



**Land at Gaydon/Lighthorne Heath Supplementary Planning Document
Informal consultation on initial draft document February/March 2015**

Consultation Statement

Council response to comments received

**Stratford-on-Avon District Council
August 2015**

1.0 - Introduction

Consultee	Comments	Response
Timothy Bull - Gaydon Resident	<p>Even before I start to read SDC's "new" Core Strategy document I feel I must have recorded the fact that I am of the opinion that both SDC and Bird group, with their separate (and now differing) proposals, are jumping the gun in inviting residents to view their proposals informally. Surely in the spirit of the outlines set out by the inspector neither of the two proposals should have been published before his report is issued; throughout the entire process of the generation of the GLH aspect of the Core Strategy, however, scant regard has been paid to either legal requirements or moral strictures. It is also interesting to note that the two proposals have reduced the numbers of houses to be built from the initial 4,800 to 2,000, with an option for more, in Bird's case and 3,000 in SDC's. I can only assume that the rapidity of the appearance of both schemes is an attempt to circumvent any negativity in the Core Strategy, by the inference of an "all or nothing" comment in the last paragraph of the email I received from David Nash.</p>	<p>Comments noted. The SPD cannot be adopted ahead of the adoption of the Core Strategy, but given the Council's decisions on this matter it is considered reasonable to prepare the document in parallel with the remaining stages of the Core Strategy process.</p>
Larry Coltman - Stratford Resident / Business	<p>Excellent plan for a sustainable community of either commuters or those who will work at JLR with easy access to the M40. Traffic will not congest district roads like other developments south of the river in Stratford or Long Marston which are unsustainable for that reason and not near any major employers or job opportunities.</p> <p>Preserves essential expansion land for JLR and AM - major employers in the district and essential to wealth generation in the region.</p>	<p>Comments noted.</p> <p>Agreed.</p>
C Roberts – Stratford Resident	<p>I am fully in support of the proposal.</p>	<p>Noted.</p>
John Hargis - Wellesbourne Resident	<p>There are excellent quality roads and the motorway within the immediate vicinity. Traffic management assessments should give adequate consideration to the level of increased activity on local roads and motorways and consideration given to road widening where this can be regarded as justified.</p>	<p>Noted.</p>

The development of a major new village of this size has the benefits of requiring new infrastructure and community facilities, as being proposed. It is important that the developers are committed to build the shops and leisure facilities at an early stage in the overall development so that residents that take up occupation early are able to take advantage of these amenities. Has any consideration been given about attempting to integrate the new village within the adjacent communities? What about a new doctors' surgery that might serve the wider area?

I detect statements which might infer a relaxation on the need to provide at least 35% affordable housing. I feel that any such relaxation, if it really is being considered, should be strongly resisted.

Noise and air pollution must be a concern despite assurance from DEFRA/others. I would have hoped that a standard of triple glazing should be stipulated for any houses, and that the boundary with the M40 should be lined with a small wood Holm Oak (or similar evergreen trees) and silver birch trees which are known to have the ability to extract pollutants from the atmosphere.

See section on phasing and infrastructure provision.

The SPD has been revised to further emphasise the need to promote integration.
A GP surgery is to be located in the new village centre.

There is no proposal to relax the requirement to provide affordable housing.

These considerations are acknowledged in the SPD. Detailed mitigation is a matter to be considered at application stage.

Peter Wiltsher -
Stratford Resident

I support the proposal at Lighthorne Heath. It is well thought out and offers good access to transport links and allows housing for the people working at Jaguar / Land Rover. It also makes an alternative to yet more housing in Stratford.

Comments noted.

Lynne Pearson -
Northend Resident

Wrong site, flawed procedures, lack of consultation with local people. Abandoning and therefore ignoring previous planning consultations where local Parish Councils fully cooperated and a consensus was agreed of extending current villages, deliberately ignores what the populace wants.

Information on Page 10 (4) is incomplete and incorrect. The school at Northend was closed in the 1990's during the school closures plan, and there are no sports pitches or facilities in this village. There is no mention of either Temple Herdewyke or Fenny Compton village on this page, despite both being closer than Bishop's Itchington and Kineton villages.

These comments are noted, but do not relate to the content of the SPD.

Accepted. These errors have been corrected.

Reference to Temple Herdewyke has been added on the Local Facilities Plan.

No linked up thinking to local plans already underway. There is no mention of the construction of new homes that are already in progress or in the planning system at: Bishops Itchington, Kineton, Temple Herdewyke, Fenny Compton - totalling around 500 homes overall which will equate to up to 1,000 more cars on local roads. Alongside the expansion of JLR who have already added 750 to their workforce an addition 1,500 employees are planned. The extra traffic daily on the B roads around the proposed development will therefore add at least 3,000 cars to the 3,000 GLH residents cars - and that is if residents only have one car per household - most unlikely! A total of 6,000 to 9,000 cars adding to congestion on the B roads around the area and clogging the motorway junction. Think of the pollution!

The proposal has been put forward having had regard to the traffic impacts that will be created. The SPD identifies both the strategic improvements required to mitigate those impacts and the need for developers to carry out further work (in the context of any future planning application) to identify more localised impacts and the interventions required.

Hugh Conway – Gaydon Resident

Only 2 months passed between the 1st Draft Supplementary Planning Document and the 2nd Draft. Given that the relevant reports are not in place and the Inspector requires SDC to redo the Sustainability Assessment, this document is premature. We regard the entire GLH proposal as unsustainable and would remind you that the current road development takes no account, either of the proposed housing or possible future expansion of JLR employment. Commuter traffic will be generated by any housing development. It is presumptuous to suppose that it can be served by bus services so most of it will be in single occupancy cars, thereby adding to traffic congestion. We are concerned at the inadequate provision for social and leisure facilities as well as a concern regarding provision for secondary schooling. What is proposed reduces what was previously proposed.

Traffic impacts have been appropriately analysed and the required response is explained in the SPD.

These comments are noted. The SPD requires on-site provision of open space and leisure facilities and other community infrastructure. Secondary school places will be provided via the expansion of Kineton High School.

<p>Chris Kettle – District Councillor, Bishops Itchington</p>	<p>The Inspector has found that the draft core strategy is not sound and that further work is required to demonstrate that the SA is:</p> <p>Robust; Objective; and Complies with statutory requirements and relevant guidance. This suggests that the SA fails on these three measures</p> <p>At this late stage in the Core Strategy process, this finding is deeply disappointing to both members and rate payers.</p> <p>As the Inspector has raised such serious concerns that the SAs could not be demonstrated to be either robust or objective by inference, it cannot therefore be appropriate to carry out any further Work on the SPD for GLH until the flaws in the robustness of the Core Strategy have been rectified.</p> <p>Despite this it is worth while taking the opportunity to set out the more obvious flaws in the SPD.</p> <p>It appears from information made available previously to Ward Members that the SPD was initially drafted, produced and under the control of the promoter of the site's agents, not SDC officers. This became apparent when, despite SDC having its own reprographics department, copies could be produced by officers at the request of members, as, it was explained, they needed to be produced by an unidentified third party. This is a matter of concern.</p> <p>Further this does not suggest that the document was either independently prepared or necessarily robust. In particular it raises material questions as to Whether the SPD was designed to address the concerns of local stakeholders or furthering the interests of promoters. In fact the considerable weight given to a major local employer's investment plans across the West Midlands seems to suggest that the document was being seen and being used as a promotional exercise rather than an attempt to address the issues arising from any proposed</p>	<p>The issues raised in the examination inspector's Interim Conclusions have been addressed by the Council. The Council has re-affirmed its support for the inclusion of Proposal GLH in the Core Strategy.</p> <p>The document has been prepared in collaboration between the Council and the site promoters, but it is an SDC document and the Council has full control over its content.</p>

development of the site. This should not be the purpose of the SPD.

As a result of this inappropriate focus, it is clear that the document fails to address or even consider the impact of the proposed policy on local residents, and the wider public accessing the area.

The document then further fails to examine how any negative impacts can be mitigated, but again seems more interested in promoting and justifying the promoters plans, again evidence that the document is not independent of the promoters aspirations.

The document must be refocused to look at the impacts and constraints of the site and how any proposed development must mitigate them

Key issues that must be addressed, although the list is not exhaustive, in no particular order, are therefore:

Visual impact on landscape in general, more specifically on the Feldon Vale and in particular from the Beacon Tower to the South, which formed such a significant part of the evidence submitted in the recent wind farm planning application, and on the setting of the Chesterton Windmill and the settlement of Chesterton itself.

The impact on the residents of Lighthorne Heath and how the B4100 which will divide Lighthorne Heath from the proposed settlement can be realigned.

The Senior planning officer confirmed in a meeting with local councillors that the impact of the development of 100 acres of industrial land will be greater on the local road network than the 2,000 houses it has replaced.

However no effort in the SPD has been made to quantify the traffic volumes arising both during the development phase and afterwards and as to how any of the traffic impacts from the development of the site can be mitigated. The document

The Beacon Tower is now referenced in the document. The setting of Chesterton Windmill is considered in both Sections 3 and 5.

This is covered in greater detail in the revised document.

The evidence supporting the Core Strategy proposal explains the anticipated transport impacts of this strategic development. More detailed transport assessments must be undertaken to inform the planning application process. It is not the purpose of

	<p>ignores the comments in the Strategic Transport Assessment 2012 about the need for mitigation on the B4451, and the inability in Bishops Itchington to implement such mitigation. The impacts of developments on other local roads has been ignored, despite the concerns of every parish council who attended meetings about this document in November 2014. There is no reference to the specific concerns raised in those meetings. One has to question why not? Perhaps the impact and the mitigation thereof is not considered important to the promoters or authors of the document.</p> <p>The plan is silent on the impact of the development on Gaydon Village. A specific concern in the village is about the removal of existing routes, whether by foot or bicycle out of Gaydon and needs to be addressed. Access to the Centenary Way will be heavily impacted.</p> <p>The plan is also silent on the feasibility and traffic impacts of transporting children to the Kineton Secondary school, through the middle of Kineton in the rush hour.</p> <p>The document other than identifying a need for medical facilities fails to set out how the provision of medical services should be provided.</p> <p>The impact of the development on the Water quality and supply to the local fish farming business in Lighthorne is not addressed. Perhaps existing local employers are not considered relevant. Similarly any negative impacts on local retail and entertainment businesses of the development of retail facilities within the site have not been considered.</p> <p>Just as the Inspector found the Core Strategy to be not sound and not demonstrated to be independent, the same could be said for this document.</p>	<p>this SPD to undertake that work or propose detailed mitigation schemes.</p> <p>This issue is now referenced in the SPD.</p> <p>The need to consider and mitigate any such impacts is referenced in the SPD.</p> <p>The SPD requires on-site provision of a GP surgery. The precise details are for determination via the application process.</p> <p>No impact is envisaged, but if necessary this detailed matter will be addressed at application stage.</p> <p>The scale of retail and other business uses planned is proportionate to the establishment of the settlement and the opportunity to serve employees at the adjoining Gaydon site.</p>
Aston Martin Lagonda Ltd.	Aston Martin Lagonda (AML) welcomes inclusion in the draft SPD of the provision for the strategic future expansion of its site. AML considers however that it would be help clarity if some background to the proposal was added in Section 1.0 of the document, and in this respect the District Council is referred to the content of the Statement of Common Ground	Accepted. Relevant text has been added.

agreed during the Hearing into the Proposed Submission of the Core Strategy and the SDC Consolidated Hearing Modifications (Section 6.10 and Proposal GLH).

Howard Collerson -
Stockton Resident

The choice is between building a new community to accommodate c. 3000 new homes or redistribute these amongst the smaller villages and overloading facilities that were never designed to cope with such large increases. The proposal for GLH solves this dilemma and protects possibly 40 villages from overdevelopment. An earlier stage of the core strategy showed that GLH is the best site for a new community. Clearly communities such as Gaydon and Lighthorne will have massive change but it means that the change will be confined. If planned and managed properly it should mean that all necessary infrastructures will be provided in step with the pace of building. This would not happen if the 3000 houses were spread across 40 villages - the necessary small improvements in infrastructure (traffic management/road safety, water supply and drainage, school provision, village halls, sports clubs, public transport, cycle routes, etc.) would probably never be identified in the planning process by the various agencies responsible and would not be funded or delivered by the developers.

Comments noted.

2.0 - The Site and its Context

Chesterton and
Kingston Parish Meeting

In Figure 4 on Page 6 "Local Facilities Plan", there is no mention of Chesterton Church. The Church mentioned in Domesday Book but not in SDC SPD. Another example of SDC failing to recognise position of Chesterton & Kingston.

Accepted. The location is now identified on the plan.

RW Horsley – Stratford
Resident

A good site for the overall development being near major roads and establishments with present and future employment potential. A condition must be implicit for all domestic occupation developers to provide effective sound screening all along the side nearest the existing motorway.

Comments noted. All applicants will have to respond to the guidance regarding noise mitigation set out in the SPD.

Ms Jacqueline Hargis -
Wellesbourne Resident

Given the current publicity and petition regarding the views from Chesterton Mill, should further detail be included in the planning document to the views that need to be retained, and how SDC expect this to be achieved?

Amended text has been added.

Hugh Conway - Gaydon
Resident

One only has to stand on the land adjacent to the M40 motorway to realise how intolerable it would be to live in property directly adjacent to it. Bunding is unsightly and would be only partly successful. We note the comment about double glazing etc. but this is an acknowledgment of the problem.

The SPD is considered to properly reference the context within which applicants will need to address the noise issues to establish conditions that are conducive to a good standard of life.

Aston Martin Lagonda
Ltd

Further it would be helpful if some reference to the existence of AML was made in Section 2.0 of the document - The Site and its Context. Again the content of the agreed Statement of Common Ground and the Consolidated Hearing Modifications offers some relevant information

Accepted. Relevant text has been added.

Avon Valley Indoor
Bowls Club

The Local Facilities Plan should show that there is a public bowls club located on the JLR site. Avon Valley Indoor Bowls Club is of significant regional importance in the sport of bowls. The facilities listed for Lighthorne Heath should include "indoor bowls facility".

Accepted. Relevant text has been added.

Gaydon Parish Council

We would like confirmation that the bund, screening the development from the M40, will extend the whole length of the site down to the B4511. The ambient traffic noise levels within Gaydon from the M40 have significantly increased since hedges have been removed. A revised noise impact assessment is required as a matter of urgency. We look for mitigating measures to reduce this both from the M40 and the

Confirmed.

	road under construction. There will be a sizable compensation bill payable to owners of properties in Gaydon due to loss of amenity.	
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2.3 - Local Facilities

Consultee	Comments	Response
Hugh Conway - Gaydon Resident	<p>Gaydon has been robbed of public footpaths over the past 20 years. Cycling has become a particularly hazardous pastime which can only become worse if cycle routes are developed piecemeal. There is already a high percentage of affordable and social housing in the area especially at Lighthorne Heath and Temple Herdewyke. The occupants are totally reliant on private cars for their employment and face a long daily commute for all their activities. Families without two cars are seriously disadvantaged. Public transport is at best infrequent and inconvenient.</p>	<p>Comments noted but do not require changes to the SPD.</p>
	<p>Additional housing requires the provision of additional education facilities. In the light of the substantial number of housing developments in the area it is important that the opportunity is taken to incorporate adequate primary and secondary education facilities.</p>	<p>Accepted. The proposals envisage on-site provision of primary school places. Secondary school places will be provided via the expansion of Kineton High School.</p>
	<p>The proposed area is clearly visible from key heritage sites. The view from the Beacon Tower, a listed building within the Burton Dassett Country Park has been compromised by the construction of the new road.</p>	<p>The views from the Beacon Tower are now referenced in the SPD as an issue to be addressed.</p>
	<p>It is noted that the view from the Tower was a reason given for the refusal of the wind farm at Knightcote. The felling of trees, doubtless to accommodate the construction of the roadway and roundabout at the Heritage Centre has exposed the buildings at JLR from the Tower. The trees acted as a buffer, preserving the rural view without the intrusion of utilitarian industrial buildings. They should be replaced as soon as possible.</p>	<p>Noted. Additional text about Public Rights of Way has been added to the SPD.</p>
	<p>Rights of way have been lost and never replaced. Gaydon lost its footpath to Northend and Burton Dassett when the M40 was constructed. Access to Centenary Way from the village is important. No more bridleways and footpaths should be lost. More off road facilities should be provided, to ensure safe and sustainable recreational and commuting travel. It should be noted that both JLR and the Heritage Centre have cycle to work policies. The two stopped up roads are no solution and</p>	<p>The SPD requires applicants to consider and enhance where appropriate the wider cycle network in the area. The area close to Gaydon village where roads will be</p>

unless

mitigating measures are taken will be a magnet for overnight trucker parking, tipping and general neglect.

The modification to Junction 12 is being built to cope with the existing planning permission held by JLR without consideration for Wider traffic issues. It does not cater for any further housing expansion included in the GLH project or even some of the more recent statements by JLR and Aston Martin about expansion. We fear that that SDC has not fully appreciated the traffic issues in the locality as witnessed by the chaos recently.

stopped up as a result of the consented highway works will be subject to improvement in a manner to be negotiated and agreed locally.

The existing unsatisfactory conditions are understood and are being addressed via both highway improvements and traffic management initiatives. The highways authorities consider that excess capacity is created as a result of these initiatives. The SPD requires that any further interventions be identified when detailed applications are considered.

NHS Property Services	We are in support of Section 2.3 of the document: Health, which states that there are GP Surgeries based in in Harbury, Kineton and Wellesbourne. The Harbury surgery operates a branch surgery in Bishops Itchington and the Wellesbourne Surgery operates a branch surgery in Kineton. The document further states that it is important to note that any available capacity at these surgeries will be absorbed by other developments already having the benefit of planning permission.	Comment noted.
Chesterton and Kingston Parish Meeting	The lack of senior school facilities or "extensive" leisure facilities in the SPD mean that the dependence on transport and particularly the car will be extensive and will not deliver a low carbon emission solution given the rural location of the proposed GLH town.	The journey distance to Kineton High School, where secondary school places will be provided, is not unusual in this rural district. School bus services will be provided. Appropriate on-site leisure facilities are required as a result of operative planning policies.
Gaydon Parish Council	Housing There is already a high percentage of affordable and social housing in the area especially at Lighthorne Heath and Temple Herdewyke. The occupants are totally reliant on private cars for their employment and face a long daily commute for all activities both for pleasure, living and employment.	The public transport services delivered as a result of the proposed development will improve the situation.

Education.
Secondary education provision needs to be looked at again in light of other building development in the area including

Warwick and Leamington, Southam and Wellesbourne. The impact of significant developments in villages such as Kineton, Gaydon, Temple Herdewyke, Harbury, Bishops Itchington etc. also should be included. Numbers are building up quickly. Southam School is already hugely oversubscribed without taking into account the building projects already being constructed or planned for as described above. This is an opportunity missed to create new provision and give a sense of sustainability to this project.

Figure 4. Local Facilities Plan

This is inaccurate. However what it has highlighted is the lack of sports pitch/facilities in Gaydon. It also does not feature Temple Herdewyke, a community of low cost housing (again like Lighthorne Heath ex MOD housing) up against the MOD perimeter fence where the only facility is a school.

The proposed approach has been carefully considered with input from WCC and local schools.

Agreed and corrected.

Consultee	Comments	Response
Sarah Taylor - Radford Semele Resident	Not enough parking for existing JLR employees - something must be done to accommodate JLR employee vehicles within the JLR site and properly prevent JLR employees parking on the public highway/pathway before any works on proposed GLH site commence.	This is not a matter for the SPD, but is being addressed by JLR.
Chesterton and Kingston Parish Meeting	The "Core Strategy DPD" section states that on the 100 hectares can include "Low volume manufacturing and assembly operations". This is a complete change from the current R & D use of Gaydon by JLR. This proposed use of the 100 ha is not acceptable.	Extant Policy CTY.16 of the Local Plan (adopted 2006) provides for the manufacture and assembly of vehicles at a scale and nature that is related to the established use of the site. This is continued into the emerging Core Strategy and is a matter of principle already established. It relates to AML as well as JLR.
Gaydon Parish Council	<p>Gaydon has opposed in principle development of the allocation of 100ha of land in Gaydon Parish. Whilst we accept that JLR may need to expand, we believe that land further north but closer to the existing site might be more appropriate. Any development on the 100 hectares should be carbon neutral and environmentally sound, not impact on the view from the Heritage listed Beacon Tower in the Country Park on Burton Dassett Hills and not add to the noise and air and light pollution caused by the current traffic levels to Gaydon and the Country Park.</p> <p>The vast majority of JLR employees live away from the local area to enable them to access all JLR sites that are located in other West Midland locations. Indeed the Parish Council have an email from a resident, whose house has been on the market for 2 years, stating that during that time there has been no viewing from a JLR employee which adds weight to our previous sentence.</p>	<p>The identification of land to accommodate JLR expansion has been endorsed in the examination inspector's Interim Conclusions. The SPD identifies landscape and pollution impacts as issues that need to be addressed when specific proposals are brought forward.</p> <p>Noted.</p>

2.4 - JLR Existing Gaydon

Avon Valley Indoor Bowls Club Consultee	The area of land available to JLR for expansion within their current ownership (i.e. to the SW of the B4100) should also be noted, so that the context of the additional 100ha can be	Noted. Response
Warwickshire and	WP/WMP welcome the inclusion of police facilities within the	Noted.

2.5 - Planning Policy Context

West Mercia Police	proposed community hub.	
Coventry and Warwickshire LEP	<p>Whilst the GLHSPD is supported by CWLEP, it is considered that the document could be enhanced as follows:</p> <ul style="list-style-type: none"> • Direct reference to the strategic alignment of the proposed development at Gaydon/Lighthorne Heath with the SEP. This is recommended to be incorporated at section 2.5 of the GLHSPD - Planning Policy Context. 	Noted. Text has been added at Section 1.1.
<p>Chesterton and Kingston Parish Meeting</p> <p>Page 17</p>	<p>The content of Page 11 is exemplary of the brochure produced by the developer for the GLH exhibition at Lighthorne Heath School on 27/28 February. It is full of ifs, but and maybes, with nothing certain, explicit or definitive on housing, the village centre, schooling support, green infrastructure, pedestrian & cycle networks, bus services. This is pure marketing speak full of promises, but how, when, where and what will be delivered is totally unclear.</p>	Noted. Infrastructure delivery expectations are set out in the revised Section 6.
Warwick District Council	<p>It should be noted that any forthcoming Developer Contributions SPD should include a reference to Strategic Highway contributions being required beyond the boundary of Stratford District in instances where it can be demonstrated that additional traffic pressure requires highway/junction improvements attributable to development within Stratford District (i.e. GLH putting additional pressure on the highway network within Warwick District).</p> <p>...</p> <p>Paragraph starting 'The phased delivery' should read - the phased delivery of highway and transport infrastructure as set out in the Infrastructure Delivery Plan including further specific schemes that may be identified as necessary to mitigate local impacts both within Stratford District and, where proven, in neighbouring Districts.</p>	<p>Agreed. This is acknowledged in Section 3.4 of the SPD.</p> <p>This text is copied from the Core Strategy and any changes would first have to be addressed in that document.</p>
Avon Valley Bowls Club	<p>Avon Valley Indoor Bowls Club has provided a facility for local bowlers for more than 35 years. The facility is leased from JLR and the lease is due to expire in 2021. To date, JLR have refused to extend the lease or sell the facility to the club on the basis that</p>	

the land is needed for expansion. It is ironic that the economic success of JLR is driving the company to act irresponsibly and against the TATA core values that include the statement "We must continue to be responsible, sensitive to the countries, communities and environments in which we work, always ensuring that what comes from the people goes back to the people many times over." If the existing facility cannot be retained and if a new facility cannot be funded, then the club will cease to exist. This is also opposite to the strategy and vision stated by Stratford District Council -

The Sustainable Community Strategy (SCS) sets out a vision for Stratford District in 2026 and includes the statement - "Encourage more residents to get involved in sport, leisure and recreation activities and extend opportunities for them to do so across the District,"

In the submitted Core Strategy, Appendix 1 Section 5.3 states "There will also be a need for new and improved indoor and outdoor sport and recreation facilities to support the health and wellbeing agenda of an increased population".

Bowls is a key participation sport for the district and many people playing at outdoor bowls clubs also play indoors during the winter. People are more likely to take up and continue playing bowls if they can play all year round. Closure of the indoor facility could result in closure of local outdoor bowls facilities in the medium term. This would be a disaster for the sport of bowls and a lost opportunity to engage more people in an active participative sport.

Bowls is an almost unique sport where three generations can play competitively against each other. The positive interaction between people aged from 14 to 94 has a significant social benefit. Avon Valley Indoor Bowls Club is used by partially sighted bowlers and wheelchair users. After school bowls clubs are operated locally by Avon Valley and regular coaching sessions are available for anyone wanting to start playing the sport. The older generation bowlers

consider Avon Valley to be much more than a bowls club as the members provide a support system for each other which is particularly welcomed when loved ones are lost.

Comments noted and accepted. New text has been introduced into the SPD to recognise the presence of the Club and to confirm the Council's commitment to seeking a suitable relocation site within the local area. (See revised section 2.4)



3.0 - Site Constraints and Opportunities

Consultee	Comments	Response
Warwick District Council	Should make reference to the joint Strategic Transport Assessment undertaken with Warwick District Council and to ensure that developer contributions will be required from GLH in respect of the interventions identified on figure 12 and any others that may become apparent as further detailed work is undertaken.	Agreed. New text added.
Warwickshire Wildlife Trust	<p>Policy CS.6 of Stratford-on-Avon's proposed submitted Core Strategy states:</p> <p>"Proposals will be expected to secure a net gain in biodiversity by safeguarding existing habitats, including...those subject to local designations such as Local Wildlife Sites and Local Nature Reserves."</p> <p>We therefore recommend that this section is amended to include a description of the 3 Local Wildlife Sites (LWS) and two potential LWS that fall within the proposed development site, and that figure 14 is updated to show these important areas for nature on the map. The LWSs should also be included in Figure 17 (page 40 - 41) showing the constraints to the master-planning of the site. Local Wildlife Site information can be obtained by contacting the Habitat Biodiversity Audit Team at Warwickshire County Council or the local Biological Records Centre.</p> <p>On page 35, paragraph 5, the reference to 'the green infrastructure strategy' is unclear. Does this refer to the sub regional strategy, district strategy, or a site specific strategy which is yet to be published? If this refers to a site specific strategy then the wording should be changed to "The Gaydon/Lighthorne Heath Green Infrastructure Strategy will include enhancement measures..." alternatively a reference to where the document is published should be provided if it already exists.</p> <p>On page 35 the bold text ('A net gain for biodiversity will also be expected to be secured in accordance with Policy(s): CS.1, CS.5, CS.6, CS.9') should be amended to also include Policies CS.4 (Water Environment and Flood Risk) and CS.7 (Green</p>	<p>The text of the SPD reflects additional site specific investigations that have now been carried out. An appendix has been added to the document to confirm contextual information drawn from the Warwickshire Biological Records Centre.</p> <p>Agreed – wording now clarified.</p> <p>Agreed – references added.</p>

Infrastructure).

These policies also have relevance to securing a net gain for biodiversity. The Trust recommends making a reference here to the requirement for planning applications to undertake a Biodiversity Impact Assessment as demonstration of the net gain to biodiversity achieved by the development proposal.

A Biodiversity Impact Assessment with the use of the Defra Biodiversity Offsetting metric is being piloted by Warwickshire, Coventry and Solihull Local Planning Authorities. In the first instance it is an ideal way to quantify the net biodiversity effects of the proposal. It, additionally, would inform the decision on the need for and extent of onsite mitigation or offsite compensation, as well as assisting in the assessment of design of appropriate habitat creation and management proposals. After consideration of the results of the Biodiversity Impact Assessment an appropriate scheme for deliverable onsite mitigation or offsite compensation can be agreed prior to determination.

The SPD confirms that a net gain in biodiversity is expected to be secured in accordance with the Core Strategy policies. An Ecological Impact Assessment will be required to support future planning applications – see section 6.1.

Severn Trent Water

I refer to Section 3.0 - (3.8) (Site Constraints and Opportunities) of the Draft SPD document and note that Severn Trent water have commented on the limited capacity at Lighthorne Heath Sewage Treatment works. With this in mind I would like to confirm the following:

We have a responsibility to provide capacity for domestic growth. We also have a requirement to manage our assets efficiently to minimise our customers' bills and so cannot commit investment to provide additional sewerage capacity unless there are firm commitments to the development. To avoid investing in unused capacity we will only provide additional capacity when we are confident that the growth will materialise. Provided there is reasonable notice (usually 3 to 4yrs) we do not envisage problems in providing additional capacity if required.

Comments noted.

Gladman
Developments

Gladman note that the Inspector held a full day hearing session to discuss the proposals for GLH. A key issue at this session was a lack of evidential basis to demonstrate that the technical issues and site constraints had been adequately overcome. The debate included discussion of the following topics (please note that this list is not exhaustive):

- Land ownership
- Noise
- Ecology
- Heritage
- Delivery

The Inspector's conclusions regarding the GLH proposal are yet to be released, it is therefore still unknown whether the GLH proposals will be found sound or not. Until the Inspector publishes his further findings / final report it remains unknown what conclusions may be reached regarding the proposals at GLH and whether the proposed allocation is sound. What is clear, however, is that serious concerns were raised by multiple parties at the EiP, which brings into question whether GLH will be capable of being delivered as planned.

Whilst section 3 of this draft SPD covers constraints and opportunities, Gladman are not content that all the issues raised are adequately addressed through this.

Gladman raised concerns in representations to the Core Strategy in relation to insufficient evidence base documents to support the proposals and mitigate for any significant constraints.

A further issue considered during the EIP hearing session was the fact the GLH combines both housing and an employment element and that there is a need to ensure that there is a coordinated approach for the delivery of both of these elements. It is fundamental that through the SPD and the proposals in the Core Strategy that the infrastructure requirements of the combined scheme are not cherry picked to enable the delivery of the residential element at the expense of the employment element.

Agreed.

The proposals for delivery are set out in the Core Strategy and will be examined when the hearings are re-opened.

The infrastructure delivery requirements associated with the residential development are clarified. In the absence of more detailed information, reasonable assessment have been made (with input from JLR) about the likely requirements associated with the employment growth.

	<p>Significant consideration needs to be given to the infrastructure requirements and when these need to be delivered in order for the overall development to progress in a coordinated fashion. It is unclear through the current consultation document whether this has been considered sufficiently to ensure the effective delivery of the entire new settlement.</p>	
<p>Sarah Vaughan - Owner of Chesterton Wood</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 23</p>	<p>The earlier section sets out the key landscape characteristics of the land within and surrounding the SPD site. The established district scale landscape character assessment set out in the District Design Guide and Character Map covers a broad area, although relevant in order to better understand the landscape character of the site and to address and support the principles set out in Policy CS5 a more detailed scale of landscape character assessment is required.</p> <p>Then in last para: "The Council may require further detailed landscape, visual and ecological survey work to be completed at a planning application stage".</p> <p>This needs to be clarified. Landscape assessment needs to be done as currently the evidence is that any large scale development will not be in line with core strategy policy CS5 and this cannot be mitigated in any shape of form unless the town is build underground!</p> <p>Page 21 "Any development will need to take account the ancient woodland. It will also need to consider noise mitigation alongside the M40 and the existing public right of way which crosses this area as well as views from the wider countryside."</p> <p>Clear guidance and clarification of buffer zone to ancient woodlands on the site needs to be given.</p> <p>Page 32 Chesterton Windmill conveniently left off Heritage Assets Plan.</p>	<p>Agreed. Section 3.2 now specifies that applicants must submit a full Landscape and Visual Impact Assessment.</p> <p>It is evident from various responses that the width of a buffer zone needs to be determined to recognise individual circumstances. The SPD correctly identifies this as an issue, but the specific requirements should be determined through the application process.</p> <p>Noted and corrected.</p>

	<p>Page 33</p> <p>"The impact of development must be mitigated through appropriate planting and green infrastructure, with a lower density of housing in this part of the site. With such mitigation the development should cause only a minor level of harm to the significance of Chesterton Windmill. The development must be designed to ensure there is no significant harm to the asset's significance".</p> <p>How could this be mitigated? There is no possible way to do this and there will be impact on the view from the windmill.</p>	<p>The text in section 3.5 has been updated to reflect feedback from various sources. It is acknowledged that some harm may be caused to the wider setting of the windmill.</p>
<p>Mrs M Fox - Gaydon Resident</p> <p>Page 24</p>	<p>Character area number 1. Gaydon</p> <p>When considering interventions that will be required, the roundabout at the junction of the B4100 - the B4451 should be removed, traffic lights installed, the camber of the road changed to divert flood water onto the fields rather than down into the village.</p> <p>The roundabout was put in to satisfy Jaguar Land Rover and was modelled on the one at Blackdown/Lillington Road - expecting the traffic flow to be similar. This has far exceeded expectations.</p> <p>Empty car transporters have difficulty going round it and the movement caused by them hitting uneven ground means danger of toppling.</p> <p>Is it possible for a controlled crossing to installed opposite the Gaydon Inn? School buses pick up/drop there at peak times and the traffic coming from the South on the B4100 is heavy.</p> <p>Those coming from the Banbury area are unlikely to use the M40 or the residential areas and estates are mostly on the W. side - away from Junction 11.</p>	<p>This junction is now specifically recognised as being considered within the wider context of the treatment of the area south of the new road.</p> <p>The highway scheme under construction will re-route all vehicles accessing the Gaydon site from the M40.</p> <p>The need for this can be considered as part of the work on potential local highway interventions.</p>

<p>Lighthorne Parish Council</p>	<p>Given the national importance of the grade 1 heritage asset Chesterton Windmill, there should be no development within its principle vista, i.e. overlooking Old Sych at the very least. It would be appropriate to ensure no development is visible from the windmill at all - no property should be more than 2 storey in the village centre or anywhere on the site for this reason.</p>	<p>The NPPF requirement is that development should cause less than substantial harm to the significance of the asset. This is clarified in the revised text.</p>
<p>Warwickshire County Council - Countryside Protection</p> <p>Page 25</p>	<p>The Draft SDP recognises that the site is crossed by various public rights of way and these appear to be correctly shown on some of the plans, but I note that some sections of recorded public right of way are not shown on certain plans, including Figure 10: 'Existing Public Rights of Way Network' (Page 26, Section 3.0). We therefore recommend that these plans are corrected, using the Definitive Map for reference. In particular, public footpath SM69a near the western site boundary has sometimes been omitted, and sections of public bridleway SM19I are also missing on some plans.</p>	<p>The plans have been corrected.</p>

3.1 - Topography and Views

Consultee	Comments	Response
<p>Chesterton and Kingston Parish Meeting</p>	<p>The views of the site on Page 12 appear to have been carefully chosen. There are no views of the site from the prominent ancient landmarks of Chesterton Windmill to the north and north-east and from Burton Dassett Beacon to the south-west.</p> <p>The presentation of the topography and views is deliberately misleading. There is no cross-section in the entire document other than to show the bund planned alongside the M40. (This section on Page 38 is again deliberately misleading and suggests flat topography.)</p> <p>Figure 5 on Page 13 " Site Topography" is shown in too small a scale and fails to demonstrate the circa 44 metre drop from the proposed GLH village centre to the northern tip of the proposed area.</p> <p>How will a bund with a proposed maximum of 8 metres (not quoted in SPD) prevent noise and other pollutants to new housing that could be 36metres plus above the bund height'?? I suggest the bund will be as much use as a chocolate fireguard.</p> <p>At the GLH PUBLIC CONSULTATION on Friday 27th February and Saturday 28th February 2015 Oliver Bell of Nexus Planning and Ian McSween of Bird Group misleadingly stated that the site was flat! Mr McSween was aggressive and frankly condescending when challenged on this. Again the brochure was misleading and none of the display board showed any cross-sections.</p> <p>There is no mention of vistas from Chesterton Windmill and Burton Dassett Beacon and the significant harm to their vistas by the proposed GLH plans and employment area of 100 ha.</p>	<p>Using a standard LVIA approach, the site would be difficult to identify in views from these locations.</p> <p>Not accepted. This is understood largely to relate to the need to address noise issues, which is fully addressed in the revised section 3.9.</p> <p>Agreed. A more detailed site topography plan has been included at section 2.</p> <p>Comment noted. The impacts of local topography will have to be recognised when designing the noise mitigations measures.</p> <p>These matters are referenced in the amended document.</p>
<p>Gaydon Parish Council</p>	<p>The proposed area is very visible from key heritage sites. Mention is not made of the Beacon Tower, a listed building within the Burton Dassett Country Park. The view from this</p>	<p>Noted – this omission has been corrected.</p>

	<p>would be compromised by this development and the view from the Tower was a reason given for the refusal of the wind farm at Knightcote. The felling of trees, presumably to accommodate the under construction roundabout at the Heritage Centre, has exposed the buildings at JLR from the Tower. The trees acted as a buffer, preserving the rural view without the intrusion of utilitarian industrial buildings. We hope there will be replanting with mature specimens as soon as possible to restore this buffer.</p>	<p>This will be taken into account in preparing the landscaping proposals for the southern end of the site.</p>
<p>Lighthorne Heath Parish Council</p>	<p>The representatives at the GLH PUBLIC CONSULTATION on Friday 27th February and Saturday 28th February 2015 were unaware of the level difference between the Old Gated Road/M40 bridge and Kingston Fields Farm of @ 42m (their opinion was that it is about 15 – 20 m). This will negate the mitigation effects of 5m bund as indicated on their cross section displayed at the exhibition.</p> <p>The same comment also applies to the proposal for four pitches on the green open space alongside the Cinder Track between Lighthorne Heath and Lighthorne which also crosses the hillside with a difference in elevation of @ 20m. There is no indication of the existing topography in the document which tends to suggest that a 5m bund will be adequate for shielding motorway noise when most of the housing site is situated well above the motorway with no acoustic mitigation whatsoever.</p>	<p>Noted – see above.</p> <p>The landform in the area proposed for playing pitches is self-evident and it is understood that it will need to be remodelled to accommodate the pitches.</p>

3.2 - Landscape Character

Consultee

Comments

Response

Lighthorne Heath Parish Council

The proposed area is very visible from key heritage sites. Mention is not made of the Beacon Tower, a listed building within the Burton Dassett Country Park. The view from this would be compromised by this development and the view from the Tower was a reason given for the refusal of the wind farm at Knightcote. The felling of trees, presumably to accommodate the under-construction roundabout at the Heritage Centre, has exposed the buildings at JLR from the Tower. The trees acted as a buffer, preserving the rural view without the intrusion of utilitarian industrial buildings. We hope there will be replanting with mature specimens as soon as possible to restore this buffer.

See same comment from Gaydon PC above.

Chesterton and Kingston Parish Meeting

The SPD on page '15 quotes Policy CS5 on "LANDSCAPE CHARACTER AND ENHANCEMENT".

The SPD completely contradicts this policy and takes no account of "historic character" or "protect landscape character and avoid detrimental effects on features which make a significant contribution to the character, history and setting of a settlement"

NB. Chesterton Windmill dating back to 1632 is unique. This vista was used as Warwickshire's main viewing point to witness the recent solar eclipse. A housing estate as the backdrop would not enhance such events.

On page 17 the SPD states..." further detailed landscape, visual and ecological survey work to be completed at a planning application stage.

This needs to be clarified. Landscape assessment needs to be done as currently the evidence is that any large scale development will not be in line with core strategy policy CS5 and this cannot be mitigated in our view.

The earlier section on page 17 sets out the key landscape characteristics of the land within and surrounding the SPD

Not agreed. A proposal of this scale inevitably has impacts, but the SPD provides appropriate analysis and identifies the further work that will be required in the context of bringing forward a planning application.

The SPD sets out clearly how this consideration must be handled when applications are assessed.

The SPD requires full Landscape and Visual Impact analysis with all applications.

Additional text has been added.

site. The established district scale landscape character assessment set out in the District Design Guide and Character Map covers a broad area, although relevant in order to better understand the landscape character of the site and to address and support the principles set out in Policy CS5 a more detailed scale of landscape character assessment required.

In the section, "Landscape Character Zones" on page 21, the description of the Chesterton Windmill view is minimised in value and reportage.

...
Clear guidance and clarification of buffer zone to ancient woodlands on the site needs to be given.

The description is considered accurate.

It is evident from various responses that the width of a buffer zone needs to be determined to recognise individual circumstances. The SPD correctly identifies this as an issue, but the specific requirements should be determined through the application process.

Natural England

Landscape Character

We welcome the enhancement of the local landscape character, consideration of local distinctiveness and avoidance of detrimental impacts. Reference could also be made to the National Character Area.

Noted.

An up-to-date Landscape Character Assessment coupled with techniques such as Landscape and Visual Impact Assessment (LVIA) provide a robust basis for defining issues and responding to them and for assessing proposed development.

Agreed.

'Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.'

In order to secure long term potential of this land and to safeguard soil resources as part of the overall sustainability of the whole development, it is important that the soil is able to retain as many of its many important functions and services

Agreed.

(ecosystem services) as possible through careful soil management.

Consequently, we advise that if the development proceeds, the developer uses an appropriately experienced soil specialist to advise on, and supervise, soil handling, including identifying when soils are dry enough to be handled and how to make the best use of the different soils on site.

This is now referenced in section 3.3 of the SPD.

Lighthorne Parish Council

Zone 1 — we require a guarantee that there will be no development on this site and a covenant to that effect as previously stated.

Not accepted. Zone 1 includes land identified for the expansion of AML.

Zone 2 — we require a guarantee that there will be no development on this site and a covenant to that effect, in addition we require that this land be conveyed to LPC with an appropriate trust fund as previously stated.

Not accepted. Limited development may be necessary to complement associated open space and recreational uses. The future ownership of land is not an issue for the SPD.

Zone 3 — we require a guarantee that there will be no development of this site and a covenant to that effect for the reasons previously stated.

Not accepted – this area is accurately assessed and is proposed for residential use.

Zone 4 - there should be no development on this site as it is the principal vista of Chesterton Windmill.

Not agreed.

Zone 5 — there should be no accommodation taller than two storey and the density of accommodation proposed should be halved at least.

There is no evidence to support such requirements.

Zone 6 — as zone 5.

As above.

Zone 7 — there is insufficient detail provided to be able to comment.

Comment noted.

Zone 8 — there is insufficient detail provided to be able to comment.

Comment noted.

3.3 - Soil, Ground Conditions and Contamination

Consultee	Comments	Response
<p>Natural England</p>	<p>The agricultural land classification survey has identified the majority of the site is grade 3b, however, 50ha is grade 3a land which is best and most versatile (BMV).</p> <p>Avoiding loss of BMV land is the priority as mitigation is rarely possible. Retaining BMV land enhances future options for sustainable food production and helps secure other important ecosystem services. Government policy is set out in Paragraph 112 of the National Planning Policy Framework which states that:</p> <p>'Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.'</p> <p>In order to secure long term potential of this land and to safeguard soil resources as part of the overall sustainability of the whole development, it is important that the soil is able to retain as many of its many important functions and services (ecosystem services) as possible through careful soil management.</p> <p>Consequently, we advise that if the development proceeds, the developer uses an appropriately experienced soil specialist to advise on, and supervise, soil handling, including identifying when soils are dry enough to be handled and how to make the best use of the different soils on site.</p>	<p>Noted. The Grade 3a land is located towards the southern end of the site.</p> <p>Accepted. This matter has been taken into account in determining the principle of permitting employment growth on the site.</p> <p>Agreed.</p> <p>This is now referenced in section 3.3 of the SPD.</p>

3.4 - Access and Movement

Consultee

Comments

Response

<p>Sarah Taylor - Radford Semele Resident</p>	<p>Vehicles from this proposed development will seriously impact routes into Warwick and Leamington Spa. Already problems with the wider road network. Details should be provided regarding specific works to take place at: Fosse Way/Chesterton Road/Harbury junction Fig. 12, item 3 Fosse Way/Southam Road Roundabout Fig.12, item 4.</p> <p>Works at the above spots should be completed before homes on the proposed GLH site are occupied.</p>	<p>Agreed – the impacts and the mitigation required has been considered via the Strategic Transport Assessment process. The precise works required will be determined by the relevant highway authority and funded through developer contributions.</p> <p>Precise triggers will be determined through the application process.</p>
<p>Lynn Pearson - Northend Resident</p>	<p>The site is crossed by bridle paths and footpaths, these are common rights of way and cannot be built over without judicial review. No review has been undertaken. There is a reference in the SDC plan that 'Proposals should seek to integrate PRoW within the development and consider ways to create new links'; however I see nothing further as to how or where this is being addressed. The Indicative Masterplan distributed by Beattie Communications makes no allowance for either Rerouting or accommodating Bridle Paths and thus in principle is unlawful.</p>	<p>The SPD seeks an approach that integrates existing PRoW. Additional text has been introduced to confirm the process that must be followed in the event that a PRoW is proposed to be diverted.</p>
<p>Bishops Tachbrook Parish Council</p>	<p>Our issues: 1. The Warwick Local Plan already generates significant traffic movements through Bishops Tachbrook most acutely along the B4087 Oakley Wood Road. 2. The predicted increase in peak time traffic along B4087 Oakley Wood Road is already 75% which is the highest in the district & does not include the SDC Gaydon/Lighthorne development (see supporting information below).</p> <p>What we would like to see: 1. Quantify the increase in predicted traffic flow through Bishops Tachbrook generated by the SDC Gaydon/Lighthorne development so that the cumulative impact of WDC + SDC local plans can be assessed. 2. Specific & costed measures to encourage traffic to use Fosse Way/Harbury Lane by investing in the junction to ease traffic flow thereby reducing traffic along the B4087 through Bishops Tachbrook.</p> <p>Supporting information: Following a freedom of information request to WDC in February 2014 the baseline 2012 peak time traffic flows at various locations around Warwick & Leamington</p>	<p>Noted.</p> <p>Completed transport assessments confirm that the development can be accommodated with the specified mitigation being implemented.</p> <p>This may be a detail that needs to be addressed by the more detailed transport assessment work associated with a planning application, but is not a specific matter for the SPD.</p>

	<p>were obtained. By comparing these to the projections contained in Warwick STA 3 it was possible to reveal the true predicted increases in traffic which will result from the Local Plan. For instance the increase along the B4087 Oakley Wood Road through Bishops Tachbrook at peak times is a staggering 75% or 1,000 cars per hour. This does not include the SDC Gaydon/Lighthorne development.</p>	
<p>Coventry and Warwickshire LEP</p>	<p>The SEP and Major Employment Sites Report identifies the future development of Gaydon/Lighthorne Heath site as requiring collaboration with relevant agencies to ensure growth is accompanied by appropriate infrastructure and is well connected to other employment related development opportunities within the M40 corridor (junctions 13, 14 and 15). It is therefore recommended to enhance cross referencing in the SPD between the broader traffic response identified in section 3.4 Site Constraints and Opportunities (Access and Movement - page 30) and the Illustrative Masterplan at section 5.3 (Movement and Access - page 58).</p>	<p>Additional text has been introduced to clarify.</p>
<p>Page 36 Lighthorne Heath Parish Council</p>	<p>The representatives at the GLH Public Consultation Friday 27th February and Saturday 28th February 2015 advised that Arup/Brookbanks Consulting are updating the original transport projections based on 12,500 JLR employees, but with a lower average population for the 100ha industrial site. They stated that there will be surplus capacity once the M40 junction is improved and travel patterns will use this in preference to the B4100. Future upgrades of the M40 are possible and have been factored into the calculations. High Speed Bus Links (L/Spa every 20 minutes and Banbury hourly) are being developed with Stagecoach. Effects on local roads will reduce as the new settlement beds in and JLR employees take up residence.</p> <p>The Parish Council do not agree with this assessment in the light of detailed local knowledge of employment patterns within the existing motor industry, and the fact that most staff are either short term apprentices, or specialised Research & Development or support staff who choose to live elsewhere within the Midlands.</p>	<p>The level of detail included is appropriate in the</p>

	<p>Within the SPD itself there is insufficient detail to make an informed response regarding Access and Movement and in particular Public Transport which will be crucial to the parishioners in Lighthorne Heath. The suggestions that the new road from the motorway will be the “panacea” to the “grid lock” caused by JLR traffic appears to be little more than window dressing with no substantial evidence that commuters will change their behaviour or place of residence. Motorway improvements will be of no benefit to incoming commuters from the East and West.</p> <p>Those who know Junction 12 well will also know that it is a sub-standard junction designed solely for access to CAD Kineton, and that in the long term is limited unless a second over bridge is built but this is not factored into the CS deliverability. With the intended third lane (Phase 2), the current over bridge will become a highly dangerous place for both leisure and commuting cyclists alike.</p>	<p>context of this document. Further details will emerge at application stage.</p> <p>These comments are not relevant to the SPD content.</p> <p>The Junction 12 capacity improvements are designed by the Highways Agency (now Highways England).</p>
<p>Page 37 Highways England</p>	<p>p.29 — ACCESSIBILITY. The commitment to developing a transport strategy is welcome, to ensure a holistic and consistent approach to the proposed access provisions and to optimise the prospects of achieving sustainable travel habits, including modal shift.</p> <p>p.29 — ROAD NETWORK It should be clarified that the capacity enhancement scheme at M40 junction 12 is being undertaken by the Highways Agency and is not within WCC’s remit.</p> <p>p.30 - TRANSPORT ASSESSMENT The requirement to undertaken a Transport Assessment will not just apply to impacts on the local road network. It should be clarified that impacts on the Strategic Road Network (SRN) will also need to be included in any assessments — and, in relation to this, a note should be included in this section which recommends early engagement with the highways authorities in order to fully scope future transport assessment work and to ensure appropriate traffic mitigation strategies are identified, where necessary.</p>	<p>Noted.</p> <p>Noted and actioned.</p> <p>Noted and actioned.</p>

<p>Lighthorne Parish Council</p>	<p>Public Transport — specific detail is required as to exactly what is being guaranteed — how will Lighthorne benefit exactly? What routes and what services are being guaranteed?</p> <p>Traffic — specific detail is required as to how the current 2 hour traffic jam on the B4100 and M40 twice a day will be resolved by the addition of 6,000 cars? Specific detail is required as to what will be done to prevent further use of local village roads to avoid the above traffic jam. What specific measures will be put in place to alleviate the traffic on local village roads, as they will be used as the direct route to Wellesbourne/Stratford etc.? The main road through Lighthorne is used as the main route to Wellesbourne/Stratford at present and is used as a cut through at peak hours by JLR — what exactly will be done to protect the conservation village from even more traffic issues? This will be a car dependant commuter town — exactly HOW is mitigation of this proposed? There is currently insufficient detail to be able to comment meaningfully. Traffic calming is alluded to but actual real detail and specifics are required.</p>	<p>The SPD identifies the opportunity. The planning application process will produce more detail and will determine the level of bus subsidy required. Actual service provision is a matter for the bus operators, with input from WCC.</p> <p>The detailed interventions on the local road network cannot be determined through the SPD process. This is an issue for the application process.</p>
<p>Harbury Parish Council</p> <p>Page 38</p>	<p>Harbury Parish Council considers the most significant impact of this proposal on the village of Harbury would be the increase in traffic on the surrounding road network. There are already serious problems at the junction of Harbury Lane/Fosse Way which are set to be exacerbated by the numerous housing developments in the immediate surrounding area which have already been granted planning permission. Road traffic accidents are frequent at this junction and local roads can become gridlocked during peak times when there are accidents here or on the nearby M40. Our neighbouring parish of Bishops Itchington already suffers particularly from a high volume of speeding traffic along the B4451. It is essential that a detailed, comprehensive strategic transport assessment is completed to identify the true scale of the impact on local roads and identify the areas requiring improvements and what those improvements may be. The cumulative effect of all the new developments in the area needs to be taken into account.</p>	<p>Comments are understood. Work to date has identified the strategic interventions that are considered necessary and these include improvements at the Harbury Lane/Fosse Way junction. Other improvements required to mitigate local impacts will be determined through the Transport Assessment work required to support future planning applications and/or via local negotiation and agreement.</p>

<p>Chesterton and Kingston Parish Meeting</p>	<p>The PROW are deemed to be integrated. The public footpath across Old Syche in the SPD has been removed! This is not acceptable.</p> <p>Accessibility on page 29 makes absolutely no mention of Chesterton & Kingston as an adjacent village (AGAIN!).</p> <p>Road Network has no consideration of the sensitive "The Old Gated Road". Figure 12 on page 30 "Required Interventions" should also include Chesterton Green junction and The Old Gated Road junction with B4100 for consideration.</p> <p>Lighting. Given the topography with 44 metre variation, the lighting of proposed GLH will be particularly sensitive to some Chesterton & Kingston Parishioners. Properties on the Thwaites Estate will have sightline lighting across the valley.</p>	<p>All existing PRoW are identified in revised Figure 10.</p> <p>Accepted and text inserted.</p> <p>The examples given are potential local rather than strategic interventions. Figure 12 specifies only the strategic interventions.</p> <p>See revised section on Lighting.</p>
<p>Warwickshire County Council - Countryside Recreation Page 39</p>	<p>It is stated in section 3.4 'Access and Movement - Walking and Cycling' (page 27, paragraph 3) that proposals should seek to integrate existing public rights of way within the development, and that pedestrian crossings with tactile paving should be included where an existing footpath crosses a new access road, all of which is welcome. The following observations regarding the integration of public rights of way within the development may also be useful at this stage.</p> <p>If it would be necessary to divert any public rights of way to enable the proposed development then a legal order would be required. This order would be made under the Town and Country Planning Act by Stratford District Council as Planning Authority. The specifications of the proposed diversions, including the route, width and surface type of the new route, would need to be agreed with Warwickshire County Council's Rights of Way team. The surface of any diverted bridleway route would need to be suitable for equestrians.</p> <p>Accommodating existing public rights of way along estate roads or enclosing them into a narrow alleyway is generally considered undesirable in terms of the impact on the amenity of the route, particularly where the existing public right of way is an open, rural route. It is preferable for existing public rights of way to be</p>	<p>Noted.</p> <p>See new text incorporated into the SPD.</p>

	<p>accommodated away from estate roads and in open space or along green corridors, wherever possible.</p> <p>The specifications for resurfacing works on any of the public rights of way would require the approval of the Rights of Way team. It may be appropriate for public rights of way integrated into the development to be included in any Section 38 agreement for the development and constructed to adoptable standard.</p> <p>If it were proposed that any existing public footpath would be upgraded to a shared footpath and cycleway then this would need to be discussed with Warwickshire County Council's Rights of Way team from an early stage, to ensure that the proposals comply with all relevant legal and policy requirements.</p>	
<p>Natural England</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 40</p>	<p>The green corridors throughout the development will improve connectivity, enabling the movement of both people and wildlife across the site, to the surrounding countryside and to the future development at the Jaguar Land Rover site to the south. We welcome the network of improved pedestrian and cycle routes and access to an integrated public transport system, which can encourage more sustainable modes of travel and provide informal recreation opportunities, helping to improve the health and well-being of residents. We suggest that these routes should link with the Green Infrastructure network through the provision of highway verges and natural footpaths.</p> <p>Local Authorities should protect and enhance Rights of Way to deliver objectives relating to health and wellbeing, and to allow access to nature and the countryside. The provision and promotion of these routes provides opportunities to deliver modal shift and reduce CO₂. We also support management of access to existing woodland, to encourage the public to keep to footpaths and diverted away from important ground flora and protected areas.</p>	<p>Noted.</p> <p>Noted.</p>
<p>Gaydon Parish Council</p>	<p>It would be useful if the road under construction had been shown on this map. Given that Gaydon is shown at the bottom of the map it does not really highlight the lack of bridle paths,</p>	<p>Comments noted. The importance of links outside the SPD area has been referenced.</p>

footpaths and cycleways in our locality. Rights of way have been lost mostly due to acts of war and requisitioned land providing the then secure MOD facilities to the north and south of the village and have never been replaced. We lost our footpath to Northend and Burton Dasset when the M40 was constructed. Access to Centenary Way from the village is important. We would ask that no more bridleways and footpaths are lost and more off road facilities are provided to ensure safe and sustainable recreational and commuting travel, given that both JLR and the Heritage Centre have a cycle to work policy. This provision cannot be compensated for by 2 stopped up roads with the inherent dangers of parking, fly tipping and general neglect and anxiety about personal safety.

It appears to us that SDC are not fully appreciating the traffic issues in the locality. The modification to Junction 12 is designed to cope with the existing planning permission held by JLR/future expansion plans (5% per year) and not wider traffic issues. It does not cater for any further housing expansion included in the GLH project.

The fact that the B4100 acts as the M40 relief road has not been taken into consideration in the design of the new road. There are no figures available as to capacity resulting from the replacement of a crossroads with a T junction which gives rise to our fears that traffic congestion in Gaydon has been engineered into the scheme. The chaos that ensued by temporary traffic lights installed by JLR during the winter producing letters to the local MP Etc. had to be witnessed to be believed. Nothing should happen in this locality until our fears have been disproved by the reality of the new junction and dual carriageway.

Again SDC does not acknowledge that:

- a) Junction 12 is not lit
- b) M40 is not lit.
- c) 1.2 KM of dual carriageway is lit causing further light pollution in Gaydon and we require mitigation measures against this.
- d) The local network has little spare capacity during peak times: something acknowledged by the developer in their recent consultation meetings at Lighthorne Heath (Spring 15).

The SPD is informed by comments from Highways England, as shown above.

Incorrect – this function of the road is understood and accepted.

These comments relate to the highway scheme currently under construction rather than to anything within the content of the SPD.

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3.5 - Heritage and Archaeology

Consultee	Comments	Response
<p>Council for British Archaeology West Midlands (CBAWM)</p>	<p>This section might be better titled Historic Environment. The archaeological desk-based assessment mentioned here should be included as a supporting document when the SPD is released for formal consultation. We note that the archaeological desk-based assessment identifies a low potential for archaeological remains of Saxon to post-medieval date and, on current evidence, a low potential for archaeological remains of prehistoric and Roman date but that there has been a lack of previous archaeological work, therefore the potential is uncertain. We strongly support the statement that further archaeological investigations will be required in support of future applications- see our comments on 6.01. We query whether the historic environment, including non-designated heritage assets and their settings as well as designated heritage assets, has had an equivalent level of consideration in the SPD as, for example, landscape.</p>	<p>Accepted – heading changed.</p>
<p>Hugh Conway - Gaydon Resident</p>	<p>No mention of the Beacon Tower on the Dassett Hills, a scheduled historic monument and a reason given for rejecting the wind farm at Knightcote.</p>	<p>This omission has been corrected.</p>
<p>Cherwell District Council</p>	<p>Given that the text discusses the significance of Chesterton Windmill, it would be helpful to specifically identify it on Figure 13.</p>	<p>Agreed – omission corrected.</p>
<p>English Heritage West Midlands</p>	<p>Section 3.5 of the draft document notes that the Chesterton windmill (Grade 1 Listed Building and Scheduled Monument) is within 1.9 km of the site, and that its wider setting, including the northern part of the site, contributes to its significance.</p> <p>As a consequence the local authority, in its preparation of the planning document, should demonstrate how it has had special regard to the desirability of preserving the setting of the Chesterton windmill in accordance with Section 66 of the Planning (Listed Building and Conservations Area) Act 1990 and that great weight has been given to the heritage assets conservation (NPPF</p>	<p>Agreed. The text within the SPD has been revised to more accurately reflect the tests that must be applied under the NPPF.</p>

	<p>paragraph 132). To address these important matters, might the Masterplan set out more clearly how the concept, strategic layout and landscaping for the Woodland Rise parcel has responded to the windmill's setting?</p> <p>Perhaps due to the national importance of the Chesterton windmill more detailed work needs to be undertaken to inform the most effective approach to "avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal" (NPPF paragraph 129).</p>	<p>All character area descriptions are brief, but have regard to the identified constraints set out in section 3 of the SPD. Far more detailed analysis will be provided by way of the masterplans prepared to support future planning applications.</p> <p>Accepted and to be required when applications are brought forward.</p>
Lighthorne Parish Council	There should be no development in sight of Chesterton Windmill. The impact on Chesterton Windmill cannot be mitigated.	Such a requirement is not justified under national policy.
<p>Chesterton and Page 44 Kington Parish Meeting</p>	<p>Chesterton Windmill The windmill is Grade 1 listed and a scheduled ancient monument. Its architectural and historic interest should not be underestimated. It is an iconic local landmark which attracts many visitors at all times of the year. These people come to enjoy the views and the peace and quiet of the countryside. The windmill's setting within the landscape should be protected and preserved as an essentially rural setting which is how it was designed to be seen.</p> <p>Burton Dassett Hills Country Park The views from Burton Dassett Hills would also be compromised by such a large urban development spreading out beneath it. Given that the application for a wind farm within a few miles of the country park was recently refused on appeal by the Secretary of State gives some indication of the importance of this landscape and the public view from the country park.</p>	<p>Agreed.</p> <p>The need to assess the impacts as viewed from this location is now incorporated into the SPD.</p>
Gaydon Parish Council	No mention of the Beacon Tower on the Dassett Hills, a scheduled historic monument and a reason for the failed permission for the wind farm at Knightcote.	This omission has been corrected.



3.6 - Ecology

Consultee	Comments	Response
<p>Warwickshire County Council - Planning and Development</p>	<p>a) The reference to greater horseshoe bats in the paragraph should be altered to a species more relevant to Warwickshire, for example lesser horseshoe.</p> <p>b) The County Councils Ecology Service has conducted surveys on the presence of great crested newt surveys as part of the road re-alignment of the motorway junction 12. The survey confirmed the presence of great crested newt in the large pond at the end of the track adjacent to the water facility to the south of the application area. The report on findings can be made available on request.</p> <p>c) The council supports the objective for a net biodiversity gain objective.</p> <p>d) The council encourages the opportunity to create a substantial green land bridge over the M40 has not been shown on Figure 17: Opportunities Plan or other figures later in the document. This opportunity was raised by a number of parties in the consultation process. The council will not insist on such a feature, but would like the opportunity to be recognised and at least positively explored.</p> <p>e) The council would welcome the opportunity to comment on the Green Infrastructure document referenced within the SPD.</p> <p>f) The County Council suggest that photo montage is submitted, with potential assistance, to illustrate the opportunity of a green land bridge over the M40.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Comments noted. It is not felt to be appropriate to specify the inclusion of such a feature, although it might be considered in the event that this proved to be necessary to secure the requirement of net biodiversity benefit.</p> <p>Noted.</p> <p>See comment above.</p>
<p>Woodland Trust</p>	<p>The New Settlement Proposal affects the ancient woodland of Gaydon Coppice and Chesterton Wood and both these sites therefore require full protection. The Stratford on Avon Core Strategy (submission draft June 2014) proposed Policy CS.5 on Landscape clearly states (sub-para C) -</p> <p>'Due to the quality of ancient semi-natural woodland and aged/veteran trees, particularly in the Forest of Arden, and their</p>	<p>All the generic matters referred to are accepted as</p>

relative scarcity elsewhere in the District, no development will be permitted that would lead to their loss or damage’.

Paragraph 3.6 Ecology

The Woodland Trust is particularly concerned about the following:

- Intensification of the recreational activity of humans and their pets cause disturbance to the habitats of breeding birds, vegetation damage, litter, and fire damage.
- There can be changes to the hydrology altering ground water and surface water quantities. Also the introduction of water run offs from urban development will result in changes to the characteristics and quality of the surface water as a result of pollution/contamination etc.
- Where the wood edge overhangs gardens, branches and even whole trees can be indiscriminately lopped/felled, causing reduction of the woodland canopy.
- There will inevitably be safety issues in respect of trees adjoining public areas and buildings, which will be threatening to the longer-term retention of such trees.
- Where gardens abut woodland or the site is readily accessible to nearby housing there is an unfortunate tendency for garden waste to be dumped in woodland and for adjacent landowners to extend garden areas into the woodland.
- The chemical effects of housing construction impacts upon the woodland during the construction period and as an ongoing effect from development. Construction involves the storage, creation and use of a range of chemical substances hazardous to the environment, such as petrochemicals and cement dust.
- Following building completion and occupancy, a range of ongoing affects may impact upon nearby woodland, such as the use and disposal of pesticides associated with domestic gardening. As a result we would expect to see buffer zones in this instance considerably in excess of 15m, preferably 100m.

We would like to see these matters directly addressed in the SPD.

being ones that will need to be considered when more detailed proposals are formulated into a planning application. They are not, however, considered as being necessary to be incorporated into the text of the SPD.

The SPD has been revised to clarify that all buffer zones to ancient woodland must be at least 15m wide. If there is justification for a wider buffer zone, this will become apparent via more detailed design work.

However we are pleased to see the recommendation in the draft SPD to follow Natural England's and the Forestry Commission's Standing Advice for Ancient Woodland and Veteran Trees...and in particular the proposed buffer for both Gaydon Coppice and Chesterton Wood. It is, however, important that this buffer should surround the whole wood and should be a minimum of 15m, preferably considerably more. In their Standing Advice, Natural England note that "Development must be kept as far as possible from ancient woodland, with a buffer area maintained between the ancient woodland and any development boundary. An appropriate buffer area will depend on the local circumstances and the type of development. In a planning case in West Sussex the Secretary of State supported the arguments for a 15m buffer around the affected ancient woodland, but larger buffers may be required".

It is also important that these ancient woodlands are managed appropriately as recreational assets, given the likely increased visitor pressure on them resulting from the development.

Lighthorne Heath Parish Council

Another failing of the SPD is that it provides no information whatsoever for the 100Ha of proposed industrial development to the South of the GLH site which still remains within the GLH curtilage within the Draft Core Strategy as submitted. This accounts for a third of the total GLH proposal and yet this Parish Council and the other Parish Councils continue to be 'kept in the dark' about the true intentions of JLR who intend to develop the site and indeed have since purchased small parcels outright. This matter has been raised by all four affected Parishes with the Jaguar Land Rover Community Liaison Group but they have not been forthcoming. In ecological terms this is a serious failing because that site abuts Gaydon Coppice, covers an extensive landfill area which will require remediation and impacts visually and environmentally on the village of Gaydon to the South West.

The quarry to the West of the B4100, Chesterton Wood, Gaydon Coppice and Old Syche provide interconnected havens for a

Comments noted and issues raised have all been taken into account in preparing the SPD.

The aim is to enhance these identified links through the creation of new habitat within the policy area, as described in the SPD.

	<p>variety of flora and fauna and the introduction of urban infrastructure to the site will ultimately “ring fence” the wildlife</p> <p>breeding and feeding, and will prevent the cross fertilization of species and deny key foraging areas for the migrating bird population who annually visit the quarry and Old Syche.</p> <p>The developer intent to create yet another “urban village” is quite clear in his statement that “The B4100 will be re-characterised to form an urban space with a speed reduction of 30mph” This Parish Council objects strongly to this approach which could be used to describe any suburban extension throughout the country when, should the GLH proposal get the go ahead, here is a great opportunity to “raise the bar” and develop a unique environmentally sustainable environment which might, just might, attract a new type of village settlement for the professional classes employed by the motor industry which has chosen Lighthorne Heath as its new host.</p>	<p>The commentary within the SPD on the treatment of the B4100 has been extended and clarified to reflect the feedback received.</p>
<p>Sarah Vaughan - Owner of Chesterton Wood</p>	<p>Page 34 Where is the top half of the plan?</p> <p>Page 35 What about the recommendations from Warwickshire Wildlife trust? Buffer of 15m is not enough for Chesterton wood and no size has been indicated for Gaydon Coppice.</p> <p>Page 35 I disagree that any green corridors will offer a net gain in biodiversity. The field next to Chesterton Wood is an important foraging area for all wildlife. The quarry also. The addition of access roads between the latter and Chesterton Wood will effectively fence in wildlife. Street lighting will deter bats and birds to cross the area to get to their feeding grounds at the quarry.</p> <p>There is no statement of how to prevent wood theft and vandalism and trespassing- how will this be mitigated or resolved?</p>	<p>The plan properly identifies the issues within the policy area covered by the SPD.</p> <p>The text has been revised to state “at least 15m”, with the required buffer to be determined in each specific instance.</p> <p>Comments noted.</p> <p>A planning policy document cannot prevent such activity.</p> <p>No.</p>

	<p>Can the SPD guarantee that no houses will have any wood burning stoves or open Fireplaces?</p>	
<p>Lighthorne Parish Council</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 50</p>	<p>Chesterton Woods - There should be a 200m buffer to the woods given its conservation status and the significant number of protected species within the woods and depending upon it. Pollution in all forms including light would be devastating if there was any development any closer. Warwickshire Wildlife Trust's recommendations should be given full weight.</p> <p>Light re: residences - specifics are needed re: how light spillage will be prevented. There is insufficient detail to be able to comment meaningfully.</p> <p>Ecology - If the habitat survey found no major constraints, then it clearly was not comprehensive enough and should be done again properly. The green corridors proposed will not offer a net gain for biodiversity. Old Sych, for example, is essential for the survival of multiple species of flora, fauna and wildlife. It is a vital interconnecting area for Chesterton Woods and the old quarry. It is an important foraging area for all wildlife. Any development on this part of the site would be devastating to all those who depend upon it. Once again there is insufficient detail to be able to comment meaningfully in any event.</p>	<p>Currently there is no evidence to support this statement. It is not backed up by the responses from the statutory bodies.</p> <p>The SPD text has been extended to more fully specify the issues to be addressed. How they are addressed is a matter for individual applicants.</p> <p>The aim is to enhance these identified links through the creation of new habitat within the policy area, as described in the SPD.</p>
<p>Chesterton and Kingston Parish Meeting</p>	<p>Figure 14 "Ecology Plan" Page 34 where is the top half of the plan?</p> <p>Page 35 What about the recommendations from Warwickshire Wildlife Trust? Buffer of 15m is not enough for Chesterton Wood and no size has been indicated for Gaydon Coppice.</p> <p>We disagree that any green corridors will offer a net gain in biodiversity. The field next to Chesterton Wood is an important foraging area for all wildlife. Deer in particular forage on the Old Syche. The quarry also. The addition of access roads between</p>	<p>The plan properly identifies the issues within the policy area covered by the SPD.</p> <p>As comments above.</p> <p>As comments above.</p>

	<p>the latter and Chesterton Wood will effectively fence in wildlife. Street lighting will deter bats and birds to cross the area to get to their feeding grounds at the quarry.</p> <p>There is no statement of how to prevent wood theft and vandalism and trespassing - how will this be mitigated or resolved’?</p> <p>Can the SPD guarantee that no houses will have any wood burning stoves or open fireplaces.</p>	<p>A planning policy document cannot prevent such activity.</p> <p>No.</p>
<p>Natural England</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 51</p>	<p>Green Infrastructure Strategy</p> <p>Natural England consider the incorporation of high quality, sustainable and multifunctional greenspace within built development can provide a range of economic, environmental and social benefits and is fundamental to the creation of sustainable communities.</p> <p>Green infrastructure (GI) can perform a range of functions including improved flood risk management, provision of accessible green space, climate change adaptation and biodiversity enhancement. GI can improve connectivity to other green spaces, provide opportunities for recreation, promote sustainable transport and enhance landscape character.</p> <p>We are therefore supportive of the aims of the proposed Green Infrastructure Strategy, as it will provide a variety of natural habitats, a net gain in biodiversity and recreational opportunities for future residents, such as the inclusion of sports pitches and allotments. It will also retain existing habitats, such as areas of deciduous woodland (Gaydon Coppice), hedgerow and ponds, which are important for preserving priority habitat and protecting species such as commuting bats. We also note the incorporation of SuDs in the GI strategy, which will be beneficial for the water resource management of the site.</p> <p>We would welcome the use of the green infrastructure to include the delivery of priority habitats, as listed in Section 41 of the Natural Environmental and Rural Communities Act 2006,</p>	<p>Support noted.</p> <p>Accepted and new text introduced accordingly (see section 5.6).</p>

	<p>contributing to national and local targets. This could include habitats such as unimproved grassland, broadleaved woodland and ponds.</p> <p>Ancient woodland We note the intention for a 15m buffer around the ancient woodland at Gaydon Coppice and Chesterton Wood to be made up of undeveloped land, measured from tree canopies, reinforced by native shrub and tree planting. Natural England would like to point out 15m is a minimum requirement and would encourage further protection and enhancement around the areas of ancient woodland. We would welcome a larger buffer at the north west of the site between Chesterton Wood and residential development as indicated on the opportunities plan (figure 18). We would also encourage buffers larger than 10m around existing woodland and habitats, which could be incorporated into the GI network.</p>	<p>Accepted and text altered to clarify that 15m is a minimum figure.</p>
<p>Page 52 aydon Parish Council</p>	<p>No mention is made of schemes to facilitate migration of species through the entire site from north to south.</p>	<p>This is considered to be implicit in the many references to the need for a site-wide approach.</p>

3.7 - Flood Risk and Drainage

Consultee	Comments	Response
Hugh Conway - Gaydon Resident	Flood Risk and Drainage - Flooding is a major concern of the residents of Gaydon. A number of householders on Kineton and Church Roads were flooded out of their properties as recently as 2010 — not for the first time we should add. Gaydon lies at a lower level than the proposed development. Whilst this issue has been acknowledged by SDC it is has to be stressed that the combined sewer system in Gaydon is totally inadequate and a health hazard. The risk will remain until the drainage system is brought up to modern standards.	Comments noted.
Warwickshire County Council - Planning and Development	Although we will make site specific comments on the merits of each planning application, however, consideration should be made to an overall Drainage Strategy that looks at the whole site. This will allow the establishment of features such as blue/green corridors through the site and prevent a fragmented approach for individual parcels of land.	Agreed – the SPD has been revised to seek this.
Highways Agency	<p>This section should confirm that there must be no discharge of drainage into the motorway surface water drainage system, arising from future development.</p> <p>Given that Tach Brook passes beneath the M40 motorway in a 600mm diameter culvert, the Highways Agency will have an interest in the design of any future surface water discharge system and will seek to ensure that the existing culvert is adequate. Similarly, noting that foul sewage is to be taken to the Longbridge Treatment Works and will most likely require a crossing of the M40, the Highways Agency will expect to be engaged in any future drainage strategy or detailed design.</p> <p>In both these matters, the need to scope the level of analysis and to engage with the Highways Agency in defining any mitigation measures should be noted within the SPD.</p>	<p>Agreed – text inserted.</p> <p>Noted.</p> <p>Agreed – text inserted.</p>

Lighthorne Parish Council	What mitigation is proposed exactly? There is insufficient detail to be able to comment meaningfully.	The detail provided is considered appropriate for this document.
Gaydon Parish Council	We were pleased to see acknowledgement of flooding issues due to surface water drainage within Gaydon and note the three SUDS ponds within the green triangle as mitigation measures against this. We consider this land is an essential mitigation measure for the village against noise, light, and air pollution emanating from the dual carriageway.	Comments noted.

3.8 - Utilities

Consultee	Comments	Response
Chesterton and Kingston Parish Meeting	Figure 16 "M40 BUND SECTION" is misleading and takes no account of the sloping topography mentioned earlier from north west to south east across the north eastern part of the site.	Noted – see earlier comments in relation to site topography.

3.9 - Noise

Consultee	Comments	Response
Hugh Conway - Gaydon Resident	The noise from the M40 has to be experienced to be believed. Mitigation measures to reduce noise, air and light pollution are needed.	Need for mitigation is agreed.
Lighthorne Heath Parish Council	<p>The representatives at the GLH Public Consultation Friday 27th February and Saturday 28th February 2015 advised that the noise study was based on a 7 day period using static devices, which provided a definitive result. There appears to be no recognition of varying factors, e.g. the prevailing West wind would produce a successful result over that period, however a North Easterly wind would produce dramatically different results. The Planning Inspector was advised of this matter during his Examination in Public he agreed to walk through the site via the local public footpaths in order to experience the extreme noise levels generated by the busy M40 motorway.</p> <p>The possibility of the adverse effect of nitrous oxide pollutants so close to a busy motorway is another concern which does not appear to have been taken into consideration in the SPD, despite previous submissions by this Parish Council.</p>	<p>The role of the SPD is to identify an issue or constraint that needs to be tackled and to set the context for future work that will respond to that need. Section 3.9, as revised, is considered to provide a robust basis for future work.</p> <p>See section 3.10 on Air Quality – the evidence on local conditions does not support the need for additional analysis.</p>
Highways Agency	<p>The Highways Agency notes the intention to provide a substantial landscape bund along the boundary with the M40 motorway in order to mitigate noise impacts over time. Whilst a typical cross-section for the landscape bund is provided, it is not clear from this whether additional tree planting is intended within the highways boundary; it should be noted that the Highways Agency will not allow any such tree planting within the boundary.</p> <p>The Highways Agency will also need to be assured that the noise protection to be provided will ensure that current noise regulations are not breached.</p>	<p>Noted. This is not proposed.</p> <p>Noted.</p>

The Highways Agency will have an interest in the design of the proposed landscape bund adjacent to the motorway boundary.

Accepted.

It should be noted that the provision of interceptor drainage will be necessary to ensure that there is no surface water run-off from the bund onto the motorway — as there must be no discharge of interceptor drainage into the motorway surface water drainage system.

Accepted – text added accordingly.

<p>Lighthorne Parish Council</p>	<p>There is much use of 'should' but no specific detail — what exactly will be done and where? How will Lighthorne be protected from noise generated from the new settlement? What guarantees are given that the land movements required for the noise bund won't fundamentally and irrevocably change the topography of this historic area? There is insufficient detail to be able to comment meaningfully.</p>	<p>Comments noted. No specific change to the SPD is considered necessary.</p>
<p>Chesterton and Kingston Parish Meeting</p>	<p>The bund will be totally inadequate based on the topography of the site. What happens at the northern tip of the bund? The noise problem on the site will be a major factor.</p>	<p>Noise is acknowledged as a significant factor and the SPD sets out clearly the standards against which the proposed mitigation will be judged.</p>
<p>Gaydon Parish Council</p>	<p>We have already stated that we regard as essential the noise bund protecting part of the site from noise pollution to be extended southwards to abut the B4451. In addition, given the close proximity of the new road to the village we would require mitigation measures to protect the village from noise, air and light pollution emanating from this.</p>	<p>The bund is proposed as extending to the southern boundary of the site. These matters relate to the public highway that is already under construction and are outside the scope of the SPD.</p>

3.10 - Air Quality

Consultee	Comments	Response
Highways England	<p>Whilst the site is not within an Air Quality Management Area (AQMA) and background concentrations are currently well within the air quality standards for human health, the SPD indicates that due to the proximity of the development site to the motorway, ambient NO₂ concentrations will need to be monitored. The Highways Agency will need to be assured that the developments on the site will not be detrimentally affected by vehicle emissions arising from the motorway.</p>	Noted.
Lighthorne Parish Council	<p>Given known air particulate pollution generated by motorways and very heavily used roads, there should be no family housing, accommodation for the elderly or health/education facilities within 200m of the B4100 or M40. We refer to the House of Commons Environmental Audit Committee's Action of Air Quality Report published 8th December 2014. We would ask close consideration be given to this report as a whole, but highlight Recommendation para. 19 page 42 which recommends that "the Government should issue NPPF guidance which makes clearer the great importance of protecting good quality air including protecting green spaces in development planning. Specifically, the NPPF should make it impossible to build new schools, care homes or health clinics near existing air pollution hot spots".</p> <p>Contrary to views expressed by the proposed developers on 28th February, it is NOT an acceptable standpoint that "it's the countryside, it can cope with more pollution". There is insufficient detail to be able to comment meaningfully without more information, but we would argue that a linear site sandwiched between and adjoining busy motorway and a busy arterial road, the B4100 (Which would also be upgraded to cope with the additional transport capacity required) can only be described as an existing air pollution hot spot.</p>	<p>The evidence does not support this statement.</p> <p>The recommendations set out in this document have been considered. The current and anticipated future air quality is such that the site cannot properly be described as an "air pollution hot spot".</p>

<p>Chesterton and Kingston Parish Meeting</p>	<p>The current air quality standards are being challenged and the NO₂ concentrations are now being seen to lead to respiratory related deaths in towns and cities. London Oxford Street is more polluted with NO₂ than Beijing. Warwick has a major traffic related air quality problem.</p> <p>Legislation is likely to impact NO₂ emissions and the diesel engine. We can envisage laws to ban schools and hospitals at least in high NO₂ areas. There will be future compensation claims and GLH will be prime for it.</p>	<p>Noted, but not relevant to the conditions at this location.</p>
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3.12 Opportunities

Consultee	Comments	Response
Sarah Vaughan - Owner of Chesterton Wood	Sports pitches - what about noise and light pollution from these affecting the nature reserve and Lighthorne village.	Any lighting provided would need to have regard to these constraints. No significant noise is anticipated.
Chesterton and Kingston Parish Meeting	Figure 18 "Opportunities plan" shows a pub/restaurant adjacent to an Ancient Woodland. This is totally acceptable. This is repeated on Page 51 under Masterplan Principles.	The nature and location of the potential gateway feature has been revised in the new document.
Gaydon Parish Council	The lack of green infrastructure and footpaths etc. through the allocated 100 hectares for JLR is glaring. Migration paths need to be illustrated. Specifically designated cycleways and footpaths allowing interconnection with the off road network need to be illustrated and provided for. Given the environmental sensitivity of the site with regard to the Beacon at Burton Dassett and in the absence of any JLR plans the potential for a landmark building on the industrial site would appear to be misplaced and should be deleted from this document.	It is accepted that the illustrative plans for the 'JLR' land are less developed. This is reflective of the uncertainty that continues to surround the precise forms of development that will be proposed. However, the SPD is now more explicit about the need for a whole-site approach to (inter alia) green infrastructure provision. The possibility of including a landmark building is felt to be acceptable.

4.0 - Vision and Principles

Consultee	Comments	Response
Mrs J Hargis - Wellesbourne Resident	The clear strategic planning on GLH is positive for SDC communities as a whole. The phasing is important, and should be clearly emphasised - currently we have too much building that takes no account of phasing and causes much stress because of the noise and traffic pollution that increases for those living near to such developments.	Comments noted.
Hugh Conway - Gaydon Resident Page 61	<p>The lack of green infrastructure and footpaths etc. through the allocated 100 hectares for JLR is a missed opportunity. Specifically designated cycleways and footpaths allowing interconnection with the off road network need to be illustrated and provided for. JLR and the Heritage Centre have cycle to work policies and this should be taken into account.</p> <p>Given the environmental sensitivity of the site with regard to the Beacon at Burton Dassett the potential for a landmark building on the industrial site should be rejected.</p> <p>The Housing development will be poorly connected and have few facilities: it is difficult to see the vision in this.</p> <p>We are especially concerned at the lack of clarity with regard to the stopped up roads and the risks associated with fly tipping and fly parking within them.</p>	<p>This is a detailed issue that should be addressed at application stage.</p> <p>At this stage there is insufficient information to justify rejecting the aspiration to include a landmark building.</p> <p>This statement does not accurately reflect the proposals for the site.</p> <p>See previous comments on this concern.</p>
IM Properties Development Limited	Page 47 "Quality of Housing ·Achieve a Building for Life Award" Due to changes associated with Building for Life 12 this should read " <i>Aim to achieve a Built for Life Commendation</i> "	Accepted – text to be updated.

<p>Lighthorne Heath Parish Council</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 62</p>	<p>Whilst Lighthorne Heath Parish Council welcomes the revision of the Vision and Principle statement (p44), feedback from the Beattie Communication Consultation event at Lighthorne Heath Primary School on 27th & 28th February 2015, suggests that the improved infrastructure will be limited, and there appears to be little "on offer" for the village of Lighthorne Heath itself.</p> <p>In conversation with Brookbanks Consulting, acting on behalf of the Developer, it was discovered that there were plans for a "Parish Fund" for the local Parishes of Lighthorne Heath, Gaydon, Lighthorne, Bishops Itchington and Kington for use in addition to CIL receipts. This scheme has been successfully introduced for the new village at Swindon to the East of the Honda plant. Lighthorne Heath Parish Council recognise this would be a key aspect of the proposal and request that full details are made available to all of the four Parishes directly affected by the GLH proposal, i.e. Lighthorne Heath, Chesterton & Kingston Parish Meeting, Lighthorne and Gaydon.</p> <p>Lighthorne Heath Parish Council also considers that this informal consultation is premature, particularly in the light of the Planning Inspector's Interim Conclusions which deems "that the CS is not sound as it stands". (Inspector's Interim Conclusions on the Core Strategy, 18th March 2015, p 62).</p>	<p>Assuming the Vision is confirmed, the Council will seek to bring about that vision through on-going negotiations to influence the delivery of the overall proposals.</p> <p>Comments noted – the action required lies outside the scope of the SPD.</p> <p>Not accepted – see previous comments.</p>
<p>Gladman Developments</p>	<p>The draft SPD outlines a vision and series of principles for GLH. At this stage Gladman have no specific comments in relation to this, but note that the Council need to ensure that the proposals are capable of achieving the desired vision and that the two are effectively aligned. Gladman reserve the right to make further comments on this element of the draft SPD to any further consultation exercises.</p>	<p>Noted.</p>
<p>Gaydon Parish Council</p>	<p>Vision is good but unfortunately cannot be fulfilled here: this document is a vision based on preconceived ideas and not founded on geographical principles and site constraints (limited width of site constrained by existing developments and a motorway). This is a poorly connected housing development with</p>	<p>The site is naturally constrained and further significant development is not envisaged beyond its proposed boundaries. It is a well-connected site in the context of this rural district.</p>

a few facilities: certainly no great vision of a new town that has room for development and enrichment in the decades to come.

There are plenty of attractive words but little concrete commitment: possibly wise in view of inspector's comments but not reassuring to Gaydon Parish Council. The lack of clarity with regard to the stopped up roads and the risks associated with fly tipping and fly parking within them just adds to our sense of doubt. Promises of open space to the north of Gaydon need to be firmed up. Does SDC means a stopped up road with issues about access to the land and houses along it with lack of landscaping and an air of general redundancy and at risk of fly parking?

We do not accept that this preserves our rural setting. Much work needs to be done with the landscaping of this area and also introducing measures so that people feel safe using it. GPC has voiced concerns regarding fly parking and tipping on the two stopped up roads on many occasions and has not received satisfactory replies.

Given the traffic problems that Gaydon experiences on a daily basis we find the statement regarding sustainable transport risible. If the traffic is not moving then the buses are not moving.

The principle that relates to these comments has been re-worded to re-inforce the importance of achieving a comprehensive approach.

As above.

Comment noted.

4.1 - The Vision

Consultee

Comments

Response

Stephen Groves - Stratford Resident Consultee	Comments	Response
Warwickshire and West Mercia Police Page 65	<p>None of us want mass building of houses in our district. However with population growth, changes in demographics, everyone living longer etc. I appreciate we have to accept more building somewhere. My preference would be to build this in our cities as they have the employment to avoid travel being necessary. If we do need to accept 10k of houses in SOA district I agree this is by far the best solution rather than more urban sprawl in our market towns whose character is being lost. The plans included in this document tick most of the boxes for me: good employment with JLR, minimal disruption to existing population, minimal environmental damage for the district, high quality proposal, great public transport opportunity with the railway, and good access to the M40. Gets my support. Appreciate it will not be great for the existing local residents though!</p>	General support noted.
Lighthorne Parish Council	<p>Neither the vision statement nor the associated bullet points make any reference to the need for a safe and secure community. This could be remedied by the insertion of an additional bullet point as follows:</p> <ul style="list-style-type: none"> • Provide a safe and secure environment for local communities and businesses. 	Accepted – text to be updated.
Chesterton and Kingston Parish Meeting	<p><u>Integration of Lighthorne Heath</u> - If there is a genuine wish to integrate Lighthorne Heath into the new settlement, then the new settlement should be called Lighthorne Heath. There can and will be no integration if they are 2 separate entities with 2 separate names.</p> <p>No mention of Chesterton and Kingston in the Vision.</p>	<p>Comments noted – this is an issue that will be determined via a separate process.</p> <p>This point has been considered both previously and as a result of this comment, but it is notable that no specific addition has been suggested.</p>

4.2 - Placemaking Principles

Warwickshire and West Mercia Police	WP/WMP fully support the bullet points included under the 'Community Safety' heading. In particular, we are pleased to see the reference to Secured By Design, which is the nationally recognised standard for designing out crime in new developments.	Support noted.
Lighthorne Parish Council	The Placemaking Principles contain no substance and are nothing more than PR whitewashing. There is insufficient detail to be able to comment meaningfully.	Comment noted but not accepted. The principles establish clear expectations for the new settlement.
Alison Heine - Heine Planning	For all the talk of providing a mix of residential units by tenure, design, type, price etc. I can find no provision for Travellers? This area is well frequented by Travellers. If the Council is not prepared to include provision for Travellers as part of new 3000 dwelling schemes such as this they should stop refusing consents elsewhere.	Comments noted. The Core Strategy Proposal GLH does not include provision for Travellers at this location.

5.0 - Illustrative Masterplan

Consultee

Comments

Response

Lynne Pearson -
Northend Resident

There is no detail on parking, a vital consideration when 3,000 homes, shopping and community facilities are being planned. From details, illustrations etc. many residents will not have parking facilities attached to their homes. There will be three and four storey developments, none of which seem to have been allocated parking areas on the plans.

Parking is briefly mentioned on page 60, The Street Hierarchy point 4 - the street Hierarchy has been designed to accommodate a 'certain amount of on street parking, which brings activity to the street scene and helps traffic calming'. Another way of saying the roads will be narrowed by on street parking to intentionally slow the traffic flow - leading to the conclusion that streets could be dangerous for pedestrians, especially children. In high density housing area with little or no parking facilities drivers park their vehicles on grassy areas, this needs to be addressed before going any further. It is now deemed as the norm for families to have at least 2 cars per household. With 3,000 homes there will be upwards of 3,000 vehicles, more likely 6,000 on the housing estate. Where is the provision for them in the plan?

Please stop referring to this development as a village. What is being planned is an urban area the size of a town. The development will swamp and ruin the local area, little advantage can be seen for current local residents. The Construction process will all but wipe out local wild life and with the proposed population of 3,000 residential units, a conservative estimate of 6,000 to 10,000+ people will be imported into a currently rural setting. The proposed shopping and community facilities are inadequate for such a large density of population being dumped in a rural area on B class and C class roads and it is going to cause traffic chaos, pollution and many social problems.

This is a detailed matter to be considered at application stage, but appropriate parking will be provided to serve all aspects of the development.

See above.

Comments noted but not agreed.

Steve Taylor - Upper
Tysoe Resident

The illustrative Masterplan shows the B4100 from the Gaydon road traffic island being closed off and turned into some sort of giant cycleway. The proposed turning head for access to existing

See previous comments about the accepted need for a comprehensive treatment of this area.

	<p>properties must be extended some 100m towards the JLR Heritage Centre and extended away from the island to reach our existing drop-kerb field gate access serving the field next to JLR. I have no objection to the turning head being re-located beyond the drop-kerb area for pedestrian / cycle use, however the public highway must be maintained in its present form up to this point, to facilitate my client's full, existing, vehicular access at all times and for all purposes.</p>	
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<p>Hugh Conway - Gaydon Resident</p>	<p>We need to understand the promises of open spaces to the north of Gaydon and receive firm commitments in their regard. We understand that SDC has given certain assurances regarding the triangle of land being a public open space. However we think it may be preferable that this whole area given over to planting and mitigation measures to reduce the impact of the new road. It would also be less of a maintenance problem and more attractive.</p>	<p>As above.</p>
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<p>Page 69 Mallam Land Management</p>	<p>Proposal GLH of the Proposed Submission Core Strategy (CS) requires the delivery of approximately 3,000 homes. As this is a significant proportion of the likely housing requirement for the District, it is important the SPD is able to clearly demonstrate the total number of homes can be suitably accommodated within the site. The Concept Masterplan identifies areas as suitable for residential, but does not provide details as to the quantum of land considered suitable. Notwithstanding the detail provided as to densities of development (of which concerns are raised below), it is not possible to conclude whether the SPD in this form will enable the delivery of the 3,000 homes.</p>	<p>Comments noted. Masterplan Principle 10 has been revised to clarify the net residential area and average residential density.</p>
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<p>Aston Martin Lagonda Ltd</p>	<p>In order to be consistent with other figures and illustrations of the Concept Masterplan, the plan shown on page 62 of the draft SPD should be amended to identify the strategic future expansion of AML.</p>	<p>Agreed – plan altered accordingly.</p>
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<p>IM Properties Development Limited</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 70</p>	<p>Page 48-53, page 56 illustrative Masterplan drawings and text reference page 58. Within Zone 4, the spine road access point needs to be relocated approximately 200m to the south-east in order to align with the topography, so that the spine road and B4100 meet at the same level.</p> <p>"A gateway feature of a pub or restaurant could mark the northern entrance to the village" should read "A gateway feature such as a pub, cafe/restaurant or community building could mark the northern entrance to the village."</p> <p>This gateway feature would need to be relocated alongside the spine road access.</p> <p>Page 74 Woodland Rise "The style of homes within this area should be more traditional". This sentence should be omitted to leave scope for the design to explore traditional and contemporary architecture as the Masterplan progresses.</p> <p>Page 76 Park Edge The SPD limits Park Edge to two storey development. However, solely 2 storey properties will not create a varied and interesting frontage to the development. In key parts of Zone 4 building heights could go up to 2.5 or 3 storeys, creating a strong frontage and enclosure to the open park edge.</p> <p>P76. The SPD should read: "Building Heights : Up to 3 stories"</p>	<p>Comment noted and plan revised accordingly.</p> <p>Accepted.</p> <p>Accepted in part – proposed that "should" be replaced by "is likely to".</p> <p>Accepted in part – text proposed to be altered to permit up to 2.5 storeys.</p>
<p>Highways Agency</p>	<p>It is noted that the proposed new northbound on-slip road to the motorway at Junction 12 is shown on the Masterplan for the JLR site. The implication may be taken from this diagram that the slip road is a requirement of the JLR element of the site rather than being required as any part of the wider development, including any residential elements. It should be clarified that this intervention has been identified as part of the STA work, and that further work will be necessary to inform the delivery of all development identified in the SPD.</p>	<p>Comments noted.</p>

	<p>The aspiration for buildings on the JLR allocation to be visible from the motorway is also noted. It will be important to ensure that future proposals do not, by virtue of their appearance or visual impact constitute a distraction or safety hazard to drivers on the M40.</p>	<p>Accepted.</p>
<p>Ramblers Association (Warwickshire Area)</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 71</p>	<p>The Ramblers' Association is a National Charity, working to safeguard footpaths, the countryside and places where people wish to walk, and as statutory consultees on path orders we welcome this opportunity to comment on the Public Rights of Way (PRoW) aspects of the Informal Consultation for the Gaydon/Lighthorne Heath, Draft Supplementary Planning Document.</p> <p>Our comments below are based on a comparison of the map of the Existing PRoW Network shown on page 26 of Section 3.0 (Site Constraints & Opportunities) with what remains of the PRoW Network show on the maps on pages 52 & 53 of Section 5.0 (Illustrative Master Plan) - plus the map on page 79 of Section 5.0 (Illustrative Master Plan - Jaguar Land Rover).</p> <p>We would not be satisfied with the proposed extinguishment of Public Bridleway SM180 through the Jaguar Land Rover site without an alternative being offered. We would suggest that in return for the extinguishment of Bridleway SM180 through the Jaguar Land Rover site, a new Bridleway running from the Bridleway Bridge over the M40, around the eastern side of the Jaguar Land Rover site be provided, to join with the abandoned section of the B4451, which could then be used as a bridleway into Gaydon Village. This would seem to us to make good sense as walkers or riders coming from Harbury on the Centenary Way would more likely be making for the old Gaydon Village than the Lighthorne end of the site. SM 180 already follows the first 300m of this route south-east from the Bridge anyway, but we would ask that it be moved further back from the motorway and well screened from both the motorway and the industrial site. It would also require an underpass or overbridge to cross the rerouted B4451, as an equestrian crossing at grade would not be suitable for this potentially busy road. The diversion could then re-join the</p>	<p>Comments noted. Any proposed diversion of existing PRoW will need to be the subject of a specific application setting out the intended detail.</p>

	<p>old B4451 as a bridleway into Gaydon Village.</p> <p>Also, we are not happy with the excessive re-routing of Public Bridleway SM81 around the north- west end of the Jaguar Land Rover site, as this would result in a lengthy diversion (750m) alongside the M40 motorway. While we agree that it is desirable that this Bridleway should also provide a link between the two Bridleway Bridges over the M40, we would prefer that it was situated further back and well screened from the motorway.</p>	Comments noted, as above.
Gladman Developments	The draft SPD provides a section on an illustrative Masterplan (section 5.0). This chapter of the consultation document splits the site into various 'character areas' and provides further detail on each of these. At this stage Gladman have no specific comments on the illustrative Masterplan, however reserve the right to make comments on this in response to further consultation exercises.	Noted.
<p>Page 72</p> <p>Westerton and Kingston Parish Meeting</p>	Pedestrian & Cyclists; in paragraphs 4 & 5 in this section, we require written confirmation that The Old Gated Road will be as a minimum re-gated and have access for cyclists and pedestrians only.	Such confirmation cannot be provided, but the importance of minimising traffic impacts on this road has been reinforced (see Masterplan Principle 3).
Gaydon Parish Council	<p>1. We think it inappropriate to build a "Landmark Building" directly in the sight line from the listed Beacon Tower at Burton Dassett.</p> <p>4. We welcome the noise bund being extended to the B4451.</p> <p>5. We welcome SDC acceptance of the triangle of land being a public open space. However given the paucity of accessible green spaces locally we think that sports facilities should be provided elsewhere and this whole area given over to planting and mitigation measures to reduce the impact of the new road.</p>	<p>At this stage there is insufficient information to justify rejecting the aspiration to include a landmark building.</p> <p>Noted.</p> <p>See revised Masterplan Principle 5.</p>

13. See comments under Vision and Principles 4. No mention is made of the stopped up B4451 at the same point to which the same comments pertain, regarding landscaping, safety, fly parking and tipping. Measures need to be planned and instigated between SDC and WCC. This is designated as a cycle route but with no clear means of safe crossing of the motorway bridge and also pedestrian crossing. This closing of a facility requires another provision elsewhere for crossing the M40 in order to satisfy targets for increased pedestrian and cycle use as stated in your policy.

15. The road scheme replaces a crossroad with a T junction. There will be congestion there. Surely it would be better not to have an access point to the 100 hectares at the same point.

17. The suggested bus route would appear to disadvantage the existing users already living in Lighthorne Heath. Surely it should cater for both?

As above.

Precise details will be agreed at application stage.

The importance of all properties, including those existing, being within 400m of the bus routes is accepted and is specified in the SPD.

5.1 - Concept Masterplan

Consultee

Comments

Response

Lighthorne Parish Council

Health Centre - the proposed facilities are too small, a larger plot is required. What guaranteed funding will there be from the developers for the building as well as leaving the plot vacant? Has there been liaison with NHS England about this specific site proposal and will they approve notional rent for GP services?

A written guarantee is required before this document can be approved.

Gateway feature or pub at north end of site — we object strongly to any such feature. It is entirely inappropriate on every level. A pub would encourage vandalism of Chesterton Wood by unlawful entry etc. A pub would have a devastating impact on The Antelope Pub in Lighthorne (the only daily facility in the village). This proposal is unacceptable and should be removed from the SPD.

Secondary School - if there is truly commitment to safe routes to school then children should be able to walk to school and the developers should fund a secondary school on site. Of the multi million pound profits to be made by the developers, they should be made to commit to a secondary school on site as 'bussing' children off site exacerbates traffic issues and safety issues.

It is not clear how this conclusion has been reached. The scale of the required facility will be determined through ongoing discussions with the relevant parties.
Yes.

Comments noted – the options available to create a gateway building have been restated and the facility would be provided adjacent to the (now relocated) spine road junction.

The proposed provision of secondary school places at Kineton HS is supported by WCC and the school itself. On-site provision is accepted as being not justified.

Sport England

The proposed open space indicated by number 5 on the indicative SPD Concept Masterplan may not necessarily represent the best location for formal sports in the proposed development to serve the future residents. A primary school with playing fields is proposed in the village centre; these playing fields could potentially be utilised for community use at weekends and in the evenings. Furthermore combining the school playing field land with other into one area will be beneficial as it will allow for a multi-sport site and help to ensure that the playing field land is financially sustainable in the future.

Playing Fields — it is inappropriate to put playing fields etc. in such close proximity to ponds containing great crested newts. There

Accepted – text revised.

The buffer distance is well in excess of 200m. The need to light the area with care is accepted. Any relocation of the playing fields to the 'town centre' would place alternative development pressure on their proposed location. The Council does not

	<p>should be a 200m buffer around those ponds. Noise and light pollution from these facilities would affect both the wildlife reserve and the conservation area of Lighthorne Village. These facilities should be relocated to the town centre and primary school areas.</p>	<p>endorse significant built development in that general area.</p>
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5.2 - Masterplan Principles

Consultee	Comments	Response
Tracie Byrne - Avon Dassett Resident	I see no reference to a requirement to have a Secondary School. As they have only listed one in the local area, which is well subscribed already, where do they envision older children going? Will they assist in investing in Kineton High School to expand or build a new one?	See comments above. A considerable investment at Kineton HS will be required.
Warwickshire and West Mercia Police	Under point 9 relating to a mixed use village centre the bullet points should include reference to a police office in order to be consistent with the text elsewhere in the SPD.	Agreed – text revised.
Stratford Voice	<ol style="list-style-type: none"> 1. The provision of sports pitches is shown at bottom right of the site plan page 50 - this is remote from new housing. 2. Cycle ways shown at page 52 - all cycle ways must be segregated from roads to avoid conflict and to encourage users of all ages. Safe cycle ways to school should be a priority. "Shared space" is not suitable in a new town. 	<p>Accepted. The text has been revised.</p> <p>See updated text at 5.3.</p>
NHS Property Services	Section 5 of the draft SPD The Illustrative Master Plan highlights that it is proposed that the health centre will be located within the main village centre which will be delivered within the first phase of the development. The health centre will be located within a community hub to include a meeting space, the police and health. Whilst we are in support of the health centre being located within the main village centre within a community hub, we would like to reiterate the point that the health centre must be provided within its own building, and not shared with the police.	Noted. This is as proposed.

5.3 - Movement and Access

Consultee	Comments	Response
Stratford Voice	<p>3. Para 5.3 we agree totally with the expressed wish to encourage travel other than by car- the words "a safe and convenient access for cars." is perhaps misleading- "safe" to whom?</p> <p>We are also concerned that the provision of adequate public transport is not guaranteed. There being no rail service option, we would seek stronger commitment from parties who would propose to operate and subsidise bus services.</p> <p>4. Paragraph headed Pedestrian and Cyclists page 59 needs more emphasis for safe off road provision.</p> <p>5. Paragraph headed Cycle paths on page 60 makes reference to calmed "safe routes" which enable cyclists to mix with vehicles- this shared space must be avoided with dedicated cycle paths across the site.</p>	<p>Text accepted as somewhat confused and has been revised.</p> <p>Comment noted. Precise routes and frequency of services will be subject to future negotiation.</p> <p>This section has been revised.</p> <p>This section now clarifies that the provision of dedicated cycle routes will prioritise cycling within the new community.</p>

<p>Gaydon Parish Council</p>	<p>There is nothing in this section which would encourage Gaydon residents to use alternatives other than private cars. Without additional provision of off road pedestrian, cycle and bridleways this would appear to be a nonstarter for the Parish. We fear that this also applies to the GLH development: very aspirational but nothing to back it up in terms of substance.</p> <p>We await with interest a plan for safe routes to Kineton School. The school bus uses the Kineton Road through the village and has been delayed due to traffic congestion. No responsible parent would encourage their child to cycle to school on this road.</p> <p>JLR Parking We have not seen much of this up until now. The kerbs are littered with yellow cones preventing inconsiderate parking across walkways. We await their plans with interest.</p>	<p>References to off-site footpath and cycle networks have been reinforced.</p> <p>Comments noted. It is an appropriate aspiration to seek to improve on the current circumstances.</p> <p>Noted.</p>
<p>Warwickshire County Council - Planning and Development</p>	<p>1. The final sentence of paragraph 1 on page 62 refers to an aspiration to achieve a high level of modal split (circa 20% to 30%). It might be better to phrase this as follows...<i>an aspiration to encourage a high proportion of trips to be undertaken by walk/cycle/bus and car sharing so that these modes make up circa 20% to 30% of overall mode share.</i></p> <p>Whilst we would support an ambitious mode share aspiration in principle, it is likely to be difficult to achieve in reality without substantial investment in bus services and financial incentives which encourage people to choose bus instead of car (e.g. through discounted ticketing).</p> <p>'Choose How You Move' is a WCC initiative which includes Car Share Warwickshire which is open to the general public - please see (http://carsharewarwickshire.liftshare.com/). We would request that the SPD provides a commitment to promote car sharing through this initiative as part of the Travel Plan proposals described on page 63.</p>	<p>The SPD seeks an ambitious mode share for public transport and future negotiations will be based on securing substantial investment to support this.</p> <p>Specific change to wording agreed and text updated.</p> <p>See above.</p> <p>Agreed – text revised.</p>

2. Consideration should also be given to providing some form of bus priority measures along the spine road (e.g. bus priority lanes and/or bus priority at traffic signals). These should be designed to enable buses to gain a competitive advantage by improving bus journey times from the site towards key destinations, the principal one being Leamington Spa.

3. We welcome the commitment to work with local (bus) operators and WCC as Highway Authority to develop the public transport strategy. However, the paragraph at the end of page 62 does not appear to fully reflect our stated aspirations for service frequency which we outlined to the development team at an initial meeting on 13 August 2013 as set out below:

New or enhanced express bus services would be required to provide (1) a minimum 15 minute frequency serving the development between 0600 – 1900 from Monday to Saturday,

(2) a minimum 30 minute frequency between 1900 - 2300 on Monday to Saturday and (3) a minimum 30 minute frequency between 0830 - 2300 on Sundays.

Initially, the promoter would be expected to provide a 30 minute service frequency during the early stages of development so that it becomes an established travel option for residents from the outset, (e.g. possibly upon the occupation of 100 dwellings).

The promoter would be expected to provide a 15 minute service frequency as more of the development is built-out and/or upon the opening of a possible park and ride facility (on A452 Europa Way).

4. Access to Kineton High School is discussed in the penultimate paragraph on page 64. Kineton Parish Council has expressed concern about existing traffic congestion problems in the village associated with students accessing this school by car and school bus/coach. The SPD should note our requirement that the developers will need to assess the extent to which their proposals would exacerbate these problems, and include details

Accepted – text revised.

Noted – text revised to make this a matter for negotiation via the application process.

Accepted – wording in SPD revised to clarify.

of an appropriate mitigation strategy which would need to be funded by the developer in the Transport Assessments which accompany planning applications for the site.

5. Whilst it should be the aim to design all new streets within the settlement to create low speeds and safe on-carriageway cycling conditions, the amount of traffic using the main Spine Road and the fact that it will be a bus route means that good quality off-carriageway cycling provision segregated from traffic is desirable to cater for many types of cyclists.

The Department for Transport's Local Transport Note 1/12 'Shared Use Routes for Pedestrians and Cyclists' recommends that a segregated footway / cycleway should ideally be a minimum width of 4 metres (2 metres for pedestrians and 2 metres for cyclists). Unsegregated footways / cycleways should be a minimum of 3 metres wide (this is the 'effective width' and 3.5m should be provided if the path is bound by vertical features i.e. boundary walls or is immediately adjacent to the carriageway,

i.e. no verge is provided. It is desirable to provide cycle tracks on both sides of the spine road, to enable easy access for all residents and to avoid the need to cross the road to access / leave the cycleway.

Accepted – wording revised.

5.4 - Character Areas

Consultee	Comments	Response
Lighthorne Parish Council	This is a rural community of small historic villages — the design of the proposed settlement should reflect this fact. There should be no accommodation taller than two storey anywhere on the site, especially not on the most elevated part opposite Lighthorne Heath. The proposed density of accommodation is more in keeping with an urban town rather than a rural location — the density of accommodation should be halved at least.	Not agreed. The design needs to produce a settlement of high quality and should respect, but without the need to copy, that to be found in the local area. The average density is considered modest at 37.5dph.

5.4 - Character Areas - 1. Village Centre

Consultee	Comments	Response
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Warwickshire and West Mercia Police	In the third paragraph, WP/WMP welcome the inclusion of a reference to a police office. Such a facility is essential in providing a safe and secure environment for local residents.	Noted.
<p>Lighthorne Parish Council</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 84</p>	<p>The use of the words "Village Centre" in the SPD is a misnomer and is not supported by this Parish Council. Lighthorne Heath is a "village" with approximately 300 houses and the largest of the four communities most affected by the GLH proposal. 3,000, or even 2,500 homes in the earlier stages of GLH, cannot be described as a village when it is indeed a town second only to Southam in this locality in size.</p> <p>The proposal set out in the SPD for a high density "village centre" with 3 storey town houses and 4 storey commercial premises is unacceptable to this Parish, especially given the elevated contour of its siting (@42m above the motorway). It is abundantly clear that the GLH proposal for up to 3,000 homes is barely viable unless such densities could be achieved, and what concerns this Parish is that the resultant "town centre", albeit with little mixed use employment, is out of keeping with such a rural setting which currently comprises of mainly Grade 3 unspoilt agricultural land. This is at odds with the vision we have set out in the preceding paragraph of a unique environmentally sustainable environment.</p>	<p>Noted.</p> <p>The average density is considered modest at 37.5dph. It is not inappropriate that there should be a variety of different character areas with varying densities and it is realistic to propose that those around the centre will be at the higher end of the density range. This does not compromise an environmentally sustainable approach.</p>
Stratford Voice	Page 65 The illustrative village centre plan is far too angular having all straight line streets. Firstly this would encourage vehicle speeding (even with road humps) and secondly provides a potentially boring village centre - there need to be turns and softer corners to provide interest.	Comments noted – the layout is purely illustrative and will be subject to ongoing discussions via the application process. The concept of providing a central square is however supported.

5.5 - Jaguar Land Rover

Consultee	Comments	Response
Mrs Jacqueline Harris - Wellesbourne Resident	<p>It seems a sensible planning to consider one of the largest companies operating in the area, and what their future requirements might be. However, from the various neighbourhood plans and other surveys it is clear that many people live in the district that do not work here. A further look at existing data may be relevant so that there is a clearer indication on whether the new settlement will be for people working locally, or as is already proven to be the case, living in the county and commuting (either is ok, but would benefit from being stated more explicitly).</p>	Comments noted.
Hugh Conway - Gaydon Resident Page 85	<p>Allocating 100 hectares of land to JLR is unsustainable. We have already referred to the adverse impact on the Listed Beacon Tower at Burton Dassett. Buildings on this land should have sustainability as a prerequisite. A landmark building is quite inappropriate for this site. If JLR has no firm plans for the site Stratford District Council should not be appearing to be offering carte blanche to do what it likes when this seems to be against democratic principles and against the interests of the local community.</p> <p>We do not believe that this development is sustainable on the grounds of both noise and air quality. On page 84 you state that you support renewable and low carbon energy. Here is an opportunity to practice what you preach.</p> <p>Whatever the outcome community interests should be served and compensated by the provision of appropriate community facilities and mitigating measures. All developers should be directed to provide these e.g. s106 agreements and Community infrastructure levy.</p>	<p>The principle of the proposed allocation is a matter for the Core Strategy, not the SPD. It has been endorsed by the Inspector in his Interim Conclusions.</p> <p>See previous comments re landmark building.</p> <p>Noted.</p> <p>These are not matters for the SPD.</p>

Gaydon Parish Council

Gaydon Parish Council opposes in principle the 100 hectares of land allocated to JLR. We have already referred to the adverse impact on the Listed Beacon Tower at Burton Dassett by any buildings on this land unless as a minimum they adhere to green sustainable building guidelines with for example green roofs. A landmark building visible from the M40 would have to be very tall to show above the bund and be seen from the M40 which is in a cutting and would be inappropriate for this site: very visible from the country park but not from those that JLR might intend to see it — M40 commuters. The SDC document albeit given that JLR say that they have no firm plans for this site seems to be offering carte blanche for whatever JLR want, a stance we find unacceptable.

We do not believe that this development is sustainable on the grounds of both noise and air quality and as already stated we think that it should be carbon neutral. On page 84 you state that you support renewable and low carbon energy. The principles applied on this site could help JLR reduce both JLR and SDC's sizable carbon footprint as set out on page 86 of the document and act as a flagship development. The picture on this page might suggest that JLR are diversifying into the production of bicycles!

This size of development brings financial implications for a small community. We would require sizable grant aid to meet these.

We would point out that page 79 of the draft SPD is the first time that 3 SUDS ponds appear in the green triangle between the dual carriageway and the stopped up B4100. Is this where you are suggesting sports pitches? It is essential that this land is used to protect the village and act as a green barrier between the proposed developments and the existing village of Gaydon.

Noted, but allocation is endorsed via the core Strategy.

See previous comments.

The SPD must be consistent with the Core Strategy proposal, which provides appropriate flexibility.

Noted.

Agreements will be reached to mitigate the impacts that are likely to arise from the development.

Noted. This is purely illustrative. See previous comments regarding the importance of a comprehensive approach.

5.6 - Landscape and Open Space

Consultee	Comments	Response
Sport England	<p>The statement: 'Details of the exact nature, location and quantum of open space will be determined through negotiations during a planning application process' is supported. The location, type and standard of facilities will need to be informed by an up-to-date Playing Pitch Strategy (PPS).</p> <p>The existing PPG17 Playing Pitch Strategy (PPS) will need to be updated to reflect the NPPF, the most up-to-date Sport England PPS guidance and to reflect the most up-to-date position for playing pitches in Stratford. Generally PPSs are considered out-of-date after three years without annual reviews. Future updates of the PPS will need to inform the quantum and location of playing pitches.</p> <p>Sport England will make further comments on new sports provision at pre-application and formal application stage.</p>	<p>Noted.</p> <p>A new PPS will be produced during the financial year 2015/16.</p>
Woodland Trust	<p>We are pleased to see the reference in Paragraph 3.6 to "<i>The green infrastructure strategy includes enhancement measures which will actively increase the habitat connectivity between Gaydon Coppice and Chesterton Wood, by planting of hedgerow and tree lines as part of the development</i>". We are also pleased to see the reference in Paragraph 5.6 to "<i>The development should have regard to Policy CS. 7 Natural Environment which states that development will be expected to contribute towards a resilient ecological network throughout the District that supports ecosystems and provides ecological security for wildlife, people, the economy and tourism.</i>"</p> <p>However we have some concern over the subsequent comment in Para 5.6 that "<i>Details of the exact nature, location and quantum of open space will be determined through negotiations during a planning application process</i>". We would like to see firm proposals included in this SPD in order that the strong thrust of this 'resilient ecological network' aspiration is not lost in the negotiation process.</p> <p>It is therefore important that the ancient woodlands of Gaydon</p>	<p>Noted.</p> <p>Noted, but see comments above from Sport England that support the SPD approach.</p> <p>The need for this is clearly established in the SPD.</p> <p>This is a matter to be pursued through the detail of a</p>

Coppice and Chesterton Wood are protected by, in addition to the buffers mentioned above, further open space retention, preferably of native tree planting. Our ecosystems are under increasing pressure from multiple factors, including climate change, increasing numbers of new pests and diseases, pollution, and intensive or inappropriate land management. Natural habitats are increasingly fragmented, and landscapes increasingly losing diversity in terms of structure, habitats and species.

The Government's **Forestry and Woodlands Policy Statement** (Jan 2013) places resilience and climate change at the core of its objectives (p.7)

*"**Protecting** the nation 's trees, woodlands and forests from increasing threats such as pests, diseases and climate change, **Improving** their resilience to these threats and their contribution to economic growth, people 's lives and nature, **Expanding** them to increase further their economic, social and environmental value"*

We therefore need to re-develop a resilient landscape, where resilience is the ability of habitats and species to respond to disturbance by resisting damage and recovering quickly. The last fifty years has seen a drift towards uniformity of structure and function of habitats across the country with the loss of the unique and different. A diverse landscape system with mixed species and structure and connections between habitats for all species is far better at resisting threats.

The need to develop resilient landscapes is more than just undertaking landscape scale activities for an individual species or habitat, and may require new levels of analysis both in grant planning and assessment. To do this, green space delivery should clearly align itself to the **Biodiversity 2020 strategy** (Defra, 2011) as well as the **Natural Environment White Paper** (The Natural Choice -Securing the value of nature, Defra, 2011) and **Making Space for Nature** (A review of England's Wildlife Sites and Ecological Network by Prof Sir John Lawton, Defra, 2011).

planning application.

This approach is strongly supported in the **Natural Environment White Paper** which clearly states: *"Our ambition is for a major increase in the area of woodland in England, better management of existing woodlands and a renewed commitment to conserving and restoring ancient woodlands. Forests and woodlands must play a full part in achieving a resilient and coherent ecological network across England"*

We would therefore like to see this SPD set out clearly the landscape and open space proposals that will prevent Gaydon Coppice and Chesterton Wood from becoming isolated and fragmented ancient woodland 'reserves'. This should encompass a genuine ecologically resilient network and not simply a few green corridor linkages paying lip service to the aspirations above.

The approach to be taken has been reinforced by the inclusion of a requirement for a site-wide approach to the provision of green and blue infrastructure (see section 3).

5.7 - Sustainable Urban Drainage - (SUDS)

Consultee	Comments	Response
Lighthorne Parish Council	Sewerage — guarantees and specifics must be provided regarding the 10 mile pipeline required to Longbridge. Has land been acquired, are CPOS required, where will it cross the M40 etc. etc.? There is insufficient detail to be able to comment meaningfully.	These works will be undertaken by STW under the statutory powers available to it.

5.8 - Community Infrastructure

Consultee	Comments	Response
<p data-bbox="58 280 342 375">Greg Woodall - Avon Valley Indoor Bowls Club</p>	<p data-bbox="413 280 1285 792">The Sport England Sports Facility Calculator (SFC) is a planning tool which helps to estimate the amount of demand for key community sports facilities that is created by a given population. Using 2011 population data, the requirement for indoor bowls facilities in Stratford District is 10.25 rinks which is currently served by 6 rinks at Welford on Avon and 6 rinks at Avon Valley. In the wider context, and given that Leamington Spa is the National Centre for lawn bowls, the calculated requirement for Warwick District is 9.13 rinks. However there is no indoor bowls facility in Warwick District and bowls players from all comers of Warwick District current play indoor bowls at Avon Valley. Combining the numbers gives a requirement for 19.38 rinks in Stratford and Warwick Districts. If Avon Valley were to close then the number of rinks in Stratford / Warwick would reduce to the 6 at Welford on Avon, which is in the remote south west of the combined Districts.</p> <p data-bbox="413 829 1285 1211">Leamington Spa is the national centre for lawn bowls and home of Bowls England. The outdoor bowls facilities at Victoria Park are some of the best in the country and the location of the National Championships. The Leamington Courier reported in January 2015 that the National Championships brought an economic benefit to the region of more than £2m in 2014. The GLH development brings the potential for a national standard indoor bowls arena, located within easy travelling distance of Leamington, to enable South East Warwickshire to become a national centre of excellence for bowls. Such a centre of excellence could bring a significant economic benefit to the area.</p> <p data-bbox="413 1248 1285 1343">Retention of an indoor bowls facility in the east of Stratford District should be considered as a high priority by Stratford District Council, JLR/TATA and the potential developers of GLH.</p> <p data-bbox="413 1380 1285 1500">The existing indoor bowls facility should either be retained in its current location or relocated locally. The proposed GLH development provides an ideal opportunity for relocation. The bowls facility could be usefully expanded to include other sports</p>	<p data-bbox="1310 280 2034 407">Comments noted. The club is not located within the area covered by this SPD, but reference has now been added to confirm the Council's wish to find a relocation site in the local area (see 2.4).</p> <p data-bbox="1310 829 1997 956">It is not possible to impose a requirement that the facility be relocated within the area covered by the SPD – this is not a requirement under the Core Strategy proposal.</p> <p data-bbox="1310 1343 1950 1373">This is an opportunity that should be discussed.</p>

and community facilities that would be of great benefit to the expanded village and surrounding communities.

Possible re-location sites include:

- On the current Primary School site (to be replaced) and adjacent to the proposed outdoor sports facilities. This would enable combined management of the indoor and outdoor facilities. Other sports / community facilities could also be combined on the site.
- In the new village centre, possibly adjacent to elderly care housing. This would provide easy access and a great opportunity to combine the indoor bowls facility with other indoor sport and community uses.
- Adjacent to the M40 and between the residential and commercial areas. This would provide a community facility for residents that could also be conveniently used by JLR staff.
- Existing Avon Valley Indoor Bowls facility. In an excellent location to serve the expanded village and business communities.
- At the southern (Gaydon) end of the proposed developments. It appears that Gaydon does not benefit from any new community facility within easy walking distance and a combined indoor bowls / sport / community facility in this area would provide additional benefit to the residents of Gaydon.

Suggested options are noted, but see comments above.

Warwickshire and West Mercia Police

The SPD concentrates very much on on-site provision of facilities. We consider that it needs to give more consideration to off-site strategic infrastructure, such as the need to enhance the provision of police services to contribute to ensuring that the developments would be safe and secure. WP/WMP will be seeking contributions from the development, either through the Community Infrastructure Levy or Planning Obligations, to policing over and above the provision of a police office.

Noted – an issue for the application stage and/or for associated documents such as the Infrastructure Delivery Plan and the CIL Charging Schedule/Reg 123 list.

A detailed case for these contributions was set out in the detailed Hearing Statement in relation to Proposal GLH prepared by

WP/WMP for the Public Examination on the Core Strategy on 22 January 2015.

Some of the key points were as follows:

- Section 216 of the Planning Act 2008 provides a list of "infrastructure" but is clear that that list is non- exhaustive and that "infrastructure" is not a narrowly defined term. That fact is demonstrated by the use of the word "includes" prior to the list being set out. In our view, there is no difficulty in the proposition that contributions towards Police infrastructure can be within the definition of infrastructure for the purposes of the 2008 Act. In policy terms this is reinforced by the reference to security infrastructure in Paragraph 156 of the NPPF.
- Furthermore, infrastructure in the police context is not limited to buildings. It can also include equipment such as vehicles and bicycles, communications technology and surveillance infrastructure such as Automatic Number Plate Recognition (ANPR) equipment.
- The NPPF includes a number of paragraphs that make reference to the work of the police. Paragraphs 58 and 69 of the NPPF specifically refer to the creation of safe and accessible environments which do not lead to crime or fear of crime. Paragraph 156 makes specific provision for security infrastructure to be included in Local Plans.
- New housing and other development will create an additional demand on police resources. Alongside this, existing funding available to the police is insufficient to cover the additional infrastructure required. Once that test is met, it is the responsibility of the local authorities to work with WP/WMP to ascertain the appropriate level of contribution so that any future development can be sustainable. WP/WMP will seek contributions for those impacts arising only from the

	<p>developments and will not seek contributions towards shortfalls in infrastructure elsewhere, or a betterment of services that will not have to be increased as a result of the</p> <p>developments. Accordingly, any future request would be directly related to the development.</p> <ul style="list-style-type: none"> • If the development envisaged by Proposal GLH did not make any provision for police infrastructure, WP/WMP would need to stretch their existing resources to provide services to it. • This would have a significant knock-on impact across South Warwickshire (Stratford-on-Avon and Warwick Districts) due to officers, staff and resources being diverted to the development. • The above is notwithstanding the fact that the building of 3,000 new dwellings is likely to lead to an additional 294 crimes, 167 anti-social behaviour incidents and 426 public safety/welfare incidents per year, causing a significant impact on policing (figures predicted using the 'Warwickshire Population and Household - Crime and Incident Model' based on actual crime figures from 2013-14 in Stratford-on-Avon District). 	
Stratford Voice	Community Infrastructure - there is no apparent provision for publically available allotments close to the housing.	The provision of allotments will be required as per the Core Strategy Policy CS.24.
NHS Property Services	We are in support of Section 5 of the SPD - Community Infrastructure, which states that applicants will be encouraged to discuss the of community infrastructure with the relevant service providers, and agree the detailed requirements in the right location. We would welcome further discussions with the Council during the production of the Master Plan for the site, to ensure that the size and scale of the health centre and associated car park meet the NHS requirements for this area. We would also need to liaise with South Warwickshire CCG to determine whether there are any additional requirements for community health provision.	Position noted.

Lighthorne Parish Council	We require a guarantee in the SPD that community facilities will be built before the housing to ensure that this does not become a car dependent ghetto, as it is feared it will by all the local communities.	The phased delivery of infrastructure is as set out at revised section 6.2.
Jeremy Wright - MP for Kenilworth and Southam	I was pleased to see that a range of sports facilities will be provided as part of the development. I do have some concerns for the Avon Valley Indoor Bowls Club who are located within the JLR site in Gaydon. The club is growing and is an invaluable facility for all age groups in the area. Given the expansion envisaged by JLR the Club will need to relocate and I hope that assistance will be offered to the Club to facilitate their move to alternative premises.	Noted – see previous comments.

5.9 - Affordable Housing

Consultee	Comments	Response
<p>Warwickshire County Council - Planning and Development</p>	<p>Paragraph 5.9 (Affordable Housing) on page 83 reads as follows:</p> <p>"...The evidence of need through the Strategic Housing Market Assessment and the wider population growth statistics highlight the increase in older person households throughout the district. The Council would welcome as part of the affordable housing being targeted at this sector of need either through a dedicated extra care facility being brought forward in close cooperation with the relevant enabling and funding authorities or through specifically targeted housing types within the wider affordable offer..."</p> <p>We suggest the following addition, which widens the customer groups/service provision:</p> <p>"...The evidence of need through the Strategic Housing Market Assessment and the wider population growth statistics highlight the increase in older person households throughout the district. The Council would welcome as part of the affordable housing being targeted at this sector of need either through a dedicated extra care facility being brought forward in close cooperation with the relevant enabling and funding authorities or through specifically targeted housing types within the wider affordable offer, including specialised housing suitable for adults with learning and/or physical disabilities, sensory impairment or mental health issues, e.g. dementia..."</p>	<p>Agreed – text is revised accordingly.</p>

5.11 - Sustainability

Consultee	Comments	Response
<p>Hugh Conway - Gaydon Resident</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 98</p>	<p>13 - We remain concerned at the lack of a clear integrated vision for cycle access. Too often cycle routes are a series of "afterthoughts" rather than part of an integrated plan.</p> <p>15 - The road scheme replaces a crossroad with a T junction. The opportunity should be taken to review the access to the 100 hectare site and remove the roundabout on the B4100 which will no longer serve a useful purpose other than to feed the stopped up road.</p> <p>There is nothing in this section which would encourage Gaydon residents to use alternatives other than private cars. Without additional provision of off road pedestrian, cycle and bridleways this would appear to be a nonstarter for the Parish. We fear that this also applies to the Gaydon Lighthorne Heath development.</p> <p>JLR has set a bad example. The kerbs are littered with yellow cones preventing inconsiderate parking across walkways. Clearly they failed to anticipate the demand for parking places on its site.</p> <p>IN SUMMARY - We do not believe that this development is sustainable on the grounds of both noise and air quality. On page 84 you state that you support renewable and low carbon energy. Here is an opportunity to practice what you preach.</p> <p>Whatever the outcome community interests should be served and compensated by the provision of appropriate community facilities and mitigating measures. All developers should be directed to provide these e. g. s106 Agreements and Community Infrastructure Levy.</p>	<p>Cycling provision is integral to the delivery of the development in accordance with this SPD.</p> <p>Noted – the detail will be agreed via the application process.</p> <p>See previous comments.</p> <p>See previous comments.</p> <p>See previous comments.</p>
<p>Warwickshire and West Mercia Police</p>	<p>This section includes 10 detailed objectives relating to sustainability. It is unclear, however, how these relate to the Residential Placemaking Principles set out under Para 4.2. As it is set out, the sustainability principles appear to be an add-on rather than a core element of the development. In our view, it is</p>	<p>This section of text has been relocated to Section 4 of the revised draft SPD to emphasise its importance.</p>

	<p>essential that the reference to safe, secure development is incorporated as an integral part of the Residential Placemaking Principles, along with the reference to Secured By Design and the first bullet point on page 85 relating to crime and fear of crime.</p>	
Stratford Voice	<p>All housing should incorporate solar panels and access a district combined heat & power scheme — the highest level of sustainability must be insisted upon not left to developers to sign up or not.</p> <p>Landscape & Biodiveristy - developers must be required to plant good sized trees (perhaps 2 year old saplings as a minimum) rather than "whips".</p>	<p>The SPD encourages sustainable energy proposals including CHP.</p> <p>Not appropriate to be specified within an SPD.</p>
<p>Page 99</p> <p>ghthorne Parish Council</p>	<p>Carbon Footprint - The new settlement will be a car dependant commuter town, how specifically does this fit with commitment to reduce CO₂ levels as a district? Specific detail is required to explain how this will be mitigated. How will the addition of 6,000 cars from residents reduce the district's CO₂ emissions and what will be done about this?</p> <p>Further work required - Far more detail should be provided at this stage. As an example the Landscape Assessment needs to be done as currently the evidence is that any large scale development will not be in line with Core Strategy.</p>	<p>Any development in the rural parts of the District would be similarly car dependant. The potential benefit here is that there will be sufficient demand to establish and sustain public transport services given the presence of a significant resident population and a substantial workforce.</p> <p>The SPD requires that full LVIA's be produced to support all applications. It is not the role of the SPD to produce this work.</p>

6.0 - Delivery

Consultee	Comments	Response
CEG/Bird Group	<p>Within the Delivery Chapter of the Land at Gaydon / Lighthorne Heath SPD, we consider that it would be beneficial to include a section that provides further clarity on how infrastructure will be delivered, having regard to the fact that planning applications will come forward in separate phases and to ensure that infrastructure is provided on a pro-rated basis between developers.</p> <p>We also consider that it could be beneficial to include some plans to support the 'Strategic Phasing' text to illustrate how residential phasing is anticipated/expected to come forward.</p>	<p>Accepted –this is now incorporated into the revised text.</p> <p>It is not considered appropriate to adopt such a prescriptive approach in the SPD.</p>
Page 101 1 Properties development Limited	<p>Zone 4 is identified as Phase 3: "In the longer term the final northern most section of Land at Gaydon/Lighthorne Heath could be delivered as Phase 3, with development logically progressing away from the previously established residential neighbourhoods towards the site edges."</p> <p>It is agreed that Zone 4 will be part of a secondary phase, following the commencement of development of large parts of the village centre to the east of Lighthorne Heath. Zone 4 is capable of coming forward as part of Phase 2, starting with land adjacent to the village centre.</p> <p>P88. The SPD should read: "<i>it is anticipated that Land at Gaydon/Lighthorne Heath will come forward in two broad phases</i>"</p> <p>And continue:</p> <p><i>"Phase 2 could entail continued growth around Phase 1, expanding towards the M40 and the north to south open space corridor that crosses broadly the centre of the site, forming a logical edge at this stage. This phase is also likely to see the completion of the village centre and development of the parcel to</i></p> <p><i>the west of the B4100, adjacent to the north edge of Lighthorne</i></p>	<p>Accepted in part – it is now proposed that the development of the southern section of land within Zone 4 will come forward during the initial phase. See revised text.</p>

	<p><i>Heath and the parcel to the north-west of the village centre"</i></p> <p>The paragraph commencing "<i>In the longer term</i>" should be omitted.</p>	
<p>Gladman Developments</p> <p>Nicole Penfold - Gladman Developments</p>	<p>Gladman's key concern with the GLH SPD is the very brief section dedicated to the delivery of the new settlement. This section has a significant lack of detail and provides no reassurance that the housing numbers and community facilities and services proposed to come forward during the plan period will be delivered as planned. Gladman note that this chapter identifies 3 main phases to the delivery of the GLH site and relates this to vague geographic areas of the site; however it does not provide much more detail.</p> <p>In fact the proposals in the Core Strategy themselves provide further detail regarding the phasing of housing delivery over the plan period than the SPD, which in essence is supposed to add clarity to the Core Strategy proposals. This further brings into question the purpose or necessity of this SPD.</p> <p>Due to the significant importance of the delivery of GLH to the Core Strategy as a whole, Gladman would have hoped for this section of the SPD to have provided further detail and robust evidence to demonstrate how the new settlement will be brought forward.</p> <p>Gladman refer back to the hearing statement submitted for the GLH session at the EiP which raised serious concerns that the delivery rates proposed for the housing element of GLH were overly ambitious and highly unlikely to be achieved. These concerns should be taken into account when considering the delivery of this scheme.</p> <p>Gladman note that the Inspector in his interim findings does touch upon the proposed trajectory for GLH. The Inspector states: "<i>In the event that the additional work confirms GLH, the proposed trajectory, which has been the subject of sustained criticism from</i></p>	<p>It is accepted that the section as initially drafted was lacking in detail. This has been rectified.</p> <p>All submitted evidence has been taken into account in updating the draft SPD.</p> <p>Noted.</p>

<p>(cont.)</p>	<p><i>a number of parties appears to be tight...</i>"This again echoes concerns raised by Gladman through written submissions during the plan preparation and examination process and further highlights the concerns regarding the robustness of the proposed delivery rates for the proposed new settlement.</p> <p>Gladman agree with statements in the draft SPD referring to the fact that development of this new settlement needs to take place in a planned sequence to avoid isolated pockets of development, as this is key to ensuring the early phases of the new settlement work. The development of this site needs to be done in a coordinated fashion ensuring that the necessary facilities and infrastructure are in place alongside the delivery of housing.</p>	<p>Support noted.</p>
<p>Lighthorne Parish Council</p> <p>Page 103</p>	<p>We require a written guarantee within the SPD that there will be no breach of or deviation from the rules and regulations set down regarding planning applications and any decision on the same.</p> <p>This SPD cannot be adopted until the Core Strategy has been adopted and no planning application on the proposed new settlement can be granted until the SPD has been adopted.</p> <p>We require an absolute guarantee that SDC and the developers will not seek to bend, shift or in any way evade due process.</p>	<p>The SPD carries that weight that can properly be attached to it under the planning regime.</p> <p>The former is true. The latter is not an accurate reflection of the legal position, but is consistent with the preferred approach set out in the Core Strategy.</p> <p>Position noted.</p>
<p>CALA Homes (Midlands) Ltd</p>	<p>CALA Homes has other concerns with regard to the SPD, notably that its provisions for timing and mechanisms for how infrastructure delivery will be managed is wholly inadequate (reinforcing concerns expressed by CALA at the Core Strategy Examination that the planning of infrastructure for housing and employment elements had not been properly justified and would not be effective). No mention is made of the motorway works required. Assumptions around density also appear to be unjustified.</p>	<p>Comments noted and have been taken into account in drafting a number of revisions to the draft document.</p> <p>The average density is considered modest at 37.5dph.</p>

6.1 - Future Planning Applications

Consultee	Comments	Response
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Council For British Archaeology West Midlands (Consultee)	We welcome the requirements for heritage statements, including statements of significance, and archaeological surveys, to be submitted with planning applications. However, we	Accepted.
	consider that the term "Archaeological Survey" is vague and that to be in accordance with the Submission Core Strategy (3.7, Historic Environment, Development Management Considerations) developers will need to submit the results of an archaeological field evaluation with their planning application- as stated in 3.05 of the SPD an archaeological desk-based assessment has already been carried out for the area. We therefore strongly urge that the term "Archaeological Survey" in the bulleted list be replaced by "Archaeological Field Evaluation".	Response
Highways Agency Page 105	It would benefit the SPD to acknowledge that, in respect of all supporting document, pre-application engagement with the relevant consultees to define the scope of any assessments would be strongly recommended. This would include the requirement, if necessary, to develop site wide strategies for mitigation and infrastructure delivery.	The updated SPD is considered to be clearer as regards this suggestion.
NHS Property Services	Section 6 of the draft SPD - Delivery outlines the delivery of the future planning applications and outlines that planning obligations should be agreed by applicants prior to the submission of any planning application. The proposed development comprises of a large residential development of 3000 residential units which would substantially increase the population of the surrounding area. This would be a burden upon existing NHS resources. We would therefore seek s106 contributions for primary health care provision and would welcome early discussions with applicants.	Comments noted. The current assumption is that the on-site provision of health facilities will be funded via s106 agreements.

6.2 - Strategic Phasing

Highways Agency	Under Section 6.2 it is recognised that a Phasing Plan should be developed to help guide the approach to delivery of the project.	Accepted - the expectations are now more clearly stated.
Consultee	Comments	Response
Page 106	<p>A series of guiding principles are recommended to inform this. An additional principle could be incorporated in this section to recognise that any necessary highways infrastructure must be delivered in parallel with new development, such that impacts are mitigated at an appropriate time — and that highways safety and efficiency is not compromised.</p> <p>In relation to infrastructure funding and delivery, it can be expected that close co-operation between all stakeholders will inform this, and that appropriate triggers and delivery mechanisms will be a key consideration of all future planning decisions.</p> <p>The role of the Council's Infrastructure Delivery Plan (IDP) — including its regular monitoring and review would provide a useful point of reference in this section — to demonstrate consistency with the Local Plan, and the links to the Council's overall development strategy.</p> <p>Similarly, reference to the potential collection and use of CIL funding, by the Council would be useful in this section - to provide clarity and consistency in relation to other relevant aspects of the LDF.</p>	<p>Noted and agreed.</p> <p>Agreed – new text has been added accordingly.</p> <p>Agreed – new text has been added accordingly.</p>
Hallam Land Management	Proposal GLH of the Proposed Submission Core Strategy (CS) requires the phased delivery of utilities and highways/transport infrastructure. Furthermore, Policy CS.26 requires that infrastructure should be delivered concurrently with, or in advance of, development. The Strategic Phasing section of the Draft SPD also identifies the need for a phasing strategy which integrates development, infrastructure and landscaping, however, it then proposes three phases of development without any reference to what infrastructure or landscaping will be required for each phase.	Agreed – text amended accordingly.

Other Comments

National Federation of Gypsy Liaison Groups	It is unfortunate that the opportunity has not been taken to examine the possibility of providing a Traveller site within the new settlement. This would have been an opportunity to help secure Traveller provision with integration into the new community.	Noted – see previous comments on this issue.
<p>Warwickshire County Council - Planning and Development</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 107</p>	<p>Comments from Community - Fire and Rescue</p> <p>The residential elements to the development will be covered by the compliance the approved Document B (the Building Regulations 2010) Volume 2 Section B5 (access and facilities for the fire service) should be applied, e.g. adequate water suppliers, vehicle access for firefighting personnel etc.</p> <p>From a Fire and Rescue Operational point of view the substantial expansion of Jaguar land Rover Operation is of interest to us.</p> <p>Jaguar Land Rover is one of our existing "Level 3" sites, and any substantial changes could impact significantly on our Operational Plan in responding to the site. We request regular communication with Warwickshire Fire and Rescue Service during and at the end of the development is essential to ensure we always have up to date risk information in the form of full risks and temporary risks.</p> <p>We wish to be kept informed of the following:</p> <ul style="list-style-type: none"> • Any access restrictions due to any new building programme or change to the road network upgrade that might hinder fire appliance access. • The maintenance of access suitable for a fire appliance • Notified of any interruptions to water supplies in the local area during the build, that might affect the supply to Jaguar Land Rover in particular. <p>In addition to the above comments we will also comment each planning application on the compliance with fire safety availability of water at the detail stages of the development in the normal way.</p>	Comments noted as being of relevance to the application process.
Harbury Parish Council	The draft SPD appears to have been produced by the	The presentation of the document is the result of a

	<p>promoters/developers of the site with some input from SDC and Jaguar Land Rover. Consultation with the local communities which would be affected by this plan has been minimal which is very disappointing.</p>	<p>collaborative process. Local consultation has been undertaken as required under the Council's Statement of Community Involvement.</p>
<p>Chesterton and Kingston Parish Council</p>	<p>As stated in the representation some of the actions of Nexus Planning, Beattie Communication, Bird Group at the GLH exhibition on 27/28 February were a disgrace. A number of residents were angry at the arrogant, dismissive and aggressive nature of some of the representatives. This needs action by SDC.</p>	<p>Feedback noted with concern, but not an issue for the SPD.</p>
<p>Lighthorne Parish Council</p>	<p>We believe that irreparable damage has been done to the working relationship with the 4 Parishes following the Beattie Communications Exhibition at Lighthorne Heath School 27th and 23rd February. The developers' representatives were rude, aggressive and insulting to and about our current communities. They told those who attended that the town WILL be going ahead no matter what and that we have to get used to that fact. There are numerous examples of their arrogance and offensiveness. It will be difficult to claim that there has been meaningful engagement or consultation with our Parish given the damage done to by these people.</p>	<p>Feedback noted with concern, but not an issue for the SPD.</p>
<p>Lighthorne Heath Parish Council</p>	<p>Furthermore the approach taken by developer's representatives at the meeting was, at best unhelpful, and indeed defensive and/or dismissive, an approach which is not conducive to building a future relationship with the most affected Parish by a major development that will become critical for the future of the inhabitants should the proposal for GLH move forward</p>	<p>Feedback noted with concern, but not an issue for the SPD.</p>

General Comments

Consultee	Comments	Response
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<p>Warwick District Council Development Services</p>	<p>Warwick District Council cannot state strongly enough the need to ensure that developers are fully aware of their responsibilities to fund (through developer contributions) highway and public transport improvements that are attributable to the GLH development both on the immediate network within Stratford District and beyond where necessary (such as in Warwick District).</p>	<p>Noted and clearly reflected in the SPD.</p>
<p>Jeremy Wright MP (Kenilworth and Southam)</p> <p style="text-align: center;">Page 110</p>	<p>I write in response to the above mentioned informal consultation which seeks comments on the draft supplementary planning document [SPD] for a new settlement proposal at Gaydon / Lighthorne Heath [GLH]. As the Member of Parliament for Kenilworth and Southam the proposed site lies wholly within the constituency I represent, I hope that my comments and those of my constituents will be considered.</p> <p>I have responded to previous consultations associated with this proposed new settlement, in September 2013 and March 2014, and I continue to associate myself with those remarks regarding the sustainability of the site and the impact of the development on the landscape and countryside. I continue to be concerned about the impact 3000 homes will have on the local infrastructure, including public transport and water and sewage works and welcome references in the document to enhancing transport connectivity in the surrounding area and ensuring necessary upgrades are in place so that an appropriate sewage treatment strategy is delivered.</p> <p>Since the launch of this consultation, the Planning Inspector has published interim conclusions on the Stratford on Avon Core Strategy, which he believes is not sound as it stands. Following his suspension of the examination of the Core Strategy and his request for SDC to carry out further work regarding housing numbers and to consider other strategic sites previously rejected,</p> <p>it seems to me that this SPD process should also be suspended pending the Inspector's request for further information. I note the Inspector's recommendation that Stratford District Council</p>	<p>Noted.</p> <p>See previous comments about the relevance of the processes proceeding in tandem in order, inter alia, to meet the Government's objective of boosting significantly the supply of new homes.</p> <p>Noted – this site is now also proposed for inclusion within the Council's Core Strategy.</p>

(SDC) should properly consider alternative sites in the District, including the Long Marston Aerodrome. A brownfield site, its status meets with national planning guidelines, which encourage the effective use of land, by re-using that which has already been developed.

The Long Marston scheme also provides for a relief road that will relieve traffic flows in and around Stratford. Previously it was argued the road would pass through a Site of Special Scientific Interest (SSSI), which resulted in the scheme being rejected. It has now been acknowledged this is not the case.

In contrast no similar infrastructure is provided for in the GLH proposal. The expansion of the Jaguar Land Rover (ULR) plant in Gaydon and a new settlement that would, in my view, be car dependent, will likely result in heavy congestion on an already busy road network especially during peak commuting hours. Whilst I appreciate that Junction 12 of the M40 is being upgraded, the improvements being made have not, as I understand it, made allowances for extra traffic caused by thousands of extra houses.

Before any planning application is submitted for GLH I would seek assurance that a comprehensive transport assessment is carried out, looking at existing vehicles on the network as well as future growth. Noise is also of concern, which I have raised previously and I welcome recognition in the document that appropriate mitigation measures need to be put in place to protect existing communities from disruption.

The commitment to deliver a secondary school on the Long Marston site is a further reason why this scheme should be considered in greater detail. I am concerned that an equivalent offer for a high school has not been made by the GLH developers and this should be reconsidered. It is of course preferable for children to be schooled within their own community environment but should this development go ahead I would seek assurance that Kineton High School would receive significant financial assistance to be able to accommodate the extra students.

The required infrastructure has been discussed in detail with the relevant parties, including all national agencies with an interest in the proposals.

The application process is specified as requiring the submission of a full transport assessment and a noise assessment.

See previous comments on this issue.

	<p>Schooling in the community would also eliminate the need to travel and would also contribute significantly towards less congestion on the road network.</p> <p>Finally, considering the scale of the development planned and the close proximity of many major businesses, not least JLR and Aston Martin Lagonda, I urge the developers to ensure super high speed broadband is provided. It is an essential component of any development if we are to attract high tech manufacturing and research business into the area to grow the local economy, and to enable new and existing residents alike to access digital service at modern standards.</p>	Noted and agreed.
<p>Gaydon Parish Council</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 112</p>	<p>This Parish Council regards this document as premature especially in view of the Inspectors Interim Report suspending the Examination process on the Core Strategy until a Sustainability Assessment has been conducted. At the very least, clear objective assessments of all sites need to be conducted and comprehensive reasons need to be given for those that are already dismissed. We certainly endorse the necessity of this and ask that Gaydon Parish as a whole is included in this process as our sustainability is under threat by noise, compromised traffic flow, lack of through pedestrian access to other settlements and open spaces and lack of provision of mixed employment for our residents. We also feel that the planned facilities are inadequate for the size of the planned population especially in light of its distance from other major centres</p> <p>We repeat, this SPD is premature bearing in mind that other sites have not been properly evaluated. This needs to occur as they are more likely to offer more sustainable growth opportunities than originally assessed. Both new towns and existing settlements need room for managed growth to ensure that populations do not age rendering facilities unsustainable.</p>	Noted – see previous comments.
<p>Warwickshire County Council - Planning and Development</p>	<p>The site lies within one of the most economically dynamic parts of the County located on the M40 corridor a key corridor for businesses and jobs. It benefits from a high quality of life and</p>	Support noted.

	<p>environment, a strong skills base and high levels of economic participation. The developments at the Gaydon proving ground including Aston Martin are of national significance. We support the proposed Master Plan and development strategies which underpin it.</p>	
<p>Lighthorne Heath Parish Council</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 113</p>	<p>Lighthorne Heath Parish Council continues to maintain its' opinion that the current SPD as it stands is inadequate, based on the limitation of details in relation to the proposed new settlement ... the new settlement has been incorrectly planned for the GLH site when it could have been fulfilled in full, and with added benefits including an additional 500 homes on Long Marston Airfield which is classed as a 'brownfield site'.</p> <p>If the Planning Inspector fails to support our conclusion Lighthorne Heath Parish Council will work together with the developer and SDC to help ensure the best outcome for the existing Parishioners in co-operation with the three adjoining Parishes most affected, but arguably to a lesser extent. In order to do that in a constructive way we await the formal consultation once the Core Strategy has been adopted and ahead of any Outline Planning Application, which we believe cannot be determined by SDC under the present circumstances in the light of the Planning Inspector's Interim Report.</p>	<p>See previous comments – both sites are now proposed for development under the emerging Core Strategy.</p> <p>Noted and welcomed.</p>
<p>Mr Michael Hill - Bromford Housing Group</p>	<p>Bromford supports the proposal of a new settlement at Gaydon/Lighthorne Heath and is pleased to see the early production of an SPD to set out guidance and further detail on the development principles already set out in the Core Strategy.</p> <p>A well prepared comprehensive Masterplan including all stakeholders will be crucial in ensuring the success of the development. Similarly, the relationship between the employment being generated by the expansion of Jaguar Land Rover and Aston Martin Lagonda, and the provision of new housing will be key to the success of the proposed new settlement. The timing of the delivery of these two elements will have to be co-ordinated accordingly.</p>	<p>Noted.</p> <p>Agreed.</p>

	<p>The proposal to use Policy CS.17 requiring the delivery of 35% affordable housing as a starting point for the development is to be welcomed. The affordable housing provision, however, will need to be guided by the housing needs of the new employment being created, mainly by the expansion of Jaguar Land Rover and Aston Martin Lagonda. Affordable housing demand is very difficult to predict 5 years from now never mind over a period of 15 years plus, being the estimated development period for the new settlement. To ensure the development can meet future affordable housing needs, the Masterplan should, rather than setting a rigid figure at this stage be written in such a way to enable the provision to be varied, within certain parameters, over the period of the development.</p> <p>We were very pleased to see that the document includes comments on governance. If the aspirations of the SPD and the proposed Masterplan are to be realised a strong delivery and governance structure, including all the relevant stakeholders, will be required. This private/ public group will need to be established early on in the process. We look forward to the publication of the formal consultation version of the SPD.</p>	<p>Comments understood – any flexibility would have to arise through a future change to the policy established via the Core Strategy process.</p> <p>Noted and agreed.</p>
<p>F4: McDonough - Wellesbourne Resident</p>	<p>The proposal relating to Gaydon / Lighthorne Heath will generate a significant amount of traffic. A large proportion of this will undoubtedly travel through Wellesbourne, where there is already a considerable amount of traffic congestion and shortage of parking spaces. Even without additional traffic from the Gaydon / Lighthorne Heath proposal, development within Wellesbourne and surrounding districts will exacerbate the existing problematic traffic situation within the village, which is already the cause of social discord. A further large increase in traffic is likely to bring the road network through Wellesbourne to a standstill, which is unacceptable.</p>	<p>Comment noted, but not related to the specific purpose or content of the SPD.</p>
<p>Cherwell District Council</p>	<p>As indicated in our previous responses to the draft Core Strategy, the Council is supportive in principle of the proposals at Gaydon/Lighthorne Heath. I note that our previous concerns regarding the need for the new settlement to be sustainable and the potential traffic impact on Cherwell (and particularly Banbury) to be minimised by providing an alternative to private</p>	<p>Support noted.</p>

	<p>car use is addressed in the SPD, through reference to the development of a public transport strategy, including the required express bus service to major conurbations. The Council supports the indication in the SPD that the public transport strategy should deliver a network of services that caters for likely demand, at a frequency that will encourage modal shift. It also supports reference to the need for proposals for Jaguar Land Rover expansion to be accompanied by a travel plan with targets for 45% of trips to be walking/cycling/public transport/car share, and that planning applications should be supported by a Transport Assessment.</p>	
<p>Stratford Voice</p>	<p>Generally we welcome the principle of creating an entirely new settlement rather than risking over development of existing towns and villages. We do have concerns over the amount of greenfield land to be developed, and would propose that this be minimised, for example if any adjacent brownfield land could be substituted.</p>	<p>Comments noted. The adjoining brownfield land is all to be used to accommodate the expansion of JLR.</p>
<p>Page 115 S Property Services</p>	<p>We have now reviewed the SPD for the New Settlement proposal at Gaydon/Lighthorne Heath. We have no objections to the proposal in principle subject to the provision of a health care centre to accommodate a 4 GP practice comprising floorspace of 646sq.m together with an appropriately sized site to accommodate the practice.</p>	<p>Position noted.</p>
<p>Mrs H Johnson - Gaydon Resident</p>	<p>I feel Gaydon has done its fair share of development - there is outline planning for 50 or so houses - 20+ either end of the village. We have lost our lovely green fields and hedges to make way the JLR M40 motorway spur (losing hedges mean M40 traffic noise is more audible now) and we are threatened with 100 hectares of commercial buildings and if we are really lucky a towering eyesore advertising JLR visible to the M40 traffic. We have lost the Gaydon Inn for nefarious reasons - i.e. building houses - which I fail to understand - surely with all the extra housing, traffic and commercial buildings coming SDC should have encouraged a sale of the pub as a going concern (large pub owners should be charged by local councils if they let their pubs run down.) The Gaydon Inn should have been restored to</p>	<p>Comments noted, but not related to the specific purpose or content of the SPD.</p>

its former glory as a 17c coaching inn - not 25 or so houses crammed into the site.

The houses planned in Lighthorne are wrong. On one hand we hear about noise/air pollution from motorways. The WHO have recently published a paper on this subject - so why are these affordable houses going to be built in such a polluted area - air pollution isn't going to stop drifting just because a "bund" has been built! Where are these people going to work - in their cars. Has any SDC person tried to get into Leamington/Banbury/Stratford recently at peak times - it is awful. There are houses in Gaydon and around the area that are not selling - which suggests that JLR workers are not rushing to live near their work. IF the houses go ahead it is absolutely imperative that a new secondary school should be built - Kineton, Southam, Shipston are all full - they also seem to be doing well - I suspect because they are relatively small and perhaps more manageable. Traffic problems in Kineton at drop-off/pick-up are bad - Kineton village comes to a standstill.

We have no nice safe walking or cycling areas here as it is and I can't see these will improve greatly, whatever the planners say.

Has SDC given any thought to the future as far as JLR is concerned? OK, at the moment they are riding high, but it wasn't many years ago that it was a struggling company - what if that happens again and Gaydon/Lighthorne are left with empty disused factory buildings etc.

I think it is very sad that JLR have managed to take over two small villages and given us their huge traffic problems and ongoing development plans, and equally sad that thousands of houses are being built in what is a pleasant green area of Warwickshire with very little infrastructure - a little thought to the amount of cars needed to go anywhere. There must be brownfield sites up and down the country - closer to towns and amenities - these should be explored first. I know developers don't like brownfield sites, but that should not allow them to trample all over "David Cameron's beloved Green Belt countryside".

Lighthorne Parish Council

This entire process is premature - SDC should await the outcome of the Government Inspector's findings. Given the recently published interim report, continuing with pre-emptive work on a site allocation - which may be substituted for another in the fullness of time - is entirely inappropriate. We consider this exercise to be wasteful of public funds.

The SPD as presented is entirely unacceptable - it lacks any substance or detail of any kind, making it impossible to engage in any meaningful way with the specifics of the proposed new settlement. In some areas details are inadequate, in others they are entirely absent. LPC requires a fully worked up, fully specified and detailed document before we can consider the same for amendment and adjustment.

There should be no land allocated to Aston Martin south of the B4100 as is currently proposed; their land allocation should be adjacent to the JLR land allocation north of the B4100. Should AML require land they can physically expand into then they have the potential to use their current car park (an extensive area), they would be able to relocate the parking facilities to north of the B4100. There is no sound justification for using the green field land to expand their operation. LPC object to any development on this land as it would coalesce Lighthorne and Lighthorne Heath, further, it would enclose Lighthorne Heath with development on all sides. The Inspectors' report from 1995 supports our objection and we argue that the reasoning used in 1995 is relevant today.

There should be no housing development south of the B4100 - the proposed 200 houses would close the gap between Lighthorne and Lighthorne Heath and seek to coalesce the two - we rely upon the Inspector's report from 1995 in support of this.

A guarantee should be provided within the SPD that there would be a legally binding covenant regarding all land south of the B4100 protecting it from any housing/commercial development in the future. Without such a guarantee in writing in the SPD the communities are left vulnerable to current stated aims being overturned.

LPC want a guarantee that a protective covenant will be set up

See previous comments on this area of concern.

The document as revised as a result of the initial round of consultation will be published for further comment.

This is a matter of principle that will be resolved via the Core Strategy process.

The limited development proposed adjacent to the northern edge of Lighthorne Heath is not considered to threaten coalescence. It is part of a proposal that differs substantially from that promoted in the 1990s.

The future ownership and control of the land will be determined separately.

The control will be provided through the transfer of

	<p>for the old quarry land, further that land should be legally conveyed to LPC giving us absolute title over the same as an ecological reserve. It would also be appropriate for a trust fund to be set up by the developers to enable the management of the same.</p> <p>Full details of the proposed magistrate court applications must be provided as a matter of urgency to explain how the public footpaths and bridleways are to be re-routed and the evidence to be put forward supporting the proposed applications.</p>	<p>ownership to an accountable local body.</p> <p>Additional text has been inserted to clarify the relevant process.</p>
<p>Chesterton and Kingston Parish Meeting</p>	<p>The document is premature and, in the light of the Planning Inspector's Interim Conclusions which deems "that the CS is not sound as it stands". (Inspector's Interim Conclusions on the Core Strategy, 18th March 2015, p 62), is therefore irrelevant at the moment.</p>	<p>As previous comments.</p>
<p>CALA Homes (Midlands) Ltd. Page 118</p>	<p>CALA Homes (Midlands) Ltd is currently promoting land at Long Marston Airfield and was a participant at the recent Examination Hearings into the Stratford upon Avon Core Strategy. The Submission version of that Plan placed significant reliance on the Gaydon Lighthorne Heath proposals within its employment and housing proposals.</p> <p>The Inspector's Interim Findings have been published. Among his findings, he concludes at Paragraph 75-77 that the Sustainability Appraisal process that justified the selection of GLH as a Strategic Site instead of Long Marston Airfield was flawed. At paragraph 77, the Inspector states: <i>"In the circumstances the admitted error needs to be corrected before a conclusion is drawn as to the preferred alternative. In order to maintain the integrity of the SA process, it is essential that those who undertake this additional SA work approach it with an open mind rather than seeking to justify the decision previously reached."</i></p> <p>In view of the above, it would be premature and inappropriate for the Council to proceed with the draft SPD for a strategic site that it might not select, once the SA process is correctly carried out. To proceed with the SPD might be seen to prejudice the</p>	<p>See previous comments on this issue.</p>

	<p>conduct of the SA. If the Local Planning Authority chooses to proceed with GLH after the Local Plan process has been properly conducted, this would be the time to recommence progress with the SPD, but not before.</p>	
<p>Coventry and Warwickshire LEP</p>	<p>CWLEP has prepared a report 'Supporting the Delivery of Major Employment Sites across the Coventry and Warwickshire Area' (Major Employment Sites Report). The purpose of the report is to consider issues associated with the pipeline supply of employment sites across Coventry and Warwickshire. The report utilises a criteria based assessment to identify sites of strategic importance.</p> <p>The Gaydon/ Lighthorne Heath site is identified as a major employment site and the Report reaffirms support for development of the site by identifying that the site clearly supports the wider priorities of CWLEP. It is noted that the Major Employment Sites Report refers primarily to the initial phase of development at Gaydon / Lighthorne Heath (approximately 18 hectare business park development) but also acknowledged the wider proposals addressed as part of the GLHSPD.</p> <p>The Major Employment Sites Report also acknowledges the potential constraints of the site, including the need for wider off site highway improvements and other off-site transportation measures. This will complement measures already committed in relation to the proposed development including £12m for to upgrade the capacity of junction 12 of the M40.</p> <p>The Gaydon/Lighthorne Heath site is strategically significant within the context of Coventry and Warwickshire. It provides opportunities for the growth of key businesses and housing development to complement the economic growth. The GLHSPD provides an appropriate response to the opportunities of the site and is supported in principle by CWLEP.</p>	<p>Comments noted and welcomed.</p>
<p>Bishops Itchington Parish Council</p>	<p>The greatest impact that the new settlement would have on Bishop's Itchington is an increase in traffic along the B4451 which runs through the centre of the village, and on the</p>	<p>More information on the predicted traffic impacts on the village should become apparent as a result of the transport assessment work required in connection</p>

	<p>surrounding road network in general. The B4451 is already subject to a high volume of traffic making its way to and from the M40 and Jaguar Land Rover. In addition, there is already an unacceptably high proportion of traffic which exceeds the speed limit through the village. The additional traffic generated from the new settlement would only exacerbate these problems. A detailed and comprehensive strategic transport assessment is essential in order to identify the precise effect the new development would have on the surrounding road network, and in particular the B4451, and what improvements would be required to mitigate these effects.</p> <p>The draft Gaydon/Lighthorne Heath Supplementary Planning Document (GLH SPD) is completely separate from the submitted Core Strategy (CS) which has recently completed its examination in public by the inspector appointed by the Secretary of State. The GLH SPD is in fact part of the process towards the preparation of a planning application. Bishop's Itchington Parish Council (BIPC) is aware that, following the public examination of the CS, serious doubts have arisen about the evidence base which informed Stratford District Council's (SDC) preparation of the CS, not the least of which was the Sustainability Appraisal (SA) - key to the decision to build at GLH - which drew 10 legal submissions challenging the evidence. In the light of this, it is highly likely that SDC will have to revisit that appraisal.</p> <p>The inspector confirmed at the end of the public examination that the GLH SPD cannot be adopted until the CS is adopted. Bearing in mind that the inspector's interim report has only just been published and that his full report will be delayed until after the general election, it is unlikely that anything will be finalised until July 2015 at the earliest. BIPC, therefore, wonders about the value of this 'informal consultation' as no planning permission can be granted for building at GLH until the CS is adopted.</p>	<p>with the application process.</p> <p>See previous comments on this issue.</p>
Gladman Developments	Gladman note that in parts of the draft SPD the Core Strategy is referenced in a manner which suggests it has already been found sound and adopted. This is not yet the case and it should not be assumed that the Core Strategy in its current form will	Comments understood, but as the SPD cannot be adopted unless and until the Core Strategy is adopted, the wording used reflects that anticipated state.

be found sound. On 19th March the Inspector issued an Interim Report (ID.O1) which set out that whilst he is satisfied that the Duty to Cooperate has been complied with there are significant areas where further work is required. This includes revisiting the objectively assessed need (OAN), the Sustainability Appraisal (SA) and housing trajectory.

Stratford on Avon District Council submitted its Core Strategy to the Planning Inspectorate on 30th September 2014. The Examination in Public hearing sessions took place between 6th January 2015 and 30th January 2015. Following the conclusion of the hearing sessions the Inspector confirmed that he would be issuing interim findings and that these would be available by the 20th March 2015.

Gladman submitted hearing statements in relation to a significant number of matters covered within the hearing sessions and participated, with the assistance of specialist consultants, at various hearing sessions. Consequently Gladman have an in depth understanding of the Council's proposals through the Core Strategy and the fundamental flaws which were discussed throughout the hearing sessions. Gladman maintain that the Core Strategy as proposed by the Council should not be found sound as it does not meet the tests set out in paragraph 182 of the National Planning Policy Framework (the Framework).

Gladman note that the Inspector's interim findings were published on 19th March 2015. As outlined above the Inspector concluded that "further work is required in order to demonstrate a robust and objective assessment of housing needs and ensure that the SA process is carried out in full accordance with the statutory requirements and relevant guidance... I consider that the CS is not sound as it stands. In the circumstances it would not be appropriate to let the CS progress to adoption at this time."

Scale of Housing Need

Throughout the examination numerous participants raised significant concerns regarding the Council's OAN and the proposed housing requirement. Gladman maintain that the housing requirement proposed and CAN work undertaken by the

Council does not conform to the requirements of the Framework and the PPG and therefore should be found unsound. Gladman believe the housing requirement for Stratford on Avon is significantly higher than currently proposed and as such the Council will need to consider further growth through both additional strategic housing sites/new settlements and dispersed growth across the existing settlements.

The concerns raised by Gladman regarding the inadequacies of the Council's OAN and housing requirement figure have been echoed in part in the Inspector's interim findings, and as such, the Council have been tasked with undertaking further work in relation to determining their true OAN, ensuring that the housing requirement is capable of resulting in an adequate labour force to meet the projected jobs growth within the District.

Purpose of the SPD and Timing

The purpose of GLH SPDs is to provide greater clarity on the policies of the Stratford on Avon Core Strategy. In this regard Gladman note that this document will sit alongside the policies in the Stratford on Avon Core Strategy (once adopted). Gladman are concerned that this draft SPD is superficial and provides limited details on some fundamental elements of the proposal. It appears to be in some parts, more of a promotional document for the development at GLH, rather than a document which acts to supplement the Core Strategy.

A further concern Gladman raise is in relation to the timing of the draft SPD in relation to the preparation and examination of the Core Strategy. The GLH proposal is fundamental to the Core Strategy but it is still unknown, following the hearing sessions" earlier this year, whether the Inspector will find this element of the plan sound. The inspector's interim findings provide limited comments on the new settlement proposal at Gaydon/Lighthorne Heath; due to the scope of the additional SA work which the Inspector has identified is required.

New Settlements/SUEs

Whilst Gladman recognise the role new settlements or large strategic sites can play in delivering development, it is crucial that plans in relation to this scale of development are realistic

	<p>and deliverable. As mentioned previously, Gladman have submitted representations which state that the overall housing need in Stratford on Avon is significantly greater than the Council are currently planning for. Gladman's view is that the Council need to include additional strategic developments sites (such as Wellesbourne West), along with further housing growth dispersed between the existing settlements to meet the increased housing need.</p> <p>As mentioned in previous submissions to the Core Strategy, in principle, Gladman do not dispute that the GLH site may come forward, the issues Gladman raise relate to the proposed delivery timescales associated with this site and also the scale of housing need across the district, resulting in the need for further strategic housing sites.</p>	
<p>Alan Akeister - Southam President Page 123</p>	<p>I fully support this draft document and all the information included within. This is a well thought out document which looks at both a sustainable village style estates and future growth for business and local jobs.</p>	<p>Support noted.</p>
<p>Andrew J Arkwright - Hatton Estate</p>	<p>Whilst it is clearly important that employment land is made available for the future requirements of Jaguar Land Rover (JLR), Hatton Estate have concerns that the site is not the most sustainable location for housing. In this respect, although some of the houses will be occupied by JLR employees most of them will not and the residents will therefore have to access Warwick, Leamington, Banbury or further afield for employment. These journeys will inevitably have to take place by car as there is no alternative form of transport.</p> <p>In comparison, Hatton Estate have land of a similar size available for development at Hatton Station, where the M40 and the London Marylebone - Birmingham line converge. The station and M40 are approximately 400 metres apart.</p> <p>The Hatton Station provides access to Birmingham, London, Leamington, Warwick, Solihull etc. It is also the junction at which the Stratford rail spur joins that line; so employment, shopping, etc., in Stratford, Warwick and Leamington Spa as</p>	<p>These comments concern a site in Warwick District and are not pertinent to the content of the SPD.</p>

well as London, Birmingham can be accessed by rail. In particular, we note that Leamington Spa congestion already leads to tailbacks on the M40.

The site would potentially provide direct access to the M40 via a new junction; we are led to believe that this would create no technical problems from a highways perspective.

The site's low lying topography is also a benefit as the potential housing would not be visible from any distance, there are no important landmarks (like Windmill Hill) overlooking, and once developed, it would be unobtrusive.

Whilst we recognise that the site is located outside the Stratford District, it is only just so. Furthermore, its location is such that it could serve the needs of both Stratford and potentially Warwick District's given that it is only 6.5 miles from Stratford whereas Gaydon/Lighthorne Heath is 9 miles.