**GAYDON PARISH COUNCIL**

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 30th December 2015

**Application reference:**  15/04200/OUT - land adjacent to the Old Gated Road

**Gaydon Parish Council (GPC) opposes the outline planning application submitted by IM Properties Development Ltd and Feldon Herbs Ltd.**

**In brief, it is opposed on the following grounds:**

(based on the Addendum December 2015 1 to 4)

1. **As with the applications regarding the 2000 houses adjacent to this site, applications – even outline applications are premature as we await the final report of the Inspector: Mr Peter Drew.** We too are awaiting the latest SPD.
2. **As with the application by CEG/Bird Group, there is a fundamental lack of recognition of the lack of existing or planned infrastructure to support such a development.** There is nothing in that has been added within this application that takes into account any recognition of public consultation findings especially in regard to the weakness of the road network and the lack of any alternative that is likely to have any significant impact.
3. **This appears to be little more than a poorly connected dormitory housing estate attached to a bigger one that offers the minimum of services.** The lack of ambition seems only to be compounded by this application.
4. **This particular site: adjacent to ancient woodland, highly visible from a Grade 1 monument and isolated from larger centres of population, is contrary to the National Policy with regard to long term sustainability and the minimisation of environmental impact.** The lie of the land is such that it will be difficult to minimise the ambient sound of the M40 coming from the North. It is noted that high visibility is invited by the proposed 4 to 5 metre structure.
5. **GPC strenuously questioned the validity of findings within the Environmental Statement in late 2014 and the traffic modelling this Autumn 2015 with regard to the application by CEG/Bird and note that assessments are being reused for this application.**

**Notes on the Environmental Statement – Non technical summary.**

**2.5** The cumulative impact was partly recognised in ‘The ES Addendum Vol 1 and 2 Oct’15’ for CEG/Bird. It was however seriously questioned by GPC in its response and remains so especially with regard to the generation of traffic.

**2.6** The alternatives were too quickly dismissed by SDC and the reason why GPC and other local councils and groups made representations to Peter Drew the inspector.

**The Site and its Surroundings**

**3.1 The distant view of Chesterton Windmill is one that GPC feels should be protected.**

**The Proposed Development**

**4.1 The issue of connectivity with Planning Application 15/00976/OUT and the total reliance on an already heavily congested B4100 at peak times is GPCs main concern.** The proximity of JLR can only be mitigated against by serious investments an alternative to the B4100.

The landmark building only makes the problem with Chesterton Windmill worse. If this was a church tower then it would perhaps fit into the current rural feel of the area.

It is noted that in neither of the developments that there is any provision for worship or provision for those that are deceased: no graveyard.

It is noted that the other application seemed to hint at allotments being close to the Banbury Road – this application seems to tuck such provision away in an area that is suitable for nothing else.

**4.2 There is no provision for secondary schooling** – more traffic generation and another failure to recognise the positive effects on social cohesion especially for youth. GPC has expressed fears that such positive developments would be the perfect opportunity to decrease risks of youth crime whilst also alleviating the pressure on secondary school places in the Southam area with a reshaping of the catchment areas. GPC references the social role of the NPPF as mentioned in 5.1.

**4.3 We would presume that the ancient woodlands themselves (home to deer and other wildlife) would be afforded protection** from pedestrians, bikers etc. It will however be impossible to protect it from cats and dogs that will have an impact especially as this has been assigned as accessible green space. Please note that the empty countryside that is to be covered by housing is currently very much part of the natural environment for wildlife that currently takes cover in the woods. GPC references the environmental role of the NPPF as mentioned in 5.1. It is noted however that there are wider green spaces proposed in this outlined planning application but notes that these appeared considerably less generous in Planning Application 15/00976/OUT with CEG/Bird.

**Planning Policy**

**5.3 – 5.9 Though GPC has been expecting this application and accepts that this is consistent with the emerging core strategy, it would respectfully remind all parties that Peter Drew has not given his final report** and is currently engaged in hearing further evidence. There are serious flaws in the applications for housing with regard to infrastructure and its incompatibility with the ambitions of JLR if they are not delivered upon. Both applications for housing development have barely shifted in this regard to take into account real concerns.

**Socio-Economics**

**6.4&6.7 GPC questions which ward statistics were used.** It would also point out that these pockets of deprivation are closest to the proposed sites of development. This is reflected in the housing stock as described.

**6.13, 6.21&6.22 These statistics will need reviewing in light of the other housing developments in the area** including those in Kineton itself.

**6.14&6.23 Though it accepted that Kineton High School has a large number of unfilled places and that the school needs investment, GPC points out that other schools in the area are bursting and have significantly grown in recent years before houses have been built – including Southam College** (now 11 form entry). With the massive developments planned for (and some currently being built in the Southam Area), and significant building in nearby Bishops Itchington and Harbury Cement Works, GPC urges that catchments are reviewed so as to enable secondary schooling to be provided on site as part of GLH. The effects on social cohesion should also be included as already referenced.

**6.15, 6.16&6.24 Much is made of these that are already at or close to capacity in areas that are also being enlarged as part of the emerging CS.** This is a too conservative estimate. JLR should also be taken into account when planning health provision.

**6.27 10 fte jobs for a 1000 houses!** Clearly a neglible impact on providing employment opportunities – this really is a dormitory estate.

**6.30 Neglible impact on education and health provision of a 1000 new homes, a small positive because of a promise to employ construction workers locally and by building on open land (to create open space) all adds up to a major positive?** GPC accepts that it will have a major positive impact on SDC who is helped to reach its target of housing and a major positive impact on those developing but not on existing populations and not in the long term for those faced with unsustainable futures because of the lack of onsite facilities.

**Transport, Accessibility and Movement**

**7.3&7.4 It is inevitable that there will be some impact on traffic during construction especially with new roundabouts and crossings along the route of the B4100 but for it to be assessed as a minor adverse knowing that the route is heavily congested at peak times seems impossible to believe** and in the realms of wishful thinking. During construction of houses, this may well be a more realistic assessment.

**7.5 to 7.16 To suggest that 1000 houses built on an isolated site where the road network struggles to cope at peak times will not have any significant impact on traffic is difficult to comprehend.** There seems to be huge emphasis on the unlikely prospect of pedestrian traffic – unlikely other than on site knowing that there are few places that are actually accessible by foot simply because of distance. Though it is accepted that some (who may end up working for JLR) might cycle to work it has to equally accepted that cycling to their places of work will be the exception rather than the rule: again because of distance.

**7.17& 7.18 A suggestion that stagecoach might offer an additional service and a modal shift towards the non-existent sustainable modes of travel as envisaged in the GTP are hardly good platforms to suggest that traffic impacts are mitigated by them.** A light railway might though: a dedicated bus lane to key destinations might also encourage bus use. A shame that neither are included in this or in the CEG/Bird applications.

**7.19 It would appear that every road improvement has been included and built just so these housing applications can go ahead?** IMP and Feldon herbs need to be again respectfully reminded that improvements in the vicinity of the M40 are being constructed to mitigate against dangerous congestion caused by the ever expanding JLR up to a capacity of 12650. Currently JLR employs over 10000 and has significant ambitions for development of the current site without taking into account the 100ha and those outlined in their current Scoping Report. These improvements as mentioned will be at capacity well before this outlined application becomes a reality.

GPC would also surmise that the other improvements as listed have more to do with other developments that are currently going ahead and little if anything to do with GLH in either guise.

**7.20 to 7.22 The summary is quite simply unrealistic and wrong.**  This has been pointed out in relation to the ‘Response to ES Addendum Vol 1 and 2 Oct’15’ as submitted by GPC.

The impact of traffic has to be properly recognised and planned for in its own right: listing other planned (and often inadequate including the Harbury Lane/Chesterton Rd/Fosseway crossing) road improvement is simply not good enough.

**Air Quality**

8.2 With the expansion of JLR, the proximity of the M40 and the County Councillor’s (for Gaydon) admission that this development will create the second biggest town in the Stratford Area, GPC argues that SoADC should have a third Air Quality Management Area for this area.

**Noise and Vibration**

**9.11&9.12 Whilst GPC accepts that thermal double glazing can have a seriously positive impact on mitigating against the sound of the M40 when closed, this might be less effective on hot Summer nights – and for those who might want to spend time in the garden.** For those who have windows facing North towards the Old gated road crossing of the M40, this will be especially a problem.

**9.14 to 9.17 GPC notes that most houses are set back from the Banbury Rd but urges that as many trees and hedging are retained of indeed added to** further mitigate against sound pollution on hot days when windows are likely to be open.

**9.26 For most, GPC don’t question this assessment but urges IMP and Feldon herbs to add to measures and not rely on closed windows** for those properties in greatest danger from noise.

**Hydrology and Flood Risk**

**10.3 It is not clear how the Thelsford Brook is affected by the raising of land as outlined in AR\_320\_006 in terms of both flow and pollution.** Other measures do appear to recognise that surface flow and waste water has to be managed.

**Ground Conditions**

**11.5 GPC presumes that houses built on this filled in area will be designed accordingly** so as to ensure their long term stability and would expect to see this referenced in a detailed application id one was to come.

**Archaeology and Cultural Heritage**

**12.3, 12.5 to 12.7 On one hand we are told that residents and visitors will be able to catch glimpses of the windmill, the next that it is screened by greenery and buildings.** There might even be a ‘jelly mould’ hill to view from. There now seems no mention of the landmark building. With greatest of respect, the developers can’t have it both ways.

**12.8 The developments in their entirety may not physically affect (other than light pollution and increases in traffic) but the rural nature of Lighthorne and Gaydon with the combined size of these developments will have an impact.** If these villages are considered to be part of the second biggest settlement in the Stratford area as has been already mentioned, there will be a political one as well. The social impacts as well are not considered here either. An acknowledgement of these would go a long way in the believing other assessments.

**Ecology**

**13.1 to 13.8 It is good to see that some value has been placed on some of the main ecological assets in the vicinity**. GPC looks forward to seeing how these will be further protected.

**13.9 There seems to be no recognition of the Roe Deer and Muntjac that use this area.**

**13.13 The green principles as seen in 15/00976/OUT seem to have been somewhat overlooked and amount to little more than some trees planted along some of the roads.** There is no evidence that these are the much vaunted green corridors for wildlife to travel along. As most assessments for this development seem to from the same providers as referenced, GPC has little faith in these plans.

**13.21&13.22** GPC draws the same conclusion as it did to the GLH application when this statement says that the building of 1000 houses has a minor positive impact on the ecology of what had been a green field site: **GPC has no faith in this unbelievable conclusion.**

**Landscape and Visual Impact Assessment**

**14.22 The most realistic assessment yet – GPC would argue that the cumulative effect of all developments as identified in the emerging CS will however extend a lot more than 100m.**

**Lighting Impact Assessment**

**15.9 Though it is clear that this application aims to keep lighting to a minimum, GPC is more than aware that in reality lighting is then justified to meet National standards or for Health and Safety Reasons (especially at junctions).**

**It can hardly therefore be assessed that there will only be a minor negative of lighting up a new estate of 1000 houses in an area that is currently unlit. The cumulative impact with the other estate will be significant.**

**Overall Conclusion**

**16.1 to 16.4 The very nature of this area of Warwickshire will be permanently impacted by this** development and though there will be some positive benefits to SDC and the developers as outlined, this cannot be said for the existing communities or the environment.

**If the positive benefits to new residents to this development are to be realised, significant investment needs to come from the developer to address the infrastructure weaknesses as have been identified. Realistic assessments of impact and infrastructure requirements of what will be an isolated new development to enable it to grow into a sustainable and attractive community are needed and then planned for.**

**Service Supply Strategy**

**GPC has no comment other than to point out that there was no mention of micro generation or of other green technologies being used as part of this development.**

**Construction Environmental Management Plan**

**Section 3: GPC would urge that green infrastructure including tree planting is put in place right from the start to ensure that they established by the time Phases 2 and 3 are completed.**

**GPC has no further comments.**

**Statement of Community Involvement**

**The comment relating to transport issues say it all: deal with these and there is a real prospect that stakeholders will feel that their real experiences and local knowledge are being taken seriously.**

**The comment about acting before the inspector has provided his final report should also be noted. Right from the start, even those who could have been persuaded about the proposals could see that due process was not being followed and this aroused deep suspicions.**