Supplementary Planning Document – Comments from Gaydon Parish Council

**November 2014**

# General

The Parish Council feels that the tone of the document is more akin to a marketing pitch, than a reasoned planning assessment: filled with aspiration but not tackling fundamental difficulties with the whole proposal.

Gaydon Parish Council has met and carefully considered each part of this SPD and offers the following comments:

# Introduction

We believe that the opening paragraphs contain unnecessary hyperbole.

# 1.1 Background

Para 4 refers to provision of land to JLR as key element of plan. This has no bearing on requirement for the development of 3,000 dwellings.

This section makes no reference to the original Core Strategy proposal, which has been scaled back because of demands by JLR for more land. Because of these demands, the volume of housing has been decreased from 4800, the breadth of facilities has seriously been curtailed and the range of employment opportunities has been withdrawn. The geographical limitations of the site have been amply raised as an issue but the long term sustainability of this development as outlined in this SPD has subsequently been compromised.

# 1.2 The Purpose of the SPD

Though local communities have engaged with little affect, there is little recognition of vigorous opposition in this document. The statement ‘with input from the existing local communities…’ suggests that Parish Councils and individuals have supported the proposals and willingly made some ‘helpful’ suggestions. At best this is disingenuous, at worst deliberately misleading.

# The Site and its Context

# 2.1 Location & 2.2 Wider Context

These sections paper over the geographical limitations and lack of scope being narrowly sandwiched between the B4100 and the M40 from east and west and ancient woodland and further industrial developments to the North and South.

The Atkins Report of Oct’12 for Warwickshire County Council Highways Department is not acknowledged. 4.9 in this report stated that JLR and Aston Martin are not in the most sustainable locations evidenced by congestion issues caused by the reliance on the private car. Gaydon Parish Council would like to point out that the truth is now clearly evidenced every day at peak times with the local road infrastructure.

Gaydon Parish Council would also reiterate its concern for the lack of adequate consultation. Though much of the development is in Chesterton and Kingston CP, we understand that they were not even included in the initial consultation process. This is not acknowledged.

# 2.4 Planning Policy Context

There seem to be more mentions and support for JLR even though previous reports have maintained that it is not in a most sustainable location. The duelling of the road from Junction 12 was built to mitigate the current M40 junction difficulties. Gaydon Parish Council believes that a further Infrastructure Delivery Plan is needed to look at the effects of the additional housing, the additional industrial development and the effects of locating of additional secondary school provision for the development away from the site.

We have very serious concerns that school traffic will inevitably have to cross JLR traffic and then be directed down a minor road known for dangerous bends into the already seriously congested village centre of Kineton. Such traffic has not been acknowledged: a full assessment and solutions need to be agreed before the SPD developments are committed to.

# Site Constraints & Opportunities

The zone analysis is useful and gives an indication on why certain areas are considered either suitable or unsuitable for development. It doesn’t however appear to recognise the new road in zone 8 with its controversial cross road junction.

**3.1 Environmental**

Gaydon Parish Council believes that important local views from Burton Dassett Country Park and Windmill Hill should be protected.

The green corridors that are welcomed in the residential area need to be extended through the industrial zone to allow for the migration of species further to the south.

Run off from the high topography of the site needs to be mitigated towards the M40 especially to the extreme north of the site. This does not appear to have been recognised.

# 3.3 Soil, Ground Conditions and Contamination

Para 3 mentions 50 hectares (18%) of the site is classified as Grade 3a agricultural land. This section of land falls almost completely into Zone 7 identified in the previous section as having a high capacity to accommodate development. We question why the best farmland is reserved for industrial development.

# 3.4 Access and Movement

Though there mentions the commissioning of a Strategic Transport Assessment (STA), this has not been provided to Gaydon Parish Council. Has this been published?

Traffic is a key concern and the document doesn’t have sufficient content or any indication of measures to be taken. We believe that the following actions need to be carried out before plans progress any further:

* A new EIA needs to be carried out in light of the new enhanced Junction 12 arrangements that takes into account the 3000 houses, the details of the industrial developments, the knowledge that secondary school traffic that will cross the JLR flow of traffic and concerns over water discharge onto the M40 (it was closed in 2007 because of run off). It needs to be acknowledged that even the current road improvements are designed to reduce current queues – not actually eliminate them.
* A transport assessment of the South Warwickshire road infrastructure and the impact of the above needs to be carried out as a matter of urgency. There is far too much reliance on a single motorway junction: the B4100, the Gaydon to Kineton road (old B4451) and other local roads will not be fit for purpose. Traffic calming will most certainly not be required. The SPD glosses over the projects Achilles Heel.

Connectivity to larger established centres (Banbury, Stratford, Warwick and Leamington) is not fully addressed by providing a few buses: buses are already comparatively expensive and will need their own bus lanes if they are not going to just add to the queues.

Connectivity to established local centres is addressed but is a relatively minor detail.

# 3.6 Ecology

It is acknowledged that further surveys will be required. We suggest that native wild flower reseeding will assist the net gain in biodiversity that is expected.

# 3.7 Flood Risk and Drainage

Within this SPD, there is no mention of previous flood issues within the Parish of Gaydon. Water currently drains down the B4100 from JLR into the village.

# 3.8 Utilities

The aspects mentioned, if delivered, could be positive. Further planning is required before a view can be taken. It has to be acknowledged that the installation of utilities will impact traffic flow along the B4100.

# Noise

In this part of the SPD there is no mention of M40 at all. We strongly believe that there needs to be a more detailed study of noise and air quality to reassure those who might want to live in the new housing. Background checks are not enough.

Gaydon Parish believe that an additional bund is required south/west of the new dual carriageway.

# Stakeholder/Community Engagement

This section of the document gives the impression that an inclusive and comprehensive consultation process has been undertaken. There’s sufficient evidence to counter this. References to local opposition are often glossed over especially with regards to local traffic concerns. We have absolutely no idea of what is proposed in the substantial industrial sector other than there is no longer a range of employers and that the original settlement proposals now lacks facilities that threaten its sustainability.

# Vision and Principles

Whilst we accept that an ambitious, aspirational vision is expected, it is difficult not to be cynical about the waffle contained in this section. Terms such as “placemaking principles” and “concept illustrative masterplan” are just verbiage.

This is best illustrated by:

* The diagram that speaks of being well connected even though established centres are around 10 miles away linked by a bus.
* New job skill opportunities - as long as they are with JLR and it remains in the area. The original potential for other jobs was scrapped.
* Community focused: heavy on rhetoric and lacking in detail. Though there may be a pub at the furthest reach of the development, there seems to be a lack of this in the village centre. The lack of secondary school aged facilities is of a particular concern in terms of community ownership for the youth of the community. This will compound not only our concerns about lack of community cohesion and crime but that of the police in their recent consultation report.

There are a range of facilities that are planned for in this SPD and eluded to by the cut and pasted images: are they dreams or are they being written into the actual permissions?

# Illustrative Masterplan

Our observations include:

* New footpaths, cycle routes and bridleways are positives (unless you want to go towards Bishops Itchington along the B4451.)
* The southern section of Banbury Rd near Gaydon is to be declassified to a cycle and pedestrian route only. We are still unsure what this means for residents along this section and the plans to create a cul-de-sac.
* Traffic calming on the B4100: it is pretty much calmed already and in desperate need for extra capacity from the north. We are unsure how this fits with the current plan for J12 and the new road. We presume that there is a hope and wish that everyone will access JLR from the M40.
* The revised bus route, could be a positive but is unlikely to make any difference because of its relative cost and inconvenience in comparison to private means. Buses can only travel as fast as other vehicles at peak times unless specific provision is put in place.
* Car sharing is not a solution but a dream unless this is incentivised. A travel plan needs concrete solutions: this is not fit for purpose, weak and totally inappropriate.
* The plan to locate secondary education in the existing school in Kineton is poorly thought out in terms of traffic generation at peak times. School traffic travelling east will need to cross the flow of JLR traffic moving from the M40. The responses on pages 95 – 97 are totally inadequate, unconvincing response in light of generated school traffic and an undetermined volume of traffic generated by JLR’s expansion.
* Kineton High School is not accessible and will further impact traffic flow through Gaydon and through an already heavily congested route through Kineton itself.
* The stakeholders workshop considered various mitigating schemes but not mentioned in this SPD: local knowledge again seems to count for very little.
* There seems to be no diversity of employment opportunities with this plan. JLR monopolises employment opportunity. The whole plan seems wholly dependent on them.

The SPD illustrates an idealised, very pleasant and tranquil development which we view with scepticism.

# Delivery

# 7.1 Future Planning Applications

This is a comprehensive and useful list of supporting items, though there’s a potential reduction dependent on discussion with the council. Does this give certain applications an advantage over others?

# 7.3 Community Governance

The 100 hectares “assigned to JLR” lies totally within the Parish of Gaydon. There is a financial implication in this for a community of just over 200 dwellings which would require grant aid to meet.

**Gaydon Parish Council believes that the expansion of JLR (we've been told 5% a year) and the proposed extension in zones 7 and 8 will lead to an unsupportable increase of traffic on the B4451 that nothing so far proposed, discussed or envisioned will be able to mitigate. Gaydon Parish Council remains totally unconvinced by the whole plan.**