

Gaydon Parish Council

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017: Request for Formal Scoping Opinion

Address: Land South of Junction 12, M40, near Gaydon, Warwickshire

Proposal: Erection of up to approximately 96,000 sqm for flexible B2, B8 and Class E(g)(ii&iii) floor space

Gaydon Parish Council thanks Stratford District Council for providing the opportunity to comment on this document in relation to local issues.

The Parish Council considered the scoping report submitted by the applicant at a meeting on 4th October, 2022. The meeting was preceded by an informal presentation to Members of the Parish Council by CEG on behalf of the applicant. The Meeting was attended by 40 Members of the public and a general invitation was extended to the wider community of Gaydon to provide input to this submission.

The Parish Council suggests that the following areas are considered for inclusion in the Environmental Impact Assessment (EIA)

Socio-Economic

The site is in a rural location albeit on a motorway junction. Evidence should be submitted to show the permanent and temporary employment opportunities being fulfilled by the residents of Gaydon or Upper Lighthorne and the need for employment in this area. This should consider the totality of current employment vacancies within the two Parishes.

Transport, accessibility and movement

There is no rail or regular 'town/city' bus service. Safe cycleway and pedestrian access are only available from Upper Lighthorne. B class employment permission would indicate 24 hours usage requiring a 24 hour bus service plus cycleways from nearby towns. The relative remoteness of this rural location and lack of economically viable public transport options suggest that it is unsuited for this type of development.

A site, mainly accessed by vehicles, requires considerable parking space to cope with change over at shift times together with traffic data supporting the effectiveness of the proposed access to the site. The maximum capacity of Junction 12 should consider the effect of full on-site employment at JLR (approx. 11,000) and Aston Martin together with the houses with planning permission or extant planning permission prior to this assessment and the British Motor Museum Hotel and events. In addition, construction movements should consider other potential building projects in the local area; the hotel, house building programme at Upper Lighthorne, the solar farms at Gaydon and Bishop's Itchington.

Flood risk and drainage

Surface water from the existing site has led to flooding on Pimple Lane and the Banbury Road. Water from the site flows into the Banbury Road ditch and the motorway system. Surface water following heavy rain can be seen lying on the top of these fields. There is an ancient pond at Village Farm Kennels and wells on adjacent properties. Water pipes supplying local properties cross this site.

Gaydon Parish Council

The Parish Council has been informed in the past by Severn Trent Water that the sewage system is at full capacity. Low water pressure is an issue within the Parish and this resulted in Severn Trent removing permission for water container lorries to access the hydrant system within the Parish. The 'new road system' has experienced problems with surface water flooding during heavy downfalls and the M40 has been known to flood near this site. Residents have experienced an increase in lorries accessing the sewage works to remove waste. In addition, there are health issues with sewage overflow to properties.

Ecology

It is imperative that the mature trees, including Poplars, which are landmarks, are protected. These can be seen from Burton Dassett and other approaches to the village. The hedgerows around the sites are very well established and important for birds, bats, mammals and insects as are the ditches which act as routes for amphibians and otters linking the various ponds nearby. The site is part of a swath of interlocking green spaces which act as a natural barrier for Gaydon.

Air quality

The site should be hoarded and fenced whilst any construction work is in operation to protect the quality of life for parishioners. It is believed that the air quality is particularly poor in Gaydon during hot weather particularly when traffic volumes are high and when the M40 experiences traffic congestion. As a rural community walking and cycling are popular. Pimple Lane, Itchington Holt, the Centenary Way and the Warwick Road are walking routes with cycling clubs regularly meeting in the Parish. It is imperative that these healthy activities should be encouraged, and residents do not 'take to their cars' to find alternatives due to poor air quality because of this development.

Noise

Consideration should be given not only to the noise generated directly by the construction phase but to the noise which will be generated as a consequence of that disturbance by 100+ dogs housed on Pimple Lane when construction work starts on this site. On the top of the hill where there is very little vegetation the site- occupied by Lillypad Racing Ltd,- benefits from a planning consent for boarding and greyhound kennels with a capacity of up to 100 animals. The noise levels generated by 6 dogs housed on the site was considered by Stratford District Council to be above the motorway noise levels recorded at Gaydon Fields Farm and a condition was placed on the retrospective application for a noise barrier to be erected. Prior to construction, due to the closeness to residents, noise barriers should be erected around the whole site. Strict hours of operation will be required. This is a quiet area despite being close to a motorway and noise levels carry. Additional receptors should be placed at the beginning of Edgehill View, near the roundabout on Kineton Road and close to the Gaydon Inn. Vibration levels should be considered close to the historic Gaydon Inn. Construction traffic should only enter the village to access fuel from the garage. They should access the site immediately and not park awaiting entry due to poor site management. All traffic should be managed on-site near the B4100 Starlight Expressway (road from the junction to JLR). We also note that 'lorry bays' have been positioned close to residential properties. Reversing lorry noises can be extremely irritating in a rural environment not to mention the noise involved in unloading or loading.

Gaydon Parish Council

Cultural Heritage

The scoping report leans heavily on the desk- based assessment which is a limited resource. There is no mention of the link between the Village Farm and The Old House nor Francis Fauquier and his significance for colonial and USA history. With the close proximity of the Salt Way, the Centenary Way and the Dodds Hlaw we would like a more detailed assessment of this land. There is also the Coventry Road which linked the Gaydon turnpike to Ichington Holt – this is completely omitted from the desk- based survey. This site formed part of the open fields of Gaydon in medieval times – with ridge & furrow over the whole site (see the ridge & furrow map produced by Warwick Museum0. This does not appear to have been discovered by the desk- based assessment).

Section 15 on ground conditions & geology – this needs to be thorough in the assessment of the stability of the Charmouth Mudstones for the major excavations to level the site and the effects of drainage water (we don't want a Charmouth landslip!). The potential for finding fossils of national significance during any excavations (c.f. the Bishops Itchington Ichthyosaur) also doesn't seem to be mentioned.

Landscape and visual impact

This site is very visible both from the B4100 Starlight Expressway, Itchington Holt, the footpath on the motorway bridge, Banbury Road (near to the Gaydon Inn) and Pimple Lane. Whilst the adjacent site has been allocated to JLR as industrial land in the Core Strategy the Parish Council understands that this site “is **no longer in JLR’s control as their business needs have changed**”. This is reinforced by the site being included in the SWLP call for sites as a ‘mixed use’ site. Huge industrial buildings could blend in with the existing vegetation at the northern part of the site approved for industrial use in the Core Strategy and would, therefore, be better suited to this allocated site.

Gaydon no longer has ‘stars’ due to light pollution caused by the unnecessary lighting of empty car parks. It is imperative that consideration is applied to the rural nature of this site. Buildings can be low level with low level (see Aston Martin car park lighting) solar panelled sensor activated lighting surrounded by mature vegetation. Retaining existing hedgerows and the ‘landmark Poplar trees’ on Pimple Lane is key to retaining a rural identity and the character of Gaydon. In addition, we note that the development will be ‘all electric’. Since the building of GLH Gaydon residents have seen an increase in power cuts and blackouts. Is there enough power to cope with this ‘all electric’ development?

Pegasus indicate that Gaydon, due to development, will increasingly become urban. Do we not have a right to retain our existing rural lifestyle and the wellbeing benefits associated with this? If residents want to live in an urban environment, they could move to Leamington or Stratford and have the benefits an established town brings.

Ground conditions

Contamination is a concern as the site floods. Fuel can be obtained from the local petrol station and so there should be no need for this to be stored on-site. Hazardous substances and chemicals should be stored away from residential or adjacent agricultural fields and should only be on site when required.

Gaydon Parish Council

Climatic factors

We note that the amount of cement and concrete used could have an impact on air quality. The Parish Council believes this development should be built responsibly being creative and working with nature to tackle climate change; not increasing it with tons of co2 emissions. Several innovative, creative industrial buildings have been built recently in Warwick District and it is hoped Stratford District will follow this much needed approach to build for the needs of today without affecting the future.

Energy

We wish the developers to conduct a thorough review, together with National Grid (Western Power) with regards to electric and gas supply to the site. With 3,500 houses being built currently in Upper Lighthorne, does the area have the required infrastructure to supply a further significant demand? Any energy solution would still be reliant on such infrastructure, which may include substantial investment, which we would like to see itemised.

Sustainability

This site, as planned, will require a substantial extra demand in power. With gas boilers being phased out, and with such a large development, what are the developers proposing to make this requirement sustainable and in particular to reduce the carbon footprint associated with energy consumption on the site? How will the buildings and the site be designed to consume minimum energy over their lifetime? How will buildings and the overall site be constructed to reduce the embodied carbon in them?

The developers should not just be looking to pull this significant extra requirement to power the site from the electricity or gas grids. How will the site be powered in order to make energy consumption sustainable? The site has no current energy infrastructure. What do the developers propose e.g., the use of air source or ground source heat pumps for alternative heat supply.

In the event that a solar powered solution is proposed to meet the energy demands of this site, there is the opportunity to exploit the vast available roof area. Buildings should therefore be designed to incorporate the maximum coverage of solar panels within the external roof area. Not only does this provide a source of power for the site, but it will alleviate the need for further solar generation via green field sites.

Employees on the site would likely travel from other urban centres and then predominantly along the M40, to reach the workplace. Gaydon is a small rural community, with no rail or light rail infrastructure and infrequent bus links. How will such travel be made sustainable, with little or zero emissions?

Cumulative impacts

These have been in the respective sections mentioned above.

Parish Clerk

14th October, 2022

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