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**Part B – Please use a separate sheet for each representation**

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Name or Organisation: Keith Whitehead

3. To which part of the Local Plan Review does this representation relate?

Paragraph  Policy  AC2

4. Do you consider the Local Plan Review is:

4.(1) Legally compliant	Yes <input type="text"/>	No <input type="text"/>
4.(2) Sound	Yes <input type="text"/>	No <input checked="" type="text"/> X
4 (3) Complies with the Duty to co-operate	Yes <input type="text"/>	No <input type="text"/>

Please tick as appropriate.

5. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

See representation on separate sheet below

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested

revised wording of any policy or text. Please be as precise as possible.

See representation on separate sheet below

(Continue on a separate sheet /expand box if necessary)

***Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.***

***After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.***

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. To which part of the Sustainability Appraisal (SA) report does this representation relate?

Paragraph

Please add any further comments relating to the SA report in the box below.

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

***Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.***

**I do not consider that Land at Baginton Fields will enable the delivery of a sustainable development and therefore is not consistent with National Policy**

The West Midlands Investment Zone expects up to 10,000 additional jobs on the south side of the A45 adjacent to the Land at Baginton Fields. This Investment Zone has two main entrances both onto the A45. The A45 will also be one of the main routes to and from Land at Baginton Fields.

Concentrating employment allocation in a location that is expected to see up to 10,000 additional jobs does not appear sound. In Coventry's Climate Change Strategy 2024-2030, an objective is to reduce congestion. Land at Baginton Fields will add to congestion as the land south of the site will largely be for employment with little housing so is unlikely that staff will use active travel.

In the preamble for Policy AC2, downloaded from Council's website, it shows in table 10.3 a prediction of up to a 42% increase in peak hour trips by 2031.

Additionally the A45 is already a concern for congestion. From CRSTS award Assessment in 2022 it included statements "Poor journey time reliability on key corridors such as the Eastern Bypass. High traffic volumes on the A46, A45".

From CRSTS award Assessment in 2022 it says a 58% reduction in car mileage between 2016 and 2035 would be needed for car CO2 emissions to be in line with a 'well below 2°C' pathway. This points to locating employment closer the housing so that there can be more active travel and for employment allocation to be aligned with housing allocations.

Including Baginton Fields as an employment allocation into an area that may have up to 10,000 additional jobs and staff travelling to work, in my view, could significantly add to congestion which is contrary to Coventry's Climate Change Strategy 2024-2030 and will not contribute to achieving a sustainable development.

## **Modifications considered necessary to make the Local Plan Review sound**

As it is suggested that most of land known as Baginton Fields is an unsound location for employment allocation and that this section of the representation is asking for modifications considered necessary to make the Local Plan Review sound I believe alternatives should be suggested.

The basis for an alternative site or sites should include the following characteristics.

Employment allocation is most viable when it is adjacent to an area of population. South of Baginton Fields is an Investment Zone and will have very few residents.

A principle to avoid Climate Change is to try and have employment close to housing to minimise travel by car and encourage walking and cycling. Baginton Fields is a poor location for this.

The A45 is already a concern for congestion. From CRSTS award Assessment in 2022 included statements “Poor journey time reliability on key corridors such as the Eastern Bypass. High traffic volumes on the A46, A45”.

Additionally the West Midlands Investment Zone expects up to 10,000 additional jobs adjacent to the Land at Baginton Fields which only has two main entrances both onto the A45. The A45 will also be one of the main routes for this site.

In the preamble for Policy AC2, downloaded from Council’s website, it shows in table 10.3 a prediction of up to a 42% increase in peak hour trips by 2031.

The concentration of employment around the Baginton section of the A45 will exacerbate this problem. Employment needs to be spread more widely around the City and again Baginton Fields is a poor location.

From 3.11 in Regulation 19 Proposed Submission it is stated that “Midlands Strategic Employment Sites Study (WMSESS) 2024 has therefore been jointly produced by several Local Authorities across this area to guide this work.” In finding employment location it is recognised that Coventry does not have the space to accommodate the necessary developments. Hence the search for an alternative location should include all these Local Authorities.

Coventry is growing and expanding its housing by over 30%. Employment should be located near these new housing estates.

Hence suggestions of where the 25ha of employment allocation would be more sustainable include:

Near Kings Hill development

Enlarging the 15ha strategic allocation adjoining the A45 as part of the Eastern Green sustainable urban extension (SUE).

Near the Keresley housing allocation.

Land in neighbouring Local Authorities.