

BAGINTON PARISH COUNCIL

STEVE WILLIAMS - CLERK
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*Our Ref: L090
Your ref*

Planning department
PO Box 2178
Warwick District Council
Riverside House,
Milverton Hill,
Leamington Spa,
CV32 5QH

18th July 2012.

Dear Sirs

Local Plan Preferred Options consultation.

Thank you for your email of 1st June 2012 re the above subject. The Councillors of Baginton Parish Council have considered the Preferred Options documentation. We have also attended the WRECF meeting of 28.6.12 and the WDC Proposed Development Forum of 2.7.12. We have debated these issues at various meetings. We have also attended the Gateway Developers presentation at Baginton Village Hall of 19.6.12 where we gained written feedback from many concerned residents.

This letter sets out our opposition to the Gateway proposals, as presented to residents on 19.6.12, being included in the Local Plan Preferred Options. It also puts forward our preferences regarding housing need for the area based, on our current Parish Plan. Whilst the majority of the proposals are satisfactory, in our view, we are alarmed and concerned by tentative proposals to include the "Gateway" in the proposals, as illustrated in the Preferred Options documents. We write asking you to consider all our comments below when making your judgement:-

1. BPC oppose Preferred Options 8.15, 8.18 and 8.42 abstracts of which are in **Appendix 1** of this letter. BPC opposes the inclusion of the Gateway shown in Map 3, an abstract of which is shown in **Appendix 2** of this letter. The Gateway proposals are not appropriate development and should not be included, for reasons as set out below.
2. The NPPF calls for Protecting the Green Belt in section 9. See abstracts of section 9 in **Appendix 3** of this letter. Baginton Parish borders with Coventry City. There is a vital need to prevent the unrestricted sprawl of Coventry into Rural Warwickshire, safeguard the countryside from encroachment and preserve the setting and special character of our village, with its Roman Fort, Castle and Grade 1 listed church amongst other things. The gateway proposal is contrary to these fundamental requirements of the NPPF. The development encroaches on previously undeveloped Green Belt fields which provide a vital buffer between rural Warwickshire and Coventry City. It is essential that this buffer remains. BPC believes that WDC have an ideal opportunity to prevent the urban sprawl of urban Coventry into rural Warwickshire. WDC should not therefore support the Gateway project, which must be removed from the Preferred Options and local plan. The development is in the protected Green Belt with no very special circumstances to justify its existence. The openness of this Green Belt land must be maintained.
3. The environmental effects of the Gateway proposal have not yet been considered and there are many reasons why such a proposal is unsustainable development adversely affecting the environment and contrary to the requirements of the NPPF. There is no need for such a development, which should be omitted from the local plan.

4. The proposal significantly affects the nationally significant Highways Agency Tollbar improvement scheme; the affects which need to be clearly annotated in the local plan.
5. The Gateway includes a "smart card" system for allowing Baginton residents access to Rowley road, but with no details of how this would be run.
6. It is noted the large industrial units are envisaged to have 24/7 operations, yet the environmental effects of 24/7 HGV operations on local rural and other communities has not been considered.
7. The proposals are unsustainable as they fail to comply with fundamental tests in the NPPF. The proposals are to develop Green Belt land but with no very special circumstances to warrant such development. It is both necessary and essential for WDC to consider all other developments with extant planning permission in the wider area. There are many such developments in the locality and which are suited to developments of this nature, e.g. (but not limited to) the huge sites at Ansty and Ryton, both with infrastructure already in place. Preferred Options, section 8.42 (Section 8.33 of the draft Local Plan) specially refers to the Coventry Gateway project, it specifically states '*To demonstrate that there are not any other preferable and suitable sites*'. The above clearly shows that there are alternative sites available with extant planning permission within the sub-region, and further afield, which provide more than adequate development opportunity, so there is no need for this development. It is essential that the Local plan includes a requirement to review all existing developable land in the sub-region and further afield, to ensure the proposals are robust. BPC demonstrates that there ARE other preferable and suitable sites, so the Gateway should be excluded.
8. There is no need, either economic or otherwise, for the Gateway proposals to be included in the local plan. There is no case for releasing land in the Green belt for the Gateway development.
9. The development to the north of the A45, in Coventry, can be developed without destroying the Green Belt to the south of the A45, providing 4000 jobs for the benefit of the region. There is no need for the Gateway development south of the A45.
10. The provision of "up to" 14000 jobs is inaccurate and misleading. Given that 4000 of the 14000 jobs quoted are for development north of the A45, within boundary of Coventry, already with planning permission granted to another developer (Whitley Business Park), it is wholly inaccurate for the Local Plan to headline up to 14000 jobs. Of the remaining 10,000 jobs, it is highly likely that these will not be newly created jobs, but in the main taking jobs form elsewhere in the sub region and further afield. These jobs can and should be created using the vast acreage of sites in the sub region, and nearby, which are already available, or have infrastructure already in place, or have extant planning permission, or which are otherwise far more suitable to gain planning permission. The local plan should quote a realistic level of job creation, within WDC only, accounting for all other sites.
11. The closing of the Bubbenhall Road and Rowley Road to the general public will destroy the many local rural businesses which thrive in Baginton Parish, e.g. Baginton Village Store, Hong Kong House, Smiths Nurseries, Russell's Nurseries, Oak Farm, The Old Mill, The Oak Pub, British Legion Club and many others. Each would be adversely affected and forced to close with the loss of jobs, adversely affecting the local sustainable community, contrary to the NPPF. It is absolutely essential that the Bubbenhall and Rowley Roads be maintained as a public right of way with the present alignment between Baginton and Bubbenhall, to maintain the sustainability of local rural businesses hence comply with a fundamental aspect of the NPPF.
12. BPC are also concerned that the provision of a new road west of the runway could be put into a deep cutting which would pave the way for future runway expansion. It is absolutely essential that the Bubbenhall Road be maintained as a public right of way with the present alignment between

- Baginton and Bubbenhall, to prevent the Airport from runway expansion in the long term. See old proposals from September 2002 in **Appendix 4** of this letter. BPC acknowledges this is not part of current proposals but BPC are most concerned that the proposed Bubbenhall Road alterations could facilitate the opportunity to allow such development in the future. This must not be allowed to be facilitated, by ensuring the Bubbenhall Road stays as it is and the proposed alterations shown on the Preferred Options are omitted from the emerging Local Plan.
13. The documents presented do not adequately correlate the requirements of the NPPF with the proposals for the Gateway. The proposals are not therefore robust in the view of BPC, so the proposals should be omitted.
 14. There is an excellent "Green Infrastructure" opportunity to maintain the undeveloped green belt green fields which lie to the South of the A45 and which will be adversely affected by the Gateway project. Instead of the Gateway WDC should give consideration to developing this area under the Green infrastructure scheme. This will have the advantage of ensuring that the surrounding areas, such as Baginton Parish, do not suffer from urban sprawl and maintain important opportunities for Flora and Fauna to flourish. The planted buffer zone to the urban sprawl proposed for the Gateway is insufficient compensation for the loss of the undeveloped green belt green fields which presently act as a natural buffer between urban Coventry and rural Warwickshire. It is also far too close to the Lunt Roman Fort. The Gateway should be omitted from the Local Plan.
 15. BPC are very concerned that the Preferred Options summary leaflet makes no mention of the Gateway development, only showing "highway improvements as per abstract from the summary in **Appendix 5** of this letter, which are as per Map 5 of the preferred options.... This is misrepresentative of the developer's intentions. The public are not therefore being afforded the opportunity to see the true extent of the proposals in the summary leaflet, so are not being afforded the opportunity to comment. This must be rectified by modifying the summary document to include the developer's true intentions. These are not highway improvements but will destroy public highway rights of way which are essential for the prosperity of the many rural businesses which thrive in this area and which will be destroyed by the Gateway development. These are not improvements but will serve to develop a huge area of green belt land and create urban sprawl, contrary to the principles in the NPPF. It is essential that these proposals be omitted from the Local Plan
 16. The 12.3.12 WDC map entitled "unrestricted natural and green corridor greater than 2Ha" doesn't show the green space south of the A45 which forms a natural barrier between Coventry and Warwickshire, and is undeveloped Greenfield Greenbelt land protecting Baginton from urban sprawl. The map should be amended, the area recognised as such and the area not allowed to be developed.
 17. Councilors believe that the Gateway proposals, by a private developer who also owns the Airport and who is also past and proposed Chairman of the Local Enterprise Partnership promoting the development, are foisting an unwanted and unnecessary development on Baginton village which will ruin this rural village community, destroy essential Green Belt and destroy its local amenities and businesses. The quality of life of Baginton and Bubbenhall residents will be significantly adversely affected by the Gateway proposals. The proposal is against resident's basic human rights under the Human Rights Act, due to the traffic and operations noise from huge warehouse logistics development which will run 24 hours per day, seven days per week, with especially adverse effects at night and weekends. Cllrs anticipate significant HGV traffic movements all night which will be particularly disturbing to residents.
 18. The Gateway development is not sustainable compared with other nearby developments with extant planning permission, which are sustainable.

19. The proposed smart card access system for local residents and businesses is impracticable and unworkable, with no one willing to operate it, certainly not Baginton PC. It is understood alternatives are under consideration but based on what BPC are aware of at this time these proposals are damaging to the village and must not be allowed to proceed.
20. The proposals put into jeopardy the construction of the Highways Agency Tollbar Island proposals due to commence early next year. The proposals will not facilitate major improvements to the road network not already covered by the HA proposals, but will only add to the traffic in this area.. In addition, the proposals will only add to the traffic in this area, so will not facilitate improvements over and above what is already proposed by the HA, so the statement must be removed from Para 8.33 of the draft.
21. It is noted from the presentation on the Local Plan by WDC of 28.6.12, at Baginton Village Hall, that there is 23 hectares of business development land proposed within WDC boundaries separate to that of the Gateway. Noting that many commercial premises within the sub region, and slightly further afield in Solihull, lie empty and unused at this time, the additional 23 hectares of business development land is more than sufficient to satisfy the need for economic growth without the Gateway project. There is no need for the Gateway project and this must be omitted from the proposals
22. BPC believes it is entirely inappropriate for WDC to support the C&W Gateway proposals, which are against the fundamental principles of the NPPF, adversely affects the environment, adversely affects Parish residents human rights to peace and quiet, will destroy rural businesses based in Warwickshire, will develop on high quality green field Green Belt with no very special circumstances, will create urban sprawl and which will jeopardise industrial development elsewhere in the local area which already has planning permission or has been previously developed and will destroy the openness of the area, amongst other things. The Gateway should be removed from the Local Plan
23. Councillors believe there is a clear conflict of interest between the LEP, which we understand is to be once again chaired by the Owner of both development companies, Sir Peter Rigby, and the broader requirements of the residents of WDC. BPC Cllrs reinforce the need for WDC to be independent and not compromise its integrity through the forced will of a developer who is intent on ruining our unspoiled corner of rural Warwickshire for financial gain. It is wrong therefore to refer to the LEP within the Local Plan.
24. WDC should modify the proposals to state that its preferred option is to utilise to the maximum capacity all sites in the sub region with extant planning permission prior to developing any further site on Green Belt Land. WDC should review all existing developed land within the sub-region. It is vital that WDC explores and justifies the case for releasing land within the Green Belt when existing Brownfield and other sites with extant planning permission exist within the sub region remain under-utilised and unoccupied.
25. BPC observes that the Gateway proposals do not protect the character and scale of the village, nor the openness of the rural countryside around the village, so should be omitted.
26. BPC has already gained written feedback from almost one hundred residents, all of whom believe the Gateway proposal is damaging to Baginton and there is no justification for ruining the Green Belt. All wish to see the Green Belt protected. It is essential that WDC takes account of the wishes of all local residents and excludes this development from the local plan.
27. All the above demonstrates that the Gateway site, which is stated in 8.18 as being "identified as a site of regional importance for employment to serve the regeneration needs of the Coventry and

Warwickshire sub region" is fundamentally incorrect, fundamentally unnecessary and fundamentally against most requirements of the NPPF, so should be omitted from the local plan.

Regarding housing policy, Baginton has a Parish Plan and requests that the deliverables in this document be accounted for by WDC in formulating the Local Plan. In particular please note the below comments:-

28. BPC supports modest sustainable increases to housing in accordance with our letter L075A to WDC of 8.1.12, a copy of which is enclosed as **Appendix 6**. This is based on the output from the Baginton Parish Plan. The Local Plan should include opportunity related to small scale sustainable development of this nature, to retain the nature and character of the village and help to support the many local rural businesses in the village. Please note in particular that in all cases any housing shall be wholly in character with the village, be sympathetic to the amenity of existing properties/people and shall not interfere with the Green Belt. BPC opposes the Gateway development on the Green Belt to protect the rural nature of our village, to protect the openness of the area and to protect the surrounding area from urban sprawl.
29. BPC objects to the classification of villages generally. The Local Plan must not dictate the type of housing development to villages, but rather should take into account village desires under the Localism act and in the case of Baginton, our Parish Plan. In this respect we again ask WDC to account for our letter L075A as point Nr 28 above.

In conclusion, BPC consider that the proposed gateway is entirely inappropriate and ill considered unsustainable development, contrary to fundamental requirements of the NPPF, with no need given the significant size and number of underutilised employment creating developments which already exist with full planning permission in the Coventry and Warwickshire sub region area and further afield. There are no very special circumstances to develop on the Green Belt, rural businesses need to be protected, urban sprawl must be prevented and the openness of this Green Belt land must be maintained.

BPC oppose all Gateway development south of the A45 and recommend that the Gateway be omitted from the Preferred Options and excluded from the Local Plan, with any development limited only to that shown to the north of the A45, which is within the boundary of Coventry City Council, utilising Ansty, Ryton and other existing suitable sites for any economic development over and above the 23 hectares already allowed for within the Preferred Options and emerging Local Plan. Housing policy should follow our recommendations in Appendix 6 herein.

Please confirm you will consider all the above and confirm you will omit all aspects of the damaging and unsustainable Gateway development from the emerging Local Plan, within the boundary of WDC.

Yours sincerely,

Steve Williams.
Clerk to Baginton Parish Council.
CC All Cllrs

APPENDICES TO LETTER L090: appendices 1 to 6.

Appendix 1.

Abstracts from the Preferred Options study which BPC Opposes.

8.15. Developing a policy framework to support appropriate development at identified Major Developed Sites in the Green Belt which may include site specific policies for Coventry Airport

8.18. Working with partners in the Coventry and Warwickshire sub-region to explore the case for land within the District at the Coventry and Warwickshire Gateway Site (See Map 3) being identified as a site of regional importance for employment to serve the regeneration needs of the Coventry and Warwickshire sub region.

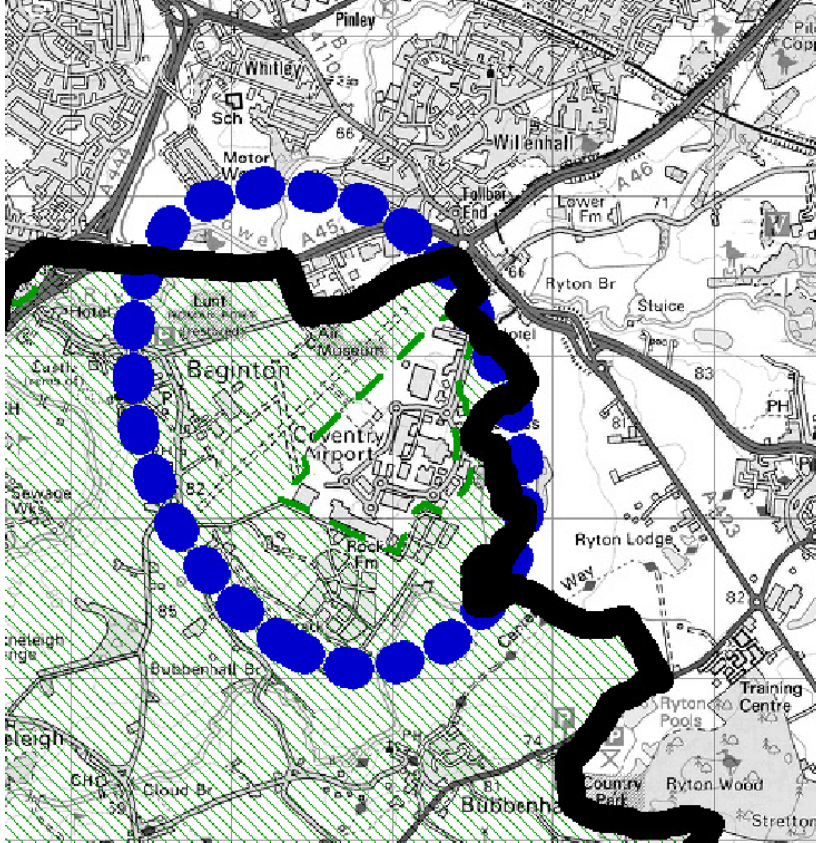
8.42. **Coventry Gateway** - The Coventry and Warwickshire LEP is committed to the identification of a site of regional importance for employment to serve the needs of the Coventry and Warwickshire sub region and have indicated that land at Coventry and Warwickshire Gateway (see Map 3) could be a suitable site. It has the potential to provide in the region of 14,000 jobs as well as facilitate major improvements to the transport network. The Council is supportive in principle but considers that further work is needed to justify the identification of this site:

- To demonstrate that there are not any other preferable and suitable sites within the sub-region
- To understand the local impacts of a major development at the Gateway in relation to housing and employment need and the District's transport infrastructure.
- To explore the case for releasing land in the green belt

8.43. The Council is working with partners on the CWLEP and neighbouring local authorities to undertake this research.

APPENDIX 2 below:

Map 3 from preferred options; abstract (Blue circle represents "Coventry & Warwickshire Gateway" in the key)



APPENDIX 3. below

Abstracts from NPPF section 9.

9. Protecting Green Belt land

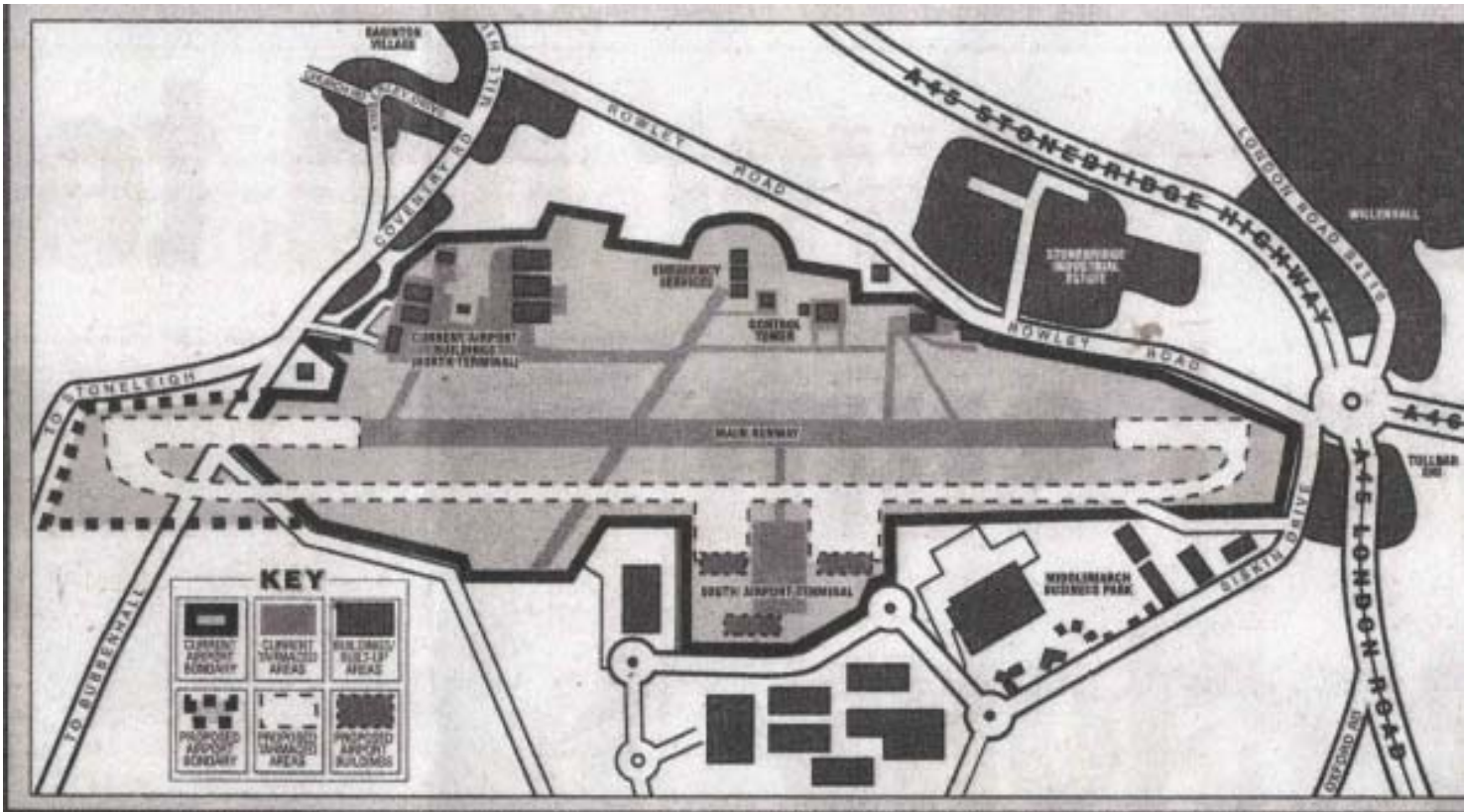
79. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

80. Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

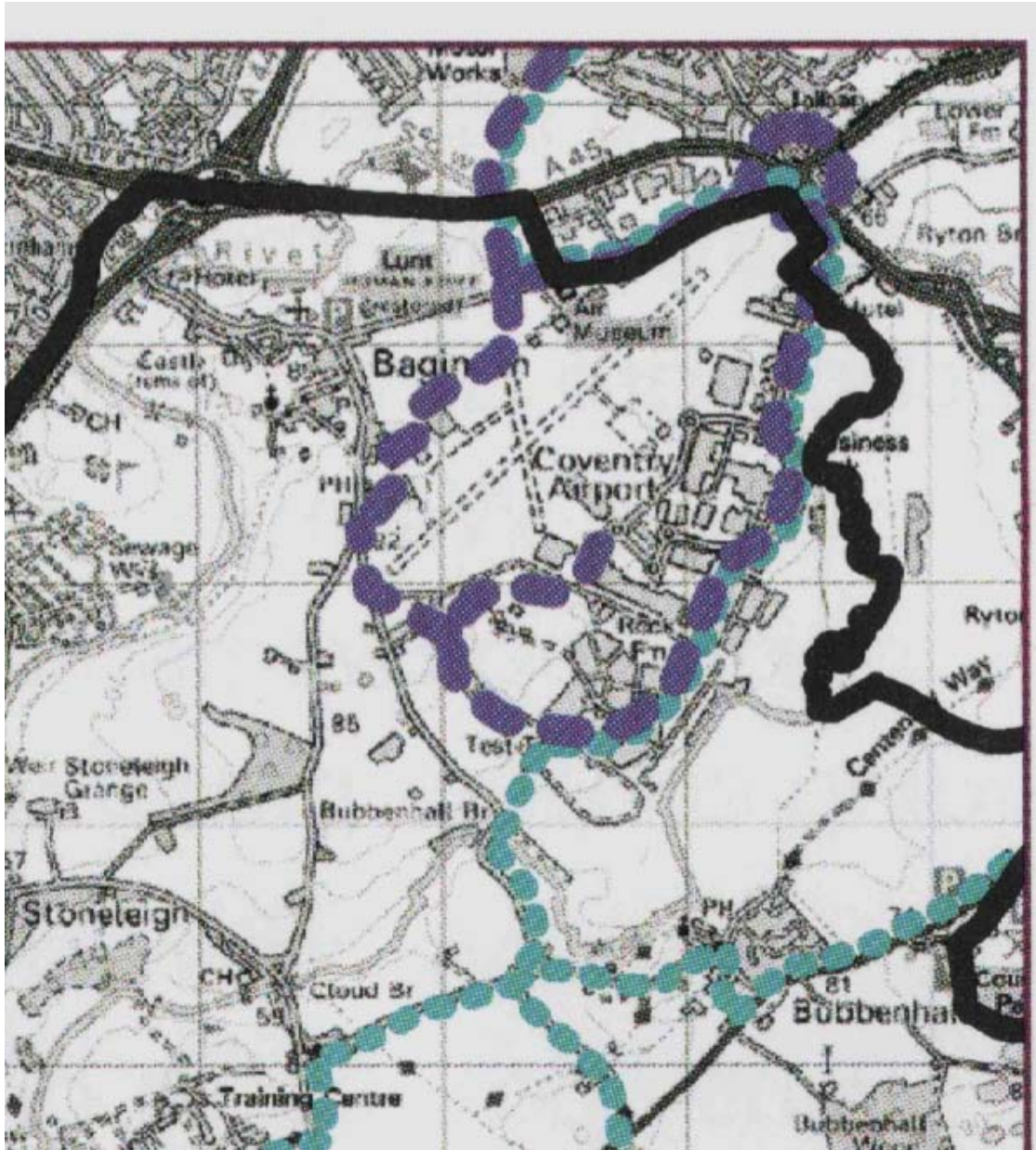
Appendix 4 Below.

Airport proposals from September 2002, showing expansion over the Bubbenhall road. Any proposal must ensure that runway expansion cannot happen in the future, by keeping Bubbenhall road in place or not lowering it by more than 2m below adjacent runway level.



Appendix 5 below:

Preferred Options summary leaflet abstract page 18 showing supposed "Highway Improvements" which are in the view of BPC nothing of the sort. (Similar to Map 5 in the preferred options document)



Appendix 6.

Letter L075A page 1 and 2.

BAGINTON PARISH COUNCIL

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Our Ref: L075a

Housing/Planning departments
Warwick District/County Councils
Riverside House,
Milverton Hill,
Leamington Spa,
CV32 5HZ

8TH January 2012.

Dear Sirs

Baginton Parish Council

Baginton Housing needs survey, Baginton Parish Plan and future WDC planning policy.

At a recent ordinary meeting of Baginton Parish Council we were made aware that WDC/WCC encourages Parish councils to identify housing need to assist with your formulation of planning policy.

Councillors have considered these matters at the last two Ordinary Parish Meetings and have asked me to write to you on their behalf.

A housing needs survey was carried out a few years ago, which identified a need for social housing for 17 new properties.

In addition, the Baginton Parish Plan Committee are soon to launch the Parish Plan with various recommendations. Enclosed is an abstract from the Plan, for development. Its conclusions are self explanatory. In summary, almost 9 out of 10 respondents are in favour of supporting new houses for local people and most people support modest growth.

Having considered all the issues this Parish Council is in favour of sustainable development to allow modest village growth, from a mix of social housing, market housing and sheltered accommodation, for up to 20 number new residences. This would provide for the young and old and free up existing housing stock for families.

In all cases any housing shall be in wholly in character with the village, be sympathetic to the amenity of existing properties/people and shall not interfere with the Green Belt under any circumstances.

Councillors believe the Housing Needs Survey and the Parish Plan outcome, together with their considerations as above, could be used as you see fit in the formulation of policy for the emerging Local Plan and any local planning application determination in the interim.

We trust this is helpful to yourselves and please do contact us call should you have any queries,

Yours Sincerely,



Steve Williams.
Clerk to Baginton Parish Council.

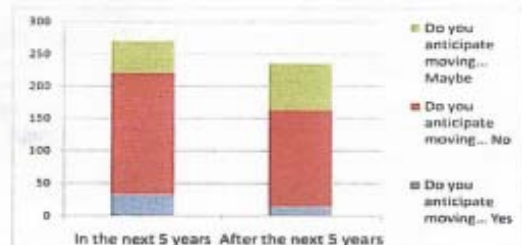
CC all Cllrs by email.

Development

Question: Do you envisage moving house within the next 5 years?

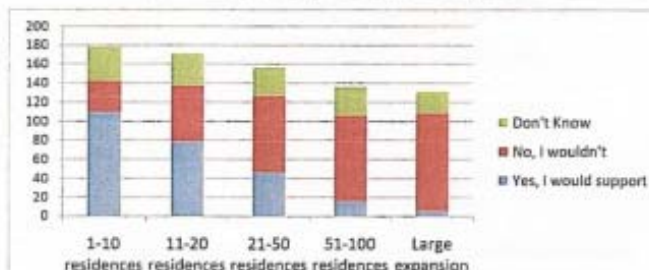
Question: Do you anticipate moving house after the next 5 years?

Proposal: That the Parish Council support indigenous residents to remain in the village with a diversity of properties, particularly recognising a need for smaller properties and mixed properties both for purchase and social housing.



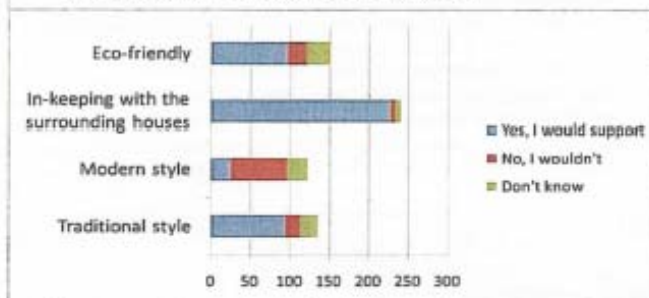
Question: In order to sustain the village facilities such as the Post Office, Village Hall, Church etc. and maintain a variety of housing within the village, would you support modest growth to the village?

Proposal: That the Parish Council support modest growth in the village of up to 20 residences.



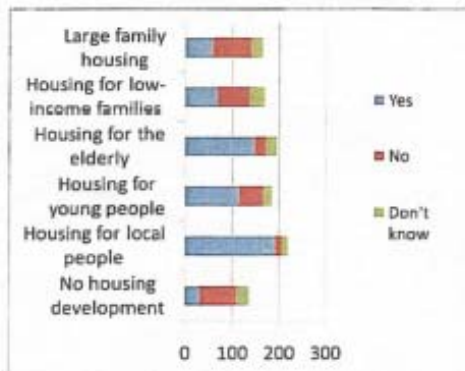
Question: If housing were needed in the village what would you request the design to be?

Proposal: That the Parish Council support housing having a design that is "in keeping with the surrounding houses" and being eco-friendly.



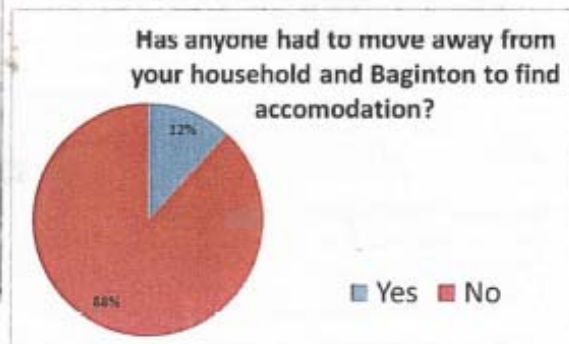
Question: If the building of new houses in Baginton were approved, which of the following developments could you support?

Proposal: That the Parish Council support and facilitate housing for local people (87% support).



Question: In the last 5 years, has anyone from your household who wanted to stay had to move away from Baginton to find suitable affordable accommodation?

Proposal: That the Parish Council support the provision of additional housing in the village, having regard to provision for indigenous people, noting that 12% of respondents have experience of family members moving away from the village to secure appropriate accommodation.



Question: In the event of the airport closing, what alternative users would you support?

Proposal: That in the event of the airport being redeveloped, the Parish Council support a mixed use strategy of business park, retail park and modest housing.

Question: Do you believe that any new housing in Baginton should be provided with parking spaces off-road?

Proposal: That the Parish Council support off-road parking in any new developments.