**GAYDON PARISH COUNCIL**

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12th January 2016

**Application reference: 15/00976/OUT – amendments** to plans for the proposed residential development – Land at Gaydon/Lighthorne Heath

**Technical Notes: Transport – Gaydon Parish Council (GPC) response**

The following statements contain the reasons for Gaydon Parish council’s objection to the above application and the subsequent addenda.

GPC reiterate our objection to referring to the proposed settlement as “Kingston Grange” both in the ‘design and access statement’ and the Brookbank report. Allowing the community to decide on the name of a potential new development would go a long way in fostering feelings of integration and would potentially increase levels of acceptance from local residents. While there is much talk in the reports of integration with the existing settlement of Lighthorne Heath, giving the new settlement a new name before the core strategy has even been agreed and the outline planning permission has been approved fosters ill feelings.

**Design and access statement &**

**TN35 - B4100 treatment to reflect 30mph urbanised zone**

**I. Banbury Road.**

Taken in isolation, the proposed design improvements to Banbury Road may improve the existing plan, however the B4100 is not being given due consideration in its status as a commuter access or M40 relief road. In the event that the M40 is closed, to have peak motorway traffic flow through the centre of a residential area with numerous traffic calming measures could be potentially dangerous and very unpleasant for residents. Despite the new Junction 12 access to JLR the B4100 from Leamington, Warwick and Rugby, will remain a commuter route for JLR staff.

The B4100 is badly categorised as a B-road, giving the false impression to the real importance of this artery. In the event of either the southbound M40 or junction 12 being closed prior to the morning rush hour at JLR, one can foresee tailbacks to junctions 13, 14, 15 and beyond. All of this traffic being forced through a 30 mph residential bottleneck. As a de facto trunk road, there is currently no 30 mph limit on the B4100 between Junction 14 and junction 12 of the M40.

The functionality of the whole scheme is fundamentally flawed.

Historically many urban settlements found themselves in need of a bypass due to the amount of traffic flowing through the centre of said settlement, eg. Southam. What is being proposed here is a short-sighted plan, with an inherent problem which will require a bypass; unless a bypass is included in the original planning, it will not be possible, due to physical constraints, to create one at a later date. The only possible option is to run a high capacity road alongside the M40 from the old gated road to junction 12/Gaydon bypass. The MADE report fails to appreciate the importance of the B4100 as a de facto trunk road.

**II. Village centre.**

From the attention given to option 1 the village square concept, it would appear that this is the developer’s preferred concept. However it is very important to ensure the integration of the existing community of Lighthorne Heath, therefore the Banbury Road parade concept should be the preferred option; ideally moving the village centre to the south east of the garage plot. This would assist JLR/AM personnel in accessing the facilities during their break time without having to use their cars.

If the B4100 was re-routed alongside the M40 the existing B4100 could be broken up in favour of the ‘Spine road’; thereby aiding in the integration of the existing settlement.

**III. Illustrative block layout.**

English Partnership’s ‘car parking what works where/toolkit’ uses out of date data. The data has been taken from 1991 and 2001 censuses, i.e. 14+ years out of date. It is inappropriate to use this data, especially when projecting 2 to 15 years into the future.

It must be considered that this development is 5 to 10 miles from a major town and has hypothetical bus links based on the whim of bus companies. The reality will be that each adult resident will have their own car as a necessity. They will need to have somewhere to park it and they will use it. Planning for insufficient parking based on outdated census data will lead to overcrowded on street parking and unpleasant living conditions.

The following reasons are why the parking is insufficient:

* Garages. A large percentage of home owners do not use garages for car parking but for storage
* In the current economic climate, single adult occupancy has become difficult; therefore one should expect multiple car ownership per dwelling.
* The nearest rail/coach hub is 10 miles away; therefore a car is a necessity.
* The location of the development and the proximity of the motorway junction will make it desirable to commuters.
* Residents who are employees of JLR/AM will more than likely walk or cycle to work, meaning that a parking space will remain in use during the day.
* JLR employees may find it easier to ‘abandon’ their cars in the settlement than wait in traffic to get to work.
* Bus services are not guaranteed as they are subject to profitability.

**Sustainability**

From a transport perspective this remains a non-sustainable location. Buses are infrequent and journey times to commercial centres are long when using buses. Cycle ways outside the settlement are limited and cycling on the roads in this locality is not for the faint-hearted. This will be a car centred development in spite of the attention to internal cycle ways and pedestrian areas.

**TN32 - Update regarding Access strategy**

Ref 2.5 (Banbury rd east of old gated road)“Evening peak reduced due to reduced development traffic using Banbury Road due to employment site access signal optimisation making M40 more attractive.”

The northern exit for JLR/AM will not be controlled by signals; It is a roundabout. Traffic exiting JLR from this junction intending to join the M40 will have priority over the egress of traffic from GLH.

Planning Application 15/03934/FUL Shows JLR’s intention to place the main employee car park within their test track. Access to this car park will be via Kingsway – the current AM access. Therefore signalling will **not** make the M40 route more attractive. This is especially relevant to those employees who live in Warwick, Leamington, Rugby and those that use the Fosse way to travel to Coventry and Leicestershire.

It is noted that this TN does not make any amendment to secondary school pupil numbers. Whilst certain areas of the TA refer to 3000 dwellings (the entire residential count of GLH) the school pupil figures are only for 2000 dwellings (Bird group only). The estimated number of pupils for 2000 dwellings is 422. To extrapolate that to 3000 dwellings it would become 633. This would require 13-15 buses. Walking to Kineton is not possible, children cycling to Kineton would be dangerous, this means that all these pupils would have to go by bus or private transport.

**TN30 - Response to road safety audit for off-site junction improvements**

No Response. Excepting that there appears to be little relevance of the wider junction improvements (B4455 Fosse way) to GLH. These improvements are required whether GLH is adopted or not.

**TN31 - Local Village Impact:**

Reviewing this document raises questions of its validity.

The prediction is for Gaydon traffic to increase by 16 vehicles during peak times as a direct result of the new development, however Kineton(Southam Road) is predicted to increase by 32 vehicles. Any vehicle travelling from GLH to Kineton via the Southam(Kineton)Rd will have to pass through Gaydon; Therefore these figures cannot be taken with any degree of credibility.

As GLH will not have a secondary school, there will be a school bus service from GLH to Kineton. The figures would indicate that a 422 (2000 dwellings. Increase this to 633 for 3000dwellings) pupils are predicted to be travelling that route. The bus service in itself would thereby account for 10-15 of the quoted 16 vehicles.

As the development has no place of worship, it can be expected that there will be additional traffic on religious days.

This application makes a strong presumption towards residents using local shops and public transport. It is clear that this development is in an area of such remoteness that each independent resident will require their own personal transport to reach places of employment and retail areas beyond basic needs. A small parade of shops is unlikely to dissuade residents from travelling to larger commercial centres. The proximity to junction 12 of the M40 will make this development attractive to commuters to London, Oxford, Coventry, Birmingham, etc. So far from being a Sustainable, environmentally sound development that will benefit the district, it will in effect promote the use of personal vehicles and tempt residents to travel to commercial centres outside the district.

**TN34 - Confidence Interval Analysis**

The confidence interval analysis is inherently flawed document that makes no mention of vehicle sample size. Without the raw data to back up the presented confidence intervals, no guarantee can be made as to whether the content of the report is either accurate or reproducible. The actual routes that have been chosen are vague at best, with no definitive start and end points being provided, rendering the journey time data next to useless without a concrete set of distances to compare it to.

Furthermore, the routes selected are far from the actual site of the development. In fact, the report fully ignores the pre-existing issue of rush-hour congestion that blocks the B4100 from Gaydon to beyond the Fosse Way each working day. The pressures put on M40 junction 12 are also overlooked. However, junction 13 is featured despite not being accepting southbound traffic from the M40 (which continues on to depart at junction 12) and despite junction 12 being the primary off-ramp for northbound traffic towards JLR and Aston Martin.

The report repeated claims that there is no evidence of ‘statistically significant variation in the results’, yet time and again, we see the presented analyses contradicting that claim. The variances range from a difference of over 70 vehicles queuing from day-to-day (Figure 3n) to over an hour’s difference in journey time (Figure 2a).

As already stated the, Gaydon/Lighthorne area already has severe problems with traffic congestion. At present, there are over 6000 employees at the JLR facility and over 2000 at Aston Martin. The proposed GLH development will add 3000 new households to the area, increasing the existing burden on transport infrastructure by 37.5%. To suggest that this will have a negligible impact on local transportation is frankly ludicrous.

**In Summary:**

The amendments to the planning application are based on inaccurate and/or out of date data. They have the potential to cause gridlock throughout south Warwickshire and make GLH and unpleasant place to live. For this development to become sustainable, self contained and acceptable it will require, as a minimum:

1. 2 parking spaces per dwelling (excluding garages)
2. A by-pass alongside the M40
3. A secondary school

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**Technical Note: Noise Impact Assessments – Gaydon Parish Council (GPC) response** to the 2nd Dec document.

**1.0 Introduction**

**1.2:** GPC notes that these amended assessments are based on the optimistic Transport Assessment as has already been commented on.

**2.0 Offsite Sensitive Receptors**

**2.10:** GPC seriously questions these on the basis that over 3000 houses is going to generate significant traffic and additional noise along more than those routes that have been identified. Surely it would be reasonable to assume that the peaks as identified in this table must surely be travelling to or from the development. There seems to be no recognition of the secondary school traffic that will generated if provision is not built as part of the development.

It seems unbelievable that the new links roads are all assessed – even though not actually completed. It is therefore reasonable that all other assessments are equally questioned as GPC assumes that there is a heavily reliance on modelling (and if the link road is anything to go by) – on minimal (if any) actual data of typical usage. GPC highlights the 2012 assessment in Bishops Itchington that indicates different conclusions based on actual surveys.

**Selective and poorly modelled transport assessments lead to unreliable noise assessments.**

**3.0 Designer’s response to Warwick District Council’s comments.**

**3.7:** At last, an acknowledgement that there is room for improvement to reduce impact.

3.8: Again, good to see an acknowledgement that there are inherent problems with regard to noise (even when using optimistic assessments). Even so, the natural reaction on a hot day is to open the window – and can’t be mitigated against without additional landscaping and layout changes.

3.10: A small gap in the bund: some minor spill shielded by houses suggests that there is a problem after all. The developer will have to prove that noise can be mitigated against through green shielding or through changes to layout.

There seems to have been an acknowledgement that existing properties/residents have not featured heavily – or that much regard has been given to them.

In summary of WDC’s comments, GPC notes that there seem to have been rather a catalogue of minor errors that have been addressed. However the substantive issues raised by previous GPC responses such as the selective use and interpretation of assessments have not been addressed.

**It is clear that there is a recognition that noise along the M40 is a problem. The expensive and land consuming bund can mitigate against much of it but … that the issue of noise from both the M40 and B4100 is still one that means that many houses will suffer from an unattractive (even if within current WHO limits) level of noise.**

**The site is fundamentally flawed as are the assessments.**