**GAYDON PARISH COUNCIL**

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25th Sept 2015

**Gaydon Parish Council (GPC) Response to the Proposed Modifications of the Core Strategy 2015**

Gaydon Parish Council endorses the ‘Formal Representation On Behalf of FORSE’ (Friends Of a Rural and Sustainable Environment). The following comments are additional and specific to GPC.

General comments:

Stratford District Council (SDC) are in error in not highlighting those modifications that the District Council submitted to the Inspector during the Examination Hearings in January 2015. These modifications have not been consulted on and would take a considerable amount of detective work for respondents to identify.

Most of the modifications appear to result from the increase in housing numbers that have been required following on from poor process and decision making by SDC early in the Core Strategy (CS) process. It would appear that the majority of the original development options are now included in this proposed set of modifications: perhaps it can be concluded that the right decision in the first place would have been better than a rushed, convenient one that now needs revisiting.

GPC would like to restate its concerns as expressed in previous responses concerning the GLH site:

1. The existing local infrastructure is not sufficient to support both the planned expansions of JLR/AML and the development at GLH.
2. The choice of this development site is fundamentally flawed as the location is unsuitable for residential dwelling.
3. The proposed provisions of facilities are inadequate and risk social isolation and resulting crime/anti-social behaviour.
4. GPC strongly believes that the Environmental Assessments are not accurate and may not be objective and therefore lead to questionable conclusions.

**Responses from GPC to the GLH proposal in addition to previous submissions:**

GPC notes that there is a small reduction of 200 to 2300 and that the initial pace of building has been reduced.

The original proposal for GLH was for 4,800 houses, employment land, a commercial/social centre and adequate schooling provision. As time has passed this has now eroded to 2,300 houses; less than half the original proposal and the allocated employment land is now in the control of one organisation (JLR) who cannot/will not reveal their intentions for the land. This undermines the original intention of SDC that there would be mixed opportunities for employment. In addition, JLR has since indicated that much of the proposed employment uplift will be sourced from other JLR sites. It cannot be argued that future GLH residents will benefit from locally available employment opportunities.

As most of these sites are within commutable distance, it is debateable that these existing employees will consider relocation. In effect, this means that the majority of occupiers of the new development will be commuting from outside of the locality.

The vision in this modified CS seems as flawed as ever; if it was to go ahead, the lack of proximity to nearby services will need to be compensated for, if social and rural isolation is not to be the much feared consequence. Within the GPC supplementary planning document response, this was fully elaborated on and included reference to health, social/service facilities and retail opportunities to minimise the necessity of a reliance on private use of cars and maximise sustainability.

Previous submissions have highlighted the inappropriateness of this location for housing. With the reduction in the numbers and loss of proposed amenities this development is now even less socially sustainable in this proposed location.

GPC wishes to reiterate its belief that if GLH was to go ahead, it would need to include an on-site secondary school during the lifetime of the CS. There are two major benefits to this:

* Knowing that this area is in line for significant development (some of which is already under construction or has planning approved), this would be an opportunity to relieve the pressure on secondary school provision within the Southam Area. A reorganisation of catchment areas based on projected populations of the Wellesbourne to Southam corridor would be required.
* It is the view of GPC that Secondary provision as part of the development would add to the social sustainability of the new settlement by ensuring that sectors of the community are catered for and develop ownership of the new project.

**Road Infrastructure Concerns that will compromise the ambitions of JLR and AML if GLH were to be given the go ahead:**

The local road infrastructure is (as has been argued) not presently up to meeting the needs of the current demands and most certainly doesn’t have the capacity for the size of development as proposed in both versions of the CS. Even though JLR might argue that traffic will not make use of the Fosseway or B4100, this is difficult to believe; knowing that many employees reside in Warwick, Leamington and along villages accessed by the Fosseway.

GPC acknowledges that the remodelling of Junction 12 from the M40 and the new (by-pass) access to JLR will be of a benefit to improved traffic flow for employees at peak times. It also is fully aware of the ambitions of JLR to further develop its current site, and that will significantly increase traffic flows. With 9500 currently employed, a further 1600(nett) moving from other JLR sites by 2019 to the new Programme office and Design Studio [*JLR liaison consultation event 8/9/15*] it would seem that the 12650 capacity of this road development [*Highways England*] is going be surpassed early on in the life of this core strategy. These figures don’t include AML employees or any development of the 100ha of employment land currently allocated to JLR.

It seems incredulous and myopic to think that a new development would be proposed (let alone constructed) that would make obsolete the expensive and environmentally unwelcome road improvements currently under construction.

No Traffic impact assessment (TIA) is available.

Transport Assessment [Brookbanks, 16th July 2015] not currently available.

Without access to a current and valid TIA it is not possible for stakeholders to comment; Thereby making the consultation process incomplete.

**GPC response with regard to land allocation for industrial expansion ambitions of JLR and AML**

GPC recognises the national and district importance of JLR as key economic assets and as such does not oppose appropriate commercial development on this land. More detailed plans would always be pressed to mitigate and minimise the visual and environmental impact of such development. JLR have strongly indicated in liaison meetings that they do not want to be hemmed in by housing: GLH, in the longer term as outlined in the CS, restricts future expansion to the North if ever required.

The original draft of the Core Strategy envisaged the land now allocated to JLR as being for, amongst other things, industrial units; this giving some basis for estimation of potential employment figures. JLR have communicated to GPC that at this point in time they are unsure as to what they will use the land for or when it might be developed. With the nature of JLR’s business, the potential employment within this area could be anywhere between 0 and 5,000+. In light of this vagary it is, at best, questionable to consider this area of land for employment allocation within the Core Strategy

GPC recognises that AML are also looking to secure land for expansion, it questions whether the land as proposed would adversely impact the conservation of Lighthorne. Land that is East of the B4100 might best suit.

**Comments on some of the other modifications for different areas of the district:**

* **Southam and area:** There is a lot more development proposed than ever originally conceived especially when Harbury and other village’s developments are considered. Whilst it is recognised that a primary school is proposed in the major Southam development, the capacity of all schooling in the area needs to be considered – especially that regarding secondary provision. It is noted that Southam College has now become an 11 form entry provider (for current Yr7’s) without any significant increase in housing, serious consideration needs to be given to redrawing the catchment area. GPC has long argued that there needs to be a solution to this. The capacity of the local ‘A roads’ needs to be considered especially as there are no realistic alternatives proposed for commuters to centres of employment such as Coventry, Leamington, Banbury and of course Gaydon. The B4451 from Southam is certainly not an ideal key route for those working with JLR or AML.
* **Stratford:** It is common knowledge that Stratford is a congested tourist town. GPC acknowledges that larger housing developments will add to this. However, it notes that the new secondary in the area, and the new relief road should go some way to mitigate against this. Though Stratford is a popular tourist attraction, it is equally considered to be a highly desirable place to live. With this in mind, GPC recognises that with infrastructure upgrades, the core strategy proposals do help meet the demands for housing.
* **Long Marston with Meon Vale:** Right from the start, GPC has believed that with the right infrastructure in place, that this is where housing development should take place. It therefore welcomes this aspect of the core strategy recognising that these proposals come with a good range of proposed facilities including the nearby relief road. Connectivity with the rail network should be added to further reduce the impact of traffic. By dismissing this option so early on in the process, GPC believes that opportunities were missed to provide housing in an area where people want to live.
* **Dispersal Proposals:** GPC supports this as it did originally. With regard to the housing trajectory in 6.0 (pg24) it does question the accuracy of some figures. For example, in Kineton 90 houses are already under construction and don’t appear to feature. It is noted and accepted by GPC that Gaydon will add 32 houses to SDC’s housing stock over the lifetime of the core strategy. GPC accepts that some appropriate expansion of Lighthorne Heath, in line with other service villages, will also be part of this strand of the strategy.