Report is inadequate regarding consideration of Objective ten.

12. SA Report Objective 11 Climate change adaption – flood risk.

Sustainability Assessment: states that undefined "suitable mitigation exists through development management policies that there will be no major negative effects on flooding."

Comment: the report acknowledges that the Avon below Zone A is a medium to high flood risk area but it does not assess whether the measures indicated on the Gateway Master Plan are adequate. The report does not include any hydrology calculation to assess whether the large scale development will add to the flooding problems regularly experienced by communities a short distance downstream on the Avon. The SA Report is inadequate regarding consideration of Objective eleven.

13. SA Report Objective 12 Housing Need.

Sustainability Assessment: "As no housing is proposed for this site development it is likely to result in a neutral affect against Objective 12."

Comment: this is an acknowledgement that the development is not Sustainable Development as required by the NPPF. It is an area of speculative industrial development for 10,000 workers in a village of 1,000 residents that would result in an unbalanced community. The G.L.Hern report estimates that almost 7,000 people will need to commute from Coventry and Nuneaton and 2,000 people commute from Warwickshire towns. The report is also contradictory saying: "the development is likely to have minor negative effects on SA Objective 10 through new housing adding to overall energy demand" but the submitted plan for Gateway was justified at the planning Inquiry and Local Plan as a Coventry 'need' to reduce unemployment for existing residents. The aim of providing jobs for Coventry's workless residents is restated in the recent Atkins Report. The report is inadequate because it fails to assess whether the proposal to provide an employment site in the green belt remote from worker's houses is Sustainable Development.

14. SA Report Objective 13 Local Services and community facilities.

Sustainability Assessment: This Objective is not considered in the SA Report.

Comment: The NPPF paragraph 7 'social roll' specifies that sustainable development should "create a high quality built environment with accessible local services that reflect the community's needs and support its health, social and cultural well-being."

The SA Report does not attempt to evaluate the scheme for this requirement and is inadequate regarding consideration of Objective thirteen.

15. SA Report Objective 14 Health & Wellbeing.

Sustainability Assessment: the long term effects on emissions reducing air quality will be only minor.

Comment: The assessment of Objective 14 is seriously deficient because it fails to consider the effects of 1,000 diesel vehicles per day travelling very close to houses on the northern edge of Baginton village to the Zone A warehouse complex that will creates 2,000 vehicle movements. The estimate of vehicle numbers was given at the Gateway Inquiry to illustrate the importance of this proposed logistics site.

(15 continued): The seriousness of diesel particulate pollution on human health is illustrated by the following three items:

15-1. June 2012 "The International Agency for Research on Cancer IARC), which is part of the World Health Organization (WHO), today classified diesel engine exhaust as **carcinogenic to humans (Group 1)**, based on sufficient evidence that exposure is associated with an increased risk for lung cancer." (Statement on WHO website)

15-2. November 2014 the European Court of Justice ruled that [UK] judges must force ministers to clean up the air as 'soon as possible'. (Press release by ClientEarth London)

15-3. December 2014 the report by HMG's Environmental Audit Committee has warned that air pollution in the UK is causing a "public health crisis". The EAC report blames traffic for 42% of carbon monoxide, 46% of nitrogen oxides and 26% of particulate (mineral dust, carbon and other chemicals) pollution in the UK. Such pollution is linked to cancer, as well as heart and lung diseases. (Report by Reuters London)

The failure to address this problem is likely to leave Warwick District Council exposed to future legal action and compensation claims. The SA Report is inadequate regarding consideration of Objective fourteen.

16. SA Report Objective 15 Poverty & Social Exclusion.

Sustainability Assessment: 'there is an indirect minor positive effect.'

Comment: The recent Atkins report on Gateway identifies the worst areas of unemployment and deprivation as north Coventry, Nuneaton-Bedworth and north Warwickshire (para. 5.38). The developers claimed at the Gateway Inquiry that this scheme was essential to help the SOA deprivation areas in Nuneaton and north Coventry. The SA Report says that Gateway will only have an indirect minor positive effect. This admission must be taken into consideration by Warwick District Council and the Inspector of the Local Plan as it significantly undermines the claim of 'very special circumstances' required by the NPPF for the Gateway speculative development to be located in the Green Belt at Baginton.

17. Conclusions: This SA Report listed on Warwick District Council's website is inadequate as it fails to analyse the serious sustainability problems inherent in the proposed speculative Gateway industrial development.

The approach taken in the report demonstrates that it is for the benefit of the developers in an attempt to minimise the location's fundamental problems and is not an objective Sustainability Assessment Report.

In view of the number of omissions and lack of objective analysis the Report should not be accepted as a valid Sustainability Assessment Report for the Coventry and Warwickshire Development Partnership's Gateway proposal.

The proposed changes to the Green Belt at Baginton have not been submitted with a valid Sustainability Assessment and Warwick District Council has failed to carry out an assessment of the risks. The proposed change of green belt landscape at the village of Baginton for the speculative industrial development should therefore be deleted from the emerging Local Plan.

In vigorously supporting the LEP proposal the Warwick District Council's Planning Department are failing the residents of the district and ignoring the sustainability requirements of the NPPF: "to achieve sustainable development, economic, social and environmental gains should be sought simultaneously through the planning system."

END /RWF/LP/ 8 Dec 2014