**GAYDON PARISH COUNCIL**

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26th April 2016

**Response to Core Strategy Modifications March 2016:**

Responding to this document, after responding to the Supplementary Planning Documents and as outline planning for GLH is being sought from SDC, is wrong. So much of what Gaydon Parish Council (GPC) has been asked to respond to, appears to be a rehash of what has been proposed at the start of the process: little reflects any of the positive contributions or questions that have previously been offered.

Indeed, the Core Strategy has now been forced to take on virtually all of the 5 ‘options’ that were once being suggested: even the politically inconvenient ones – all because of poor procedure from the start. This appears to be a continuation of this process and as a result, SDC now has to include proposals that will fundamentally change the district.

SDC is urged by GPC to embrace positive feedback with regard to infrastructure if the Core Strategy (with these modifications) is not to haunt the District in the medium and longer term. The very prosperity, attractiveness and distinctiveness of the Stratford District is at stake.

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| **Main Modification Reference** | **Submission Core Strategy Section/Policy** | **Gaydon Parish Council Response** |
| MM01 | CS1.1 | Southam will need to have matched infrastructure improvements identified at an early stage.  Two controversial new settlements (instead of one) and a big expansion of Southam because the 10800 houses have been increased to 14600 with a further 6% in reserve: a result of SDC not acting on the findings of the initial consultations?  With specific reference to GLH, GPC has long argued that LH will not be integrated with the new housing (expansion of an existing settlement) as result of the ‘unfortunate layout’ of LH as identified in the SPD and a busy road cutting it in half. |
| MM02 | CS1.3 | The delays caused by poor procedure at the start are going to haunt SDC: GLH is nothing more than an overspill housing estate from other metropolitan areas. GPC points out and would argue that it has taken over 30 years for Lighthorne Heath to develop into a functioning community because a lamentable lack of infrastructure provision. Without a large infrastructure input into GLH this proposal threatens to repeat the process with the resultant social challenges. |
| MM03 | Vision | ‘Settlements and landscape’ maintained and enhanced is very questionable when the number of houses is to be so significantly expanded – and might be even more (MM35).  An acknowledgement of the development of brownfield sites as it should have been at the beginning.  An inclusion of ‘safe’: will need adequate facilities (for all sectors of society and for both day and evening/night time) to ensure that anti-social behaviour does not threaten the wellbeing and safety of residents and existing communities.  Being ‘safe’ must also take into account air quality and sound pollution from being sandwiched between busy roads and should not rely on prevailing winds.  A new link road for LM (as in earlier proposals) suggests a rehash of old plans and highlights the lack of ambition for what is being proposed for GLH.  With specific reference to Southam: GPC has long argued that with the expansion of the town and service villages (and this is now far more ambitious than it originally was) that secondary school provision in the wider district needs to be reorganised in terms of catchments and provision. A secondary school as part of the GLH proposal would both help meet infrastructure needs of this project and give rise to an opportunity to reorganise provision. The responses given to date have failed to grasp this as an ambitious opportunity and concentrated on all the complications. An opportunity to find support for GLH is lost and not recognised in these modifications. |
| MM04 | Key Diagram | Halford a service village? |
| MM05 | Strategic Objectives | Helpful – clearer with regard to flooding. However, please note that GPC is currently working to ensure that flooding from runoff is not made worse by developments and the new road. Full assessments in accordance with the wastewater directive need to be a condition of any development. Recent developments including those in Bishops Itchington show that this is not happening adequately.  It is noted that there is a considerable increase in the number of proposed Gypsy/Traveller pitches. How does this affect previous planning objectives that were consulted on in the last year? |
| MM07 | CS.1 Explanation. | GPC largely supports the reuse of land. |
| MM08 | CS2 | Generally supportive. |
| MM10 | CS3 | District heating: sounds interesting – and the concept is one that is generally supported. GPC notes that this has not been apparent in proposals to date. |
| MM12 | CS4 | Generally GPC is supportive but schemes need real scale and assessment for 100+ year events. Recent developments including the attenuation ponds for the new duelled road link and the development in Bishops Itchington seemed to be overwhelmed by an overnight rain event in March’16! |
| MM13 | CS4 Explanation. | ‘reliant on more efficient use of existing … and references to demand reduction’ – Oh dear – such promises translate into pipe dreams! |
| MM14 | CS4 DMCs | Support tighter use of language.  B1 – GPC argues that ‘may require full landscape and visual impact assessment’ should be: ‘will require… ‘  C1 – ‘No loss or damage to woodland’ GPC supports this statement but hasn’t seen this adequately recognised in the SPD for GLH and most certainly in the outline planning applications – footpaths seem to have again appeared throughout Gaydon Coppice in the latest reincarnation. At the very least, such ancient woodlands – including Chesterton – need more protection.  C2 – The SPD was very quick to class hedgerows as scrub to be removed – fine words don’t seem to translate.  C4 – such measures if enforced would go some way to protect but have again not been evident in any plans or documents to date if located inconveniently. |
| MM16 | CS5 DMCs | The acknowledgement of cumulative impact is supported but not been evident with regard to traffic.  GPC supports the ideas of buffers. |
| MM17 | CS6 | ‘Should avoid impacts on SSSI’s is a statement that lacks ambition – any proposals should prove that there is no impact. |
| MM18 | CS6 Explanation | Generally supportive. |
| MM19 | CS7 | The references to green infrastructure lacks ambition as seen in the SPD and appears to be relegated to low lying areas unfit for development and a few trees planted along some roads. |
| MM20 | CS7 Explanation | Fine words. |
| MM21 | CS8 | Statements that are not at all water tight and very much open to subjective arguments: assessments to date appear to generate the desired answers. |
| MM22 | CS8 DMCs | Sounds positive. |
| MM23 | CS9 | ‘Schemes linked to evening and night time economy … to help manage anti-social behaviour.’ GPC supports this statement but has seen no evidence of it being translated into the SPD for GLH or planning applications that are seemingly endorsed by SDC. Schemes need to be linked to the breadth of the community especially if they are located away from major centres of population. |
| MM24 | CS9 DMCs | No comment. |
| MM25 | CS10 | ‘not inappropriate’ – not especially clear as it is intended to be non-committal?  The green belt appears to be a moveable feast/concept but one that promises to diminish in size. |
| MM26 | CS10 Explanation | It really does appear that MM03 ‘to maintain and enhance landscape’ is one that can’t be realised and that the Green Belt as a safeguard against conurbation is diminished over the lifetime of this Core Strategy. |
| MM27 | CS10 DMCs | No comment. |
| MM28 | CS12 | Sounds good but hardly compensation for what is deleted. ‘Taken into account’ means nothing in reality. The original text should therefore be reinstated. |
| MM29 | CS12 DMCs | As above. |
| MM30 | CS15 | Reference to ‘sustainable locations’ is a key point but needs to be backed up through the SPD and planning applications currently being forced through in regarding to GLH as seen in Section C.  GPC has consistently noted that there has been insufficient infrastructure planned for this location if it is to be sustainable: a housing estate reliant on the private car in a rural location is not sustainable: a new small town with a full range of facilities and with multiple routes of entry and exit coupled with a form of public transport might well be. This seems to be far more evident in the LM model than the GLH model.  Safeguards to ensure that facilities are included at the earliest stages of development need to be pursued vigorously if any new settlement is to avoid being any other than a seedbed for anti-social problems.  In Section D, the cumulative impact again needs to be measured especially with regard to educational and health provision: development encouraged where there is capacity. Where there isn’t capacity from the start, either capacity has to be built in or development proposals shelved. GPC notes that in terms of Southam College, there is limited capacity for growth even if the admission criterion was to be more strictly interpreted. |
| MM31 | CS15 Explanation | The cumulative impact in including Stockton into Category2 needs to be included – GPC refers back to secondary provision.  5.1.15 to 5.1.17 – a result of poor process and the subsequent challenge has meant that SDC has to find more capacity and must surely now have to rethink pressure on facilities including transport and secondary education as a result.  GPC notes that the politically inconvenient LM proposal that was given the most support during the initial consultations is back due to the failure of process: two new settlements to manage at a time when SDC struggled to manage one. It is noted that LM will include more facilities and that GLH will seemingly just make up the housing numbers: a political decision in the making so that anti-social behaviour is not on the doorstep of Stratford itself?  5.1.19 – GLH has limited capacity to grow in the longer term due to the geographical constraints unless SDC are proposing to loose JLR and AML from the area. |
| MM32 | CS15 DMCs | No comment. |
| MM33 | CS16 | The reuse of sustainable locations is supported.  GLH 2300 is not being matched by the planning applications coming in. Research as previously referred to by GLH shows that such numbers are not big enough to be truly sustainable. The original proposals for 5000 or so houses had lots of faults in terms of geography but may have been a lot more sustainable!  The proposed development of Southam is extensive without the secondary provision really having the capacity to cope both in terms of physical space and with regard to the capacity of the local road network.  It is noted that some category 4 villages are already shouldering more than their fair share of new housing. The 8% needs to be firmly applied and implemented as a guide per village.  Neighbourhood planning: Parish plans should also be acknowledged for where a Parish Council has not the capacity to develop one.  Phasing and delivery: GPC notes that considerably more housing might be required because of JLR at Gaydon: GLH to be a Coventry overspill housing estate as in 5.2.3 as part of MM34 |
| MM34 | CS16 Explanation | GPC questions the capacity of SDC to deliver this?  5.2.3 – seemingly confirms the overspill assumption.  5.2.6 – the planning capacity question is again raised without an expansion of expertise in the planning department of SDC. Strain on the planning services will lead to poor planning decisions railroaded by keen developers wanting to deliver raw numbers that will haunt SDC and WCC in the not so many years ahead.  With specific reference to GLH, there is a serious risk of anti-social problems early on in the life of this Core Strategy because of the lack of supporting infrastructure. This cannot be welcomed as it is likely to have an impact on not only existing communities but also a major centre of wealth generation and employment. The impact on continuous traffic disruption over the life time of the core strategy cannot be underestimated.  5.2.7 – relates to GPC comments on 5.2.6 – there are many unknowns with reference to JLR and AML but ones that will have a major impact on both parts. The total unproven reliance on the capacity of the M40 link road to ensure that there is no impact on JLR. Surely another widening project will be just that – another set of delays for JLR staff with the associated economic impact. Part of AML has already relocated – will JLR do the same? |
| MM35 | n/a | Seemingly an open commitment to take on housing from outside of the district – this commitment hasn’t been widely publicised or consulted on. This is difficult for GPC to comprehend especially when doesn’t appear to include an adequate level of infrastructure included into this Core Strategy or the SPD/Applications resulting from it.  There is an acknowledgment that there needs to be a Green Belt study – surely this should be integrated into this document before it is adopted.  All this is contradictory of MM03. |
| MM36 | CS17 | 1. A tendency to support the 35% rule but this could lead to potentially (we note though MM37) to around 1000 housing units for GLH alone.     The need for adequate, easily accessible facilities becomes even more pressing with this commitment to social housing on such a large scale without risking anti-social consequences resulting from boredom and isolation.   1. With the less than 11 rule, SDC are effectively signalling that large developments are favoured and that there is a financial barrier to small scale locally driven building. 2. Support. 3. Support. 4. Support. |
| MM37 | CS17 Explanation. | 5.3.6 Seems to make sense.  5.3.8 An acknowledged improvement knowing that there is a significant proportion of social housing already in Lighthorne Heath. |
| MM38 | CS17 DMCs | No comment. |
| MM39 | CS18 | Generally support but with a shortage of bungalows, it is surprising that this is not acknowledged if this is to meet the needs of a wider community. |
| MM40 | CS18 Explanation. | How much is the SHMA locally informed? Surely SDC has a duty to prioritise locally driven requirements.  5.4.4 – a useful guide but refer to previous comment. |
| MM41 | CS18 DMCs | No comment. |
| MM42 | CS19 | Previous comments relating to the included word of safe apply. |
| MM43 | CS20 | d) Support.  g) Support especially with ref to the use of the private car.  i) Support. |
| MM44 | CS20 Explanation. | Generally support but noted that the temporary site near Southam is adjacent to proposed development. |
| MM46 | CS21 | If this is adopted, it should guide development of land south of Gaydon. |
| MM47 | CS21 Explanation. | Reflects the work and nature of employment generated by JLR. Building houses will not solve this as so many employees have to access other JLR sites in the region on a regular basis.  5.7.20 So much being placed on uncertainty. In terms of infrastructure, the CS and resulting SPDs should plan for the worst case scenarios. |
| MM48 | CS22 | ‘will’ has been watered down to ‘should’ – perfect for the developer who wants to do it on the cheap. |
| MM49 | CS22 Explanation. | GPC supports this traditional model but emphasis needs to be placed on generous facilities in the new settlements with ease of access and parking.  5.8.12 The comparison with Alcester in terms of size of population is clearly not matched in terms of planned facilities and infrastructure. This is damning and needs addressing if these new settlements are to be regarded and assets to the region because of their sustainability:   * Where is the comparative education provision? * Where is the breadth of retail to break the reliance on the private car? * Where are the leisure facilities to create that safe environment where the risks of anti-social behaviour are minimised? * Where is the commitment to health provision for sustainability? * Where is the community focus infrastructure that you would expect in a settlement of a similar size? * What is there in this strategy that draws existing communities in? – there is little acknowledgement of this. |
| MM50 | CS22DMCs | If GPC understands this correctly, this means that there is less retail provision than the NPPF guidelines – this to be enshrined into this CS. If this is the case, it is totally unacceptable if a new settlement is to be sustainable and not generate traffic to larger centres. This is especially critical in the case of GLH when the relative isolation of the site is considered and lack of proximity to larger centres is taken into account. |
| MM51 | CS23 | No Comment. |
| MM52 | 6.1 | Somewhat expected in light of the previous comments. |
| MM53 | AS.1 | Generally support but access to green space is no compensation to access to commuting, retail and leisure generated traffic to other major centres.  To support the enhancement of emergency services is to be welcomed but GLH is too far away to benefit from those centred on Stratford and needs appropriately sized provision. |
| MM54 | SUA.1 | SPDs come after Core Strategies and modifications. SDC has got the sequencing consistently confused with regard to GLH! |
| MM55 | SUA.2 | No Comment. |
| MM57/58 | na | No Comment. |
| MM59 | 6.2 | Reserve Sites … hasn’t the CS already indicated that these are likely to be developed based on District agreements. |
| MM60 | AS.2 | No Comment. |
| MM61 | ALC.3 | Sounds sensible. |
| MM62 | 6.3 | No Comment. |
| MM63 | AS.3 | No Comment. |
| MM64 | 6.4 | More evidence that the reserve seems to be expected with language of minimum being used. |
| MM65 | AS.4 | No Comment. |
| MM66 | 6.5 | As MM64 6.4 |
| MM67 | AS.5 | Work needs doing to Kineton High but this is a missed opportunity to reorganise catchments and encourage JLR to sponsor a new academy on the GLH site. |
| MM68 | 6.6 | As MM64 6.4 |
| MM69 | AS.6 | Sounds sensible. |
| MM70 | 6.7 | There will be a big impact that needs to be matched with infrastructure improvements as already commented on. |
| MM71 | AS.7 | Sounds sensible. |
| MM72 | na | GPC notes that a new primary school has been deleted to be replaced with a contribution: unacceptable noting that there is to be such a big expansion of the town.  There is no indication of need for extra capacity for Southam College – (not required with a change of catchment and the location of a secondary as part of GLH).  Development on the cheap with the long term costs being carried out by SDC and WCC in the future: unacceptable pressure on the public purse in the years to come. |
| MM73 | 6.8 | As MM64 6.4 |
| MM74 | AS.8 | No Comment |
| MM75 | 6.9 | More evidence that secondary school provision needs restructuring? |
| MM76 | AS.9 | Generally supported. |
| MM77 | 6.10 | Amazing that AML was missed out so spectacularly in the first CS!  Will produce a SPD? – GPC has commented on one already and had its suggestions and comments seemingly disregarded if the recent applications are anything to go by. Are we to expect another regurgitation of the old one that recycles the same lack of ambition, that delivers inadequate infrastructure, that promotes the use of the private car and plans for a large, isolated housing estate that risks the generation of an unsafe settlement suffering from anti-social problems.  GLH compares most unfavourably to what is being proposed for Long Marston.  The clear encroachment of Lighthorne and the surrounding of Lighthorne Heath is sealed in this CS if adopted.  Too little promised over Phase1 and GPC still does not accept that such a large settlement should be bereft of secondary and youth provision: a missed opportunity that invites wholly unacceptable risks to the project as a whole.  The latest application for Phase1 of GLH includes precious little green space within the plan and is now as far away from the initial Garden Village/Town principle as is possible: a few trees planted alongside a road or two doesn’t count!  Cycle paths to nowhere of local significance – none to Kineton – even though this is the proposed place for secondary provision and for swimming. There are no realistic cycle routes to Southam.  Unlike Long Marston, there is no real commitment to improvements in road infrastructure that is vital during peak times. The total reliance on the B4100 with no alternatives on offer is unacceptable: GPC has consistently argued that alternatives need to be included and would be happy to share alternatives.  SDC clearly doesn’t want to put off JLR and so why is it considered acceptable to cause further disruption to commuting traffic by suggesting a further widening of a road that is being widened now?  The lack of alternative employment opportunities to JLR mean that peak traffic will be further made worse and adds to the need – not recognised in the assessments made so far.  The visual impact can hardly be minimised from Burton Dassett Country Park and Edgehill when the site is so elevated and south sloping. |
| MM78 | na | Everything that SDC wanted to avoid – but it is noted that it comes with far more generous facilities and infrastructure (as it should) compared to the mean provision associated with GLH.  It is noted that there are far better transport links with Stratford: this is the new settlement that should be prioritised as it has the greatest chance of being sustainable. |
| MM81 | AS.11 | Most points are welcomed but weak and lacking ambition. |
| MM82-86 | CS24/CS25 | No Comment. |
| MM87 | CS25 DMCs | The Travel Plan for GLH lacked any ambition and longevity as there was and still is no real alternative to the private car. Even now the bus services are being cut back in the area. |
| MM88 | 8.1 | Already commented on. |
| MM89-91 |  | Largely commented upon. |
| MM92 |  | No Comment. |
| Fig1 | Trajectory  Table | No Comment. GLH is firmly opposed without adequate facilities and transport infrastructure being planned for and then delivered. |
| Fig1 | Graph | This assumes that there are the builders and materials available to enable such rapid building to proceed. |

**In Conclusion:**

**GPC believes that there are fundamental flaws in this Core Strategy despite the modifications.** The lack of ambition with regard to infrastructure and facilities at this stage jeopardise the social and environmental sustainability a large part of the Stratford District.

**The GLH proposals are especially weak and need to made a lot more robust:** get it right and the housing needs are met: get it wrong and the plans will quickly unravel, there will be social costs that will need to mopped up and there are the economic costs associated with decades of disruption for the SDC powerhouses of JLR and AML.

**GPC urges SDC to embrace suggestions that have been carefully made rather than dismiss them out of hand by relying on assessments that give the answers that are more convenient.**