

# Luddington Parish Council

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Cllr Peter Richards  
Stratford District Council  
Elizabeth House  
Church Street  
Stratford-upon-Avon  
CV37 6HX

Cllr Jeff Clarke  
Warwickshire County Council  
Shire Hall  
Warwick  
CV34 4RL

16 August 2017

Dear Councillors Richards and Clarke,

## **Feedback on Long Marston Airfield Stakeholder Meeting**

### **Introduction**

This document is feedback from Luddington Parish Council (LPC) on the Stakeholders Meeting held on the 31<sup>st</sup> July 2017 at Elizabeth House, Stratford-upon-Avon. In submitting this document, LPC requests that you respond to the points raised in the hope that the South Western Relief Road is not already a pre-determined outcome.

Firstly, thank you for inviting LPC to the meeting. We welcome your forewords within the Evidence Report and look forward to your working with local communities to understand our concerns. However we were very disappointed with the following:

- *Sending out an email document to Stakeholders after 5pm on Friday 28<sup>th</sup> July before the meeting on the 31<sup>st</sup> July gave some attendees little time to digest all the information when following the links to the Internet;*
- *In spite of all the surveying going on in the area the information given at the meeting was nothing new - even Cllr Saint must have thought the same as he appeared to be asleep during most of the event;*
- *The panel of experts, as they did not seem to know details regarding the HGV movements/signposts in regards to Milcote and Campden Road.*

### **Core Strategy Status**

LPC understands your point that the Core Strategy is a Framework and that no Planning Application has been submitted. LPC has already offered a detailed opinion concerning the EIA Scoping Request (SCOPE/00030) and will be preparing for any formal Planning Application for the SWRR should it arise.

## MM78 Modification

Although we accept the Core Strategy has been approved it does seem that after the Planning Inspector rejected the first draft SDC went back to Cala Homes to essentially “bail them out” by re-visiting a concept first rejected due to the issues that you now face. Moreover the MM78 modification seems to have forgotten the basics of the Core Strategy – specifically that; *“priority will be given to protecting and enhancing the wide range of historic and cultural assets that contribute to the character and identity of the District, including the distinctive character of the market towns, villages and hamlets and their settings, townscapes, streets, spaces and built form”*

Furthermore we would remind you that the Core Strategy Strategic Objectives are that:

- *the rural character of the District will have been maintained and enhanced;*
- *the Green Belt and countryside of the District will have been protected from inappropriate development;*
- *the historic character of the District will have been maintained and enhanced and Sites of historic importance will have been protected from harmful development;*
- *the character and local distinctiveness of the District will have been reinforced by ensuring new development is of high quality design, taking into account the intrinsic and special value of its landscapes and townscapes;*
- *the flood plain will have been maintained and, where opportunities arise, restored;*
- *the risk of flooding will be managed effectively by taking a whole catchment approach to implement sustainable flood management schemes;*
- *waterbodies will have reached a good status or potential in accordance with the Water Framework Directive; and*
- *working with Natural England and Warwickshire County Council, biodiversity will have increased across the District and sites of environmental, nature conservation and geological importance will have been protected from harmful development.*

It seems that in the rush to appease the Planning Inspector with regard to MM78, the Core Strategy principles of policies CS.1, CS.4, CS.5, CS.6, CS.7, CS.8, CS.9 have been ignored. In addition it seems that policy CS.13 related to Areas of Restraint has also been ignored. CS.13 specifically states the following:

*“Land designated as an Area of Restraint makes an important contribution to the character of the settlement. Development must not harm or threaten the open nature of such areas taking into account any possible cumulative effects. Planning permission for a large-scale form of development in an Area of Restraint will only be granted where a scheme would have demonstrable community benefits and contribute significantly to meeting an objective of the Core Strategy. It will also need to be demonstrated that no suitable alternative site outside the Area of Restraint is available for the proposed development.”*

## **Planning Inspector Findings**

Our perception is that re-visiting LMA was a win/win situation for SDC whereby the Planning Inspector was satisfied with the new 5 year housing supply and SDC got a bonus with the Developer offering to “solve Stratford's` traffic issues” with a “relief road” in return for Cala Homes building 3,500 units at LMA. At the time Wellesbourne Airfield was also put forward and rejected, even though it is just a “stones throw” from the M40.

The Planning Inspector found the LMA and SWRR proposal “sound”. We still find this quite astounding due to the fact that the SWRR is proposed to cross Stratford's` Dependant Floodplain, which is Highest Class 3b. The origin is from Campden Road (which is already at capacity and extremely accident prone) and then is due to link up with a road cutting through a new housing development via what will turn out to be probably a further obstacle of a roundabout at the bottom of a very steep hill (Bordon Hill).

The Inspector adding significant weight to Consultees such as the Environment Agency using words such as “adequate”, generally satisfied” etc. is frankly very worrying considering the adverse effects that the proposal would have on the natural environment of Luddington and the surrounding area and also the adverse effects on health and well-being of local residents. The SWRR is too close to the Town and more than likely will be a short term solution at best, and probably obsolete in ten years.

## **Consideration of Other Options**

There appears to be little evidence that alternative options to the SWRR have been considered. Specifically:

- Rail Re-Instatement – Although we already know that SDC and WCC do not want this;
- Tunnelling - LPC would be interested in considering this option and offer an opinion on whether it would be supported as an option so would appreciate any documentation you can make available on this subject.
- Looking at the information regarding transport assessments it seems that the only other option studied was an Eastern route which even on first glance seems ill thought out and is again too close to the Town and encompasses a very dangerous series of bends in the road and similar constraints to the SWRR.

During your presentation and in your Evidence Report it was noted that Birmingham Road seems to be more prevalent in your marketing of the proposal these days. However the Arup studies do not seem to encompass much data from this area.

A great proportion of the data refers to Clopton Bridge, Tiddington Road and Shipston Road whereby ARUP points to the Atherstone Airfield development being a major player in traffic issues caused by the conflicting north/south traffic at peak times, so maybe a route “Further East” away from the Town should be subject to ARUP type scrutiny as we have not seen this type of detail regarding this option ( i.e. Long Marston to Wellesbourne area/Fosseway/M40) which may solve Atherstone AND LMA traffic flows. The Evidence Report says only that it was “considered”. Also bear in mind that Major Employers in the North/East of the area are mainly based in Gaydon, Coventry, Rugby and Banbury areas.

Likewise, a Western Route, (But more towards Alcester/Arrow/A435) is also an idea LPC has suggested in the past but again we see no ARUP type scrutiny on this suggestion either. We are again concerned that just “consideration” is not enough and would like to see *evidence* of why this would be discounted against. Again, bear in mind that major employers in the North/West of the area are mainly based in Alcester, Redditch and Birmingham areas.

Both of the above preferred options surely would carry less Technical and Environmental constraints and therefore although longer routes they would be flat and therefore maybe more cost effective both in the short term and in long term maintenance.

### **Traffic Flows**

LPC does not believe that it makes logical sense to route commuters through Clifford Chambers, Luddington and Shotton to gain access to the locations mentioned above. Vectos, November 2015 also states that;

*“Following the delivery of the SWRR, residual impacts will still occur as the SWRR will not encourage the reassignment of trips associated with the proposed developments on the eastern and south-eastern fringes of the town, as the alternative route to the A46 provided by the SWRR would likely be too onerous or inconvenient from those areas”*

LPC is also concerned that most of the traffic data relates to the eastern end of the proposed road, with no thought so far as to the impacts on Evesham Road, Dodwell and the full length of Luddington Road. We can all too vividly imagine the traffic during peak times backing up Bordon Hill, past Dodwell (It does this currently) and beyond to even the Binton and/or Welford turnings, therefore encouraging commuters to “rat-run” through the Village of Luddington due to the inbound traffic having to give way to any vehicles coming from the SWRR at the base of Bordon Hill as inbound traffic will not have the right of way.

### **On-going Maintenance Costs**

We wonder if you have any studies regarding how much a “Flyover” will cost the taxpayers of Stratford to safely maintain once it is built by Cala and then handed over to SDC/WCC. Also of concern is the ratio of project costs, which should now be reviewed as it is documented that a figure of circa £59 million is the cost of the SWRR, but with ongoing issues concerning Campden Road modifications, any restraints discovered during recent soil and environmental surveys, and any compensation due to affected residents again LPC would urge the detailed data and costs of alternative options to be reviewed.

## **Conclusion**

LPC has very real concerns related to the presentation and content of the proposals related to the LMA / Atherstone developments and the associated SWRR, concerns which are based on protecting the core principles outlined in the SDC Core Strategy and on ensuring that the very real threat to Stratford's environment and communities are averted.

Many of our concerns match those outlined by the Stratford Residents Association Action Group (SRAG) which has been very vocal in communicating the potential impacts of the proposals. We will appreciate your giving attention to the points raised in this document and look forward to your considered and measured replies and supporting evidence with regard to the lack of data on the suggested alternatives above.

Yours Sincerely,

Robert D Armstrong  
Clerk to Luddington Parish Council

Copies to : Cllr Chris Saint (SDC)  
Neil Hempstead  
Izzy Seecombe (WCC)  
Mike Brain (WCC)  
Peter Barnes (SDC)  
Molly Giles (SDC)  
Nadihm Zahawi MP  
Stratford Town Council